

# **Public consultation**

10 December 2025

Draft registration standard: General registration for experienced internationally qualified health practitioners

#### Introduction

The Australian Health Practitioner Regulation Agency (Ahpra) and the National Boards (Boards) are asking for feedback on the Draft registration standard: General registration for experienced internationally qualified health practitioners (draft registration standard). The draft registration standard has been prepared for the following professions (see Appendix A):

- dentistry
- medical radiation practice
- occupational therapy
- podiatry.

We expect the draft registration standard will encourage more internationally qualified health practitioners (IQHPs) to register in Australia by creating three faster registration pathways. These pathways will give IQHPs a way to register based on their professional skills and experience. Eligible IQHPs must still meet the standard needed to practise in Australia. The Australian states and territories prioritised these four professions for faster pathways because they need more practitioners.

The Dental Board is also asking for feedback on a proposal to extend the registration standard to <u>dental</u> <u>specialists</u>.

# **Providing feedback**

If you or your organisation wants to give detailed feedback via email:

- 1. Read the consultation paper (questions are on page 2)
- 2. Complete the feedback template (Attachment A)
- 3. Save your completed template as a Word document
- 4. Email your submission to <a href="mailto:streamlinedpathways@ahpra.gov.au">streamlinedpathways@ahpra.gov.au</a> by 5:00pm AEDT, 9 February 2026

If you want to give brief feedback via survey:

- 1. Read the consultation paper (the survey questions are based on the questions on page 2)
- 2. Complete the online consultation survey by 5:00pm AEDT, 9 February 2026

Ahpra and the relevant National Boards will choose whether to publish feedback on the Ahpra website. Please let us know if you do not want your feedback published.

For more information, contact <a href="mailto:streamlinedpathways@ahpra.gov.au">streamlinedpathways@ahpra.gov.au</a>

## **Next steps**

We will publish a report on our website, summarising the consultation feedback, in the first half of 2026.

We will consider all feedback before finalising and submitting the proposed registration standards to Health Ministers. Registration standards approved by Health Ministers will be published on the relevant Board's website.

# **Consultation questions**

- 1. Do you support the suggested approach in the draft registration standard? Why or why not?
- 2. Is the information in the draft registration standard clear and are the suggested pathways clear and practical? If no, what can we do to make this clearer and/or more practical?
- 3. Are the ways we will assess work-based experience in the comparable qualification and work-based experience pathway, and the comparable work-based experience pathway suitable? Why or why not?
- 4. Are the hours of practice experience needed for the different pathways appropriate? Why or why not?
- 5. Do you support the National Boards' criteria for assessing comparable international regulator jurisdictions? Why or why not?
- 6. Would the draft registration standard have any possible negative or unintended impacts on public safety? If yes, please explain why.
- 7. Would the draft registration standard have any possible negative or unintended effects for Aboriginal and/or Torres Strait Islander Peoples? If yes, please explain why.
- 8. Are there any other possible regulatory impacts the National Boards need to consider? If yes, please give details.
- 9. Do you have any other feedback on the draft registration standard?

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# **Glossary**

**Comparable regulator jurisdiction** (CRJ) means a country, state or province that has a regulator that the Board has approved as being comparable to Australia.

Competencies are skills needed for a profession.

Competency means the ability to perform a task or skill.

**Conditions** are restrictions the Board can put on a practitioner's registration. For example, conditions might limit what the practitioner can do at work or the setting they do it in.

**Eligibility for general registration** means a person has met the criteria to be able to apply for general registration. The criteria for general registration is stated in section 52(1) of the National Law.

**Experienced practitioner** means a person who has worked in their profession and is safe, skilled and suitable to work in their profession in Australia.

**Internationally qualified health practitioner (IQHP)** is a person who gained their qualification in a country other than Australia.

**Practice** means any professional role where the person uses their skills and knowledge as a health practitioner. This includes using professional knowledge when working in a direct non-clinical relationship with patients or clients, and working in:

- management
- administration
- education
- research
- advisory, regulatory or policy development roles, and
- any other roles that affect the safe, effective delivery of services in the health profession.

Practise means doing work as a health practitioner.

**Practitioner** refers to a person working in a profession.

**Private practice** refers to a professional arrangement where a health practitioner operates independently, or semi-independently within a shared business structure outside of public health systems, hospitals, private entities or institutional employment. In this context, "no oversight" means the health practitioner is not subject to formal clinical supervision, governance, or clinical accountability structures typically found in public or corporate health settings.

**Program of study** means the specific set of subjects that form a qualification.

Qualified for general registration means that a health practitioner has:

- a qualification that meets the qualification requirements for general registration (including qualifications that are relevant to the profession), and
- has completed an exam or other suitable assessment.

**Recency of practice** means the length of time from when a person last practised in their profession. A health practitioner with recent practice experience has maintained enough connection with the profession since qualifying to practise, or since gaining registration.

**Registration standard** is a Board-approved document that states the requirements a person must meet to become registered in a profession in Australia.

**Relevant qualification** means a qualification the Board considers is connected to the health profession, but is not an approved qualification, nor is it substantially equivalent or based on similar competencies to an approved qualification. Applicants who have a relevant qualification must complete an exam or assessment before they can be considered qualified for general registration.

Risk profile is an assessment of the possible harm a person or organisation may pose.

**Similar competencies** means the relevant Board considers the skills, knowledge and experience needed for an international qualification to be comparable to those needed for an approved qualification.

**Substantially equivalent** means the relevant Board considers the content, standards and outcomes of an international qualification to be largely equal to an approved qualification.

**Threshold** is the point at which a person meets the minimum criteria needed to move to a different stage of the application process.

**Workforce** means a group of employed people. It can refer to people working in a specific industry or profession e.g. health workforce.

# **Executive summary**

In 2023, Ms Robyn Kruk AO reviewed the ways we assess internationally qualified practitioners for general registration. They published a report of their findings called the *Independent review of Australia's regulatory setting for overseas health practitioners* (the Kruk review).<sup>1</sup>

The report suggested ways to increase the number of health practitioners working in Australia. In line with these recommendations, the draft **registration standard**<sup>2</sup>:

- creates faster registration pathways for professions that need more practitioners (recommendation 9)
- creates pathways to registration that recognise the skills and experience of internationally qualified health practitioners (IQHPs) as well as their qualifications and training (recommendation 10)
- enables the Board to put restrictions on a practitioner's registration, such as limiting what the practitioner can or cannot do, to manage risks (recommendation 10). We call these restrictions conditions.

The report also made recommendations to ensure that Australia's regulatory settings:

- do what they were made to do
- do not place unnecessary barriers on practitioners and employers
- ensure the public's safety and quality of care.

A registration standard is a Board-approved document that states the requirements a person must meet to become registered in a profession in Australia.

A **regulator** is an organisation that makes sure an industry or product is safe and meeting the standards that the regulator has set. Ahpra is a regulator for health practitioners.

A comparable regulator jurisdiction means a country, state or province that has a regulator that the Board has assessed as being comparable to Australia.

The draft registration standard includes three new pathways to general registration for IQHPs:

New pathway	Who the pathway is for	Current pathway
Comparable qualification and work-based experience pathway	<ul> <li>An IQHP who:</li> <li>qualified in a comparable regulator jurisdiction, and</li> <li>gained experience while registered in a comparable regulator jurisdiction.</li> </ul>	Refer to table 1 (page 11)
Comparable pre-registration exam pathway	<ul> <li>An IQHP who:</li> <li>qualified in a non-comparable regulator jurisdiction</li> <li>completed a pre-registration exam in a comparable regulator jurisdiction, and</li> <li>gained experience while registered in a comparable regulator jurisdiction.</li> </ul>	Refer to table 1 (page 11)
Comparable work-based experience pathway	<ul> <li>An IQHP who:</li> <li>qualified in a non-comparable regulator jurisdiction, and</li> <li>gained experience while registered in a comparable regulator jurisdiction.</li> </ul>	Refer to table 1 (page 11)

<sup>&</sup>lt;sup>1</sup> Kruk, R. <u>Overseas Health Practitioner Regulatory Settings Review - Final Report,</u> 2023. Australia. Australian: Department of Finance; 2023 (Kruk report).

<sup>&</sup>lt;sup>2</sup> We created the draft registration standard in line with sections 52 and 53 of the National Law.<sup>2</sup> These sections set out the requirements practitioners must meet to be eligible for general registration.

# Introduction

## Regulatory context

Ahpra works in partnership with the National Boards to regulate health professions in Australia. Our highest priority is to protect the public. National Boards do this by creating registration standards, professional codes, guidelines and standards for practice which health practitioners in Australia must meet.

## **Workforce context**

The Australian states and territories found that the following professions have a shortage of practitioners:3

- dentistry
- occupational therapy
- optometry
- pharmacy
- physiotherapy
- podiatry
- psychology
- medical radiation practice.<sup>4</sup>

Of these eight professions, the states and territories have prioritised five for faster pathways:

- dentistry
- medical radiation practice<sup>5</sup>
- occupational therapy
- podiatry
- psychology.

The Psychology Board will do a separate consultation because their training and registration pathways are different to the other professions.

The Kruk review noted that we will likely need an extra 27,000 allied health professionals by November 2026. Allied health professionals are health professionals that are not part of the medical, or nursing or midwifery professions.<sup>6</sup>

Figures 1-3 show workforce data as at 30 June 2024 taken from Ahpra & National Boards Annual report for 2023/24.

<sup>&</sup>lt;sup>3</sup> The Kruk report acknowledges that there is difficulty in obtaining workforce data challenges.

<sup>&</sup>lt;sup>4</sup> Kruk report, page 18, 23 and 24.

<sup>&</sup>lt;sup>5</sup> The divisions of medical radiation practitioners include diagnostic radiographer, nuclear medicine technologist and radiation therapist.

<sup>&</sup>lt;sup>6</sup> Kruk report, page 5 and 23.

Figure 1 shows the growth of registered practitioners during for the period 2023-20247

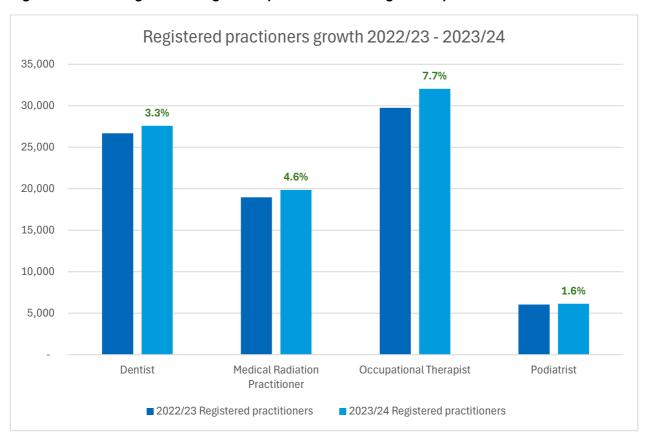
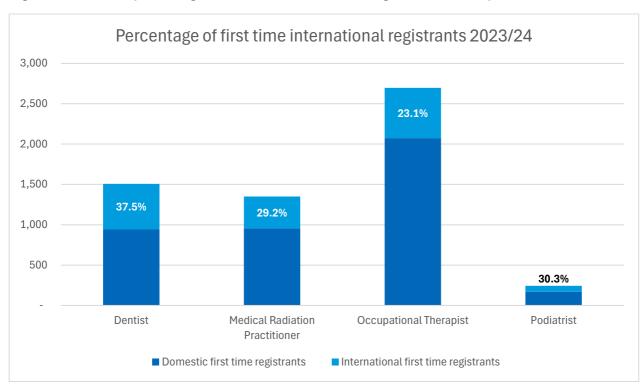
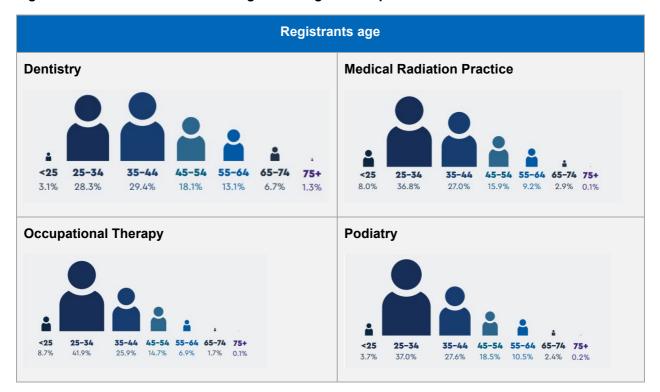


Figure 2 shows the percentage of first-time international registrants for the period 2023-2024



<sup>&</sup>lt;sup>7</sup> The data for Dental practitioners represents growth across the divisions and specialities. The data for medical radiation practitioners represents growth across the division of practice.

Figure 3 shows the distribution of registrants age for the period 2023-2024



# **Background**

The National Boards protect the public by:

- ensuring that only health practitioners with the right qualifications, skills and experience are registered to practise<sup>8</sup>
- overseeing the assessment of IQHPs' knowledge and clinical skills
- determining if IQHPs are suitable for registration in Australia.9

Accreditation authorities also play an important role by overseeing the assessment of IQHP's knowledge and clinical skills in some professions.

If an IQHP does not have a Board-approved qualification, 10 they may still be able to register if they hold:

- a qualification that the Board assessed as substantially equivalent or based on similar competencies to an approved qualification,<sup>11</sup> or
- a qualification that the Board assessed as relevant to the health profession, and they have successfully completed an exam or other suitable assessment.<sup>12</sup>

Substantially equivalent means the relevant National Board considers the content, standards and outcomes of an international qualification to be largely equal to those of an approved Australian qualification.

Similar competencies mean the relevant National Board considers the skills, knowledge and experience needed for an international qualification to be comparable to those needed for an approved Australian qualification.

#### **Current assessment model**

National Boards do not currently consider other parts of an applicants' practice history when assessing their qualifications. Practice history could include an applicant's work experience or their registration in a country that

<sup>&</sup>lt;sup>8</sup> National Law section 3(2)(a).

<sup>&</sup>lt;sup>9</sup> National Law section 3(2)(d).

<sup>&</sup>lt;sup>10</sup> National Law section 53(a).

<sup>&</sup>lt;sup>11</sup> National Law section 53(b).

<sup>&</sup>lt;sup>12</sup> National Law section 53(c).

is comparable to Australia. The standards and processes for assessing qualifications must be clear, fair, objective and non-discriminatory. <sup>13</sup> The ways the National Boards assess qualifications can be <u>found on their</u> websites.

For IQHPs with qualifications that are only relevant, table 1 summarises the current pathways and their costs for the priority professions.

Table 1: Current section 53(c) pathways for priority professions

Profession	Section 53(c) pathways currently available (not including application and qualification assessment fees)	Resources
Dental	<ul> <li>Applicants must pass:</li> <li>a written (online) exam, over 2 days (\$2,122), and</li> <li>a practical exam offered only in Melbourne (\$4,775).</li> </ul>	Australian Dental Council
Medical Radiation Practice	Applicants must pass:  • an online exam (\$764).	Medical Radiation Practice Board
Occupational Therapy	Applicants must pass:	Occupational Therapy Board Occupational Therapy Council of Australia
Podiatry	There is currently no section 53(c) pathway available. An exam is being created by the Board.	Podiatry Board

# Changes to the assessment model

# Recognising practice experience

The draft registration standard allows the Board to consider an IQHP's practice experience. Practice experience is work experience the person has in their profession. The Nursing and Midwifery Board of Australia (NMBA) recently made similar changes to their registration standard.

Practice experience is important because it gives practitioners the skills and knowledge to keep up with changes in technology. It also gives them the chance to reinforce any new skills they have learned. <sup>14</sup> Even if an applicant has practice experience, they still need to give evidence that they can meet Australian standards.

#### New assessment options

IQHPs with relevant qualifications must currently complete an exam or other assessment to be qualified. The draft registration standard gives eligible IQHPs the option to do a different form of assessment which includes their practice experience. The National Boards' current exam pathway (outlined in table 1) will still be available.

# Pathways for practitioners with substantially equivalent qualifications

The pathways in this draft registration standard only apply to IQHPs who hold a relevant qualification. IQHPs who received a qualification assessment outcome of substantially equivalent or based on similar competencies to an approved qualification, cannot use these pathways.

<sup>13</sup> This is highlighted in guidance published by the World Health Organization, <u>Health practitioner regulation</u>, <u>Design reform</u> and implementation guidance, 2024, accessed January 2025.

Al-Omary, H., Soltani, A., Stewart, D. et al. <u>Implementing learning into practice from continuous professional development activities: a scoping review of health professionals' views and experiences</u>. BMC Med Educ 24, 1031 (2024). https://doi.org/10.1186/s12909-024-06016-7

Other pathways are offered for these applicants. This has already been done for some professions, for example:

- The <u>Podiatry</u>, <u>Medical Radiation Practice</u> and <u>Dental</u> boards have approved pathways for recognised international qualifications,
- The Occupational Therapy Board recently launched <u>new pathways</u> for internationally qualified occupational therapists with recognised qualifications, including those from comparable regulator jurisdictions,
- The Osteopathy Board of Australia, through the Australian Osteopathic Accreditation Council, has the competent authority pathway, and
- the Physiotherapy Board of Australia, through the Australian Physiotherapy Council have the <a href="Express FLYR">Express FLYR</a> pathway for applicants who have obtained their qualification from an approved country.

# **Purpose of this consultation**

Public consultations give us the chance to get feedback from practitioners, organisations and the public before we make changes to requirements. This helps us see any unintended results or possible problems with putting the changes in place. It also supports open, timely and clear communication between the National Boards, Ahpra and the public. For details see the statement at Appendix J.

