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Chair, Chiropractic Board of Australia, chiroboardconsultation@ahpra.gov.au

Dear Dr. Donato,

Re: Consultation paper - Draft Guidelines - Supervision of Chiropractors

The Chiropractic & Osteopathic College of Australasia (COCA) welcomes the opportunity to comment on the revised draft guidelines and COCA congratulates the Chiropractic Board of Australia on these guidelines, which have incorporated some significant amendments. However, in keeping with our previous submission on this important aspect of clinical practice, COCA is of the opinion that the guidelines require further amendment.

As previously stated, the need for supervision implies that the supervisee's qualifications, experience or previous conduct does not meet those expected of a registered chiropractor and that in order to fulfill the requirements of general registration further training is required. As such, the training under supervision should be of the highest quality, in order to ensure that the supervisee provides care which is not of a lesser standard expected of a registered chiropractor. It is also important, that not only the care provided during supervision is of a satisfactory standard but also care provided after the period of supervision ceases.

Supervisor's Qualifications

We note that the proposed guidelines stipulate that a supervisor is required to be suitably qualified and experienced and that the previous requirement of three years' experience has been raised to five years' experience. However, the "Terms of Agreement" for supervisors still refers to a minimum of three years' experience. While the increase from three to five years' experience is laudable, the guidelines fail to define "suitably qualified and experienced".

The guidelines also state a supervisor "must be approved by the Board" yet the guidelines do not specify what if any criteria the Board will employ for such approval.

As per our previous submission, COCA suggests that to undertake such an important role as a supervisor, the chiropractor's qualifications and experience should exceed the requirements of a chiropractor holding General Registration status.

Clinical training, whether it be at an educational institution or in keeping with the role of a supervisor for the purposes of these guidelines, is not a role suited to the average chiropractor and in COCA's view is a role requiring advanced training, knowledge and experience. COCA strongly urges the Board to only consider chiropractors for supervisory roles that can demonstrate such capabilities and competencies.

In summary, COCA believes that the proposed guidelines do not adequately provide for protection of the public, while undergoing treatment provided by a supervisee and that without safeguards, such as more stringent requirements for supervisors, that the Board is failing in its duty of care to the public and the profession.

Recommendation:

That the guidelines are amended to reflect the need for supervisors to have advanced training, knowledge and experience and that those requirements are clearly defined.

We thank the Board for the opportunity to provide this submission and hope that our comments and suggested amendments assist the Board in the development of its codes and guidelines of practice.

Yours sincerely,

John W Reggars DC, MChiroSc.
CEO/Vice President