



25th October 2012

Chiropractic Board of Australia AHRRA GPO Box 9958 Melbourne VIC 3001

Re: Review of Code of Conduct

Dear Chair Person: Dr Phillip Donato

Thank you for the opportunity to respond to the Consultation Paper for the Code of Conduct for Chiropractors. The WCA as a professional Association has previously made verbal submissions and written submissions in relation to Code of Conduct. We support the majority of the Code but retain a few "in principle" issues with the content. We believe we have clearly expressed these concerns and the Board has acknowledged the concerns but has elected to continue with the proposed clauses in the Public Interest. I reiterate those in principle issues below and ask that the Board give them due consideration.

Despite having these unresolved concerns, we commend the Board and members of its Sub-committee for providing a clear and helpful document to assist Chiropractors in their performance as a Registered Health Practitioner.

- We have a principled position that the code should not restrict Chiropractors financial
 arrangements other than to say that agreements should not extend beyond where there is a clear
 and appropriate clinical justification to support an agreement.
- 2. In relation to Appendix 1, Guidelines in Relation to Public Health Activities Whilst we agree with the position to differentiate between Promotional Activities and Public Health Activities, we believe that when conducting a Promotional Activity a Chiropractor should not be bound by the terms of a Public Health Activity and should only need to meet the provisions set down for Advertising (and other relevant areas of the Code as appropriate).

We also wish to thank the Board for involving the WCA in its consultation processes.

Regards

Andrew Destro
CEO – World Chiropractic Alliance – Australia