

29 November 2010

Our ref: 101124-GRPM-DL

Mr Glenn Ruscoe
Chair
Physiotherapy Board of Australia
G.P.O. Box 9958
Melbourne VIC 3001

Dear Mr Ruscoe,

Re: Consultation document on the Limited registration standard and guidelines

The Australian Physiotherapy Association (APA) believes that the requirements and guidelines described within the consultation paper are generally appropriate; however concern is raised over the stringent requirements for Limited registration for teaching and research which we believe will severely limit the profession's ability to facilitate knowledge exchange with international physiotherapy colleagues. These and other issues are presented in the specific comments as follows:

Limited registration for teaching and research

The APA believes that the requirement for all overseas physiotherapists to gain limited registration to take up teaching positions will be a barrier to our profession's ability to attract highly trained and experienced overseas physiotherapists to lecture in conferences and universities.

Seeking overseas physiotherapists to present in a short physiotherapy course, for example, would require all presenters to meet the Board's registration standards on criminal history checking, professional indemnity insurance, English language skills, recency of practice and continuing professional development.

To meet several of these requirements, certifications that can only be obtained through lengthy or complicated processes are needed. For example, the requirement that the Certificate of Registration Status or Certificate of Good Standing from every jurisdiction in which the applicant is currently and have previously been registered as a health practitioner in the last five years be forwarded **directly from the licensing or registration authority to the Physiotherapy Board of Australia** can potentially be a significantly cumbersome administrative burden.

Similarly, requiring an IELTS or OET Test report obtained within two years prior for presenters educated in or practising in a country outside the seven listed in the English Language Skills Registration Standard will have a significant negative impact.

The APA recommends that a streamlined registration category should be developed that applies to presenters at conferences or short lectures, which exempts them from having to satisfy specific requirements if the sponsoring organisation can provide evidence to support the applicant's registration.

It should also be recognised that the list of seven countries (where English is the native or first language) in the English Language Skills Registration Standard is highly conservative and preclude many from being eligible despite having English as their native or first language. The APA believes that the Physiotherapy Board of Australia should have the discretionary powers to exempt certain applications from the requirements where it can be evidenced that the applicant's native or first language is English.

Limited Registration for post graduate training

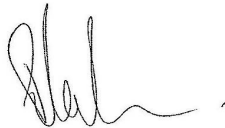
The APA believes that the application form should not combine the question on recency of health with the questions on recency of conduct and performance. Health is distinctly different from conduct and performance and it is inappropriate, for example in the application form for Limited registration for post graduate training, that questions 25-29 flow on from question 24. The APA recommends that this be changed to:

- 24. Please read this before answering the following question about recency of health; and*
- 25. Please read this before answering the following question about recency of conduct and performance.*

Further to this, it is more appropriate to group questions 15 and 16 on the applicant's criminal history with questions 25-29.

The APA appreciates the opportunity to provide feedback on these registration standards and welcomes any further discussion on the issues raised. Should you also have any enquiries, please feel free to contact Jonathon Kruger, Acting Deputy CEO and Manager, Policy and Professional Standards Division at (03) 9092 0888 or email jonathon.kruger@physiotherapy.asn.au.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Pat Maher', with a small flourish at the end.

Pat Maher
President