

**Feedback on the public consultation paper  
on the definition of practice**

**Presented to AHPRA**

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## Australian Physiotherapy Association

The Australian Physiotherapy Association (APA) is the peak body representing the interests of Australian physiotherapists and their patients. The APA is a national organisation with state and territory branches and specialty subgroups. The APA corporate structure is one of a company limited by guarantee. The organisation has approximately 12,000 members, some 70 staff and over 300 members in volunteer positions on committees and working parties. The APA is governed by a Board of Directors elected by representatives of all stakeholder groups within the Association.

The APA vision is that all Australians will have access to quality physiotherapy, when and where required, to optimise health and wellbeing. The APA has a Platform and Vision for Physiotherapy 2020 and its current submissions are publicly available via the APA website [www.physiotherapy.asn.au](http://www.physiotherapy.asn.au).

## Introduction

The Australian Physiotherapy Association thanks the Physiotherapy Board of Australia for the opportunity to comment the Preliminary consultation paper on the definition of practice. Physiotherapists work in a variety of settings and undertake both clinical and non-clinical roles. It is clear that those in management and teaching roles are potentially affected by changes to the definition of practice, as this may impact on their registration requirements.

Please find below answers to the specific questions contained in the discussion paper.

**Question 1:** Are there any other factors that the National Boards should consider when advising whether or not a person needs to be registered?

**Response:** The Australian Physiotherapy Association does not believe that there are other factors that need to be considered.

**Question 2:** Do you support this statement:

When health practitioners provide advice, health care, treatment or opinion, about the physical or mental health of an individual, including prescribing or referring, it is clear that there is a level of risk to the public. The public and the practitioners' professional peers would expect that this group of health practitioners would have the qualifications and the contemporary knowledge and skills to provide safe and effective health care within their area of practice. It would be expected that these practitioners will meet the standards set by the Board and therefore should be registered.

**Response:** The Australian Physiotherapy Association supports this statement.

**Question 3:** Do you support this statement:

Health practitioners who are in roles in which they are directing, supervising or advising other health practitioners about the health care of individuals would also be expected to have the qualifications and contemporary knowledge and skills to do so as there is potential to alter the management of the patient/client.

**Response:** The Australian Physiotherapy Association supports this statement.

**Question 4:** Do you believe that health practitioners in non-clinical roles / non-patient-client care roles as described above are "practicing" the profession? Please state and explain your views about whether they should be registered and if so for which roles?

**Response:**

Physiotherapists, who are managers/administrators/educators etc, still find themselves giving advice to others regarding services (either directly to patients/clients or indirectly through policy advice to government department / non-government agents) which can and often directly or indirectly impacts on the safe and effective delivery of physiotherapy services.

As such they should be considered to be practising as a physiotherapist and therefore require registration.

**Question 5:** For which of the following roles in education, training and assessment should health professionals be registered?

- Settings which involve patients/clients in which care is being delivered ie when the education or training role has a direct impact on care, such as when students or trainees are providing care under the direction, instruction or supervision of another practitioner

- Settings which involve patients/ clients to demonstrate examination or consulting technique but not the delivery of care
- Settings which involve simulated patients/clients
- Settings in which there are no patients/clients present

Are there any other settings that are relevant and if so, what are your views about whether health practitioners should be registered to work in these settings?

**Response:** See above response. It is important that those teaching the core physiotherapy skills (including knowledge and techniques that are applied directly to patients/clients), need to be registered as a physiotherapist.

**Options:** The Australian Physiotherapy Association supports Option 1 - **No Change** to the current definition.