



CHIROPRACTORS' ASSOCIATION OF AUSTRALIA (NATIONAL) LIMITED

Unit 2, 36 Woodruff Street
Penrith NSW 2750 Australia

PO Box 335 Penrith NSW 2751

T: 02 4731 8011

F: 02 4731 8088

E: ceo@caa.asn.au

www.chiropractors.asn.au

ABN 50 050 096 038

SUBMISSION TO
CHIROPRACTIC BOARD OF AUSTRALIA

REGARDING

PROPOSED MANDATORY REGISTRATION STANDARDS

Proposed standard for limited registration in the public interest

Proposed standard for limited registration for teaching and research

FROM

CHIROPRACTORS' ASSOCIATION OF AUSTRALIA (NATIONAL) LIMITED

25 November 2011

For further information contact:

Krystina Brown

CEO

Chiropractors' Association of Australia

ceo@caa.asn.au

(02) 4731 8011

0414 514 333

The Chiropractors' Association of Australia (National) Limited (CAAN) is pleased to provide input into the consultation process as part of the CBA's review of its Limited Registration Standard. This submission reflects the views of CAAN and the CAA State and Territory Associations throughout Australia.

Limited Registration in the public interest

The CBA has listed four reasons where limited registration in the public interest would be appropriate. Whilst CBA makes it clear that this list is not meant to be comprehensive, CAAN agrees that it seems to cover the most likely scenarios.

Healthcare response to a national disaster or practising at an international event

With regard to chiropractors looking for registration to assist in the health care response to a national disaster or for chiropractors wanting to practise at an international event (including sporting events), CAAN agrees that the application of the 13 components of the registration standard as listed on pp 17-18 of the Consultation Paper is appropriate.

International chiropractors coming to Australia to provide CPD or attend CPD programs

It is in the case of international chiropractors coming to Australia to provide CPD (or attend CPD programs involving cervical manipulation) where confusion has arisen.

Recent communication with Dr Paul Fisher, CBA EO and Dr Phillip Donato, CBA Chair, has helped to clarify CAAN's understanding of the current situation with regard to limited registration in the way it is applied to international chiropractors coming to Australia to present CPD programs.

It is CAAN's understanding that a chiropractor with qualifications recognised and listed by the Councils on Chiropractic Education International and/or as determined to be relevant and suitable by the Board in the circumstances **will not need** to apply for limited registration to provide CPD programs as long as:

- They only use the title "chiropractor" with words explaining their status in Australia e.g. "chiropractor (registered in the United Kingdom - not registered in Australia)", "chiropractor (qualified in Canada - not registered in Australia)", or
- They do not hold themselves out as a chiropractor registered in Australia, e.g. by offering clinical services to the general public or
- They do not undertake manipulation of the cervical spine or any clinical, hands-on practice

Because the Act protects the title "chiropractor" and also the act of manipulation of the cervical spine, international chiropractors **would** require limited registration in the public interest to provide CPD programs if:

- Using the title “chiropractor”; for example, advertising themselves as a chiropractor without making the above clarification regarding their status in Australia or
- Holding themselves out as a registered chiropractor in Australia; for example, by offering any services to the general public or
- Undertaking manipulation of the cervical spine.

Exceptions to the above are:

- Chiropractors from New Zealand who qualify for general registration in Australia via trans-Tasman mutual recognition, or
- International chiropractors who have passed an assessment of the Council on Chiropractic Education Australasia (CCEA) under section 53(c) of the National Law.

CAAN believes the above outline is a sensible and effective way to administer limited registration in the public interest. We would support this being the manner in which this standard is applied in the above circumstances.

Further, we would recommend changes to the standards and codes such that this arrangement is clear to CPD providers, chiropractors and the public.

With regard to requirement of registration of international participants in workshops or seminars involving cervical spinal manipulation, CAAN suggests that such a requirement should only be required for those international participants who wish to perform cervical spinal manipulation on members of the public in “clinical practice” as defined in the draft standard as “...performing the duties expected of a chiropractor for a patient in a clinical setting.” Requiring international chiropractors to apply for registration for the purpose of attending a chiropractic technique seminar or similar event seems onerous.

Because the Act protects title, attendees visiting Australia at such programs wishing to use the title “chiropractor” would require limited registration to do so. CAAN envisages that applications for this reason would be rare.

Limited registration for teaching and research

International chiropractors engaging in research in Australia

Based on the above, for international chiropractors engaging in research in Australia, CAAN would suggest that limited registration for research would be unnecessary as long as:

- They only use the title “chiropractor” with words explaining their status in Australia e.g. “chiropractor (registered in the United Kingdom - not registered in Australia)”, “chiropractor (qualified in Canada - not registered in Australia)”, or
- They do not hold themselves out as a chiropractor registered in Australia, e.g. by offering clinical services to the general public or
- They do not undertake manipulation of the cervical spine or any clinical, hands-on practice

Because the Act protects the title “chiropractor” and also the act of manipulation of the cervical spine, international chiropractors would require limited registration in the public interest to conduct research if:

- Using the title chiropractor; for example, advertising themselves as a chiropractor or
- Holding themselves out as a registered chiropractor in Australia; for example, by offering any services to the general public or
- Undertaking manipulation of the cervical spine.

International chiropractors wishing to teach in a first professional chiropractic program in Australia

As per the CCEA's *Standards for First Professional Chiropractic Programs*, international chiropractors wishing to teach in a first professional chiropractic program must have general registration and comply with CCEA requirements as listed on the CCEA website.

There is significant overlap in the consultation process with CBA regarding limited registration and the parallel consultation with AHPRA regarding the proposed changes to definition of practice. As such, this submission should be read in conjunction with the CAAN "Definition of Practice" submission to AHPRA.

Dr Lawrence Tassell
Chiropractor
President Chiropractors' Association of Australia (National) Limited

Dr Murray Stark
Chiropractor
President Chiropractors' Association of Australia (Australian Capital Territory) Limited

Dr Kerein Earney
Chiropractor
President Chiropractors' Association of Australia (New South Wales) Limited

Dr Marc Cova
Chiropractor
President Chiropractors' Association of Australia (Northern Territory) Limited

Dr Tracy Kennedy-Shanks
Chiropractor
President Chiropractors' Association of Australia (Queensland) Limited

Dr Brett Hill
Chiropractor
President Chiropractors' Association of Australia (South Australia) Limited

Dr Scott Springer
Chiropractor
President Chiropractors' Association of Australia (Tasmania) Limited

Dr Helen Alevaki
Chiropractor
President Chiropractors' Association of Australia (Victoria) Limited

Dr Warren Genders
Chiropractor
President Chiropractors' Association of Australia (Western Australia) Limited