

01 August, 2011

Submission to Physiotherapy Board Australia with respect to:

Draft Supervision Guidelines

The Council of Physiotherapy Deans Australia and New Zealand Inc. (CPDANZ) is the representative body for the academic leaders of physiotherapy education programs in Australia and New Zealand. Membership of CPDANZ comprises the following Universities:

Auckland University of Technology	Australian Catholic University	Bond University
Charles Sturt University	Curtin University	Edith Cowan University
Griffith University	James Cook University	La Trobe University
Monash University	The University of Melbourne	The University of Newcastle
The University of Notre Dame Australia	The University of Queensland	The University of Sydney
University of Canberra	University of Otago	University of South Australia
University of Western Sydney		

The CPDANZ welcomes the opportunity to comment on the Consultation document *Draft Supervision Guidelines* setting out the requirements that would apply to physiotherapists seeking limited registration or where supervision is a requirement for registration. The CPDANZ understand that the scope of these guidelines is not intended to cover: supervision of students and therapy assistants; mentoring of new graduates of more junior physiotherapists; or performance review responsibilities of managers. It is also understood that these guidelines are not applicable to those physiotherapists seeking limited registration only for sitting the clinical part of the Australian Physiotherapy Council (APC) examination.

The Consultation Draft provides a delineated process of supervision and reporting requirements, clearly presenting responsibilities of the supervisor and the supervisee with the attainment of clinical competency aligned with the Australian Standards for Physiotherapy as assessed by the Assessment of Physiotherapy Practice (APP). The CPDANZ appreciates the clarity provided by Appendix 2 of these Draft Guidelines, although does seek some further clarity with respect to Item No. 1 (see below).

The CPDANZ supports the Draft Guidelines but draw attention to clarity needed on page 7 regarding "when a secondary supervisor is unavailable, practice must cease, and the supervisee must start the supervision process from the beginning." This statement is unclear and may be of disadvantage to the supervisee if they have progressed from Level 1 to Level 4 supervision such that it could be read that if a secondary supervisor is now not available, they have to start from Level 1. **The CPDANZ requests further clarity**.

The CPDANZ requests further clarity with respect to the supervision requirements for overseas qualified physiotherapists undertaking Higher Degrees by Research (HDR) including Masters by research or PhD. Clarification is sought for these research based degrees in contrast with those

undertaking postgraduate qualifications that are oriented towards clinically based studies as those studies would clearly be covered under Item 1 of Appendix 2 (p12) and " ... would be appropriately supervised by the training program ... "(p3). Clarity with regard supervision is sought where Higher Degree by Research students may undertake clinical measures or clinical interventions as part of their research studies. It can be interpreted that these research students are enrolled in a postgraduate training program (a Research Training Scheme (RTS)) and will be subject to supervision of their research studies (including human ethics approvals) and thus satisfy the requirements of supervision by the training program. However, it is possible that a higher degree by research student may be enrolled within a Faculty/School that may not necessarily involve a Physiotherapy program and may be supervised in their research studies by non-Physiotherapists. Clarity is sought by the CPDANZ.

The CPDANZ thanks the Physiotherapy Board of Australia for the opportunity to provide comments.

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