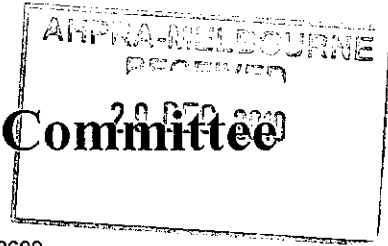


Health Workforce Principal Committee

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Mr Glenn Ruscoe
Chair, Physiotherapy Board of Australia
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Email: chair@physiotherapyboard.gov.au

Dear Mr Ruscoe

Thank you for providing the Health Workforce Principal Committee (HWPC) with the opportunity to comment on the *Consultation Paper from the Physiotherapy Board of Australia on draft registration standards and guidelines on limited registration*.

All views expressed in this letter are subject to alteration by Health Ministers and must not be assumed to represent the views of Health Ministers. As such, I would request that this response not be made publicly available.

HWPC members have reviewed the consultation paper and provide the following comments for the consideration of the Board in relation to two of the three areas of limited registration canvassed in the consultation paper: post graduate training or supervised practice and the public interest.

Post graduate training or supervised practice

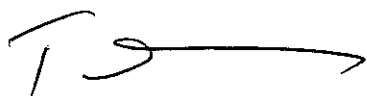
- In jurisdictions where there are difficulties with recruitment of physiotherapists, the requirement for most overseas trained physiotherapists to undertake Australian Physiotherapy Council (APC) supervised practice and an exam to achieve full registration are a significant deterrent to immigration.
- Supervised practice would occur predominantly in the public health system, given the scope of practice competencies required by APC to gain full registration including cardio-pulmonary competencies, which in most countries is a post graduate rather than entry level competence. Supervision capacity is limited in some jurisdictions given the small experienced workforce and high turnover.
- Does the requirement for the individual to be enrolled in an Australian postgraduate physiotherapy program include deferred study and part time as well as full time study?
- Expectations of employers with regard to that supervision and its documentation need to be clear and achievable both in metropolitan and rural and remote areas.

Limited registration in the public interest

- The ability to employ physiotherapists with limited registration in the public interest assists some jurisdictions to address areas of significant workforce shortage in this profession. This type of registration allows overseas trained physiotherapists into the workforce while they are undertaking APC supervised practice or if they are seeking short employment e.g. physiotherapists on working holiday visas. The potential to renew limited registration up to three times would provide some flexibility to support physiotherapists to reach full registration.
- An *Interim Certificate* from the APC is not required on application for limited registration but may be attained subsequently (paragraph 5, page 13, Guidelines). However, it is not clear what the APC may require for limited registration in regard to "compliance with assessment recommended by the APC" and whether this may result in the requirement for an *Interim Certificate*.
- Often Physiotherapists are employed in a general position, not under a particular specialty. Therefore it is important that their role is clearly defined by their supervisor. They may have the potential to have a varied scope of practice within the one position e.g. if working on a General Medicine ward and treating neurological, cardiorespiratory and musculoskeletal conditions within the one position. Therefore, in **part e) A letter from the supervisor(s)...** the Board should consider a standardised method of reporting the applicant's safety and competence to practise.
- Is there a particular reason why a position description is only required for a change of employment and not for their initial place of employment (as in a **change of employment, part c)**? Further, the Board will need to have a process in place to monitor the practice of anyone registered in the public interest. It's not clear what would happen if a person registered in the public interest wants to change jobs. The Medical Board of Australia links registration to a specific position description and appoints a supervisor.

Please contact JulieAnne Anderson, HWPC Secretariat, if you require further information.

Yours sincerely



Tony Sherbon
Chair, Health Workforce Principal Committee

14 December 2010