

Dr. Phillip Donato
Chair
Chiropractic Board of Australia
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MELBOURNE VIC 8007

chiroboardconsultation@ahpra.gov.au

Dear Dr. Donato,

Re: Draft Guidelines for the further education and training of chiropractors (by mentoring and/or counselling) when required by the National Law.

The Chiropractic & Osteopathic College of Australasia (COCA) would like to thank the Chiropractic Board of Australia (CBA) for the opportunity to provide comment on these draft guidelines.

COCA agrees with the National Board that a standardised approach and guidance on how chiropractors undertake further education and training by mentoring and/or counselling is most desirable.

COCA also agrees with the Board that Option 2. (preferred option) to develop guidelines is the most appropriate method for this purpose and as such the College endorses the draft guidelines in principle. However, we feel the guidelines require amendment and additional information in order to make them more usable and clearer for their purpose.

The draft guidelines state that they are intended for further education and “mainly to be carried out by registered chiropractors for registered chiropractors”. However, under **Part 7 of the National Law**, relating to why these guidelines are necessary, it provides an examples of where further education and training of chiropractors may be required, “For example, it may arise because of questions about a practitioner meeting the requirements of a registration standard, a change in their type of practice, or concerns about a practitioner’s suitability for registration”.

The examples provided would imply that further education and training may be required for those chiropractors who are not registered, which is in direct conflict with the guidelines, which state that they are intended to be used by “by registered chiropractors for registered chiropractors”

If the intention of these guidelines is to include non-registered practitioners the issues relating to other registration standards arise, such the requirement of registered chiropractors to hold the appropriate professional indemnity insurance cover. While the guidelines do state that professional indemnity insurance is required by the “approved person” providing the training and education they do not state that this insurance is required by the trainee. As it is unlikely that an unregistered practitioner will hold professional indemnity insurance, who will be ultimately responsible should treatment provided by the unregistered trainee result in a claim of negligence? In COCA’s view the guidelines require amendment to clarify this anomaly.

The guidelines state that “a Board approved person” should be a registered practitioner, with a minimum of three years’ experience as a registered practitioner, not be the subject of conditions, undertakings or reprimands that might impact on their ability to be an effective educator/mentor/counsellor and should be suitably qualified and experienced. Unfortunately, the guidelines fail to adequately describe the criteria on which the Board would deem a practitioner suitably qualified and experienced to become “a Board approved person.” While it is understood that Board would employ some criteria to determine who is suitable to be appointed “a Board approved person” this criteria should be stated in the guidelines.

Additionally, we propose that the minimum experience level of three years for an educator/mentor/counsellor is too short. It would be a common occurrence for the chiropractor who requires mentorship etc. to be an experienced person. A graduate with only three or four years experience is unlikely to have the breadth or depth of professional experience which is highly desirable in that role. Further, a young chiropractor attempting to play the role of wiser mentor may be unconvincing to the mentee. Inexperienced registrants simply would not have the gravitas that the position demands. Respectfully we advocate that under ideal circumstances a 10 year experience minimum would be desirable in such a role but a minimum of five years could suffice.

The preamble of the guidelines emphasises the importance of consistency and reliability in the processes of mentoring and/or counselling, for further education and training of chiropractors and the omission from these guidelines of criteria on which the Board and others can identify suitably qualified and experienced practitioners is incongruent with their intent.

COCA wishes to thank the Board for the opportunity to comment on these guidelines and we trust that our submission is helpful.

Dr John W Reggars OAM, DC, MChiroSc.
CEO
Chiropractic & Osteopathic College of Australasia