# Rationale for streamlined pathways for section 53(c)

Only qualified people can apply for general registration. A person is qualified if they have the right qualifications, skills and experience to work in the profession. This includes people who have:

- a qualification that the Board assessed as substantially equivalent or based on similar competencies to an approved qualification, <sup>15</sup> or
- a qualification that the Board assessed as relevant to the health profession, and passed an exam or other suitable assessment.<sup>16</sup>

The Board is unlikely to consider older qualifications as substantially equivalent or based on similar competencies to an approved qualification. This means IQHPs with older qualifications are more likely to have a relevant qualification and will need to complete an exam or assessment even if they have been working in their profession since they qualified. Representation of the substantially equivalent or based on similar competencies to an approved qualification.

IQHPs who have recent experience with modern types of assessment also do better in exams that assess their knowledge, clinical skills and abilities. Difficulty with assessment, combined with registration costs and requirements, may deter experienced practitioners from coming to Australia.<sup>19</sup>

Other countries already have flexible ways of assessing practitioners. For example, in New Zealand regulators can consider the applicant's qualification and their international work experience.<sup>20</sup> The changes we are suggesting in the draft registration standard will help make the assessment process clearer and more flexible for experienced IQHPs.

# **Proposal**

The draft registration standard sets out three new pathways for experienced practitioners. The pathways have five assessment options that test an applicant's relevant skills and experience.

Each pathway needs an applicant to complete a minimum number of practice hours. This makes sure the applicant has had enough time to strengthen their practice and show the standard of skill and experience needed to practise safely in Australia. A different form of assessment is suggested for each pathway.<sup>21</sup> This is explained below.

<sup>&</sup>lt;sup>15</sup> National Law section 53(b).

<sup>&</sup>lt;sup>16</sup> National Law section 53(c).

<sup>&</sup>lt;sup>17</sup> National Law section 53(b).

<sup>&</sup>lt;sup>18</sup> George v Dental Board of Australia [2022] QCAT 5 [24].

<sup>&</sup>lt;sup>19</sup> Kruk report.

<sup>&</sup>lt;sup>20</sup> <u>Health Practitioners Competence Assurance Act, 2003</u> section 12.

<sup>&</sup>lt;sup>21</sup> This is required in section 53(c) of the National Law.

The three pathways focus on experienced applicants from comparable regulator jurisdictions (CRJ).

To gain general registration via these pathways, an applicant needs to meet:

- the requirements for one of the pathways (as outlined below),
- the eligibility requirements for registration, 22 and
- any other core registration standards.<sup>23</sup>

Applicants must also give evidence of:

- the practice hours needed for each pathway, and
- their registration certificate as an IQHP in a CRJ during the practice hours.

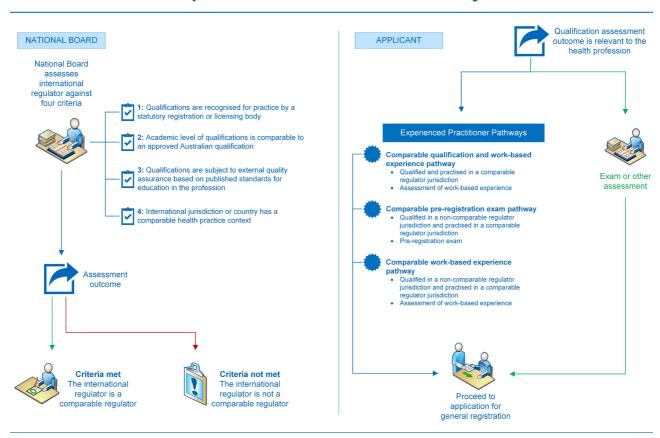
IQHPs need to learn about the Australian health system, culture and legal frameworks to practise effectively. Applicants must show evidence that they passed a Board-approved orientation program for the Australian healthcare system and Aboriginal and Torres Strait Islander cultural safety education.

Applicants are encouraged to complete the cultural safety training before registration. If the applicant has not done this training yet, the Board can choose to register them with conditions.<sup>24</sup> This would allow an IQHP to become registered before they relocate to Australia. To protect cultural safety and healthcare quality for Aboriginal and Torres Strait Islander Peoples, IQHPs will be given a timeframe to complete the training. National Boards suggest that IQHPs complete the training within three months of starting practice in Australia. We will review the timeframe if there are any negative outcomes or if access to the training modules improves.

See Appendix C for all the pathway requirements.

Figure 4: Shows assessment journey for an IQHP and their pathway options.

# **Experienced Practitioner Pathways**



<sup>&</sup>lt;sup>22</sup> National Law sections 51 and 77.

<sup>&</sup>lt;sup>23</sup> National Law section 51(1)(e).

<sup>&</sup>lt;sup>24</sup> National Law section 83.

# 1. Comparable qualification and work-based experience pathway

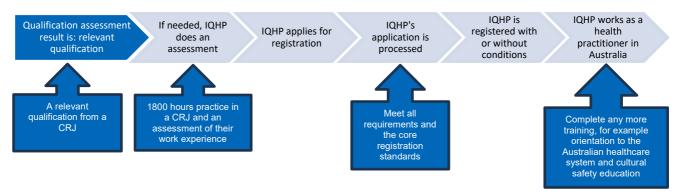
The comparable qualification and work-based experience pathway is for experienced practitioners registered in a CRJ and who qualified in a CRJ.

To be eligible for this pathway applicants will need to show:

- a relevant qualification from a CRJ, and
- evidence of passing an assessment that included:
  - a minimum of 1,800 hours of practice in a CRJ in the 36 months before their application, and
  - an assessment of their work experience via option A or B below:

Option A For applicants who have an employer or supervisor	Option B For applicants who do not have an employer or supervisor
The applicant's prior employers or supervisors (as defined in the draft registration standard) completes a checklist.	Applicant completes a written assessment task followed by an interview and provides a professional referee.

Figure 5: Journey for an applicant through the comparable qualification and work-based experience pathway



For examples, see the case studies in Appendix E.

If an applicant qualified in a CRJ before the Board recognised that CRJ, the applicant can still use this pathway. The qualification must have led the applicant to registration in the jurisdiction, and the comparable regulator must still recognise it.

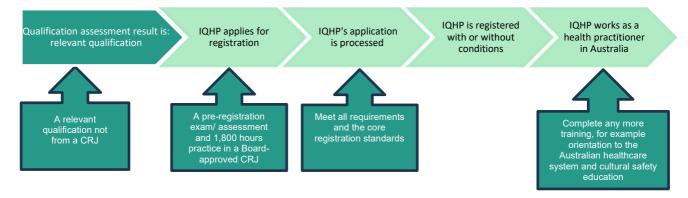
This pathway provides an option for applicants from CRJs who hold relevant qualifications that may be older and fall outside the recognised period. The Board can consider an older qualification if it meets the requirements of this pathway.

# 2. Comparable pre-registration exam pathway

The Comparable pre-registration exam pathway is for experienced practitioners registered in a CRJ, but who qualified in a country that is not an approved CRJ. To be eligible for this pathway applicants will need to show:

- a relevant qualification from a country that is not is not a CRJ,
- evidence of passing an assessment in a CRJ while that CRJ was approved by the Board. The assessment
  must have included a pre-registration exam or another suitable form of assessment that we can verify, and
- evidence of 1,800 hours of practice in a CRJ in the 36 months before their application.

Figure 6: Journey for an applicant through the comparable pre-registration exam pathway



For an example, see the case study in Appendix E.

Applicants can only use this pathway if the Board had approved their CRJ at the time they passed their exam. If not, they should follow the *Comparable work-based experienced pathway* below.

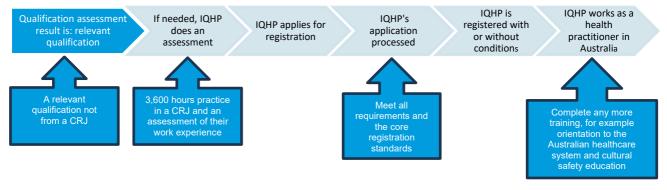
# 3. Comparable work-based experience pathway

The comparable work-based experience pathway is for experienced practitioners from CRJs who qualified in a country that is not comparable to Australia. To be eligible for this pathway applicants will need to demonstrate:

- a relevant qualification from a country that is not a CRJ, and
- · evidence or passing an assessment that included:
  - a minimum of 3,600 hours of practice in the 48 months before their application, and
  - an assessment of their work-based experience via option A or B below.

Option A For applicants who have an employer or supervisor	Option B For applicants who do not have an employer or supervisor
A checklist completed by the applicant's prior employers or supervisors as defined in the draft registration standard.	Applicant undertakes a written assessment task followed by an interview and provides a professional referee.

Figure 7: Journey for an applicant through the comparable work-based experience pathway



For examples, see the case studies in Appendix E.

# **Options**

Ahpra and the National Boards considered two options when writing this consultation paper.

# Option one - no changes

Option one is to keep the current pathways and not create new streamlined pathways. This is a missed opportunity to improve and expand the pathways to registration. This does not align with the Kruk review's recommendations. We did not identify any benefits to keeping the current pathways; we do not consider option one to be viable.

# Option two - progress the draft registration standard

Option two is to create and propose the adoption of a new registration standard. This option allows us to include research and feedback from key stakeholders, consumers and community members, including Aboriginal and Torres Strait Islander Peoples. The draft standard clearly and consistently sets out the requirements for IQHPs seeking registration in Australia.

# Preferred option and rationale

The National Boards prefer option two. We expect this option will:

- grow the supply of safe and skilled registered health practitioners in Australia
- quicken the registration process for applicants, and
- encourage experienced IQHPs to work in Australia.

Option two strikes a balance between prioritising public safety and improving fairness and flexibility for IQHPs, without lowering the minimum standards.

The proposal aligns with:

- recommendations 9 and 10 from the Kruk Review
- the NMBA's registration standard
- National Boards' aim to reduce workforce shortages while keeping high standards of care and safety.

Public consultation gives us the chance to get feedback and test the possible regulatory impacts of this proposal.

## Published lists of comparable regulators

National Boards assess international regulators to make sure they are comparable to the National Scheme. Some of the things we look at include:

- the structure of the regulator
- the professional practice context
- the content and level of qualifications approved by the regulator, and
- how the regulator operates.

You can see the assessment criteria currently approved for each of the priority professions at Appendix F.

We will publish a list of Board-approved CRJs on each Board's website and will review the list regularly. The review date will also be published.

We will follow the World Health Organization's *Global Code of Practice on the International Recruitment of Health Personnel*<sup>25</sup> when assessing international regulators. Countries on the safeguard list will not be approved as comparable regulators or practice jurisdictions.

We will regularly check Board-approved CRJs to ensure they are still comparable to Australia. This will manage emerging risks as a result of rapidly evolving education requirements in some professions.

<sup>&</sup>lt;sup>25</sup> WHO, Global Code of Practice on the International Recruitment of Health Personnel, 2010.

# Threshold criteria for the pathways

The **threshold criteria** in the draft registration standard vary for each pathway because they have been selected based on the risk profile of different IQHPs. A risk profile outlines all the risks related to a specific group of IQHPs. This approach aligns with guidance from the World Health Organization.<sup>26</sup>

Threshold criteria are the minimum requirements a person must meet to move to a new stage of the application process.

The pathways deliver a culturally safe and responsive, risk-based approach to registration.<sup>27</sup> The Board's reasons for the threshold criteria are below.

# 1. Relevant qualification

The minimum criteria is a qualification that is relevant to the profession. The applicant must also pass an exam or other suitable assessment.<sup>28</sup> To ensure public safety, the relevant qualification must meet the requirements outlined in table 2.

Table 2: The assessment criteria for a relevant qualification

Criteria	Description	
1	The qualification enabled the IQHP to practise as a health practitioner in the country, state or province where they received the qualification.	
2	The qualification was given by a legally authorised academic institution, and meets the minimum requirements for safe and ethical practice in Australia including:	
	<ul> <li>the nature and substance of the qualification is in the health profession</li> <li>learning and assessment of any core topics and/or competencies, and</li> <li>course duration</li> </ul>	
3	The academic level of the qualification meets the requirements of the National Board.	

# 2. Practice hours

The Board has set a minimum number of practice hours for each pathway. This makes sure practitioners have had enough time to gain and strengthen the skills they need to practise safely. IQHPs must show that they can apply knowledge and skills in a range of situations and to the standard expected in the workplace.<sup>29</sup>

# Comparable qualification and work-based experience pathway and the comparable pre-registration exam pathway

For these pathways IQHPs must have at least 1,800 hours of practice in a CRJ in the 36 months before their application. This is enough practice time because the applicants will have either received their qualification in a CRJ or have evidence of completing a relevant regulatory exam or assessment. The timeframe aligns with the **recency of practice** standards for most other Ahpra regulated professions.<sup>30</sup> The hours equal about one year of full-time work.<sup>31</sup>

Recency of practice means the length of time from when a person last practised in their profession.

<sup>&</sup>lt;sup>26</sup> World Health Organization, <u>Health practitioner regulation</u>, <u>Design reform and implementation guidance</u>, 2024, accessed Jan 2025. WHO guidance notes although entry to practice requirements may vary in response to a practitioner's risk profile and service delivery needs, applying qualification standards, probity and other requirements should be transparent, objective, impartial, fair and not more burdensome than necessary for public, private and foreign-trained practitioners.

<sup>&</sup>lt;sup>27</sup> Regulatory principles for the National Scheme

<sup>&</sup>lt;sup>28</sup> Required by section 53(c) of the National Law.

<sup>&</sup>lt;sup>29</sup> Department of Health and Human Services State of Victoria. <u>Allied health: credentialing, competency and capability framework (revised edition)</u>. Melbourne: State of Victoria Department of Health and Human Services; 2016.

<sup>30</sup> Excluding Psychology and Dental which have 5 year period.

<sup>&</sup>lt;sup>31</sup> Full time equivalent is calculated at 38 hours per week over 48 weeks, allowing for an average of four weeks leave. This aligns with the maximum weekly hours of work Australian Government's Fair Work National Employment Standards.

We looked at the practice hours needed for other professions when deciding the requirements for the draft registration standard. The 1,800 practice hours aligns with the NMBA's registration standard, while <u>pharmacy</u><sup>32</sup> internships need 1,575 hours and <u>psychology</u> internships need 1,480 hours.<sup>33</sup>

# Comparable work-based experience pathway

For this pathway, IQHPs must have at least 3,600 hours of practice in a CRJ in the 48 months before their application. More hours are needed because the IQHP did not receive their qualification in a CRJ. They also do not have evidence of passing a relevant regulatory assessment in a CRJ while it was approved by the Board. The 3,600 hours equal about two-years of full-time work.<sup>34</sup>

The timeframe for the comparable work-based experience pathway is 48 months due to the higher practice time requirement. We have set a higher requirement to assure National Boards that applicants' using this pathway can demonstrate recent safe practice experience.

We need a higher requirement for this pathway because some CRJs have mutual recognition agreements with countries, states or territories that are not on our approved list. In these agreements both parties must automatically register eligible IQHPs even if the IQHP does not meet the qualification or assessment requirements. This is like the Trans-Tasman Mutual Recognition Act between Australia and New Zealand or the mutual recognition between Switzerland and The Health and Care Professions Council (HCPC) in the UK.<sup>35</sup>

#### **Practice hour rules**

Practice hours can include:

- hours from multiple CRJs
- hours from multiple roles
- times when the applicant used professional knowledge working in a direct non-clinical relationship with patients or clients
- working in management, administration, education, research, advisory, regulatory or policy development roles.

The timeframes provide flexibility if the applicant was practising part-time or had gaps between periods of practice.

Applicants must show us documents that confirm their hours of practice. See Table 3 below.

Table 3: Documentation needed to confirm hours of practice

Document	Requirements
Statement of service	Each employer must give a Statement of service to support an applicant's hours of practice. The statement should be certified as per <a href="Ahpra's guidance on certification of documents">Ahpra's guidance on certification of documents</a> and:
	<ul> <li>be on the employer's letterhead</li> <li>be dated and signed by the director of the organisation (or equivalent)</li> <li>detail the applicant's professional practice title</li> <li>detail the dates and hours of the applicant's employment</li> <li>detail any periods of extended leave the applicant has taken (e.g. long service leave, maternity/paternity or extended sick leave).</li> <li>detail the applicant's scope of practice and responsibilities</li> </ul>

<sup>&</sup>lt;sup>32</sup> This was reduced from 1,824 hours as of 30 April 2020 in response to the COVID-19 pandemic and 1,575 hours is still in effect

<sup>&</sup>lt;sup>33</sup> Although pharmacy and psychology internships are for practitioners wanting to move from provisional registration to general registration, they show the amount of time a practitioner needs to gain and strengthen the skills needed to practise safely.

<sup>&</sup>lt;sup>34</sup> Full time equivalent is calculated at 38 hours per week over 48 weeks, allowing for an average of four weeks leave. This aligns with the maximum weekly hours of work Australian Government's Fair Work National Employment Standards.

<sup>&</sup>lt;sup>35</sup> Health and Care Professions Council (HCPC) mutual recognition for Swiss citizens.

Document	Requirements
Statutory declaration and supporting evidence	If an applicant is self-employed, they must give a statutory declaration and certified evidence to support their hours of practice. This could include:  • professional indemnity insurance • business registration showing sole proprietorship • client or patient logs (de-identified) • lease agreements or ownership of clinical premises • advertising or website presence  The statutory declaration must include: • any periods of extended leave the applicant has taken (e.g. long service leave, parental leave or extended sick leave). • the applicant's scope of practice and responsibilities
Curriculum vitae (CV)	An applicant's CV must be in line with the Ahpra guidelines standard format for curriculum vitae. The CV must match the information provided in the Statement of Service or statutory declaration. Applicants will need their employer or supervisor to verify their CV. Applicants who do not have an employer or supervisor can have their CV verified by a professional referee.

# 3. Pre-registration exam or other suitable assessment

For the comparable pre-registration exam pathway, if the applicant has evidence of passing a relevant regulatory exam, or other verifiable assessment, that led to registration in the CRJ, they will not need to complete a work-based assessment. The CRJ must have been approved by the Board at the time the assessment took place. This will show that the applicant has the knowledge and skills needed to practise safely at the required entry level for their profession. If the CRJ was not approved for this period, the applicant will need to consider other pathway options.

