

3.6 Attachment K

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Cc: Carmen Della-Valle
Subject: RE: AHPRA - PhysioBA Consultation on Draft Limited Registration

Dear Adam

Having reviewed these guidelines, I offer the following comments using the headings appearing in the guidelines, for ease of reference:

Introduction

In paragraph 2 line 2 insert the word "appropriate" before "professional conduct" to correctly reflect the language of section 41 of the National Law.

Who needs to use these guidelines?

In line one I query whether the reference to "individuals" should be changed to "applicants". This removes some ambiguity, and for consistency, I suggest the reference to applicants should be adopted throughout the guidelines, wherever possible.

Summary of guidelines

In the last paragraph on page one reference is made to registration starting when the Board makes the decision. What happens if a decision is made but there is delay, for some inexplicable reason, in notifying the applicant of the decision. There will be enquiries about the process for notifying applicants of the outcome of the Board's deliberations. Also applicants may seek reasons for the decision made. Reference to how applicants are notified of the Board's decision and the rights of appeal/review could be alluded to in the guidelines.

1.1 Postgraduate training

The first paragraph could be made more readable by inserting a full stop after the word "part-time". The balance of the sentence could read: "If such program of study is deferred then this limited registration will cease."

In paragraph e) is it intended that the supervision of the education provided comply with the Board's supervision guidelines. If so a reference to such guidelines could be inserted here. There is a reference at the end of the guidelines in the definition section to supervision, perhaps

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it would be useful to include a cross reference here to that definition.

1.2.1 Preparation for the APC clinical assessment where the applicant seek to practise physiotherapy

Suggest that this heading appear in the same type face as that 1.2.2 for consistency.

In paragraph a) change the word "individual" to "applicant".

In paragraph d) in the last line the meaning is ambiguous given the words "up to the end date on the individual's APC interim certificate" suggest it might be clearer to say "if it is lodged before the expiry of the applicant's APC interim certificate".

Do course attendees from overseas need to be registered?

In the last two sentences under this heading perhaps the words "not renew" and "new application" can be italicised to draw attention to these matters.

Compliance with conditions

This paragraph requires amendment to include a reference to co-regulatory jurisdictions. In NSW we do not have voluntary notifications and the reference to section 144(1)(f) does not translate to NSW. Instead we have mandatory notifications regarding notifiable conduct (section 140 & 141). This aspect of the guidelines will need more scrutiny for national coverage.

Regards

Christine Campbell