

## Consultation on draft revised registration standards and guidelines

28 April 2014

### Responses to consultation questions

Please provide your feedback as a Word document (not PDF) by email to [physioconsultation@ahpra.gov.au](mailto:physioconsultation@ahpra.gov.au) by close of business on Monday, June 30 2014.

#### Stakeholder Details

If you wish to include background information about your organisation please provide this as a separate word document (not PDF).

<b>Organisation name</b>
Jessica Crage
<b>Contact information</b> (please include contact person's name and email address)
Jessica Crage

#### Your responses to consultation questions

<b>Registration standard: Professional indemnity insurance arrangements</b> <i>Please provide your responses to any or all questions in the blank boxes below</i>
1. From your perspective how is the current Professional indemnity insurance (PII) arrangements registration standard working?
2. Is the content of the draft revised Registration standard: PII arrangements helpful, clear, relevant and more workable than the current standard?
3. Is there any content that needs to be changed or deleted in the draft revised Registration standard: PII arrangements?
4. Is there anything missing that needs to be added to the draft revised Registration standard: PII arrangements?

**Registration standard: Professional indemnity insurance arrangements**

*Please provide your responses to any or all questions in the blank boxes below*

5. Do you have any other comments on the draft revised Registration standard: PII arrangements?

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6. Do you think that that the current review period of at least every five years is appropriate or would an alternative period be appropriate e.g. three years, with the option to review earlier if the need arises?

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**Registration standard: Continuing professional development (CPD)**

*Please provide your responses to any or all questions in the blank boxes below*

7. From your perspective how is the current CPD registration standard working?

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8. Is the content of the draft revised Registration standard: CPD helpful, clear, relevant and more workable than the current standard?

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9. Is there any content that needs to be changed or deleted in the draft revised Registration standard: CPD?

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10. Is there anything missing that needs to be added to the draft revised Registration standard: CPD?

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11. Do you have any other comments on the draft revised Registration standard: CPD?

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12. Do you think that that the current review period of at least every five years is appropriate or would an alternative period be appropriate e.g. three years, with the option to review earlier if the need arises?

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**Guidelines on continuing professional development (CPD)**

*Please provide your responses to any or all questions in the blank boxes below*

13. From your perspective how is the current guidelines on CPD working?

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14. Is the content of the draft revised guidelines on CPD helpful, clear, relevant and more workable than

### **Guidelines on continuing professional development (CPD)**

*Please provide your responses to any or all questions in the blank boxes below*

the current guidelines?

15. Is there any content that needs to be changed or deleted in the draft revised guidelines on CPD?

16. Is there anything missing that needs to be added to the draft revised guidelines on CPD?

17. Do you have any other comments on the draft revised guidelines on CPD?

18. Do you think that that the current review period of at least every five years is appropriate or would an alternative period be appropriate e.g. three years, with the option to review earlier if the need arises?

### **Registration standard: Recency of practice (ROP)**

*Please provide your responses to any or all questions in the blank boxes below*

19. From your perspective how is the current ROP registration standard working?

From my perspective the current ROP registration standard is working well

20. Is the content of the draft revised Registration standard: ROP helpful, clear, relevant and more workable than the current standard?

Not in my view. For example

1. What is the composition of the 150 hours? Does it include any administration work completed during my role, does it include any continued professional development and does it include training other staff members
2. What happens if the 150 hours are not met? How do you get back your registration?
3. Why is maternity/parental leave not an exception to keep it aligned to the National Employment Standards?
4. Given the requirement for CPD how does the imposition of a certain number of hours deliver the outcome you are seeking (and why specifically 150hours)? A clinician with 100hours of accrued work in a given period may prove to be far more competent than one with 150hours as they may have spent more time and effort developing themselves through CPD.