The Boards may check that the comparable regulator's pre-registration exams align with the Board's requirements.

# 4. Assessment of work experience

Applicants in the comparable qualification and work-based experience pathway and the comparable work-based experience pathway can complete an assessment of their work-based skills and experience instead of an exam.

# **Employer or supervisor arrangement (assessment option A)**

The assessment checklist <sup>36</sup> (Appendix B) confirms whether the applicant showed the necessary skills, knowledge and experience when practising in their CRJ. Each profession will have their own version of the checklist that reflects its needs. To pass the assessment, applicants must have completed the minimum practice hours and shown the skills, abilities and knowledge on the checklist.

The applicant's employers or supervisors will complete the checklist. They must reflect on the applicant's work and give a rating for each criterion. The ratings are based on the expected level of a qualified Australian health practitioner and go from 1 (limited) to 4 (advanced). If the applicant had more than one employer or supervisor during the required hours of practice experience, the assessment checklist must be completed by each employer or supervisor.

The employer or supervisor must:

complete the checklist

<sup>&</sup>lt;sup>36</sup> We drew on the Medical Board of Australia's (MBA) Workplace-based competency assessments (WBAs) for the Expedited Specialist pathway<sup>36</sup> when creating this checklist. WBA is a validated assessment that tests the performance of doctors in the workplace. This information helps us understand if a doctor is suitable for independent practice in Australia. The Australian Medical Council Limited, 'About Workplace Based Assessment.'

- give their registration details
- sign a declaration to certify that the information they have given is true and correct
- ask the director of their organisation (or equivalent) to sign the checklist and provide their contact details, and
- return the assessment checklist directly to Ahpra from their official work email address. We will not accept checklists from personal email addresses.

The employer or supervisor must also:

- hold general registration (or equivalent) as a registered health practitioner in the same profession as the applicant
- have qualified in a CRJ or have completed a pre-registration exam in a CRJ
- have no restrictions on their registration
- have practised in the profession in the same jurisdiction as the applicant for the required timeframe, and
- provide an independent assessment of the applicant's practice.

# No employer or supervisor (assessment option B)

If an applicant does not have an employer or supervisor to confirm their professional practice, they will need to complete a different form of assessment. The assessment steps are outlined below:

- 1. The applicant will write a statement to show how they are able to do the skills and tasks needed for the profession.
  - The statement must include real, detailed examples that we can confirm are true. The applicant may refer to peer reviews, ongoing professional development (CPD logs and certificates), case studies, reports or research publications to strengthen their application.
- 2. A Board-approved assessor(s) will interview the applicant online using a checklist that outlines the skills, abilities and knowledge needed for the profession (template at Appendix B).
  - The assessor(s) will ask the applicant to detail real-life cases (de-identified) and explain how they have gained the experience needed.
  - The assessor(s) can ask the applicant targeted questions to verify their skills and experience. If only one assessor is available, the interview will be recorded for moderation purposes.
- 3. The assessor(s) will contact the applicant's professional referee to verify the applicant's written statement and professional practice experience. This will reduce the risk of applicants using artificial intelligence (AI) for the assessment.

The applicant's referee must also:

- hold general registration (or equivalent) as a registered health practitioner in the same field and specialty as the applicant
- have no restrictions on their registration
- have practised in the profession in the same jurisdiction as the applicant for the required timeframe, and
- provide an independent assessment of the applicant's practice.

This type of assessment has been informed by the HCPC's assessment processes, which are described online.<sup>37</sup>

# 5. Other requirements

As well as the above criteria, the applicant must also give evidence of their:

previous registration, and

<sup>&</sup>lt;sup>37</sup> Health & Care Professions Council, '<u>if we need further information</u>' and '<u>possible outcome from our review of your international application</u>', accessed January 2025. The HCPC may ask an applicant to submit extra reflections on their professional experience and training. These reflections are in-depth, detailed examinations of real-life cases. The HCPC will then ask the applicant's professional referee to verify the information. If the applicant has not met all the proficiency standards, they will be given the chance to complete a test of competence (TOC). The TOC is a structured interview, usually held via Microsoft Teams.

 Certificate of Registration Status or Certificate of Good Standing. These documents ensure the applicant is suitable to be registered in Australia. They include information about past complaints or notifications about the applicant's health, ethical conduct or performance, and how they manage these. The certificate must be sent directly to Ahpra from each registration authority the applicant has been registered within the last five to ten years (as applicable).

These steps will confirm that the applicant was previously registered and if anyone raised any concerns about them.

# 6. More safety measures

For each pathway, the Board can place <u>conditions</u> on the applicant's registration. For example, the Board may decide to restrict what tasks a practitioner can do or the setting a practitioner can work in because of their qualification or experience.<sup>38</sup> This allows the Board to consider the circumstances of each applicant, including their scope of practice.<sup>39</sup>

# Risk-based approach

We created a risk matrix, based on Ahpra's risk assessment framework, to identify and manage the risks related to each pathway (<u>Appendix G</u>). Once we identified the risks, we created ways to manage them. We then reviewed the risk rating for each pathway based on these strategies.

# **New Zealand applicants**

The draft registration standard does not apply to health practitioners who are registered in New Zealand. These practitioners can automatically apply for registration in Australia under the *Trans-Tasman Mutual Recognition Act 1997*. <sup>40</sup> Registration in Australia will only be granted in the same category as their New Zealand registration.

# **Eminent practitioners**

The experienced practitioner pathways in the draft registration standard are suitable for eminent practitioners who want to work in Australia. Eminent practitioners have extensive experience or are leaders in their fields, but they may have older qualifications that do not meet a board's qualification requirements.

## The National Boards' core registration standards

Applicants must also meet the National Boards' core registration standards:

- 1. Criminal history registration standard.
- 2. English language skills registration standard.
- 3. Recency of practice.
- 4. Professional indemnity insurance arrangements.
- 5. Continuing professional development registration standard
- 6. some professions may have profession-specific registration standards. Check the Board's website for more information.

# Orientation to the Australian healthcare system

All applicants must understand the Australian healthcare system. To demonstrate this, IQHPs will need to pass a Board-approved program for orientation to the Australian healthcare system.

# Aboriginal and Torres Strait Islander cultural safety

Cultural safety is crucial to providing safe and effective care to Aboriginal and Torres Strait Islander Peoples in Australia. The National Boards are committed to ensuring that all health practitioners are appropriately educated

<sup>&</sup>lt;sup>38</sup> The National Law section 83.

<sup>&</sup>lt;sup>39</sup> Credentialing health practitioners and defining their scope of clinical practice: A guide for managers and practitioners (2015).

<sup>&</sup>lt;sup>40</sup> Australian Health Practitioner Regulation Agency - Information for international practitioners.

in cultural safety. The principle of cultural safety, as set out in National Boards' Codes of conduct and/or their professional capabilities, gives guidance on how to provide culturally safe care to Aboriginal and Torres Strait Islander Peoples.

The draft registration standard reflects the importance of culturally safe practice by making Aboriginal and Torres Strait Islander cultural safety education a requirement for IQHPs. Applicants must provide evidence that they have passed Aboriginal and Torres Strait Islander cultural safety education.

Although some National Boards have Aboriginal and Torres Strait Islander cultural safety training in place, work is being done by the states, territories and Ahpra to ensure all internationally qualified health practitioners complete appropriate cultural safety training. This will help National Boards understand what training IQHPs need to provide culturally safe care to Aboriginal and Torres Strait Islander patients or clients.

#### **Implementation**

Ahpra and the National Boards acknowledge that more work is needed to put the future pathways in place. This future work is outlined in <a href="Appendix H">Appendix H</a>.

## Patient health and safety impact statement

The National Boards have completed a *Patient health and safety impact statement*. The statement shows stakeholders the potential impact of a new registration standard, code or guideline on the health and safety of patients and consumers, particularly the vulnerable members of the community, and Aboriginal and Torres Strait Islander Peoples. The statement shows that the National Boards have considered the impact of these changes before the consultation process. It will be revised after consultation to consider the feedback received.

The National Boards Patient health and safety impact statement is at Appendix I.

# Appendix A: Draft registration standards



# DRAFT Dental Board of Australia - Registration standard: General registration for experienced internationally qualified dentists with relevant qualifications

Effective date: <date>

# Summary

This registration standard explains the standards that experienced internationally qualified dentists need to meet to become a registered dentist in Australia. The standards are set by the Dental Board of Australia.

This standard creates three pathways to general registration for dentists who meet the qualification and eligibility requirements of section 52 and 53 of the National Law and the requirements of this registration standard. Applicants must also meet the Board's core registration standards to be eligible for registration.

The Board will consider each internationally qualified dentist's situation when assessing their application for registration.

# Does this standard apply to me?

This standard applies to internationally qualified practitioners who hold a qualification that the Board considers relevant to the dental profession.

This standard does not apply to you if you:

- hold a qualification the National Board considers to be substantially equivalent or based on similar competencies to an approved qualification
- hold current general registration in New Zealand.

In these cases, you should refer to the Board's website for information on other registration pathways.

# Requirements

# You must:

- meet the requirements for the registration pathway that applies to you, and
- meet the eligibility requirements for general registration outlined in the National Law.<sup>41</sup>

You are qualified for general registration if you have:42

- a qualification the Board considers relevant to the profession, and
- passed an exam or other suitable assessment.

<sup>&</sup>lt;sup>41</sup> Sections 52(1)(a) to (e) and section 77 of the National Law.

<sup>&</sup>lt;sup>42</sup> Section 53(c) of the National Law.

The pathways assess your international practice experience. The criteria for passing a practice experience assessment are listed under the pathway requirements. The Board has set a minimum number of practice hours for each pathway. This makes sure you have had enough time to develop your knowledge and skills and show that you can safely practise in a country, state or province that the Board assessed as comparable to Australia. We call these comparable regulator jurisdictions (CRJ). A list of CRJs can be found on the Board's website.

## Practice hours can:

- be from multiple comparable regulator jurisdictions
- be from multiple roles
- consider if you have worked part-time or have taken career breaks
- include times when you used professional knowledge working in a direct non-clinical relationship with patients or clients.

# **Supporting documents**

Depending on the pathway, you will need to provide evidence to show that you have met the minimum required practice hours which are:

- at least 1,800 hours (which is 12 months full-time or equivalent) completed in the 36 months before you apply, or
- at least 3,600 hours (which is 24 months full-time or equivalent) completed in the 48 months before you apply.

You must also give us evidence to show that you meet the following criteria:

Criteria	Details of requirements
Registration history as a health practitioner	If you have been registered internationally as a health practitioner in the past five years, you must have each registration authority send a <a href="Certificate">Certificate</a> of Registration Status or Certificate of Good Standing directly to us.
Orientation to the Australian healthcare system and Aboriginal and Torres Strait Islander cultural safety education	You must give us evidence that you have passed a Board-approved program for orientation to the Australian healthcare system and Aboriginal and Torres Strait Islander cultural safety education.
Board's approved registration standards	You must give us evidence to show you meet the requirements for:  English language skills recency of practice professional indemnity insurance criminal history continuing professional development, and any other requirement for registration in an approved registration standard.

The Board may ask you for more information to check that you are eligible and suitable for general registration.<sup>43</sup>

You must certify your documents and give them to us as per the instructions on our website.

# **Pathways**

# 1. Comparable qualification and work-based experience pathway

This pathway is for experienced practitioners who:

- are practising in a Board-approved comparable regulator jurisdiction, and
- qualified in that jurisdiction or another Board-approved comparable regulator jurisdiction.

<sup>&</sup>lt;sup>43</sup> This is consistent with section 80 of the National Law.

To be eligible for this pathway you will need to show that you meet the requirements listed below.

# **Qualification requirements**

To meet the qualification requirements, you must give us evidence of:

- a) a relevant qualification from a Board-approved comparable regulator jurisdiction, and
- b) passing an assessment that included:
  - i) completing at least 1,800 hours of practice as a registered dentist in any comparable regulator jurisdictions in the 36 months before you submit your application, and
  - ii) an assessment of your practice experience via option A or B below:

# Option A - Practitioners with an employer or supervisor

Your current or past employers or supervisors must complete the *Checklist for assessment of work-based experience*. They must have been working with you at the place where you completed all or part of the minimum 1,800 hours of practice in the 36 months before your application. If you had more than one employer or supervisor during this period, each employer or supervisor must complete the checklist.

# Option B – Practitioners with no employer or supervisor\*

You must complete a written assessment task set by the Board that focuses on the skills and experience you gained during your work experience. This is followed by an interview and professional reference check. A Board-approved assessor(s) will manage the written assessment and interview.

\*If the Board allows it, you may have the option to apply for limited registration while you complete the assessment.

# Other requirements

As well as meeting the qualification requirements, you must give us a registration certificate issued by a Board-approved comparable regulator. We need this to confirm you had general registration (or equivalent) as a registered dentist in that jurisdiction while completing the 1,800 hours of professional practice.

# 2. Comparable pre-registration exam pathway

This pathway is for experienced practitioners who:

- are practising in a Board-approved comparable regulator jurisdiction
- completed a pre-registration exam or other approved assessment within this jurisdiction, and
- qualified in a non-comparable regulator jurisdiction.

To be eligible for this pathway you will need to meet the requirements listed below.

#### **Qualification requirements**

To meet the qualification requirements, you must give us evidence of:

- a) a relevant qualification issued in a jurisdiction that is not approved by the Board as a comparable regulator jurisdiction, and
- b) successfully completing a pre-registration exam for internationally qualified registered dentists. If you cannot show this, you may give us another verifiable assessment that was accepted by one of the Board-approved comparable regulator jurisdictions for registration purposes. You must have completed the exam or other assessment while the jurisdiction was approved by the Board as a comparable regulator jurisdiction.

# Other requirements

As well as meeting the qualification requirements, you must provide both:

- a) a statement of service from each employer where you completed at least 1,800 hours of professional practice as a registered dentist. The professional practice must have taken place in any comparable regulator jurisdictions during the 36 months before you submit your application. If you cannot provide a statement of service, you may provide a statutory declaration and supporting evidence.
- b) a registration certificate issued by a comparable regulator to show you held general registration (or equivalent) as a registered dentist in that jurisdiction while completing the 1,800 hours of professional practice.

# 3. Comparable work-based experience pathway

This pathway is for experienced practitioners who:

- are practising in a Board-approved comparable regulator jurisdiction, and
- qualified in a non-comparable regulator jurisdiction.

To be eligible for this pathway you need to meet the requirements listed below.

## **Qualification requirements**

To meet the qualification requirements, you must give us evidence of:

- a) a relevant qualification issued in a jurisdiction that is not approved by the Board as a comparable regulator jurisdiction, and
- b) passing an assessment that included:
  - i) completing a minimum of 3,600 hours of practice as a registered dentist in any comparable regulator jurisdictions in the 48 months before you submit your application, and
  - ii) an assessment of your practice experience via option A or B below:

#### Option A - Practitioners with an employer Option B - Practitioners with no employer or or supervisor supervisor\* Your current or past employer or supervisor You must complete a written assessment task (as defined in the draft registration standard) set by the Board that focuses on the skills and must complete the Checklist for assessment of experience you gained during your work work-based experience. They must have been experience. This is followed by an interview and working with you at the place where you a professional reference check. A Boardcompleted all or part of the minimum 3,600 approved assessor(s) will manage your written hours of practice in the 48 months before your assessment and interview application. If you had more than one employer \* If the Board allows it, you may have the option or supervisor during this period, each employer to apply for limited registration while you or supervisor must complete the checklist. complete the assessment.

# Other requirements

As well as meeting the qualification requirements, you must give us a registration certificate issued by a comparable regulator. This will confirm your current and/or previous general registration (or equivalent) as a registered dentist in that jurisdiction while completing the 3,600 hours of professional practice.

# Are there exemptions to this standard?

If you are qualified for general registration but have not completed any 'orientation to the Australian healthcare system and Aboriginal and Torres Strait Islander cultural safety education,' the Board may place conditions on your registration<sup>44</sup> until you finish the training. The Board will set strict timeframes for you to complete these conditions to protect cultural safety and healthcare quality for Aboriginal and Torres Strait Islander Peoples.

<sup>44</sup> Section 83 of the National Law.

# Possible outcomes

# What happens if I do not meet this standard?

If you do not meet the qualification and eligibility requirements set out in this standard, you are not eligible for general registration via any of these pathways<sup>45</sup>.

You should refer to the Board's website for more information about other pathway options.

# What options are available for the Board?

If the Board registers you, it has the option to put <u>conditions on your registration</u> if it thinks this is needed to manage risks.<sup>46</sup>

# **Authority**

This registration standard was approved by the Ministerial Council on xxDay xxMonth 2025.

Registration standards are developed under section 38 of the National Law and are subject to wide-ranging consultation.

# **Definitions**

**Assessment of work-based experience** for this standard means a Board-approved assessment of the applicant's use of knowledge and clinical skills in their clinical work. This assessment may be completed in different ways depending on your practice setting.

Board means the Dental Board of Australia established under section 31 of the National Law.

**Comparable regulator jurisdiction** means a country, state or province that has been approved by the Board after the Board assessed it against the four requirements for comparable regulators:

- i) the international jurisdiction has a statutory registration or licensing body for the profession
- ii) the regulator recognises qualifications of a comparable level to the required <u>Australian Qualification</u> Framework (AQF) qualification level
- iii) the recognised qualifications are subject to external quality assurance and cover the learning and assessment requirements for safe and ethical practice in the profession
- iv) the practice context for the profession is assessed as comparable to the Australian context of practice.

We will follow the World Health Organization's *Global Code of Practice on the International Recruitment of Health Personnel*<sup>47</sup> when assessing international regulators. Countries on the Safeguard list will not be approved as comparable regulators.

