



The Physiotherapy Board of New Zealand

26 November 2010

Physiotherapy Board of New Zealand submission on the Physiotherapy Board of Australia documents Standards and Guidelines for Limited Registration

The Physiotherapy Board of New Zealand (PBNZ) thanks the Physiotherapy Board of Australia (PBA) for the opportunity to comment on the consultation on standards and guidelines for limited registration.

The purpose of PBNZ is to set, monitor and promote competence, continuing professional development and proper conduct for the practice of physiotherapy in the interests of public health and safety.

When reviewing the current amended version of Guidelines in comparison to the 1 July 2010 document it is evident that the amended version strengthens, clarifies, and provides further explanation of PBA's requirements for Limited Registration. PBNZ supports the PBA's new standards. The rationale for PBNZ's stance is detailed below:

In preparing this response reference has been made to PBNZ's previous submission dated 9 June 2010 and comments expressed in point 3 about pathway.

One suggested amendment/enhancement is for both PBA documents, Guidelines and Standards, to include reference to the Australian Physiotherapy Council (APC) publications and linkage with the APC processes.

The rationale for this suggested amendment is that it can be deduced from the PBA documents that there is in fact a pathway leading from Limited Registration in the public interest to General Registration, but this is not overtly expressed.

- It is noted that on the AHPRA website, overseas trained physiotherapists are directed in the first instance to contact the APC to source information.
- In order to understand the significance of the frequent references to the APC Interim Certificate on pages 12 and 13 of the PBA Guidelines, an individual first reading the PBA documents would also require a significant level of understanding of the APC processes relating to General Registration. Attaining the APC Interim Certificate is an integral step in the APC application and assessment process towards gaining General Registration.

- Limited Registration provides an opportunity for individuals not currently eligible to apply for General Registration to obtain additional knowledge/skills/practical clinical experience whilst based in Australia. With the knowledge that it could enhance their chances of gaining General Registration in the future, potential applicants for Limited Registration may well be heartened to access such information. This information may impact on their consideration of working in Australia long term.
- There are several mentions of 'APC' in the PBA Standards and Guidelines without inclusion of the full title 'Australian Physiotherapy Council' until the *Limited Registration in the public interest* section (page 6) which is the second group outlined. It therefore appears as if the order of the sections has changed and the second section *in the public interest* was originally first, hence had the full wording and the others just the abbreviation.

Under the heading 2, Limited registration in the public interest, fourth paragraph, an individual currently holding Limited Registration registered in the public interest who attains the APC Interim Certificate can 'be registered appropriately in another category'. These other categories are logically Limited Registration for

- Preparation for the APC clinical assessment, or
- Undertaking the APC clinical case examinations.

However, as previously mentioned in PBNZ's 9 June 2010 submission, it is not explicitly clear what the pathway is, if any, from *limited registration in the public interest* to full registration. Presumably there is a potential process of examination similar to that of *limited registration for postgraduate training*.

This submission has been prepared on behalf of the Physiotherapy Board of New Zealand. Any enquiries should be addressed to Mrs Susan Beggs, Chief Executive and Registrar, the Physiotherapy Board of New Zealand, P.O. Box 10-734, Wellington. Phone 04 471 2610