

National Chiropractic Board of Australia  
PO Box 16085  
Collins Street West  
MELBOURNE VIC 8007

Attention: Dr Phillip Donato  
Chiropractor  
Chair of the Board

Dear Dr Donato

The World Chiropractic Alliance on behalf of its members thanks the National Board for the opportunity to respond to the second draft of the Code of Conduct for Chiropractors.

We commend the Board for the significant work that has been performed to make well written coherent document, which reflects many of the changes proposed in the submissions of Chiropractors.

Whilst we believe the framework provided could be acceptable we respectfully make the following submissions which we believe would make the Code more appropriate.

1. We believe that financial arrangements and care plans should not be linked in any aspect of the code of conduct. The current requirement of 3.6 identifies the need for pre-payment plans to be assessed every three months and agreements not extend past three months unless clear and appropriate justification.  
We believe there is ample protection for the public in other legislations on financial arrangements and this clause does not need to be included.
2. In relation to Appendix 1 on Spinal Screenings, we strongly believe that any restriction on screenings that will not allow a Chiropractor to make an appointment for a full Chiropractic Assessment is a restriction of trade. We cannot see how this is in the Public's best interest and will have a detrimental effect on Chiropractors (Especially new businesses) capacity to build a sustainable practice.

We understand the need for Chiropractors to behave to the highest standard when exposed to the public and should the Board not accept our proposal to remove this restriction we seek an alternative arrangement where Chiropractors seeking to perform public screening be required to attend an education session conducted by their professional association on “best practice in public screenings”. Should the Board be agreeable on this proposal we would seek a 3 month extension so as to provide this training to all our members. We would also commit to providing frameworks to perform screenings and re-education sessions every two years.

3. Our members do not support the requirement for a Chiropractor to have a First Aid Certificate.
4. Our members do not support the restrictions on testimonials.
5. We seek to have ongoing discussions with the Board in relation to procedures to resolve complaints and concern. We believe that it is not in the best interest of the Chiropractor or the Board to enter into long expensive protracted Court cases. We believe that in many cases the parties could be offered mediation to seek a mutually beneficial outcome. Obviously this would not always be appropriate.

We again thank the Board for the opportunity to respond to these matters and congratulate the Board on the significant work at arriving at this document.

Regards

Andrew Destro

CEO

World Chiropractic Alliance - Australasia