**Cultural safety** is defined under the National Scheme's *Aboriginal and Torres Strait Islander Health and Cultural Safety Strategy 2020-2025*:

# **Principles**

The following principles inform the definition of cultural safety:

- a) Prioritising the Ministerial Council's goal to achieve healthcare free of racism supported by the National Aboriginal and Torres Strait Islander Health Plan.
- b) Improved health service provision supported by the Safety and Quality Health Service Standards: User Guide for Aboriginal and Torres Strait Islander Health.
- c) Provision of a rights-based approach to healthcare supported by the *United Nations Declaration on the Rights of Indigenous Peoples*.
- d) Ongoing commitment to learning, education and training.

<sup>&</sup>lt;sup>45</sup> Section 82 of the National Law.

<sup>&</sup>lt;sup>46</sup> Section 83 of the National Law.

<sup>&</sup>lt;sup>47</sup> WHO, Global Code of Practice on the International Recruitment of Health Personnel, 2010.

#### Definition

Cultural safety is determined by Aboriginal and Torres Strait Islander individuals, families and communities. Culturally safe practice is the ongoing critical reflection of health practitioner knowledge, skills, attitudes, practising behaviours and power differentials in delivering safe, accessible and responsive healthcare free of racism.

#### How to

To ensure culturally safe and respectful practice, health practitioners must:

- a) acknowledge colonisation and systemic racism, social, cultural, behavioural and economic factors which impact individual and community health
- b) acknowledge and address individual racism, their own biases, assumptions, stereotypes and prejudices and provide care that is holistic, free of bias and racism
- c) recognise the importance of self-determined decision-making, partnership and collaboration in healthcare which is driven by the individual, family and community
- d) foster a safe working environment through leadership to support the rights and dignity of Aboriginal and Torres Strait Islander people and colleagues.

**Eligibility for general registration** means the individual meets all requirements of section 52(1) of the National Law:

- a) The individual is qualified for general registration in the health profession.
- b) The individual has successfully completed any:
  - period of supervised practice in the health profession required by an approved registration standard for the health profession, or
  - ii) examination or assessment required by an approved registration standard for the health profession to assess the individual's ability to competently and safely practise the profession.
- c) The individual is a suitable person to hold registration in the health profession.
- d) The individual is not disqualified under this Law or a law of a co-regulator jurisdiction from applying for registration, or being registered, in the health profession.
- e) The individual meets any other requirements for registration stated in an approved registration standard.

National Law means the Health Practitioner Regulation National Law (as in force in each state and territory).

**Practice** means any role where a person uses their skills and knowledge as a health practitioner in their profession. This includes using professional knowledge when working in a direct non-clinical relationship with patients or clients, and working in:

- management
- administration
- education
- research
- advisory, regulatory or policy development roles, and
- any other roles that impact on the safe, effective delivery of services in the health profession.

**Pre-registration exam or other appropriate and verifiable assessment** means an exam or other formal assessment that assesses whether an applicant has the knowledge and skill to practise safely in their profession. The Board decides the requirements.

**Private practice** refers to a professional arrangement where a dentist operates independently, or semi-independently within a shared business structure outside of public health systems, hospital, private entity or institutional employment. In this context, "no oversight" means the dentist is not subject to formal clinical supervision, governance, or clinical accountability structures typically found in public or corporate health settings.

**Professional referee** means a person who holds general registration (or equivalent) as a registered dentist and practised in the profession in the same jurisdiction as the applicant for the required timeframe.

**Recency of practice** means the length of time from when a person last practised in their profession. A health practitioner with recent practice experience has kept enough connection with the profession since qualifying to practise, or since receiving registration.

**Relevant qualification** means a qualification that is connected to the health profession, but is not an approved qualification, nor is it substantially equivalent or based on similar competencies to an approved qualification.

**Supervisor (includes a representative of the employer)** for the purpose of an applicant completing practice experience assessment option A, means an individual who:

- holds general registration (or equivalent) as a registered dental practitioner
- has no restrictions on their registration
- has qualified in a Board-approved comparable regulator jurisdiction or has completed a pre-registration exam in a Board-approved comparable regulator jurisdiction
- practised in the profession in the same jurisdiction as the applicant for the required timeframe, and
- can provide an independent assessment of the applicant's practice.

Supervisors must tell us about any actual or perceived conflicts of interest that may affect the independence of their reporting of the applicant. A conflict of interest happens when a fair-minded person might reasonably think that your interest may result in a conflict.

# Review

The Board will review this registration standard at least every three years.



DRAFT Medical Radiation Practice Board of Australia - Registration standard: General registration for experienced internationally qualified medical radiation practitioners with relevant qualifications

Effective date: <date>

# Summary

This registration standard explains the standards that experienced internationally qualified medical radiation practitioners need to meet to become a registered diagnostic radiographer, nuclear medicine technologist or radiation therapist in Australia. The standards are set by the Medical Radiation Practice Board of Australia.

This standard creates three pathways to general registration for diagnostic radiographers, nuclear medicine technologists or radiation therapists who meet the qualification and eligibility requirements of section 52 and 53 of the National Law and the requirements of this registration standard. Applicants must also meet the Board's core registration standards to be eligible for registration.

The Board will consider each internationally qualified diagnostic radiographer's, nuclear medicine technologist's or radiation therapist's situation when assessing their application for registration.

# Does this standard apply to me?

This standard applies to internationally qualified practitioners who hold a qualification that the Board considers relevant to the medical radiation practice profession.

This standard does not apply to you if you:

- hold a qualification the National Board considers to be substantially equivalent or based on similar competencies to an approved qualification
- hold current general registration in New Zealand.

In these cases, you should refer to the Board's website for information on other registration pathways.

# Requirements

# You must:

- meet the requirements for the registration pathway that applies to you, and
- meet the eligibility requirements for general registration outlined in the National Law.<sup>48</sup>

You are qualified for general registration if you have:49

- a qualification the Board considers relevant to the profession, and
- passed an exam or other suitable assessment.

The pathways assess your international practice experience. The criteria for passing a practice experience assessment are listed under the pathway requirements. The Board has set a minimum number of practice hours

<sup>&</sup>lt;sup>48</sup> Sections 52(1)(a) to (e) and section 77 of the National Law.

<sup>&</sup>lt;sup>49</sup> Section 53(c) of the National Law.

for each pathway. This makes sure you have had enough time to develop your knowledge and skills and show that you can safely practise in a country, state or province that the Board assessed as comparable to Australia. We call these comparable regulator jurisdictions (CRJ). A list of CRJs can be found on the Board's website.

#### Practice hours can:

- be from multiple comparable regulator jurisdictions
- be from multiple roles
- consider if you have worked part-time or have taken career breaks
- include times when you used professional knowledge working in a direct non-clinical relationship with patients or clients.

# **Supporting documents**

Depending on the pathway, you will need to provide evidence to show that you have met the minimum required practice hours which are:

- at least 1,800 hours (which is 12 months full-time or equivalent) completed in the 36 months before you apply, or
- at least 3,600 hours (which is 24 months full-time or equivalent) completed in the 48 months before you apply.

You must also give us evidence to show that you meet the following criteria:

Criteria	Details of requirements
Registration history as a health practitioner	If you have been registered internationally as a health practitioner in the past five years, you must have each registration authority send a Certificate of Registration Status or Certificate of Good Standing directly to us.
Orientation to the Australian healthcare system and Aboriginal and Torres Strait Islander cultural safety education	You must give us evidence that you have passed a Board-approved program for orientation to the Australian healthcare system and Aboriginal and Torres Strait Islander cultural safety education.
Board's approved registration standards	You must give us evidence to show you meet the requirements for:  • English language skills • recency of practice • professional indemnity insurance • criminal history • continuing professional development, and • any other requirement for registration in an approved registration standard.

The Board may ask you for more information to check that you are eligible and suitable for general registration.<sup>50</sup>

You must certify your documents and give them to us as per the instructions on our website.

# Pathways

# 1. Comparable qualification and work-based experience pathway

This pathway is for experienced practitioners who:

- are practising in a Board-approved comparable regulator jurisdiction, and
- qualified in that jurisdiction or another Board-approved comparable regulator jurisdiction.

 $<sup>^{50}</sup>$  This is consistent with section 80 of the National Law.

To be eligible for this pathway you will need to show that you meet the requirements listed below.

# **Qualification requirements**

To meet the qualification requirements, you must give us evidence of:

- a) a relevant qualification from a Board-approved comparable regulator jurisdiction, and
- b) passing an assessment that included:
  - i) completing at least 1,800 hours of practice as a registered diagnostic radiographer, nuclear medicine technologist or radiation therapist in any comparable regulator jurisdictions in the 36 months before you submit your application, and
  - ii) an assessment of your practice experience via option A or B below:

#### Option A - Practitioners with an employer Option B - Practitioners with no employer or or supervisor supervisor\* Your current or past employer or supervisor You must complete a written assessment task set must complete the Checklist for assessment by the Board that focuses on the skills and of work-based experience. They must have experience you gained during your work been working with you at the place where you experience. This is followed by an interview and completed all or part of the minimum 1,800 professional reference check. A Board-approved hours of practice in the 36 months before your assessor(s) will manage the written assessment application. If you had more than one and interview. employer or supervisor during this period, \*If the Board allows it, you may have the option to each employer or supervisor must complete apply for limited registration while you complete the checklist. the assessment.

# Other requirements

As well as meeting the qualification requirements, you must provide a registration certificate issued by a Board-approved comparable regulator. We need this to confirm you had general registration (or equivalent) as a registered diagnostic radiographer, nuclear medicine technologist or radiation therapist in that jurisdiction while completing the 1,800 hours of professional practice.

# 2. Comparable pre-registration exam pathway

This pathway is for experienced practitioners who:

- are practising in a Board-approved comparable regulator jurisdiction
- completed a pre-registration exam or other approved assessment within this jurisdiction, and
- qualified in a non-comparable regulator jurisdiction.

To be eligible for this pathway you will need to meet the requirements listed below.

## **Qualification requirements**

To meet the qualification requirements, you must give us evidence of:

- a) a relevant qualification issued in a jurisdiction that is not approved by the Board as a comparable regulator jurisdiction, and
- b) successfully completing a pre-registration exam for internationally qualified registered diagnostic radiographer, nuclear medicine technologist or radiation therapist. If you cannot show this, you may give us another verifiable assessment that was accepted by one of the Board-approved comparable regulator jurisdictions for registration purposes. You must have completed the exam or other assessment while the jurisdiction was approved by the Board as a comparable regulator jurisdiction.

# Other requirements

As well as meeting the qualification requirements, you must provide both:

- a) a statement of service from each employer where you completed at least 1,800 hours of professional practice as a registered diagnostic radiographer, nuclear medicine technologist or radiation therapist. The professional practice must have taken place in any comparable regulator jurisdictions in the 36 months before you submit your application. If you cannot provide a statement of service, you may provide a statutory declaration and supporting evidence.
- b) a registration certificate issued by a comparable regulator to show you held general registration (or equivalent) as a registered diagnostic radiographer, nuclear medicine technologist or radiation therapist in that jurisdiction while completing the 1,800 hours of professional practice.

# 3. Comparable work-based experience pathway

This pathway is for experienced practitioners who:

- are practising in a Board-approved comparable regulator jurisdiction, and
- qualified in a non-comparable regulator jurisdiction.

To be eligible for this pathway you need to meet the requirements listed below.

# **Qualification requirements**

To meet the qualification requirements, you must give us evidence of:

- a) a relevant qualification issued in a jurisdiction that is not approved by the Board as a comparable regulator jurisdiction, and
- b) passing an assessment that included:
  - i) completing a minimum of 3,600 hours of practice as a registered diagnostic radiographer, nuclear medicine technologist or radiation therapist in any comparable regulator jurisdictions in the 48 months before you submit your application, and
  - ii) an assessment of your practice experience via option A or B below:

Option A - Practitioners with an employer or supervisor	Option B – Practitioners with no employer or supervisor*
Your current or past employer or supervisor (as defined in the draft registration standard) must complete the <i>Checklist for assessment of work-based experience</i> . They must have been working with you at the place where you completed all or part of the minimum 3,600 hours of practice in the 48 months before your application. If you had more than one employer or supervisor during this period, each employer or supervisor must complete the checklist.	You must complete a written assessment task set by the Board that focuses on the skills and experience you gained during your work experience. This is followed by an interview and a professional reference check. A Boardapproved assessor(s) will manage your written assessment and interview  * If the Board allows it, you may have the option to apply for limited registration while you complete the assessment.

# Other requirements

As well as meeting the qualification requirements, you must give us a registration certificate issued by a comparable regulator. This will confirm your current and/or previous general registration (or equivalent) as a registered diagnostic radiographer, nuclear medicine technologist or radiation therapist in that jurisdiction while completing the 3,600 hours of professional practice.

Are there exemptions to this standard?

If you are qualified for general registration but have not completed any 'orientation to the Australian healthcare system and Aboriginal and Torres Strait Islander cultural safety education,' the Board may place conditions on your registration<sup>51</sup> until you finish the training. The Board will set strict timeframes for you to complete these conditions to protect cultural safety and healthcare quality for Aboriginal and Torres Strait Islander Peoples.

# Possible outcomes

# What happens if I do not meet this standard?

If you do not meet the qualification and eligibility requirements set out in this standard, you are not eligible for general registration via any of these pathways.<sup>52</sup>

You should refer to the Board's website for more information about other pathway options.

# What options are available for the Board?

If the Board registers you, it has the option to put <u>conditions on your registration</u> if it thinks this is needed to manage risks.<sup>53</sup>

# **Authority**

This registration standard was approved by the Ministerial Council on xxDay xxMonth 2025.

Registration standards are developed under section 38 of the National Law and are subject to wide-ranging consultation.

# **Definitions**

**Assessment of work-based experience** for this standard means a Board-approved assessment of the applicant's use of knowledge and clinical skills in their clinical work. This assessment may be completed in different ways depending on your practice setting.

**Board** means the Medical Radiation Practice Board of Australia established under section 31 of the National Law.

**Comparable regulator jurisdiction** means a country, state or province that has been approved by the Board after the Board assessed it against the four requirements for comparable regulators:

- i) the international jurisdiction has a statutory registration or licensing body for the profession
- ii) the regulator recognises qualifications of a comparable level to the required <u>Australian Qualification</u>
  <u>Framework</u> (AQF) qualification level
- iii) the recognised qualifications are subject to external quality assurance and cover the learning and assessment requirements for safe and ethical practice in the profession
- iv) the practice context for the profession is assessed as comparable to the Australian context of practice.

We will follow the World Health Organization's *Global Code of Practice on the International Recruitment of Health Personnel*<sup>54</sup> when assessing international regulators. Countries on the Safeguard list will not be approved as comparable regulators.

**Cultural safety** is defined under the National Scheme's *Aboriginal and Torres Strait Islander Health and Cultural Safety Strategy 2020-2025*:

# **Principles**

The following principles inform the definition of cultural safety:

<sup>&</sup>lt;sup>51</sup> Section 83 of the National Law.

<sup>52</sup> Section 82 of the National Law.

<sup>&</sup>lt;sup>53</sup> Section 83 of the National Law.

<sup>&</sup>lt;sup>54</sup> WHO, Global Code of Practice on the International Recruitment of Health Personnel, 2010.

- a) Prioritising the Ministerial Council's goal to achieve healthcare free of racism supported by the *National Aboriginal and Torres Strait Islander Health Plan*.
- b) Improved health service provision supported by the Safety and Quality Health Service Standards: User Guide for Aboriginal and Torres Strait Islander Health.
- c) Provision of a rights-based approach to healthcare supported by the *United Nations Declaration on the Rights of Indigenous Peoples*.
- d) Ongoing commitment to learning, education and training.

#### Definition

Cultural safety is determined by Aboriginal and Torres Strait Islander individuals, families and communities. Culturally safe practice is the ongoing critical reflection of health practitioner knowledge, skills, attitudes, practising behaviours and power differentials in delivering safe, accessible and responsive healthcare free of racism.

#### How to

To ensure culturally safe and respectful practice, health practitioners must:

- a) acknowledge colonisation and systemic racism, social, cultural, behavioural and economic factors which impact individual and community health
- b) acknowledge and address individual racism, their own biases, assumptions, stereotypes and prejudices and provide care that is holistic, free of bias and racism
- c) recognise the importance of self-determined decision-making, partnership and collaboration in healthcare which is driven by the individual, family and community
- d) foster a safe working environment through leadership to support the rights and dignity of Aboriginal and Torres Strait Islander people and colleagues.

**Eligibility for general registration** means the individual meets all requirements of section 52(1) of the National Law:

- a) The individual is qualified for general registration in the health profession.
- b) The individual has successfully completed:
  - i) any period of supervised practice in the health profession required by an approved registration standard for the health profession, or
  - ii) any examination or assessment required by an approved registration standard for the health profession to assess the individual's ability to competently and safely practise the profession.
- c) The individual is a suitable person to hold registration in the health profession.
- d) The individual is not disqualified under this Law or a law of a co-regulator jurisdiction from applying for registration, or being registered, in the health profession.
- e) The individual meets any other requirements for registration stated in an approved registration standard.

National Law means the Health Practitioner Regulation National Law (as in force in each state and territory).

**Practice** means any role where a person uses their skills and knowledge as a health practitioner in their profession. This includes using professional knowledge when working in a direct non-clinical relationship with patients or clients, and working in:

- management
- administration
- education
- research
- advisory, regulatory or policy development roles, and
- any other roles that impact on the safe, effective delivery of services in the health profession.

**Pre-registration exam or other appropriate and verifiable assessment** means an exam or other formal assessment that assesses whether an applicant has the knowledge and skill to practise safely in their profession. The Board decides the requirements.

**Private practice** refers to a professional arrangement where a medical radiation practitioner operates independently, or semi-independently within a shared business structure outside of public health systems, hospital, private entity or institutional employment. In this context, "no oversight" means the medical radiation practitioner is not subject to formal clinical supervision, governance, or clinical accountability structures typically found in public or corporate health settings.

