



AUSTRALIAN
PHYSIOTHERAPY
COUNCIL

RESPONSE TO INDEPENDENT REVIEW OF HEALTH PRACTITIONER REGULATORY SETTINGS INTERIM REPORT

June 2023





Email: HealthRegReview@finance.gov.au

9 June 2023

Ms Robyn Kruk AO
Independent Reviewer

Dear Ms Kruk,

On behalf of the Australian Physiotherapy Council, we provide our response to the Interim Report recommendations.

We look forward to continuing our successful and collaborative working relationship with Ahpra, the Physiotherapy Board of Australia and other stakeholders to positively influence and address the workforce challenges for the Australian healthcare and physiotherapy sectors. We are very happy to respond to any specific questions, as required.

Warm regards,

Anton Barnett-Harris, CEO
Australian Physiotherapy Council

Note: The Australian Physiotherapy Council consents to the following questions

- I consent for the Secretariat to contact me in relation to this submission.
- I consent for my submission to be published in full.
- I consent for the Independent Reviewer to cite my feedback in the Final Report, identifying me/my organisation as the source.
- I consent for the Independent Reviewer to cite my feedback in the Final Report anonymously, attributed only in generic terms (e.g., Submission from practitioner in X profession/Y type organisation).
- I consent for the Independent Reviewer to share my feedback with other relevant parties.

a. Which reform options do you think should be prioritised?

In considering the Interim Report's urgent recommendations on page 5 of the Report, the Australian Physiotherapy Council agrees with the following and provides comment.

1. **'Fast track' pathways** which enable more applicants from trusted and similar countries.

The Council has offered the streamlined FLYR pathway for physiotherapists from a number of countries (UK, Ireland, Canada, Singapore, South Africa, Netherlands and Singapore) for several years. The Council uses a risk-based evaluation to determine which countries meet the FLYR pathway criteria, such as similarity to Australia's education systems, practice environments, regulatory requirements, and the physiotherapy scope of practice. Applicants from the FLYR countries can complete their assessment pathway with the Australian Physiotherapy Council within 6 months.

From July 2023, the Council will be introducing an express option for select countries, enabling FLYR assessments to be processed within approximately 6 weeks and reducing the assessment cost for applicants.

2. Better recognition of experience and skills of **specialist practitioners**

According to the National Law, all entry level physiotherapists, both domestic graduates and overseas qualified physiotherapists are required to demonstrate their competency to work across the Australian physiotherapy scope of practice. At this time, the Council's assessment methodology has the flexibility to assess areas of speciality, but would agree with the Report's author that consideration may need to be given to whether amendment of the National Law is required.

The Council would recommend that physiotherapy key stakeholders, including the Australian Physiotherapy Association (APA) and Council of Physiotherapy Deans of Australian and New Zealand (CPDANZ) should be consulted on this matter.

3. **Reducing duplication for overseas practitioners**

The Council agrees with the principle of reducing duplication for overseas practitioners and are open to further collaborative discussions with Ahpra and other regulatory bodies to streamline processes and improve applicant experience, whilst still ensuring public safety through appropriate verification of qualifications, registration and skills.

Applicant experience, flexibility and supporting safety

The Australian Physiotherapy Council agrees with the priorities of **improving applicant experience and offering greater flexibility, while supporting safety**. The Council has focused on these priorities as discussed in our previous submission, evidenced by developing remote written assessment, having a scalable assessment model to respond to growth in applications and investing in research to consider alternative modes of delivering Clinical Assessment, beyond the face-to-face model within our Melbourne-based Simulation Lab.

b. What, if any, reform options are missing?

The Australian Physiotherapy Council believes that each accreditation authority is unique, and we need a strong process of consultation with Ahpra in developing any end-to-end system that applicants (overseas qualified physiotherapists) would interact with. A phased and piloted approach of implementing such a system would manage the significant change across the accreditation authorities.

Additionally, when designing an end-to-end system, consideration would need to be given to appropriate controls and management of data, interaction between different entities and systems, and ensuring compliance of privacy and other regulatory requirements.

We believe developing an end-to-end system is a significant undertaking and the proposed timelines within the Interim Report are overly ambitious.

(end document)