

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 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).

Organisation name
Health Services Union
Contact information <i>(please include contact person's name and email address)</i>
Leigh Svendsen Industrial Officer HSU National

Your responses to consultation questions

Registration standard: Professional indemnity insurance arrangements <i>Please provide your responses to any or all questions in the blank boxes below</i>
<p>1. From your perspective how is the current Professional indemnity insurance (PII) arrangements registration standard working?</p> <p>The current PII standard is working satisfactorily.</p> <p>As providers of PII the Branches of the HSU have tailored their policy to meet the requirements of the AHPRA Boards.</p> <p>It is important for all Physiotherapists to have suitable PII and the HSU includes PII as part of the membership package.</p>
<p>2. Is the content of the draft revised Registration standard: PII arrangements helpful, clear, relevant and more workable than the current standard?</p> <p>The content and structure is essentially clear and relevant. The expanded definitions are useful. The draft</p>

Registration standard: Professional indemnity insurance arrangements

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

is considerably longer 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?

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

The HSU covers other registered professionals besides Physiotherapists. Our view is that there needs to be consistency across boards for a number of reasons but primarily to avoid confusion and avoid market forces competing for coverage and driving a wedge between providers and professions.

Uncertainty is very destabilising. We need clarity on who needs PII and who doesn't. We need clear definitions. While we are in favour of simplifying the standard, we do not want to see change just for change sake. Change tends to confuse and concern people.

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?

HSU considers 3 years was necessary a review period the first time around, however we consider 5 years might be a better option for the next review.

A 5 year period enables any minor or major variations to be understood and 'bedded down', any concerns will be clear as opposed to initial response to change without understanding the impact. HSU doesn't think there is any need for the shorter period to be used again.

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?

Taking feedback from members, the HSU feels that the current CPD registration standard is working satisfactorily. The only additional comment received related to the idea of compulsory or essential annual or update content such as basic life support, manual handling etc.

There is a perception that if there were any 'required' content these matters would be provide by employers regularly as opposed to the current ad hoc arrangements.

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

Registration standard: Continuing professional development (CPD)

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

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

See comments regarding 'required' content

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

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

The HSU strongly supports the ongoing education and professional development of all Physiotherapists. We support a simple, user-friendly program that recognises the CPD activities that Physiotherapists regularly undertake as part of their role as health professionals without being unreasonably onerous.

The HSU would like to see industrial instruments recognise the need for professional development and ensure adequate time is provided as well as support for the growing cost in maintaining the required standards.

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?

5 years is a good review period for consultation. See comments around PII cover

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?

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

The five year ROP requirements are working and should be continued.

Registration standard: Recency of practice (ROP)

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

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

The provision of information about what constitutes practice and the number of hours required is positive and provides clarity. The variation from five years ROP to three years is too onerous.

The board comments concerning the proposed variation includes the statement 'There is little impact anticipated on practitioners, business and other stakeholders arising from the changes proposed'

To consider there will be little impact on practitioners by imposing an increased ROP standard [from 5 to 3 years] ignores the reality of the predominantly female workforce and the impact parental leave has on a practitioners absences from the field.

The HSU is, and has always been concerned about the impact ROP requirements have on Physiotherapists accessing parental leave, while generally only 12 months a parent may decide to access leave without pay to continue caring for a child to school age. The increased ROP requirements, from 5 years to 3 years will significantly reduce the likelihood of the parent returning to practice. This is a significant workforce issue which impacts on the availability of trained professionals and the ability of the parents to continue to practice in their preferred profession.

If the requirements are increased to 3 years there will be – as there was in nursing – a significant negative gender based impact on women simply because the majority of parenting is still undertaken by women.

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

In the view of HSU the increased ROP requirement from 5 years to 3 years is not required.

Such a change will have a significant impact on the workforce availability and is greater than other health practitioners are required to meet.

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

There are no provision for reregistration should a Physiotherapist not meet ROP requirements eg: a period of supervised practice, refresher course etc. By implication if a practitioner failed to undertake an average of 450 hours of practice over 3 years they would be required to retrain.

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

See change from 5 years to 3 years

Currently all workforce projections indicate that Australia is unable to meet and will continue to be unable to meet the demand for trained health professionals. It is counter intuitive to significantly [it constitutes a near doubling] increase the requirements for ROP without significant evidence that such a change is warranted.

The only evidence advanced in the paper refers to the deterioration of skills where a practitioner is engaged in the provision care including 'significant manual and/or technical skills'. However practice includes management in physiotherapy. As with all professions many managers do not undertake any hands on practice and yet would be considered to meet the ROP requirements.

HSU is not suggesting that managers don't meet ROP, we are pointing out the inconsistency being

Registration standard: Recency of practice (ROP)

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applied to justify an increased ROP requirement without adequate evidence.

24. 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?

HSU considers that if the change from 5 years to 3 years is accepted then the review period should be reduced to 3 years in this instance.

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

While the HSU appreciates the Board's intent to ensure all practitioners are maintaining a suitable level of recency of practice in the interests of public health, we feel these new requirements are onerous and unworkable.

Nurses recency of practice requirements matches medical practitioners, there is no reason for Physiotherapists having more onerous requirements that will seriously impact on the available trained workforce and have a

The recording process will be an added burden to a workforce already under pressure. This has not been clarified but we presume it will rely on the production of rosters to demonstrate areas of practice. This is flawed as often the reality does not marry with the original roster and may not reflect actual work performed.

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

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?

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

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

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

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

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?

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