**Professional referee** means a person who holds general registration (or equivalent) as a registered diagnostic radiographer, nuclear medicine technologist or radiation therapist and practised in the profession in the same jurisdiction as the applicant for the required timeframe.

**Recency of practice** means the length of time from when a person last practised in their profession. A health practitioner with recent practice experience has kept enough connection with the profession since qualifying to practise, or since receiving registration.

**Relevant qualification** means a qualification that is connected to the health profession, but is not an approved qualification, nor is it substantially equivalent or based on similar competencies to an approved qualification.

**Supervisor (includes a representative of the employer)** for the purpose of an applicant completing practice experience assessment option A, means an individual who:

- · holds general registration (or equivalent) as a registered medical radiation practitioner
- has no restrictions on their registration
- has qualified in a Board-approved comparable regulator jurisdiction or has completed a pre-registration exam in a Board-approved comparable regulator jurisdiction
- practised in the profession in the same jurisdiction as the applicant for the required timeframe, and
- can provide an independent assessment of the applicant's practice.

Supervisors must tell us about any actual or perceived conflicts of interest that may affect the independence of their reporting of the applicant. A conflict of interest happens when a fair-minded person might reasonably think that your interest may result in a conflict.

# Review

The Board will review this registration standard at least every three years.



# DRAFT Occupational Therapy Board of Australia - Registration standard: General registration for experienced internationally qualified occupational therapists with relevant qualifications

Effective date: <date>

#### Summary

This registration standard explains the standards that experienced internationally qualified occupational therapists need to meet to become a registered occupational therapist in Australia. The standards are set by the Occupational Therapy Board of Australia.

This standard creates three pathways to general registration for occupational therapists who meet the qualification and eligibility requirements of section 52 and 53 of the National Law and the requirements of this registration standard. Applicants must also meet the Board's core registration standards to be eligible for registration.

The Board will consider each internationally qualified occupational therapist's situation when assessing their application for registration.

#### Does this standard apply to me?

This standard applies to internationally qualified practitioners who hold a qualification that the Board considers relevant to the Occupational Therapy profession.

This standard does not apply to you if you:

- hold a qualification the National Board considers to be substantially equivalent or based on similar competencies to an approved qualification
- hold current general registration in New Zealand.

In these cases, you should refer to the Board's website for information on other registration pathways.

#### Requirements

#### You must:

- meet the requirements for the registration pathway that applies to you, and
- meet the eligibility requirements for general registration outlined in the National Law.<sup>55</sup>

You are qualified for general registration if you have:56

- a qualification the Board considers relevant to the profession, and
- passed an exam or other suitable assessment.

The pathways assess your international practice experience. The criteria for passing a practice experience assessment are listed under the pathway requirements. The Board has set a minimum number of practice hours

<sup>&</sup>lt;sup>55</sup> Sections 52(1)(a) to (e) and section 77 of the National Law.

<sup>&</sup>lt;sup>56</sup> Section 53(c) of the National Law.

for each pathway. This makes sure you have had enough time to develop your knowledge and skills and show that you can safely practise in a country, state or province that the Board assessed as comparable to Australia. We call these comparable regulator jurisdictions (CRJ). A list of CRJs can be found on the <u>Board's website</u>.

#### Practice hours can:

- be from multiple comparable regulator jurisdictions
- be from multiple roles
- consider if you have worked part-time or have taken career breaks
- include times when you used professional knowledge working in a direct non-clinical relationship with patients or clients.

#### **Supporting documents**

Depending on the pathway, you will need to provide evidence to show that you have met the minimum required practice hours which are:

- at least 1,800 hours (which is 12 months full-time or equivalent) completed in the 36 months before you apply, or
- at least 3,600 hours (which is 24 months full-time or equivalent) completed in the 48 months before you apply.

You must also give us evidence to show that you meet the following criteria:

Criteria	Details of requirements
Registration history as a health practitioner	If you have been registered internationally as a health practitioner in the past five years, you must have each registration authority send a Certificate of Registration Status or Certificate of Good Standing directly to us.
Orientation to the Australian healthcare system and Aboriginal and Torres Strait Islander cultural safety education	You must give us evidence that you have passed a Board-approved program for orientation to the Australian healthcare system and Aboriginal and Torres Strait Islander cultural safety education.
Board's approved registration standards	You must give us evidence to show you meet the requirements for:  • English language skills • recency of practice • professional indemnity insurance • criminal history • continuing professional development, and • any other requirement for registration in an approved registration standard.

The Board may ask you for more information to check that you are eligible and suitable for general registration.<sup>57</sup>

You must certify your documents and give them to us as per the instructions on our website.

#### Pathways

#### 1. Comparable qualification and work-based experience pathway

This pathway is for experienced practitioners who:

- are practising in a Board-approved comparable regulator jurisdiction, and
- qualified in that jurisdiction or another Board-approved comparable regulator jurisdiction.

 $<sup>^{\</sup>rm 57}$  This is consistent with section 80 of the National Law.

To be eligible for this pathway you will need to show that you meet the requirements listed below.

#### **Qualification requirements**

To meet the qualification requirements, you must give us evidence of:

- a) a relevant qualification from a Board-approved comparable regulator jurisdiction, and
- b) passing an assessment that included:
  - i) completing at least 1,800 hours of practice as a registered occupational therapist in any comparable regulator jurisdictions in the 36 months before you submit your application, and
  - ii) an assessment of your practice experience via option A or B below:

## Option A - Practitioners with an employer or supervisor

Your current or past employer or supervisor must complete the *Checklist for assessment* of work-based experience. They must have been working with you at the place where you completed all or part of the minimum 1,800 hours of practice in the 36 months before your application. If you had more than one employer or supervisor during this period, each employer or supervisor must complete the checklist.

## Option B – Practitioners with no employer or supervisor\*

You must complete a written assessment task set by the Board that focuses on the skills and experience you gained during your work experience. This is followed by an interview and professional reference check. A Board-approved assessor(s) will manage the written assessment and interview.

\*If the Board allows it, you may have the option to apply for limited registration while you complete the assessment.

#### Other requirements

As well as meeting the qualification requirements, you must give us a registration certificate from a Board-approved comparable regulator. We need this to confirm you had general registration (or equivalent) as a registered occupational therapist in that jurisdiction while completing the 1,800 hours of professional practice.

#### 2. Comparable pre-registration exam pathway

This pathway is for experienced practitioners who:

- are practising in a Board-approved comparable regulator jurisdiction
- completed a pre-registration exam or other approved assessment within this jurisdiction, and
- qualified in a non-comparable regulator jurisdiction.

To be eligible for this pathway you will need to meet the requirements listed below.

#### **Qualification requirements**

To meet the qualification requirements, you must give us evidence of:

- a) a relevant qualification issued in a jurisdiction that is not approved by the Board as a comparable regulator jurisdiction, and
- b) successfully completing a pre-registration exam for internationally qualified registered occupational therapist. If you cannot show this, you may give us another verifiable assessment that was accepted by one of the Board-approved comparable regulator jurisdictions for registration purposes. You must have completed the exam or other assessment while the jurisdiction was approved by the Board as a comparable regulator jurisdiction.

#### Other requirements

As well as meeting the qualification requirements, you must provide both:

- a) a statement of service from each employer where you completed at least 1,800 hours of professional practice as a registered occupational therapist. The professional practice must have taken place in any comparable regulator jurisdictions in the 36 months before you submit your application. If you cannot provide a statement of service, you may provide a statutory declaration and supporting evidence.
- b) a registration certificate issued by a comparable regulator to show you held general registration (or equivalent) as a registered occupational therapist in that jurisdiction while completing the 1,800 hours of professional practice.

#### 3. Comparable work-based experience pathway

This pathway is for experienced practitioners who:

- are practising in a Board-approved comparable regulator jurisdiction, and
- qualified in a non-comparable regulator jurisdiction.

To be eligible for this pathway you need to meet the requirements listed below.

#### **Qualification requirements**

To meet the qualification requirements, you must give us evidence of:

- a) a relevant qualification issued in a jurisdiction that is not approved by the Board as a comparable regulator jurisdiction, and
- b) passing an assessment that included:
  - i) completing a minimum of 3,600 hours of practice as a registered occupational therapist in any comparable regulator jurisdictions in the 48 months before you submit your application, and
  - ii) an assessment of your practice experience via option A or B below:

## Option A - Practitioners with an employer or supervisor

Your current or past employer or supervisor (as defined in the draft registration standard) must complete the *Checklist for assessment of work-based experience*. They must have been working with you at the place where you completed all or part of the minimum 3,600 hours of practice in the 48 months before your application. If you had more than one employer or supervisor during this period, each employer or supervisor must complete the checklist.

## Option B – Practitioners with no employer or supervisor\*

You must complete a written assessment task set by the Board that focuses on the skills and experience you gained during your work experience. This is followed by an interview and a professional reference check. A Board-approved assessor(s) will manage your written assessment and interview

\*If the Board allows it, you may have the option to apply for limited registration while you complete the assessment.

#### Other requirements

As well as meeting the qualification requirements, you must give us a registration certificate issued by a comparable regulator. This will confirm your current and/or previous general registration (or equivalent) as a registered occupational therapist in that jurisdiction while completing the 3,600 hours of professional practice.

#### Are there exemptions to this standard?

If you are qualified for general registration but have not completed any 'orientation to the Australian healthcare system and Aboriginal and Torres Strait Islander cultural safety education,' the Board may place conditions on your registration<sup>58</sup> until you finish the training. The Board will set strict timeframes for you to complete these conditions to protect cultural safety and healthcare quality for Aboriginal and Torres Strait Islander Peoples.

<sup>&</sup>lt;sup>58</sup> Section 83 of the National Law.

#### Possible outcomes

#### What happens if I do not meet this standard?

If you do not meet the qualification and eligibility requirements set out in this standard, you are not eligible for general registration via any of these pathways.<sup>59</sup>

You should refer to the Board's website for more information about other pathway options.

#### What options are available for the Board?

If the Board registers you, it has the option to put <u>conditions on your registration</u> if it thinks this is needed to manage risks.<sup>60</sup>

#### **Authority**

This registration standard was approved by the Ministerial Council on xxDay xxMonth 2025.

Registration standards are developed under section 38 of the National Law and are subject to wide-ranging consultation.

#### **Definitions**

**Assessment of work-based experience** for this standard means a Board-approved assessment of the applicant's use of knowledge and clinical skills in their clinical work. This assessment may be completed in different ways depending on your practice setting.

Board means the Occupational Therapy Board of Australia established under section 31 of the National Law.

**Comparable regulator jurisdiction** means a country, state or province that has been approved by the Board after the Board assessed it against the four requirements for comparable regulators:

- i) the international jurisdiction has a statutory registration or licensing body for the profession
- ii) the regulator recognises qualifications of a comparable level to the required <u>Australian Qualification</u>
  Framework (AQF) qualification level
- iii) the recognised qualifications are subject to external quality assurance and cover the learning and assessment requirements for safe and ethical practice in the profession
- iv) the practice context for the profession is assessed as comparable to the Australian context of practice.

We will follow the World Health Organization's *Global Code of Practice on the International Recruitment of Health Personnel*<sup>61</sup> when assessing international regulators. Countries on the Safeguard list will not be approved as comparable regulators.

**Cultural safety** is defined under the National Scheme's *Aboriginal and Torres Strait Islander Health and Cultural Safety Strategy 2020-2025*:

#### **Principles**

The following principles inform the definition of cultural safety:

- a) Prioritising the Ministerial Council's goal to achieve healthcare free of racism supported by the *National Aboriginal and Torres Strait Islander Health Plan*.
- b) Improved health service provision supported by the Safety and Quality Health Service Standards: User Guide for Aboriginal and Torres Strait Islander Health.
- c) Provision of a rights-based approach to healthcare supported by the *United Nations Declaration on the Rights of Indigenous Peoples*.

<sup>&</sup>lt;sup>59</sup> Section 82 of the National Law.

<sup>&</sup>lt;sup>60</sup> Section 83 of the National Law.

<sup>&</sup>lt;sup>61</sup> WHO, Global Code of Practice on the International Recruitment of Health Personnel, 2010.

d) Ongoing commitment to learning, education and training.

#### Definition

Cultural safety is determined by Aboriginal and Torres Strait Islander individuals, families and communities. Culturally safe practice is the ongoing critical reflection of health practitioner knowledge, skills, attitudes, practising behaviours and power differentials in delivering safe, accessible and responsive healthcare free of racism.

#### How to

To ensure culturally safe and respectful practice, health practitioners must:

- a) acknowledge colonisation and systemic racism, social, cultural, behavioural and economic factors which impact individual and community health
- b) acknowledge and address individual racism, their own biases, assumptions, stereotypes and prejudices and provide care that is holistic, free of bias and racism
- c) recognise the importance of self-determined decision-making, partnership and collaboration in healthcare which is driven by the individual, family and community
- d) foster a safe working environment through leadership to support the rights and dignity of Aboriginal and Torres Strait Islander people and colleagues.

**Eligibility for general registration** means the individual meets all requirements of section 52(1) of the National Law:

- a) The individual is qualified for general registration in the health profession.
- b) The individual has successfully completed:
  - i) any period of supervised practice in the health profession required by an approved registration standard for the health profession, or
  - ii) any examination or assessment required by an approved registration standard for the health profession to assess the individual's ability to competently and safely practise the profession.
- c) The individual is a suitable person to hold registration in the health profession.
- d) The individual is not disqualified under this Law or a law of a co-regulator jurisdiction from applying for registration, or being registered, in the health profession.
- e) The individual meets any other requirements for registration stated in an approved registration standard.

National Law means the Health Practitioner Regulation National Law (as in force in each state and territory).

**Practice** means any role where a person uses their skills and knowledge as a health practitioner in their profession. This includes using professional knowledge when working in a direct non-clinical relationship with patients or clients, and working in:

- management
- administration
- education
- research
- advisory, regulatory or policy development roles, and
- any other roles that impact on the safe, effective delivery of services in the health profession.

**Pre-registration exam or other appropriate and verifiable assessment** means an exam or other formal assessment that assesses whether an applicant has the knowledge and skill to practise safely in their profession. The Board decides the requirements.

**Private practice** refers to a professional arrangement where an occupational therapist operates independently, or semi-independently within a shared business structure outside of public health systems, hospital, private entity or institutional employment. In this context, "no oversight" means the occupational therapist is not subject to formal clinical supervision, governance, or clinical accountability structures typically found in public or corporate health settings.

**Professional referee** means a person who holds general registration (or equivalent) as a registered occupational therapist and practised in the profession in the same jurisdiction as the applicant for the required timeframe.

**Recency of practice** means the length of time from when a person last practised in their profession. A health practitioner with recent practice experience has kept enough connection with the profession since qualifying to practise, or since receiving registration.

**Relevant qualification** means a qualification that is connected to the health profession, but is not an approved qualification, nor is it substantially equivalent or based on similar competencies to an approved qualification.

**Supervisor (includes a representative of the employer)** for the purpose of an applicant completing practice experience assessment option A, means an individual who:

- holds general registration (or equivalent) as a registered occupational therapist
- has no restrictions on their registration
- has qualified in a Board-approved comparable regulator jurisdiction or has completed a pre-registration exam in a Board-approved comparable regulator jurisdiction
- practised in the profession in the same jurisdiction as the applicant for the required timeframe, and
- can provide an independent assessment of the applicant's practice.

Supervisors must tell us about any actual or perceived conflicts of interest that may affect the independence of their reporting of the applicant. A conflict of interest happens when a fair-minded person might reasonably think that your interest may result in a conflict.

#### Review

The Board will review this registration standard at least every three years.



# DRAFT Podiatry Board of Australia - Registration standard: General registration for experienced internationally qualified podiatrists with relevant qualifications

Effective date: <date>

#### Summary

This registration standard explains the standards that experienced internationally qualified podiatrists need to meet to become a registered podiatrist in Australia. The standards are set by the Podiatry Board of Australia.

This standard creates three pathways to general registration for podiatrists who meet the qualification and eligibility requirements of section 52 and 53 of the National Law and the requirements of this registration standard. Applicants must also meet the Board's core registration standards to be eligible for registration.

The Board will consider each internationally qualified podiatrist's situation when assessing their application for registration.

#### Does this standard apply to me?

This standard applies to internationally qualified practitioners who hold a qualification that the Board considers relevant to the podiatry profession.

This standard does not apply to you if you:

- hold a qualification the National Board considers to be substantially equivalent or based on similar competencies to an approved qualification
- hold current general registration in New Zealand.

In these cases, you should refer to the Board's website for information on other registration pathways.

#### Requirements

#### You must:

- meet the requirements for the registration pathway that applies to you, and
- meet the eligibility requirements for general registration outlined in the National Law.<sup>62</sup>

You are qualified for general registration if you have: 63

- a qualification the Board considers relevant to the profession, and
- passed an exam or other suitable assessment.

The pathways assess your international practice experience. The criteria for passing a practice experience assessment are listed under the pathway requirements. The Board has set a minimum number of practice hours for each pathway. This makes sure you have had enough time to develop your knowledge and skills and show

<sup>&</sup>lt;sup>62</sup> Sections 52(1)(a) to (e) and section 77 of the National Law.

<sup>&</sup>lt;sup>63</sup> Section 53(c) of the National Law.

that you can safely practise in a country, state or province that the Board assessed as comparable to Australia. We call these comparable regulator jurisdictions (CRJ). A list of CRJs can be found on the Board's website.

#### Practice hours can:

- be from multiple comparable regulator jurisdictions
- be from multiple roles
- consider if you have worked part-time or have taken career breaks
- include times when you used professional knowledge working in a direct non-clinical relationship with patients or clients.

