

SUBMISSION TO THE PRODUCTIVITY COMMISSION

REVIEW OF MUTUAL RECOGNITION

Prepared by the

AUSTRALIAN PHYSIOTHERAPY ASSOCIATION

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INTRODUCTION

Members of the Australian Physiotherapy Association (APA) work in all jurisdictions throughout Australia. Their registration is regulated by the relevant registration act applicable to the State or Territory in which the physiotherapist practices.

The APA acknowledges that the Mutual Recognition Agreement (MRA) has simplified the registration of physiotherapists across Australia. However, physiotherapists continue to experience difficulties moving between jurisdictions.

This submission focuses on the MRA in relation to the registration of occupations.
The APA has no position in relation to the operation of the Trans-Tasman Mutual Recognition Agreement or in relation to the sale of goods.

The APA appreciates the opportunity to submit to this review.

RECOMMENDATIONS

The APA calls on Australian Governments to:

- Legislate to allow physiotherapists to practice in any State or Territory if they are registered in any one State or Territory; and
- Broaden the scope of mutual recognition with the aim of working toward a uniform National registration and regulation system for physiotherapists.

ABOUT THE AUSTRALIAN PHYSIOTHERAPY ASSOCIATION

The APA is the sole voice of the physiotherapy profession in Australia and leads the profession internationally. Physiotherapists must be fully qualified and eligible for registration with the physiotherapists' registration board in their respective State or Territory to be eligible for full APA membership.

Australia has approximately 11,300 registered practising physiotherapists. The APA has more than 10,000 members, representing the vast bulk of registered and practising physiotherapists in Australia.

SPORTS PHYSIOTHERAPISTS

All physiotherapists who have been required to practice in another jurisdiction have experienced difficulties in relation to registration but sports physiotherapists attached to national team competitions face specific problems. The MRA does not address these problems.

As it stands, sporting team physiotherapists travelling with their teams have to register in each State and Territory to which their team travels. Registration is time consuming and costly, particularly for physiotherapists who accompany sports teams to a number of States and Territories.

Registration costs vary as do registration processes. In Queensland prescribed fees for registration vary from $160 to $220, depending on the time of year of the registration. In Western Australia the prescribed fee is $75, while in Victoria it is $150. If required to register in each State and Territory, physiotherapists would be required to pay between $890 and $950 to be registered under the MRA.

The cost is excessive but many physiotherapists find the paperwork even more daunting. While requirements vary, at a bare minimum physiotherapists are required to provide certified copies of: their annual practicing certificate; proof of identity; photographs; and information about things such as practice restrictions, name change or criminal record.

Some teams only visit another State or Territory once a season. This means that the team physiotherapist has to complete the required paperwork and pay the required fee for one weekend per year. This requirement is onerous and does not bear any relationship to the standard of practice.

A further complication is the time taken to process applications for temporary registration. Members report waiting periods of eight weeks or more before they receive temporary registration. This is an impossible time line for sports physiotherapists. Once teams enter their finals seasons it is not uncommon to find that the location of the next game will only be known one week in advance. This places physiotherapists in a difficult situation: travel with the team and practice unregistered or do not travel with the team. Clearly both options are unacceptable.

ACCESS TO PROFESSIONAL DEVELOPMENT

APA members in the smaller States and Territories have less access to professional development activities within their State or Territory than their counterparts in the large States.

It is widely acknowledged that professional development activities are essential to maintain the skills and knowledge of the modern health professional. The APA believes that professional development activities lead to continuous improvement in the profession's standards and to greater public confidence in the services provided by physiotherapists. Consequently, the APA has mandated participation by members in professional development activities. Members must participate in such activities in order to retain APA membership.

Many professional development activities have a hands-on therapy component so participants must be registered in order to participate. Members from States such as Tasmania and Western

Australia, and in remote areas such as the 'Top End',[1] find it necessary to travel to other States in order to attend professional development courses. These members incur substantial costs in transport and accommodation in order to attend courses. The fact that they have to register in the State in which the course is held means extra costs. Additional costs and paperwork provide a disincentive for members to travel to the professional development courses that they need.

Members in the less populous States and Territories are often disadvantaged because of fewer career opportunities and reduced access to educational opportunities. Some of these members also work in remote and regional areas and are further disadvantaged by their isolation. The APA believes that the current MRA further disadvantages these members and that legislation ought to be amended to remove the disincentive to participation in interstate professional development activities.

It should also be noted that, in relation to physiotherapists working in the private sector, additional costs incurred for professional development may need to be recouped by way of higher costs for consumers.

SCOPE OF MUTUAL RECOGNITION

The APA believes that the scope of Mutual Recognition ought to be expanded. The MRA has led to improvements in the ease of registration of occupations and it is now time for it to go further.

There is no logical reason for the continuation of different requirements for registration in different jurisdictions, nor is there a reason for the different approach to regulation in each State and Territory. There is no difference in outcomes (ie the quality of practice) across the jurisdictions. The APA therefore contends that differing requirements merely lead to unnecessary complexity and confusion.

In addition to the requirements for registration, the APA believes that all other aspects of regulation should be uniform nationally. Matters such as reserved titles, codes of conduct, disciplinary proceedings and advertising should also be consistent throughout Australia.

The APA acknowledges that there would be costs associated with bringing the registration and regulation requirements into line but argues that this would lead to savings in the long term. It would also lead to a simple, transparent registration system with uniform practice requirements.

The APA calls on Australian Governments to establish a working group (perhaps via the Australian Health Ministers' Advisory Council) to develop uniform national registration and regulation requirements for the physiotherapy profession. The APA would be pleased to participate in such a working group.

[1] Physiotherapists practicing in northern Western Australia and the Northern Territory have reported that they have been required to attend the registration board in person to obtain mutual recognition. Given the distances involved these members have been substantially inconvenienced.