

27th November 2010

ATTENTION:
Physiotherapy Board of Australia
Level 7/111 Bourke Street
MELBOURNE VIC 3000
By email

Dear National Board members,

Re: **CONSULTATION DOCUMENT:
DRAFT REGISTRATION STANDARDS & GUIDELINES**

The South Australian Board of the Physiotherapy Board of Australia is pleased to provide the following comments in response to the call for submissions regarding this consultation paper and thank you for the opportunity to provide feedback. Please accept our comments in note form.

General comments:

1. We note “specialist registration” is referred to throughout the document, although there is no specialist registration category currently available. We assume this is to cater for future contingencies.
2. The document should be consistent throughout for the wording of “registration standards on English language skills, professional indemnity insurance, criminal history checks, recency of practice and continuing professional development”. Variations currently occur throughout the document.
3. The document should also be consistent throughout for wording of “dates, location(s) of practice, scope/area of practice and the supervisor(s).....”. Variations currently occur throughout the document.
4. The document should be consistent throughout for headings, eg “Renewal” should be added on page 7, and be consistent between Standard and Guidelines for each category.

Specific comments:

5. Page 3 – under heading “Requirements”, 2nd para: delete the word “either” and the comma.
6. Page 4 - top line: insert “limited” between renew and registration.
7. With respect to Limited Registration in the Public Interest, there needs to be consistency in terminology used for either the “employer/host employer” as well as the “new employer/new host employer”. This also applies to the Guideline.
8. Page 6 - 3rd para: “practise” should read “practice”.
9. Page 7 – point 5. This is ambiguous.

- What is the intent of the requirement?
- How can a supervisor report on a limited registrant's performance *prior to* a placement?
- Whose safety is referred to (ie, the registrant's or the patient's) and in what context?
- Is a pro-forma required to assist potential supervisors to achieve this requirement?
- Should there be an maximum limit on the number of limited registrants a supervisor can supervise? (The SA Board believes there should be.)

The comments above also apply to "Change of employment" heading - page 7.

10. Page 7 – the heading "Renewal" is missing after Change of employment heading.
11. Page 9 – Limited registration for teaching and research, bottom para: Instead of "of up to 12 months" should read "**for** up to 12 months".
12. Page 10 – Change of employment: We assume that the use of the word "practice" in the second line is incorrect and should be replaced with "limited registration". This also applies to page 15.
13. Page 10 – the heading "Renewal" is missing after Change of employment heading.
14. Guidelines: Limited registration – page 11: under the heading "Summary of Guidelines", there is inconsistency in the statement regarding limited registration renewal (last line) and the previous registration standards for limited registration for post graduate training or supervised practice.
15. Again we note inconsistency in terminology and wording between the Guidelines and the Registration Standards.
16. Page 15 – Audit: delete comma between "supervising physiotherapists".

Yours faithfully

SA BOARD OF THE PHYSIOTHERAPY BOARD OF AUSTRALIA



Jo Bills
Chair

cc: Ms Anni Liwu, Executive Officer Board Services, AHPRA