#### Supporting documents

Depending on the pathway, you will need to provide evidence to show that you have met the minimum required practice hours which are:

- at least 1,800 hours (which is 12 months full-time or equivalent) completed in the 36 months before you apply, or
- at least 3,600 hours (which is 24 months full-time or equivalent) completed in the 48 months before you apply.

You must also give us evidence to show that you meet the following criteria:

Criteria	Details of requirements
Registration history as a health practitioner	If you have been registered internationally as a health practitioner in the past five years, you must have each registration authority send a Certificate of Registration Status or Certificate of Good Standing directly to us.
Orientation to the Australian healthcare system and Aboriginal and Torres Strait Islander cultural safety education	You must give us evidence that you have passed a Board-approved program for orientation to the Australian healthcare system and Aboriginal and Torres Strait Islander cultural safety education.
Board's approved registration standards	You must give us evidence to show you meet the requirements for:  • English language skills • recency of practice • professional indemnity insurance • criminal history • continuing professional development, and • any other requirement for registration in an approved registration standard.

The Board may ask you for more information to check that you are eligible and suitable for general registration.<sup>64</sup>

You must certify your documents and give them to us as per the instructions on our website.

#### **Pathways**

#### 1. Comparable qualification and work-based experience pathway

This pathway is for experienced practitioners who:

- are practising in a Board-approved comparable regulator jurisdiction, and
- qualified in that jurisdiction or another Board-approved comparable regulator jurisdiction.

<sup>&</sup>lt;sup>64</sup> This is consistent with section 80 of the National Law.

To be eligible for this pathway you will need to show that you meet the requirements listed below.

#### **Qualification requirements**

To meet the qualification requirements, you must give us evidence of:

- a) a relevant qualification from a Board-approved comparable regulator jurisdiction, and
- b) passing an assessment that included:
  - i) completing at least 1,800 hours of practice as a registered podiatrist in any comparable regulator jurisdictions in the 36 months before you submit your application, and
  - ii) an assessment of your practice experience via option A or B below:

#### Option A - Practitioners with an employer Option B - Practitioners with no employer or or supervisor supervisor\* Your current or past employer or supervisor You must complete a written assessment task set must complete the Checklist for assessment by the Board that focuses on the skills and of work-based experience. They must have experience you gained during your work been working with you at the place where you experience. This is followed by an interview and completed all or part of the minimum 1,800 professional reference check. A Board-approved hours of practice in the 36 months before your assessor(s) will manage the written assessment application. If you had more than one and interview. employer or supervisor during this period, \*If the Board allows it, you may have the option each employer or supervisor must complete to apply for limited registration while you the checklist. complete the assessment.

#### Other requirements

As well as meeting the qualification requirements, you must give us a registration certificate from a Board-approved comparable regulator. We need this to confirm you had general registration (or equivalent) as a registered podiatrist in that jurisdiction while completing the 1,800 hours of professional practice.

#### 2. Comparable pre-registration exam pathway

This pathway is for experienced practitioners who:

- are practising in a Board-approved comparable regulator jurisdiction
- · completed a pre-registration exam or other approved assessment within this jurisdiction, and
- qualified in a non-comparable regulator jurisdiction.

To be eligible for this pathway you will need to meet the requirements listed below.

#### **Qualification requirements**

To meet the qualification requirements, you must give us evidence of:

- a) a relevant qualification issued in a jurisdiction that is not approved by the Board as a comparable regulator jurisdiction, and
- b) successfully completing a pre-registration exam for internationally qualified registered podiatrists. If you cannot show this, you may give us another verifiable assessment that was accepted by one of the Board-approved comparable regulator jurisdictions for registration purposes. You must have completed the exam or other assessment while the jurisdiction was approved by the Board as a comparable regulator jurisdiction.

#### Other requirements

As well as meeting the qualification requirements, you must provide both:

a) a statement of service from each employer where you completed at least 1,800 hours of professional practice as a registered podiatrist. The professional practice must have taken place in any comparable

- regulator jurisdictions in the 36 months before you submit your application. If you cannot provide a statement of service, you may provide a statutory declaration and supporting evidence.
- b) a registration certificate issued by a comparable regulator to show you held general registration (or equivalent) as a registered podiatrist in that jurisdiction while completing the 1,800 hours of professional practice.

#### 3. Comparable work-based experience pathway

This pathway is for experienced practitioners who:

- are practising in a Board-approved comparable regulator jurisdiction, and
- qualified in a non-comparable regulator jurisdiction.

To be eligible for this pathway you need to meet the requirements listed below.

#### **Qualification requirements**

To meet the qualification requirements, you must give us evidence of:

- a) a relevant qualification issued in a jurisdiction that is not approved by the Board as a comparable regulator jurisdiction, and
- b) passing an assessment that included:
  - i) completing a minimum of 3,600 hours of practice as a registered podiatrist in any comparable regulator jurisdictions in the 48 months before you submit your application, and
  - ii) an assessment of your practice experience via option A or B below:

## Option A - Practitioners with an employer or supervisor

Your current or past employer or supervisor (as defined in the draft registration standard) must complete the *Checklist for assessment of work-based experience*. They must have been working with you at the place where you completed all or part of the minimum 3,600 hours of practice in the 48 months before your application. If you had more than one employer or supervisor during this period, each employer or supervisor must complete the checklist.

## Option B – Practitioners with no employer or supervisor\*

You must complete a written assessment task set by the Board that focuses on the skills and experience you gained during your work experience. This is followed by an interview and a professional reference check. A Board-approved assessor(s) will manage your written assessment and interview

\* If the Board allows it, you may have the option to apply for limited registration while you complete the assessment.

#### Other requirements

As well as meeting the qualification requirements, you must give us a registration certificate issued by a comparable regulator. This will confirm your current and/or previous general registration (or equivalent) as a registered podiatrist in that jurisdiction while completing the 3,600 hours of professional practice.

#### Are there exemptions to this standard?

If you are qualified for general registration but have not completed any 'orientation to the Australian healthcare system and Aboriginal and Torres Strait Islander cultural safety education,' the Board may place conditions on your registration<sup>65</sup> until you finish the training. The Board will set strict timeframes for you to complete these conditions to protect cultural safety and healthcare quality for Aboriginal and Torres Strait Islander Peoples.

<sup>&</sup>lt;sup>65</sup> Section 83 of the National Law.

#### Possible outcomes

#### What happens if I do not meet this standard?

If you do not meet the qualification and eligibility requirements set out in this standard, you are not eligible for general registration via any of these pathways.<sup>66</sup>

You should refer to the Board's website for more information about other pathway options.

#### What options are available for the Board?

If the Board registers you, it has the option to put <u>conditions on your registration</u> if it thinks this is needed to manage risks.<sup>67</sup>

#### **Authority**

This registration standard was approved by the Ministerial Council on xxDay xxMonth 2025.

Registration standards are developed under section 38 of the National Law and are subject to wide-ranging consultation.

#### **Definitions**

**Assessment of work-based experience** for this standard means a Board-approved assessment of the applicant's use of knowledge and clinical skills in their clinical work. This assessment may be completed in different ways depending on your practice setting.

Board means the Podiatry Board of Australia established under section 31 of the National Law.

**Comparable regulator jurisdiction** means a country, state or province that has been approved by the Board after the Board assessed it against the four requirements for comparable regulators:

- i) the international jurisdiction has a statutory registration or licensing body for the profession
- ii) the regulator recognises qualifications of a comparable level to the required <u>Australian Qualification</u> Framework (AQF) qualification level
- iii) the recognised qualifications are subject to external quality assurance and cover the learning and assessment requirements for safe and ethical practice in the profession
- iv) the practice context for the profession is assessed as comparable to the Australian context of practice.

We will follow the World Health Organization's *Global Code of Practice on the International Recruitment of Health Personnel*<sup>68</sup> when assessing international regulators. Countries on the Safeguard list will not be approved as comparable regulators.

**Cultural safety** is defined under the National *Scheme's Aboriginal and Torres Strait Islander Health and Cultural Safety Strategy 2020-2025*:

#### **Principles**

The following principles inform the definition of cultural safety:

- a) Prioritising the Ministerial Council's goal to achieve healthcare free of racism supported by the *National Aboriginal and Torres Strait Islander Health Plan*.
- b) Improved health service provision supported by the Safety and Quality Health Service Standards: User Guide for Aboriginal and Torres Strait Islander Health.
- c) Provision of a rights-based approach to healthcare supported by the *United Nations Declaration on the Rights of Indigenous Peoples*.

<sup>&</sup>lt;sup>66</sup> Section 82 of the National Law.

<sup>&</sup>lt;sup>67</sup> Section 83 of the National Law.

<sup>&</sup>lt;sup>68</sup> WHO, Global Code of Practice on the International Recruitment of Health Personnel, 2010.

d) Ongoing commitment to learning, education and training.

#### Definition

Cultural safety is determined by Aboriginal and Torres Strait Islander individuals, families and communities. Culturally safe practice is the ongoing critical reflection of health practitioner knowledge, skills, attitudes, practising behaviours and power differentials in delivering safe, accessible and responsive healthcare free of racism.

#### How to

To ensure culturally safe and respectful practice, health practitioners must:

- a) acknowledge colonisation and systemic racism, social, cultural, behavioural and economic factors which impact individual and community health
- b) acknowledge and address individual racism, their own biases, assumptions, stereotypes and prejudices and provide care that is holistic, free of bias and racism
- c) recognise the importance of self-determined decision-making, partnership and collaboration in healthcare which is driven by the individual, family and community
- d) foster a safe working environment through leadership to support the rights and dignity of Aboriginal and Torres Strait Islander people and colleagues.

**Eligibility for general registration** means the individual meets all requirements of section 52(1) of the National Law:

- a) The individual is qualified for general registration in the health profession.
- b) The individual has successfully completed:
  - i) any period of supervised practice in the health profession required by an approved registration standard for the health profession, or
  - ii) any examination or assessment required by an approved registration standard for the health profession to assess the individual's ability to competently and safely practise the profession.
- c) The individual is a suitable person to hold registration in the health profession.
- d) The individual is not disqualified under this Law or a law of a co-regulator jurisdiction from applying for registration, or being registered, in the health profession.
- e) The individual meets any other requirements for registration stated in an approved registration standard.

National Law means the Health Practitioner Regulation National Law (as in force in each state and territory).

**Practice** means any role where a person uses their skills and knowledge as a health practitioner in their profession. This includes using professional knowledge when working in a direct non-clinical relationship with patients or clients, and working in:

- management
- administration
- education
- research
- advisory, regulatory or policy development roles, and
- any other roles that impact on the safe, effective delivery of services in the health profession.

**Pre-registration exam or other appropriate and verifiable assessment** means an exam or other formal assessment that assesses whether an applicant has the knowledge and skill to practise safely in their profession. The Board decides the requirements.

**Private practice** refers to a professional arrangement where a podiatrist operates independently, or semi-independently within a shared business structure outside of public health systems, hospital, private entity or institutional employment. In this context, "no oversight" means the podiatrist is not subject to formal clinical supervision, governance, or clinical accountability structures typically found in public or corporate health settings.

**Professional referee** means a person who holds general registration (or equivalent) as a registered podiatrist and practised in the profession in the same jurisdiction as the applicant for the required timeframe.

**Recency of practice** means the length of time from when a person last practised in their profession. A health practitioner with recent practice experience has kept enough connection with the profession since qualifying to practise, or since receiving registration.

**Relevant qualification** means a qualification that is connected to the health profession, but is not an approved qualification, nor is it substantially equivalent or based on similar competencies to an approved qualification.

**Supervisor (includes a representative of the employer)** for the purpose of an applicant completing practice experience assessment option A, means an individual who:

- holds general registration (or equivalent) as a registered podiatrist
- has no restrictions on their registration
- has qualified in a Board-approved comparable regulator jurisdiction or has completed a pre-registration exam in a Board-approved comparable regulator jurisdiction
- practised in the profession in the same jurisdiction as the applicant for the required timeframe, and
- can provide an independent assessment of the applicant's practice.

Supervisors must tell us about any actual or perceived conflicts of interest that may affect the independence of their reporting of the applicant. A conflict of interest happens when a fair-minded person might reasonably think that your interest may result in a conflict.

#### Review

The Board will review this registration standard at least every three years.

## Appendix B: Template for Checklist for assessment of work-based experience

See below for details of the practice experience assessment for option A for the **comparable qualification and work-based experience pathway** and the **comparable work-based experience pathway**. The checklist will be developed for each specific profession in line with the profession-specific requirements.<sup>69</sup>

#### Checklist for assessment of work-based experience

General registration for experienced internationally qualified <a href="mailto:rore"><a href="mailto:rore"><a

#### Purpose of this document

Employers and supervisors must use this checklist to assess the work experience of internationally qualified profession title who are applying for general registration in Australia under one of the experienced practitioner pathways. The checklist aligns with the Profession> Board of Australia's Professional Capabilities/
Standards/Other relevant Board-approved document>. It evaluates the applicant's knowledge, clinical skills and professional attributes to ensure they can practise safely and effectively as a profession title> in Australia.

The applicant's current or past employers or supervisors must complete the checklist.

#### Requirements for the employer or supervisor

The employer or supervisor must:

- hold general registration (or equivalent) as a registered health practitioner in the same field as the applicant
- have no restrictions on their registration
- have qualified in a comparable regulator jurisdiction or have completed a pre-registration exam in a comparable regulator jurisdiction
- have practised in the profession in the same jurisdiction as the applicant for the required timeframe
- provide an independent assessment of the applicant's practice
- tell us if there are any actual or perceived conflicts of interest that may affect the independence of their reporting of the applicant (for example, a personal relationship with the applicant would be an actual conflict of interest, whereas multiple conflicting roles may create a perceived conflict of interest)
- ask a third party to verify the checklist (the director or equivalent), and
- return the checklist directly to Ahpra from an official email address from their organisation.

Section A: Applicant information	
Applicant name	
Country of practice	
Position title	
Organisation/practice name	
Position of employer/supervisor	
Duration of practice	
Applicant email address	
Applicant phone number (with country code)	

<sup>&</sup>lt;sup>69</sup> The profession specific requirements can be found in the <u>Australian Dental Council's Professional Competencies of the newly qualified dental practitioner</u>, the <u>Professional capabilities for medical radiation practice</u>, the <u>Australian occupational</u> therapy competency standards and the Professional capabilities for podiatrists.

Section B: Assessment of professional capabilities		
The applicant's capability in the following areas needs to be rated by using the scale 1 to 5		
Rating scale	Description	
1 – Limited	Rarely demonstrate this capability	
2 – Developing	Occasionally demonstrates this capability	
3 – Competent	Consistently demonstrates this capability	
4 – Advanced	Always demonstrates this capability	
0 – Not Applicable	Assessment of the capability not applicable/possible/etc. due to the nature of the applicant's role or lack of sufficient opportunity to observe the capability.	

A score of 1-2 is considered below the expected level; 3 is at the expected level; and 4 is above the expected level required of an Australian-trained health practitioner. The overall score to pass would be determined by the Board.

Standard 1: Applies scientific knowledge to inform safe and effective practice		
Capabilities		Rating
1.1		
1.2		
1.3		
1.4		
Comments:		

Detine
Rating

Standard 3: Communicates and collaborates effectively with clients and colleagues		
Capabilities		Rating
3.1		
3.2		
3.3		
3.4		
Comments:		

Standard 4: Working with people from diverse groups		
Capabilities	Rating	
4.1		
4.2		
4.3		
4.4		
Comments:		

Standard 5: Risk Management and Quality Assurance		
Capabilities	Ra	
5.1		
5.2		
5.3		
5.4		
Comments:		

Standard 6: Practises ethically and professionally	
Capabilities	Rating
6.1	
6.2	
6.3	
6.4	
Comments:	

## Section C: Declaration by the supervisor/employer I certify that the information I have provided in relation to the applicant is true and accurate to the best of

my knowledge. I understand that this information will be used by Ahpra to evaluate the applicant's practice in <a href="mailto:sprofession">profession</a>. I understand that this information may be provided to the candidate.

Employer/supervisor name

Employer/supervisor Registration no.	
Employment/supervision date range	
Signature	
Date certified	
Employer/supervisor email address	
Employer/supervisor phone number (with country code)	
Section D: Verified by the Di	rector (or equivalent)
Director name	
Signature	
Date verified	
Email address	
Phone number (with country code)	

See below for details of the practice experience assessment for option B for the *Comparable qualification and* work-based experience pathway and the *Comparable work-based experience*.

#### Checklist for assessment interview of work-based experience

General registration for experienced internationally qualified <a href="mailto:rore"><a href="mailto:rore"><a

#### Purpose of this document

Assessors and moderators should use this checklist to assess the work experience of internationally qualified cprofession title> who are applying for general registration in Australia under one of the experienced practitioner pathways.

The checklist aligns with the <a href="Profession"><a href="Profession">

The assessor and moderator should use the checklist to evaluate the applicant's written task and interview.

Section A: Applicant information	
Applicant name	
Country of practice	
Position title	
Organisation/practice name	
Duration of practice	
Applicant contact details (Email and Telephone number)	

Section B: Assessment of professional capabilities			
The applicant's experien	The applicant's experience in the following areas need to be rated by using the scale 1 to 5		
Rating scale	Description		
1 – Limited	Rarely demonstrate this capability		
2 – Developing	Occasionally demonstrates this capability		
3 – Competent	Consistently demonstrates this capability		
4 – Advanced	Always demonstrates this capability		
0 – Not Applicable	Assessment of the capability is not applicable/possible/etc. due to the nature of the applicant's role or lack of sufficient opportunity to observe the capability.		

A score of 1-2 is considered below the expected level; 3 is at the expected level; and 4 is above the expected level required of an Australian trained health practitioner. The overall score to pass would be determined by the Board.

