

Attention
Chair, Physiotherapy Board of Australia

16 November, 2010

Thank you for the opportunity to respond to your "Consultation document: Registration standard and guidelines". Our submission relates specifically to the new English language requirements for "Limited registration for postgraduate training".

The new Registration Guidelines state that "Limited registration is restricted to undertaking training". This new restriction prohibits postgraduate students from working as a physiotherapist outside of their University studies as they had been allowed in the past. With this change postgraduate students now function the same as undergraduate students in that they can only see patients as part of their formal studies and while under supervision. Postgraduate physiotherapy students receive the same or greater supervision of their clinical training as do undergraduate students. As such there is no longer any difference between the guidelines/restrictions placed on undergraduate and postgraduate students. Since undergraduate students are not required to obtain Limited Registration we feel the same should apply to postgraduate students.

If this is not supported then we feel the new IELTS requirement of 7.0 overall and 7.0 in all bands is unnecessarily high. Our previous experience over many years with postgraduate students is that English scores of 7.0 in all bands, particularly reading and writing, are not necessary for satisfactory completion of our program. Under the new regulations, students are only allowed to work under supervision as part of their studies. Therefore, all interaction with patients is closely supervised and associated patient documentation co-signed by their clinical educator. We believe this reduces the need for such high English language standards as would be required for independent practice. Clearly if these students wish to stay in Australia after graduation they would need to comply with the higher English requirements but for the purpose of their postgraduate studies they are not necessary.

Thank you for considering this submission,



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