



Public consultation

13 November 2014

Proposed Physiotherapy practice thresholds in Australia and Aotearoa New Zealand

Please provide feedback using the response pages and return as a Word document (not PDF) by email marked 'Consultation – Proposed Physiotherapy practice thresholds' to physio.project@aretegroup.com.au by close of business on 12 January 2015.

Public consultation

The Physiotherapy Board of Australia and the Physiotherapy Board of New Zealand (the Boards) are releasing for public consultation the attached proposed *Physiotherapy practice thresholds in Australia and Aotearoa New Zealand* (referred to in this document as "Physiotherapy practice thresholds").

The Boards have a statutory obligation to ensure there is wide-ranging consultation on the content of any proposed standard, code or guideline

The Boards are now seeking feedback on the proposed Physiotherapy practice thresholds and are interested in comments from stakeholders.

The Boards are seeking specific feedback on the questions in the response sheet. Stakeholders may also wish to provide general feedback on the proposed Physiotherapy practice thresholds. The attached response sheet is provided to assist you to provide your comments.

Please use the response pages to provide your feedback by email marked 'Consultation – Proposed Physiotherapy practice thresholds' to physio.project@aretegroup.com.au by close of business on 12 January 2015.

Please provide your feedback in a Word document (not PDF) so that we can conform to the international Web Content Accessibility Guidelines when we publish submissions.

Unless a submission to this consultation is made in confidence or contains confidential information, the Boards will generally publish the submission on their websites. The views expressed in the submissions to this consultation are those of the individuals or organisations who submit them. Their publication does not imply any acceptance of, or agreement with, these views by the Boards.

The Boards also accept submissions made in confidence. These will not be published on the Boards' websites or elsewhere. Submissions may be confidential because they include personal or other sensitive information. Any request for access to a confidential submission will be determined in accordance with the applicable legislation – the Freedom of Information Act 1982 (Cth) in Australia or the Official Information Act 1982 in Aotearoa New Zealand.

Please use the box on the first response page to let us know if you do not want us to publish your submission, or you want us to treat all or part of it as confidential.

All submissions may be distributed to members of the Boards, Board support staff, the Project Steering Committee members and Expert Reference Group members. If the submissions were made confidentially, the Boards, Board support staff, the Project Steering Committee members and Expert Reference Group members will keep them confidential.



Overview of consultation

Purpose of the proposal

The Physiotherapy Board of Australia (PhysioBA) and the Physiotherapy Board of New Zealand (PBNZ) are national bodies concerned with the regulation of the physiotherapy profession in Australia and Aotearoa New Zealand respectively, including the registration of physiotherapists and directly or indirectly with the accreditation of programs of study leading to approval of qualifications for registration as a physiotherapist.

The PhysioBA is a body corporate with perpetual succession and is established under the *Health Practitioner National Law Act* (National Law) as in force in each Australian state and territory. The National Law establishes the national registration and accreditation scheme. The objectives of the national registration and accreditation scheme are, in part, to provide for the protection of the (Australian) public by ensuring that only health practitioners who are suitably trained and qualified to practise in a competent and ethical manner are registered; and, to facilitate the rigorous and responsive assessment of overseas-trained health practitioners.

The PBNZ is the regulatory authority for physiotherapists, established under the *Health Practitioners Competence Assurance Act 2003* (HCPA Act). The principal purpose of this Act is to protect the health and safety of members of the (NZ) public by providing for mechanisms to ensure that health practitioners are competent and fit to practise their professions.

The PhysioBA and PBNZ wish to develop mutually consistent statements that describe entry-level practice for the physiotherapy profession in both Australia and New Zealand. The end product will be designed to meet the needs of both parties. Whilst the document is owned by the Boards (in Australia, the Australian Health Practitioner Regulation Agency on behalf of the PhysioBA) it is acknowledged that the document will have wide utility within and outside the profession.

The PhysioBA and PBNZ recognise that a cultural approach to the process needs to be incorporated to recognise the unique cultures of both Australia and Aotearoa New Zealand.

Current documents

The *Australian Standards for Physiotherapy (2006)* and the *Physiotherapy Competencies for Physiotherapy Practice in New Zealand (2009)* provide the profession in each country, respectively, with a benchmark for the knowledge, skills and attributes of a safe and effective entry-level physiotherapist.