Standard 1: Applies scientific knowledge to inform safe and effective practice			
Capabilities	Rating written	Rating interview	
1.1			
1.2			
1.3			
1.4			
Comments:			

Capabilities	Rating writte	
2.1		
2.2		
2.3		
2.4		
Comments:		

Standard 3: Communicates and collaborates effectively with clients and colleagues			
Capabilities		Rating written	Rating interview
3.1			
3.2			
3.3			
3.4			
Comments:			

Standard 4: Working with people from diverse groups		
Capabilities	Rating written	Rating interview
4.1		

4.2	
4.3	
4.4	
Comments:	

Standard 5: Risk Management and Quality Assurance			
Capabilities		Rating written	Rating interview
5.1			
5.2			
5.3			
5.4			
Comments:			

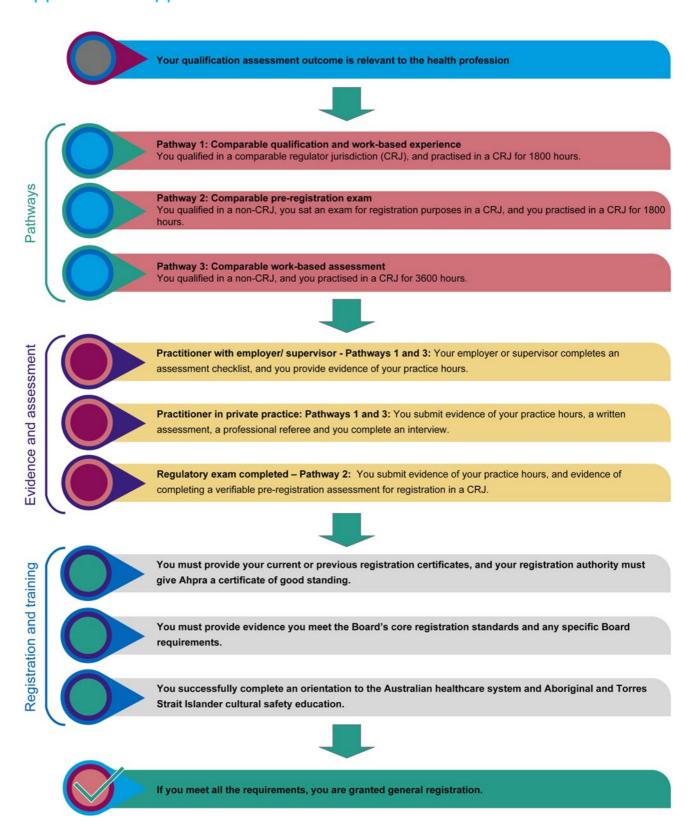
Rating written	Rating interview

Section C: Declaration by the assessor/moderator		
I understand that this information will be used by Ahpra to evaluate the applicant's practice in <a href="mailto:rprofession"><a hre<="" td=""></a></a></a></a></a></a></a></a></a></a></a></a></a></a></a></a></a></a></a></a></a></a></a></a></a></a></a></a></a></a></a></a></a></a></a></a></a></a></a></a></a></a></a></a></a></a></a></a></a></a></a></a></a></a></a></a></a></a></a></a></a></a></a></a></a></a></a></a>		
Assessor's name		
Signature		
Date certified		

## Appendix C: Summary of pathway requirements

Applicants must provide evidence to confirm the following requirements	Comparable qualification and work-based experience	Comparable pre-registration exam	Comparable work-based experience
A relevant qualification from a country approved by the Board as a comparable regulator jurisdiction (CRJ)	Yes	No	No
A relevant qualification from a country not approved by the Board as a CRJ	No	Yes	Yes
Completion of a verifiable pre-registration assessment in a CRJ during the timeframe approved by the Board	No	Yes	No
Completed a minimum of 1,800 hours of practice as a registered health practitioner in a CRJ during the previous 36 months	Yes	Yes	No
Completed a minimum of 3,600 hours of practice as a registered health practitioner in a CRJ during the previous 48 months	No	No	Yes
Employer/ supervisor completes a retrospective work-based assessment sent directly to Ahpra  OR  If the applicant does not have an employer/ supervisor, the applicant submits a written assessment task, completes an interview with a Board-approved assessor and provides a professional reference for the assessors to check.	Yes	No	Yes
Current and/or previous general registration (or equivalent) as a registered practitioner in CRJ while completing the 1,800 hours of practice	Yes	Yes	No
Current and/or previous general registration (or equivalent) as a registered practitioner in a CRJ while completing the 3,600 hours of practice	No	No	Yes
Certificate of Good Standing from each registration authority	Yes	Yes	Yes
Successful completion of orientation to the Australian healthcare system and Aboriginal and Torres Strait Islander cultural safety education	Yes	Yes	Yes
Meet Board registration standards for:	Yes	Yes	Yes

#### Appendix D: Applicant flowchart



#### Appendix E: Case studies

#### Comparable qualification and work-based experience pathway

#### Case Study 1

#### Comparable qualification and work-based experience pathway (assessment option A)

Kim completed a Bachelor of therapeutic radiography in the UK in 1996. Kim has been practising as a radiation therapist within the National Health Service (NHS), gaining experience over nearly three decades. Although Kim has an older qualification, Kim has gained the skill and knowledge to manage changes in technology. Kim wants to apply for general registration with the Medical Radiation Practice Board to work in Australia to be closer to their family. The Board assesses Kim's qualification as relevant to the profession, but under current rules Kim would also need to do an exam to be qualified to work in Australia.

The **comparable qualification and work-based experience pathway** could provide a faster pathway to general registration for Kim. The Medical Radiation Practice Board of Australia already considers the UK regulator, the Health and Care Professions Council (HCPC), to be comparable to the National Scheme.

Kim easily meets the required 1,800 hours of practice. Ahpra would ask Kim's current employer to complete the simple assessment checklist detailing Kim's skills and competencies. Kim would also need to give Ahpra proof of their registration with the HCPC and a certificate of good standing. Under the comparable qualification and work-based experience pathway, Kim's experience would be recognised. They would not need to do an exam to be eligible for general registration.

#### Case Study 2

#### Comparable qualification and work-based experience pathway (assessment option B)

Glenn is a qualified podiatrist who has held registration with the HCPC in the UK since 2010. They received a BSc Podiatry from the University of Wales in 2009. At the time Glenn completed the degree it was accredited by the Society of Chiropodists and Podiatrists before the HCPC set new accreditation standards for the profession. The Podiatry Board of Australia considers the HCPC to be a comparable regulator from 2013 onwards; however, Glenn received their qualification before this date.

For the past 10 years, Glenn has worked as the only podiatrist in a small clinic. They now want to apply for registration with the Podiatry Board to work in Australia. The Board assessed Glenn's qualification as relevant to the podiatry profession. Glenn has the work experience needed for the **comparable qualification and work-based experience pathway** but, because they have been working as a sole practitioner, they do not have an employer or supervisor who can complete the assessment checklist for their professional experience.

Option B gives Glenn the option to complete a written assessment task set by the Podiatry Board instead of doing the assessment checklist. The written assessment task focuses on skills and abilities Glenn gained through their work experience. Board-approved assessors would review Glenn's written assessment and then interview Glenn online. Glenn would also need to go through a professional reference check. If Glenn passes this assessment and meets the eligibility criteria, they could apply for general registration.

#### Comparable pre-registration exam pathway

#### Case Study 3

#### Comparable pre-registration exam pathway

Ramesh completed a dentistry degree in India in 2013 and then moved to Ireland in 2020. To work as a dentist in Ireland, they completed a pre-registration written exam, practical exam, and live clinical exam. Ramesh has worked in their own private practice in Ireland for five years. Ireland is considered a CRJ by the Dental Board of Australia.

Ramesh wishes to move to Australia and continue their career as a dentist. To register as a dentist in Australia, Ramesh applies to have their qualification assessed. The Board assesses Ramesh's qualification as relevant to the profession. Through the Dental Board's current assessment process, Ramesh would need to pass a written online exam and then pass a practical exam that is only run in Melbourne. The cost of the two exams is \$6,897 in 2025.

The **comparable pre-registration exam pathway** could make Ramesh's journey to registration faster. Ramesh meets the requirements for this pathway because they completed and passed regulatory exams with the Dental Council of Ireland and they have worked as a dentist in Ireland for over 1,800 hours. Ramesh would need to provide a current registration certificate and a certificate of good standing from the Dental Council of Ireland. Because this pathway confirms that Ramesh is qualified for general registration, they would not need to complete any other exams or assessments.

#### Comparable work-based experience pathway

#### Case Study 4

#### Comparable work-based experience pathway (assessment option A)

Sofia completed a three-year Bachelor degree in radiography in Italy in 2017. Sofia then moved to the United Kingdom in 2019, registering with the HCPC through European Mutual Recognition. Sofia has been working as a diagnostic radiographer with a large radiography practice since then.

Sofia wishes to apply for registration with the Medical Radiation Practice Board to migrate to Australia. The Board assessed Sofia's qualification as relevant to the profession. The Board invites Sofia invited to apply through the **comparable work-based experience pathway**.

Sofia would need their supervisor at their practice to complete an assessment checklist. This would show the Medical Radiation Practice Board whether Sofia has gained the skills and abilities needed to practise, and that they have completed the required work experience in the UK. Sofia must also to give proof of their current registration certificate with the HCPC. If Sofia meets the other eligibility requirements, including providing a certificate of good standing, they will be qualified for general registration.

The Board decides to place a condition on Reyna's registration that stops Reyna from working alone when she first starts working in Australia. This will help make sure Reyna gets the support she needs.

#### Case Study 5

#### Comparable work-based experience pathway (assessment option B)

Reyna is an Occupational Therapist who completed a Bachelor of Science in Occupational Therapy in the Philippines in 2017. Reyna has been registered and practising in Ireland since 2021 in a small private practice. Currently, if Reyna wants to register as an Occupational Therapist in Australia, the Board must assess if Reyna's qualification is suitable for registration. Reyna would then complete a period of supervised practice under limited registration for around six months.

Based on their work experience, the **comparable work-based experience pathway** could give Reyna a faster pathway. As they have been working alone in private practice, Reyna does not have an employer or supervisor who can complete the checklist to confirm their professional skills and abilities. Reyna would need to do assessment option B which is a written assessment task set by the Occupational Therapy Board of Australia, followed by an online interview and a professional reference check.

If Reyna passes the assessment, they would be able to apply for general registration with the Occupational Therapy Board without needing to complete the period of supervised practice.

### Appendix F: Comparable Regulator assessment frameworks



## Dental Board of Australia - Comparable Regulator Assessment Framework

#### Assessment criteria

1. Professional registration	Supporting information		
<ul> <li>1.1 The international regulator is a statutory registration or licensing body for dentistry, dental hygiene, dental prosthetics, dental therapy or oral health therapy, which:</li> <li>has a publicly accessible register of all licensed or registered practitioners</li> <li>specifies the qualifications they recognise for registration as a dentist, dental hygienist, dental prosthetist, dental therapist or oral health therapist, provided the qualification was obtained in that country, state or province</li> <li>specifies any pre-registration examination requirements for the profession</li> </ul>	<ul> <li>official website of the regulator with evidence of statutory authority (e.g. enabling legislation)</li> <li>online public register of practitioners</li> <li>registration standards or eligibility criteria published by the regulator</li> <li>documentation outlining any pre-registration examination requirements or assessment processes</li> <li>government or legal sources confirming the regulator's status as a statutory authority</li> </ul>		
2. Quality assurance and accreditation	Supporting information		
<ul> <li>2.1 Education providers and programs of study in dentistry, dental hygiene, dental prosthetics, dental therapy or oral health therapy are subject to quality assurance. Programs of study are recognised or accredited by an independent body external to the education providers and are based on published standards specific to dentistry, dental hygiene, dental prosthetics, dental therapy or oral health therapy education in the comparable regulator country, state or province. The published standards recognised by the international regulator cover, at a minimum:</li> <li>contemporary approaches to education in dentistry, dental hygiene, dental prosthetics, dental therapy or oral health therapy</li> <li>evidence-based and contemporary practice in dentistry, dental hygiene, dental prosthetics, dental therapy or oral health therapy</li> <li>assessed professional practice in the practice of dentistry, dental hygiene, dental prosthetics, dental therapy or oral health therapy in relevant health settings</li> <li>institutional resources such as staffing and facilities</li> <li>a published process to review programs and providers against the standards which included:</li> </ul>	<ul> <li>name and role of the accrediting body or ministry of education overseeing the profession</li> <li>accreditation standards or guidelines published by the body</li> <li>processes for initial and cyclical accreditation or audit of education providers</li> <li>standards addressing contemporary education, professional practice, assessed clinical experience, and institutional capacity</li> <li>published review reports or listings of accredited programs</li> <li>regulator confirmation that only accredited programs are recognised for registration</li> <li>curriculum standards or competency frameworks published by the international regulator or accrediting authority</li> <li>sample program curricula from approved or accredited education providers</li> </ul>		

an assessment conducted by an individual or team, independent from the education official course descriptions, unit outlines, or program provider, with expertise in education and practice for the dentistry, dental hygiene, dental handbooks prosthetics, dental therapy or oral health therapy profession/s profession-specific competency or capability frameworks (e.g. regular review of the qualification such as annual reporting or cyclic re-accreditation to published by regulator, professional associations, or ensure it continues to meet the standards accreditation authorities) core topics and/or competencies required for an approved qualification to ensure safe and ethical practice in dentistry, dental hygiene, dental prosthetics, dental therapy or oral health therapy 3. Academic level Supporting information 3.1 The academic level of qualifications in dentistry, dental hygiene, dental prosthetics, dental therapy or national qualifications framework or education system oral health therapy awarded in the jurisdiction and recognised by the international regulator is overviews from official government/education sources comparable, at a minimum, to the qualifications required for an approved qualification in Australia. published academic level descriptors and qualification which is: classifications (e.g. bachelor, honours, master) regulator's stated minimum entry-to-practice qualification level Dentist - Bachelor degree, Australian Qualification Framework (AQF) level 7 for registration Dental hygienist - Advanced diploma or Associate degree, AQF level 6 sample program descriptions from recognised education Dental prosthetist - Advanced diploma or Associate degree, AQF level 6 providers Dental therapist - Advanced diploma or Associate degree, AQF level 6 any international comparability databases e.g. from Country Oral therapist - Bachelor degree, AQF level 7 Education Profile (CEP) 4. Health practice context Supporting information 4.1 The practice of dentistry, dental hygiene, dental prosthetics, dental therapy or oral health therapy in regulator-published scope of practice and practice standards the international jurisdiction is assessed as comparable to the Australian context of practice health workforce or system reviews from official government includina: sources comparative international studies such as reports and data divisions of practice for the profession reflect comparable competencies from WHO or OECD (if available for the profession) or peer practitioners in the profession are expected to perform comparable clinical activities or tasks reviewed journal articles on healthcare delivery and regulatory the level of autonomy and independence of decision making by the practitioner systems responsibilities for safe use of medicines and any scope of prescribing professional practice guidelines and codes of conduct the country has a comparable health system based on factors such as: descriptions of health service access, public/private system patient access to care structures, and regulatory oversight the similarity of the registration system published data or official sources showing role expectations. external quality assurance of the healthcare organisations where practitioners are employed independence, and prescribing rights (where relevant) regulatory requirements for the international regulator AND 4.2 Regulatory requirements for the profession address: criminal history checks recency of practice codes of conduct and ethical practice

continuing professional development



## Medical Radiation Practice Board of Australia – Comparable Regulator Assessment Framework

#### **Assessment Criteria**

1.	Professional registration	Supporting information
1.1	<ul> <li>The international regulator is a statutory registration or licensing body for diagnostic radiography, nuclear medicine or radiation therapy, which:</li> <li>has a publicly accessible register of all licensed or registered practitioners</li> <li>specifies the qualifications they recognise for registration as a diagnostic radiographer, nuclear medicine technician or radiation therapist, provided the qualification was obtained in that country, state or province</li> <li>specifies any pre-registration examination requirements for the profession</li> </ul>	<ul> <li>official website of the regulator with evidence of statutory authority (e.g. enabling legislation)</li> <li>online public register of practitioners</li> <li>registration standards or eligibility criteria published by the regulator</li> <li>documentation outlining any pre-registration examination requirements or assessment processes</li> <li>government or legal sources confirming the regulator's status as a statutory authority</li> </ul>
2.	Quality assurance and accreditation	Supporting information
2.1	Education providers and programs of study in diagnostic radiography, nuclear medicine or radiation therapy are subject to quality assurance. Programs of study are recognised or accredited by an independent body external to the education providers, based on published standards specific to diagnostic radiography, nuclear medicine or radiation therapy education in the comparable regulator country, state or province. The published standards recognised by the international regulator cover, at a minimum:  • contemporary approaches to education in diagnostic radiography, nuclear medicine or radiation therapy  • evidence-based and contemporary practice in diagnostic radiography, nuclear medicine or radiation therapy  • work-integrated learning experiences in diagnostic radiography, nuclear medicine or radiation therapy within relevant health settings  • institutional resources such as staffing and facilities  • a published process to review programs and providers against the standards which included:  • an assessment conducted by an individual or team, independent from the education provider, with expertise in education and practice for the diagnostic radiography, nuclear medicine or radiation therapy profession	<ul> <li>name and role of the accrediting body or ministry of education overseeing the profession</li> <li>accreditation standards or guidelines published by the body</li> <li>processes for initial and cyclical accreditation or audit of education providers</li> <li>standards addressing contemporary education, professional practice, assessed clinical experience, and institutional capacity</li> <li>published review reports or listings of accredited programs</li> <li>regulator confirmation that only accredited programs are recognised for registration</li> <li>curriculum standards or competency frameworks published by the international regulator or accrediting authority</li> <li>sample program curricula from approved or accredited education providers</li> <li>official course descriptions, unit outlines, or program handbooks</li> <li>profession-specific competency or capability frameworks (e.g. published by regulator, professional associations, or accreditation authorities)</li> </ul>

