

29 November 2010

Attention: Chair of Physiotherapy Board of Australia

Email: chair@physiotherapyboard.gov.au

Dear Glenn,

Thank you for the opportunity to comment on the Consultation document: Registration Standards and Guidelines: Limited Registration. The Council of Physiotherapy Deans of Australia and New Zealand (CPDANZ) offers the following comments.

Limited registration for teaching and research.

There is a lack of clarity in the guidelines surrounding the circumstances where Australia is receiving visitors for short-term visits for the purposes of teaching and research. For example, when a university receives an academic visitor from overseas for the purpose of providing occasional lectures or to collaborate with university staff in research activities. These circumstances do not typically involve a formal employer-employee relationship with the university.

- The guidelines state that “Individuals intending to teach or conduct research independently, for example, to provide a short course, may apply for this category of limited registration”. The inclusion of the word “may” in this statement introduces ambiguity about the actual requirements under these circumstances.
- Will English language restrictions be applied when submitting an application for "limited registration for teaching or research"? Academic colleagues from overseas who do not have English as a first language may have language skills appropriate to a visit. We would seek clarity as to whether the Board's English language skills standard (see Q 18 on page 6 of 9) would apply to a visiting academic or research fellow?
- The introduction of potentially onerous procedures can be a significant impediment to the conduct of these visits which are important to enhance the quality of Australian education. Getting practice certificates and other evidence of practice (e.g., Q 21, page 6 of 9) translated from non-English takes time and additional expense for the applicant and host institution and may adversely impact on the likelihood of the visit going ahead. This will be particularly the case for short-term visits.
- We would also seek clarity on the degree of flexibility that can be associated with a visitor's activities. Is it possible that the system will be sufficiently flexible to allow variations to the visit, for example, to include variation to the universities / facilities visited? Will the system also be sufficiently flexible and responsive to allow variation in the scope of activities undertaken to occur in a timely manner.

Limited registration for postgraduate students.

AHPRA has combined requirements for those undertaking postgraduate training with those undertaking supervised practice, assessment or examination under section 66 of the Health Practitioner Regulation. As such, postgraduate students who have had to meet university requirements for entry into postgraduate course, and obtain the necessary clearances from Department of Immigration are required to duplicate these processes to meet the requirements of AHPRA. The process currently requires the following assessments:

- Universities, typically through their International Office and in collaboration with the relevant schools, departments and faculties, assess each candidate on their English proficiency, academic merit and their clinical experience. It is only after this thorough assessment that students are offered a place in a postgraduate course.

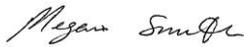
- Once an offer is made to a student, the student is required to obtain a Visa from the Department of Immigration. As part of this process, criminal record screening is undertaken.

The process, as proposed by AHPRA, does duplicate what is currently occurring at a cost to the student, and an additional burden to the course coordinators. It is proposed that the course coordinator will be required to verify criminal record history, impairment statements, records of suspension, conditions, disqualifications, health proceedings; and then requires them to sign off on behalf of the AHPRA.

Rather than an additional burden to all involved, we propose that an appropriate triage of applications by the Department of Immigration [VISA requirements], PBA/AHPRA [professional issues] and the Education provider [eligibility for postgraduate study] meets the requirements of AHPRA and the University and the potential student.

Thank you for considering these points.

Yours sincerely



Megan Smith, PhD
President
Council of Physiotherapy Deans of Australia and New Zealand