The *Australian Standards for Physiotherapy* underpin and provide the foundation for registration and accreditation standards, codes and guidelines developed or approved by the PhysioBA and provide a benchmark for a variety of its functions under the National Law, including:

- The determination of competence of practitioners for registration, including practitioner self-assessment, and decisions regarding the nature and scope of conditions, undertakings and supervision arrangements.
- The assessment of the knowledge and clinical competence of overseas trained applicants for registration as physiotherapists in Australia
- The assessment, investigation and management of notifications about registered physiotherapists with respect to health, professional conduct and performance matters.

The PBNZ's Physiotherapy Competencies describe the standards of clinical, professional, and cultural competence required in order to practise physiotherapy in New Zealand.

Applicants for registration in Aotearoa New Zealand must demonstrate that they meet each competency established by the Board as the standard to practise autonomously as an entry level physiotherapist.

The established PBNZ Physiotherapy Competencies are used in both curriculum development and in the audit for accreditation of physiotherapy programs in Aotearoa New Zealand.

The PBNZ Physiotherapy Competencies also provide the profession with a benchmark for safe and effective practice as an entry level physiotherapist.

In cases of competence or conduct, the PBNZ uses the Physiotherapy Competencies in the investigation, assessment, and management of such cases as the benchmark of the expected standard of physiotherapy practice.

Specific mention of systems or areas of physiotherapy

The introduction and examples of evidence in the current Australian Standards for Physiotherapy refer to “*cardiorespiratory, musculoskeletal, neurological and other systems*” and the section of the current Australian standards related to demonstrating achievement of the standards refers to “*the areas of cardiorespiratory, musculoskeletal and neurological physiotherapy*”. The section of the current Australian standards containing the standards does not include any specific reference to these three systems of areas of practice.

The current PBNZ Physiotherapy Competencies state “*Content, learning experiences and clinical education experiences that encompass the three core physiotherapy bases of cardiovascular/pulmonary; musculoskeletal; and neurology must be integrated throughout the curriculum*” and one of the components of competency 9 is “*Demonstrate autonomous practice as an entry level physiotherapist encompassing cardiovascular/pulmonary, neurology and musculoskeletal bases of physiotherapy management*”.

The detailed literature review in Stage 1 of the project and input from the profession during Stage 2 indicated that these three areas are part of the foundation of physiotherapy practice but in the context of contemporary physiotherapy practice, the areas need to be integrated, not discrete, areas for a physiotherapist practising at threshold competence. Members of the profession across a scope of geographical locations, roles and areas of practice expressed a view that specific reference to the three areas in the proposed Physiotherapy practice thresholds may create difficulties in clinical education of students because health systems no longer “stream” patients in these three areas. Members of the profession also expressed a view that client presentations in contemporary physiotherapy practice require these areas to be highly integrated as threshold competence level. Consequently, the proposed Physiotherapy practice thresholds do not mention these three systems or areas of physiotherapy.

Some stakeholders have expressed concern that if the three systems or areas of physiotherapy are not specifically mentioned in the proposed Physiotherapy practice thresholds – either in the section titled “Assumed minimum qualifications” or the section titled “Assumed integrated elements” – education programs may no longer teach these “core” areas.

The PhysioBA and the PBNZ are seeking comment from stakeholders on whether the proposed Physiotherapy practice thresholds document should specifically mention these three systems or areas of physiotherapy and, if so, where they should be mentioned in the document.

Trans-Tasman Mutual Recognition Agreement

The PhysioBA and the PBNZ recognise the benefits of professional mobility made possible by the Trans-Tasman Mutual Recognition Arrangement (the TTMRA) and the legislation giving effect to this arrangement in Australia and Aotearoa New Zealand. In recognition of the TTMRA, the PhysioBA and the PBNZ wish to, in so far as possible, establish mutually consistent statements that describe the elements of entry-level practice for physiotherapy.

The overall objective of the PhysioBA and the PBNZ is to develop and publish stakeholder supported shared statements that will replace the *Australian Standards for Physiotherapy (2006)* and the *Physiotherapy Competencies for Physiotherapy Practice in New Zealand (2009)*.

The PhysioBA and the PBNZ are consulting on the proposed *Physiotherapy practice thresholds in Australia and Aotearoa New Zealand* as these are intended to become the shared statements.

A separate document containing the response pages is provided as part of the consultation documents to assist you to provide your feedback.

To satisfy the international Web Content Accessibility Guidelines when we publish submissions, please provide your feedback in a Word document (not PDF) by email marked 'Consultation – Proposed Physiotherapy practice thresholds' to physio.project@aretegroup.com.au by close of business on 12 January 2015.