CHIROPRACTORS REGISTRATION BOARD

REGISTERED OFFICE: SECOND FLOOR, 15 RHEOLA STREET, WEST PERTH WA 6005
ADDRESS ALL MAIL TO: PO BOX 263, WEST PERTH WA 6872

C. D. EMMOTT, REGISTRAR
TELEPHONE: (08) 9321 8499
FACSIMILE: (08) 9481 3686

10 February 2003

MRA Review
Productivity Commission
PO Box 80
BELCONNEN ACT 2616

Dear Sir/Madam

I refer to your circular seeking submissions in respect of the Trans Tasman Mutual Recognition Arrangement and confirm this was tabled at a recent Board meeting. The Board would like to submit the following suggestions:-

- The present Act only provides for a written notice between Boards about an applicant to state that the applicant is not the subject of disciplinary proceedings. It should include whether the person is the subject of a complaint. In many occasions disciplinary proceedings may not occur for a number of months after a complaint is received.

- As part of the Mutual Recognition Act it would seem appropriate that the level of penalties imposed by various Boards should in some way be standardised. At present the penalties imposed in one State may result in an applicant not being considered to be subject to any disciplinary matters or penalties. Whereas in another jurisdiction there may have been a penalty invoked.

- There should be provision that the status of an applicant be required to be obtained from all jurisdictions not just from the last jurisdiction as shown on the Mutual Recognition forms.

- Whilst in principle the philosophy of Mutual Recognition is fine there are often situations where collectively jurisdictions have agreed a standard for examination or accreditation, however, due to delay in amendments to legislation being past in those jurisdictions loopholes can be created where an applicant may be able to be registered in one of those jurisdictions contrary to the intent of the rest of the Country.

I hope the above suggestions are sufficient, please contact me if you require any further information.

Yours sincerely

COLIN EMMOTT
Registrar