21. Is there any content that needs to be changed or deleted in the draft revised Registration standard: ROP?

Yes. I am very concerned by the requirement to work 150 hours a year 'with no exceptions' if I am to be re registered. For example I am currently working therefore I will be able to re register this year. If I had a baby it is my legal right to take a years maternity leave and in one year my job will be available to me. Under the 150 hours in 1 year / 450 hours in 3 years proposal am I correct in saying if I don't complete the hours in the first year then I don't lose my registration provided that before the end of the 3<sup>rd</sup> year I have completed 450 hours?

**Registration standard: Recency of practice (ROP)**

*Please provide your responses to any or all questions in the blank boxes below*

22. Is there anything missing that needs to be added to the draft revised Registration standard: ROP?

Yes I would like there to be an 18 month grace period for mothers with a new born.

23. Do you have any other comments on the draft revised Registration standard: ROP?

Discussions with my colleagues confirmed that these proposed changes are not well known. My colleagues and I are registered physiotherapists, members of the APA and you have our email addresses so I am interested to know why we were not emailed about the proposed changes to ensure that everyone is given a fair opportunity to respond.

24. Do you think that the current review period of at least every five years is appropriate or would an alternative period be appropriate e.g. three years, with the option to review earlier if the need arises?

I have no problem with a 5 year review period provided that the review period is not retrospective. Requiring members to have historically abided by new standards that didn't exist in prior years would be unreasonable and unethical.

25. Do you think that 150 hours of practice per year or 450 hours of practice over three years is reasonable?

No, I believe technical competence can be retained through the current CPD program and fewer work hours per annum. I also believe there should be an 18 month grace period for mothers with new babies.

26. Is one year an appropriate period for the definition of recent graduate in the context of the physiotherapy profession?

Yes

**Recency of practice Guidelines (ROP)**

*Please provide your responses to any or all questions in the blank boxes below*

27. From your perspective how are the current ROP guidelines working?

From my perspective the current ROP registration standard is working well

28. Is the content of the draft revised ROP guidelines helpful, clear, relevant and more workable than the current standard?

Not in my view. For example

1. What is the composition of the 150 hours? Does it include any administration work completed during my role, does it include any continued professional development and does it include training other staff members
2. What happens if the 150 hours are not met? How do you get back your registration?
3. Why is maternity/parental leave not an exception to keep it aligned to the National Employment Standards?
4. Given the requirement for CPD how does the imposition of a certain number of hours deliver the outcome you are seeking (and why specifically 150 hours)? A clinician with 100 hours of accrued work in a given period may prove to be far more competent than one with 150 hours as they may have spent more time and effort developing themselves through CPD.

### Recency of practice Guidelines (ROP)

*Please provide your responses to any or all questions in the blank boxes below*

29. Is there any content that needs to be changed or deleted in the draft revised ROP guidelines?

Yes. I am very concerned by the requirement to work 150 hours a year 'with no exceptions' if I am to be re registered. For example I am currently working therefore I will be able to re register this year. If I had a baby it is my legal right to take a years maternity leave and in one year my job will be available to me. Under the 150 hours in 1 year / 450 hours in 3 years proposal am I correct in saying if I don't complete the hours in the first year then I don't lose my registration provided that before the end of the 3<sup>rd</sup> year I have completed 450 hours?

30. Is there anything missing that needs to be added to the draft revised ROP Guidelines?

Yes I would like there to be an 18 month grace period for mothers with a new born.

31. Do you have any other comments on the draft revised ROP guidelines?

Discussions with my colleagues confirmed that these proposed changes are not well known. My colleagues and are registered physiotherapists, members of the APA and you have our email addresses so I am interested to know why we were not emailed about the proposed changes to ensure that everyone is given a fair opportunity to respond.

32. Do you think that that the current review period of at least every five years is appropriate or would an alternative period be appropriate e.g. three years, with the option to review earlier if the need arises?

I have no problem with a 5year review period provided that the review period is not retrospective. Requiring members to have historically abided by new standards that didn't exist in prior years would be unreasonable and unethical.

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