

1 August 2011

Ms Jill Humphreys  
Executive Officer  
Physiotherapy Board of Australia  
AHPRA  
VICTORIA 2000

Dear Ms Humphreys

I have been asked by Mr Glenn Ruscoe, Chair, Western Australia Board of the Physiotherapy Board of Australia (WA Board), to provide written comments from the WA Board regarding the current consultation documents "Draft Supervision Guidelines", which they discussed at their most recent meeting on 7 July 2011.

**1. Physiotherapy Registration standard Limited registration Registration standard: Consultation draft**

It was noted that registration that had previously been in the public interest, has now moved to Limited registration for postgraduate training or supervised practice, and that the onus is now on the applicant to apply for limited supervision.

Members noted that the Australian Physiotherapy Council's (APC) assessment is more about the physiotherapist's decision making process, rather than the technical aspects of physiotherapy, and that before being eligible for this category of registration, applicants will need to have completed the written part of the APC assessment. The applicant has the responsibility to undertake all that is required to complete the APC process, i.e. the supervision role versus the scope of experience.

Members have some concern as to whether the aged care sector can provide the level of supervision required. It was acknowledged that the hospital setting had previously been seen as the best place for supervision, and the place that provides exposure across the entire range of physiotherapy specialties.

Members discussed how much discretion the Board has to decline an application, noting that if members have confidence in the APC assessment process, then the supervision plan should be sufficient.

There was some concern expressed regarding the potential for an employer to bring in physiotherapists who may be set to fail because they may not be able to successfully meet the APC requirements. Consideration was given to the personal impact this can have upon the applicant, with it being acknowledged that the ethical issues associated with employment is not a Board matter.

It was agreed that placements within the aged care sector and private practice may not provide exposure to acutely ill patients or an opportunity for independent decision making. Concern was raised about the potential that this may be open to abuse by employers creating a “revolving door”, and that lower qualified and lower skilled employees may lead to lower paid practitioners. Whilst safety is not an issue under this plan, concern was expressed that this may open the door to less qualified physiotherapists with lower standards.

There was also concern about the potential for reduced development of local workforce.

Members discussed where internationally qualified PhD students (teaching & research) would sit within this registration category, acknowledging that limited registration will only be renewed on 2 separate occasions, applicants may submit a new application at the end of that time.

Members agree that the principles of Safety and Quality need to be considered within any supervision plan.

### **Limited registration in the public interest**

Members noted that this registration category would only be used in the case of natural disasters for very short periods. This category of registration is consistent with all other National Boards. It was also noted that internationally qualified physiotherapists have never been brought into Australia for a natural disaster.

Members expressed some concern that this may not be workable, and there needs to be some rational basis for this form of registration. It was noted that the previous way of using area of public interest (physio) is similar to the area of need for medicine.

### **Limited registration for teaching or research**

Members noted that this type of registration may be suitable for internationally qualified physiotherapists who come to Australia to conduct a course. Applications will be assessed on a case by case basis, with the State Board having discretion in this matter.

Scenarios were considered, e.g. PhD student may come to Australia for 6 months to do some pilot work and then return to their home country to complete data collection. These applicants would need to hold Limited registration for teaching or research. This means that applicants will need to meet English Language Standards. Previously these physiotherapists would not have had to hold registration.

## **2. Physiotherapy Guidelines for limited registration**

Members noted that this document did not contain anything new from the previous version; therefore, no further discussion was required.

### 3. Consultation draft: Supervision guidelines

Members sought clarification that the Likert scale used correlates with the APC scale.

Member queried whether this supervision guideline should be differentiated to clarify that it relates to undergraduates, whilst noting that post graduate students do not need supervision per se.

Members discussed what they could do in situations where there are doubts about the veracity of the assessment, and on what basis would they be able to challenge the report. It was acknowledged that this may only become apparent within a pattern of assessments by a supervisor. Members were advised that there is no power to randomly audit supervisors.

Member expressed concern about the low level of scrutiny of supervisors. It was acknowledged that the employer has some level of responsibility, including a legal responsibility, to ensure that supervisors were competent. Insurance providers may become involved if employers/employees are supervisors. This may affect insurance premiums.

**FORM A – Conflict of Interest –** Members acknowledged that, as an employer there is a conflict where the supervisor and employer are the same person. However, requiring an independent supervisor may have a detrimental impact upon the workforce.

Members understand that for Limited Registration at Level 1 (L1), the registrant needs to have completed the APC “written” certificate. They will remain at L1 until the assessment comes before the Board. This means that this category of registrants will be excluded from undertaking annual leave relief within private practice. It was agreed that this process would limit private practitioners’ ability to have holiday relief because of the need for the registrant to have received a successful Level 4 assessment.

The Board may impose conditions on Limited Registration. It was suggested that FORM A be amended by the addition of a section in the agreement that states “I understand that I will be held legally responsible if I do not comply with...”

**FORM 2 -** Orientation to the Australian health care program.

The wording and grammar in this document needs to be re-checked. Members were informed of the plan to develop an orientation program to the Australia health care system, which will be standardised across all professions. The method of program delivery is not known at this time.

### Supervision guidelines

Members discussed the four levels and raised some concern that Level 3 and Level 4 are not clearly differentiated, and that consideration should be given to combining the levels. Other Members interpreted these levels as being differentiated by communication and the immediacy of advice being available, i.e. Primary (operational), and Substantial (global/ independent).

Some Members thought that there needs to be further clarification regarding “Contactable”, whilst other Members believe that there is differentiation. It was emphasised that the supervisor needs to be able to differentiate between Level 3 and 4. The term primary infers a different (higher) level of supervision within the health care setting. If the supervisor is required to contact the supervisee, then this would clearly differentiate between these two levels.

Members discussed the need for supervisor training in relation to the APP assessment – i.e. role, processes, responsibilities, and assessment procedures, and that supervisors’ need to understand the importance of their role.

Questions were raised in regard to why 5 years experience was the point for someone being eligible to be a supervisor. Within the current environment 2 – 3 year post-graduate physiotherapists may already be undertaking supervision roles. Conversely, some experienced physiotherapists are not suitable as supervisors.

Whilst it is unlikely that a 1st year will supervise, it is possible. It was suggested that emphasis should be placed on the training (suitability) of the supervisor and not their years of experience, suggest “**REPLACE 5 YEARS**” with “**APPROPRIATELY TRAINED**”. The question to be asked is “**IS THE SUPERVISOR APPROPRIATE IN THIS CASE?**”

Members requested that the supervisor’s registration number be added to Form A. Similarly, the Board needs to know the same information for any backup supervisor.

### Appendix 2, section 7 and 8 - 69 Teaching or Research and 69 Teaching or Research

Members made the following comments in relation to these categories:

- APP still inappropriate for these purposes;
- low risk, no complaints;
- within Governance of an institution;
- if the registration process becomes onerous for research - do not want to create a barrier or rule out the possibility of supervision;
- some discretion required – trust v requirement.

I trust that the issued raised by the WA Board will be considered by the Physiotherapy Board of Australia.

Yours sincerely



**Carol Mirco**

Director, Board Services

On behalf of the WA Board of the Physiotherapy Board of Australia.

CC: Mr Glenn Ruscoe, Chair, WA Board of the Physiotherapy Board of Australia