<ul> <li>regular review of the qualification such as annual reporting or cyclic reaccreditation to ensure it continues to meet the standards</li> <li>core topics and/or competencies required for an approved qualification to ensure safe and ethical practice in diagnostic radiography, nuclear medicine or radiation therapy.</li> <li>Academic level</li> <li>The academic level of qualifications in diagnostic radiography, nuclear medicine or radiation therapy awarded in the jurisdiction and recognised by the international regulator is comparable, at a minimum, to the qualifications required for an approved qualification in Australia, which is a Bachelor degree – Australian Qualification Framework (AQF) level 7.</li> </ul>	Supporting documentation  • national qualifications framework or education system overviews from official government/education sources  • published academic level descriptors and qualification classifications (e.g. bachelor, honours, master)  • regulator's stated minimum entry-to-practice qualification level for registration
4. Health practice context	<ul> <li>sample program descriptions from recognised education providers</li> <li>any international comparability databases e.g. from Country Education Profile (CEP)</li> <li>Supporting documentation</li> </ul>
4.1 The practice of diagnostic radiography, nuclear medicine or radiation therapy in the	regulator-published scope of practice and practice standards
<ul> <li>international jurisdiction is assessed as comparable to the Australian context of practice including:         <ul> <li>divisions of practice for the profession reflect comparable competencies</li> <li>practitioners in the profession are expected to perform comparable clinical activities or tasks</li> <li>the level of autonomy and independence of decision making by the practitioner is comparable</li> <li>the country has a comparable health system based on factors such as:</li></ul></li></ul>	<ul> <li>health workforce or system reviews from official government sources</li> <li>comparative international studies such as reports and data from WHO or OECD (if available for the profession) or peer reviewed journal articles on healthcare delivery and regulatory systems</li> <li>professional practice guidelines and codes of conduct</li> <li>descriptions of health service access, public/private system structures, and regulatory oversight</li> <li>published data or official sources showing role expectations, independence, and requirements for safe us of medicines and ionising radiation</li> </ul>
AND	regulatory requirements for the international regulator
4.2 Regulatory requirements for the profession address:	
<ul> <li>criminal history checks</li> <li>recency of practice</li> <li>codes of conduct and ethical practice</li> <li>continuing professional development</li> </ul>	



### Occupational Therapy Board of Australia – Comparable Regulator Assessment Framework

#### **Assessment Criteria**

Professional registration	Supporting information
<ul> <li>1.1 The international regulator is a statutory registration or licensing body for Occupational Therapy, which:</li> <li>has a publicly accessible register of all licensed or registered practitioners</li> <li>specifies the qualifications they recognise for registration as an Occupational Therapist, provided the qualification was obtained in that country, state or province</li> <li>specifies any pre-registration examination requirements for the profession</li> </ul>	<ul> <li>Official website of the regulator with evidence of statutory authority (e.g. enabling legislation)</li> <li>Online public register of practitioners</li> <li>Registration standards or eligibility criteria published by the regulator</li> <li>Documentation outlining any pre-registration examination requirements or assessment processes</li> <li>Government or legal sources confirming the regulator's status as a statutory authority</li> </ul>
Quality assurance and accreditation	Supporting information
<ul> <li>2.1 Education providers and programs of study in Occupational Therapy are subject to quality assurance. Programs of study are recognised or accredited by an independent body external to the education providers and are based on published standards specific to Occupational Therapy education in the comparable regulator country, state or province. The published standards recognised by the international regulator cover, at a minimum: <ul> <li>contemporary approaches to education in Occupational Therapy</li> <li>evidence-based and contemporary practice in Occupational Therapy</li> <li>assessed professional practice in the practice of Occupational Therapy in relevant health settings, recommended minimum of 1000 hours</li> <li>institutional resources such as staffing and facilities</li> <li>a published process to review programs and providers against the standards which included: <ul> <li>an assessment conducted by an individual or team, independent from the education provider, with expertise in education and practice for the Occupational Therapy profession</li> <li>regular review of the qualification such as annual reporting or cyclic re-accreditation to ensure it continues to meet the standards</li> </ul> </li> </ul></li></ul>	<ul> <li>Name and role of the accrediting body or ministry of education overseeing the profession</li> <li>Accreditation standards or guidelines published by the body</li> <li>Processes for initial and cyclical accreditation or audit of education providers</li> <li>Standards addressing contemporary education, professional practice, assessed clinical experience, and institutional capacity</li> <li>Published review reports or listings of accredited programs</li> <li>Regulator confirmation that only accredited programs are recognised for registration</li> <li>Curriculum standards or competency frameworks published by the international regulator or accrediting authority</li> <li>Sample program curricula from approved or accredited education providers</li> <li>Official course descriptions, unit outlines, or program handbooks</li> </ul>

core topics and competencies required for an approved qualification to ensure safe and ethical practice in Occupational Therapy	Profession-specific competency or capability frameworks (e.g. published by regulator, professional associations, or accreditation authorities)	
3. Academic level	Supporting information	
3.1 The academic level of qualifications in Occupational Therapy awarded in the jurisdiction and recognised by the international regulator is comparable, at a minimum, to the qualifications required for an approved qualification in Australia, which is a Bachelor degree – Australian Qualification Framework - (AQF) level 7	<ul> <li>National qualifications framework or education system overviews from official government/education sources</li> <li>Published academic level descriptors and qualification classifications (e.g. bachelor, honours, master)</li> <li>Regulator's stated minimum entry-to-practice qualification level for registration</li> <li>Sample program descriptions from recognised education providers</li> <li>Any international comparability databases e.g. Country Education Profile (CEP)</li> </ul>	
4. Health practice context	Supporting information	
<ul> <li>4.1 The practice of Occupational Therapy in the international jurisdiction is assessed as comparable to the Australian context of practice including:</li> <li>practitioners in the profession are expected to perform comparable clinical activities or tasks</li> <li>the level of autonomy and independence of decision making by the practitioner is comparable</li> <li>the country has a comparable health system based on factors such as: <ul> <li>patient access to care</li> <li>the similarity of the registration system</li> <li>external quality assurance of the healthcare organisations where practitioners are employed</li> </ul> </li> </ul>	<ul> <li>Regulator-published scope of practice and practice standards</li> <li>Health workforce or system reviews from official government sources</li> <li>Comparative international studies such as reports and data from WHO or OECD (if available for the profession) or peer reviewed journal articles on healthcare delivery and regulatory systems</li> <li>Professional practice guidelines and codes of conduct</li> <li>Descriptions of health service access, public/private system structures, and regulatory oversight</li> <li>Published data or official sources showing role expectations, independence</li> </ul>	
AND  4.2 Regulatory requirements for the profession address:  • criminal history checks  • recency of practice  • codes of conduct and ethical practice  • continuing professional development	Regulatory requirements for the international regulator	
AND 4.3 Qualifications recognised by the comparable regulator are approved by the World Federation of Occupational Therapy.	programs are verified against the WFOT website.	



### Podiatry Board of Australia - Comparable Regulator Assessment Framework

#### Assessment criteria

1. Professional registration	Supporting information
<ul> <li>1.1 The international regulator is a statutory registration or licensing body for podiatry, which:</li> <li>has a publicly accessible register of all licensed or registered practitioners</li> <li>specifies the qualifications they recognise for registration as a podiatrist, provided the qualification was obtained in that country, state or province</li> <li>specifies any pre-registration examination requirements for the profession</li> </ul>	<ul> <li>Official website of the regulator with evidence of statutory authority (e.g. enabling legislation)</li> <li>Online public register of practitioners</li> <li>Registration standards or eligibility criteria published by the regulator</li> <li>Documentation outlining any pre-registration examination requirements or assessment processes</li> <li>Government or legal sources confirming the regulator's status as a statutory authority</li> </ul>
2. Quality assurance and accreditation	Supporting information
<ul> <li>2.1 Education providers and programs of study in podiatry are subject to quality assurance. Programs of study are recognised or accredited by an independent body external to the education providers and are based on published standards specific to podiatry education in the comparable regulator country, state or province. The published standards recognised by the international regulator cover, at a minimum: <ul> <li>contemporary approaches to education in podiatry</li> <li>evidence-based and contemporary practice in podiatry</li> <li>sufficient work-integrated learning opportunities to demonstrate the required professional capabilities</li> <li>institutional resources such as staffing and facilities</li> <li>a published process to review programs and providers against the standards which includes:</li> <li>an assessment conducted by an individual or team, independent from the education provider, with expertise in education and practice for the podiatry profession</li> </ul> </li> </ul>	<ul> <li>Name and role of the accrediting body or ministry of education overseeing the profession</li> <li>Accreditation standards or guidelines published by the body</li> <li>Processes for initial and cyclical accreditation or audit of education providers</li> <li>Standards addressing contemporary education, professional practice, assessed clinical experience, and institutional capacity</li> <li>Published review reports or listings of accredited programs</li> <li>Regulator confirmation that only accredited programs are recognised for registration</li> <li>Curriculum standards or competency frameworks published by the international regulator or accrediting authority</li> <li>Sample program curricula from approved or accredited education providers</li> <li>Official course descriptions, unit outlines, or program handbooks</li> <li>Profession-specific competency or capability frameworks (e.g. published by regulator, professional associations, or accreditation authorities)</li> </ul>

<ul> <li>regular review of the qualification such as annual reporting or cyclic re- accreditation to ensure it continues to meet the standards</li> </ul>	
<ul> <li>core topics and/or competencies required for an approved qualification to ensure safe and ethical practice in podiatry</li> </ul>	
3. Academic level	Supporting information
3.1 The academic level of qualifications in podiatry awarded in the jurisdiction and recognised by the international regulator is comparable, at a minimum, to the qualifications required for an approved qualification in Australia, which is a Bachelor degree – Australian Qualification Framework - (AQF) level 7	<ul> <li>National qualifications framework or education system overviews from official government/education sources</li> <li>Published academic level descriptors and qualification classifications (e.g. bachelor, honours, master)</li> <li>Regulator's stated minimum entry-to-practice qualification level for registration</li> <li>Sample program descriptions from recognised education providers</li> <li>Any international comparability databases e.g. Country Education Profile (CEP)</li> </ul>
4. Health practice context	
<ul> <li>4.1 The practice of podiatry in the international jurisdiction is assessed as comparable to the Australian context of practice including:</li> <li>divisions of practice for the profession reflect comparable competencies</li> <li>practitioners in the profession are expected to perform comparable clinical activities or tasks</li> <li>the level of autonomy and independence of decision making by the practitioner</li> <li>responsibilities for safe use of medicines and any scope of prescribing</li> <li>the country has a comparable health system based on factors such as: <ul> <li>patient access to care</li> <li>the similarity of the registration system</li> <li>external quality assurance of the healthcare organisations where practitioners are employed</li> </ul> </li> </ul>	<ul> <li>Regulator-published scope of practice and practice standards</li> <li>Health workforce or system reviews from official government sources</li> <li>Comparative international studies such as reports and data from WHO or OECD (if available for the profession) or peer reviewed journal articles on healthcare delivery and regulatory systems</li> <li>Professional practice guidelines and codes of conduct</li> <li>Descriptions of health service access, public/private system structures, and regulatory oversight</li> <li>Published data or official sources showing role expectations, independence, and prescribing rights (where relevant)</li> </ul>
AND 4.2 Regulatory requirements for the profession address:	Regulatory requirements for the international regulator
<ul> <li>criminal history checks</li> <li>recency of practice</li> <li>codes of conduct and ethical practice</li> <li>continuing professional development</li> </ul>	

## Appendix G: Risk assessment matrix for experienced practitioner pathways

Pathways	Risk	Initial rating	Controls	Final rating
Comparable qualification and work-based experience pathway - Assessment option A	An IQHP who qualified, and has recently practised in a comparable regulator jurisdiction (CRJ) is not suitably experienced, trained or qualified to practice in Australia	Based on the IQHP's qualification and experience, it is unlikely an incident related to skills or knowledge could occur that we would need to act on to protect the public	<ul> <li>Relevant qualification</li> <li>Qualified in a Board-approved CRJ</li> <li>Evidence of completing at least 1,800 hours of practice as a registered health practitioner in a CRJ in the 36 months before applying</li> <li>Retrospective work-based assessment by an employer sent directly to Ahpra</li> <li>Evidence of current and/or previous general registration (or equivalent) in CRJ while completing the 1,800 hours of professional practice</li> <li>Certificate of Good Standing sent directly to Ahpra from each registration authority</li> <li>Passing any programs for orientation to the Australian healthcare system and Aboriginal and Torres Strait Islander cultural safety education.</li> </ul>	After the controls are applied, it remains unlikely that an incident related to skills or knowledge could occur that we would need to act on to protect the public
Comparable qualification and work-based experience pathway - Assessment option B	An IQHP who qualified and has practised as an independent/sole practitioner in a CRJ is not suitably experienced, trained or qualified to practice in Australia	MEDIUM  Based on the IQHP's qualification and experience, and past work context, it is possible that an incident related to skills or knowledge could occur that we would need to act on to protect the public	<ul> <li>Relevant qualification</li> <li>Qualified in a CRJ</li> <li>A minimum of 1,800 hours of practice as a registered practitioner in a CRJ in the 36 months before applying</li> <li>Written assessment task and interview conducted by Board-approved assessors</li> <li>Professional reference check</li> <li>Evidence of current and/or previous general registration (or equivalent) in a CRJ while completing the 1,800 hours of practice</li> <li>Certificate of Good Standing sent directly to Ahpra from each registration authority</li> <li>Passing any programs for orientation to the Australian healthcare system and Aboriginal and Torres Strait Islander cultural safety education</li> </ul>	After the controls are applied, it is unlikely that an incident related to skills or knowledge could occur that we would need to act on to protect the public
Comparable pre-registration exam pathway	An IQHP who has completed a pre-registration exam and recently practised in a CRJ is not suitably experienced, trained or qualified to practice in Australia	Based on the IQHP's qualification, experience and completion of a preregistration exam, it is unlikely that an incident related to skills or knowledge could	<ul> <li>Relevant qualification</li> <li>Evidence of completing an assessment comprising a pre-registration examination for internationally qualified registered practitioner, or other appropriate and verifiable assessment in a CRJ</li> <li>A minimum of 1,800 hours of practice in a CRJ in the 36 months before applying</li> <li>Evidence of current and/or previous general registration (or equivalent) in a CRJ while completing the 1,800 hours of practice</li> </ul>	After the controls are applied, it remains unlikely that an incident related to skills or knowledge could occur, that we

Pathways	Risk	Initial rating	Controls	Final rating
		occur that we would need to act on to protect the public	<ul> <li>Certificate of Good Standing sent directly to Ahpra from each registration authority</li> <li>Passing any programs for orientation to the Australian healthcare system and Aboriginal and Torres Strait Islander cultural safety education</li> </ul>	would need to act on to protect the public
Comparable work-based experience pathway - Assessment option A	An IQHP who did not qualify in a CRJ but has been employed in a CRJ is not suitably experienced, trained or qualified to practice	MEDIUM  Based on the IQHP's qualification and experience, it is possible that an incident related to skills or knowledge could occur that we would need to act on to protect the public	<ul> <li>Relevant qualification</li> <li>A minimum of 3,600 hours of practice as a registered practitioner in a CRJ in the 48 months before applying</li> <li>Employer completes retrospective work-based assessment sent directly to Ahpra</li> <li>Evidence of current and/or previous general registration (or equivalent) in a CRJ while completing the 3,600 hours of practice</li> <li>Certificate of Good Standing sent directly to Ahpra from each registration authority</li> <li>Passing any programs for orientation to the Australian healthcare system and Aboriginal and Torres Strait Islander cultural safety education required by the Board</li> </ul>	After the controls are applied, it is unlikely that an incident related to skills or knowledge could occur that we would need to act on to protect the public
Comparable work-based experience pathway - Assessment option B	IQHP who did not qualify in a CRJ but has practiced as an independent/sole practitioner in a CRJ is not suitably experienced, trained or qualified to practice	MEDIUM  Based on the IQHP's qualification, experience, and past work context, it is possible that an incident related to skills or knowledge could occur that we would need to act on to protect the public	<ul> <li>Relevant qualification</li> <li>A minimum of 3,600 hours of practice as a registered health practitioner in a CRJ in the 48 months before applying</li> <li>Written assessment task and interview conducted by Board-approved assessors</li> <li>Professional reference check</li> <li>Evidence of current and/or previous general registration (or equivalent) in a CRJ while completing the 3,600 hours of practice</li> <li>Certificate of Good Standing sent directly to Ahpra from each registration authority</li> <li>Passing any programs for orientation to the Australian healthcare system and Aboriginal and Torres Strait Islander cultural safety education required by the Board</li> </ul>	LOW  After the controls are applied, it is unlikely that an incident related to skills or knowledge could occur we would need to act on to protect the public

#### Ahpra risk assessment framework

	Impact/Consequences **				
Likelihood *	1	2	3	4	5
	Insignificant	Minor	Moderate	Major	Catastrophic
5	Low	Medium	High	Extreme	Extreme
Almost Certain	5	10	15	20	25
4	Low	Medium	High	Extreme	Extreme
Likely	4	8	12	16	20
3	Low	Low	Medium	High	High
Possible	3	6	9	12	10
2	Low	Low	Low	Medium	High
Unlikely	2	4	6	8	10
1	Low	Low	Low	Medium	Medium
Rare	1	2	3	4	5

#### \* Likelihood that IQHP is not suitably experienced, trained or qualified to practice

Rare	The consequence will only happen in exceptional circumstances	
Unlikely	The consequence is not likely to happen	
Possible	The consequence may happen	
Likely	The consequence is likely to happen	
Almost certain	The consequence will happen	

#### \*\* Consequences if IQHP does not have the competencies and professional capabilities to practice

Insignificant	Insignificant consequences that do not cause harm and do not need further action
Minor	Minor consequences that do not cause significant harm and can be corrected
Moderate	Moderate consequences that call for action in the interests of public safety
Major	Major consequences for public safety that need to be addressed at once
Catastrophic	Very serious consequences for public safety needing urgent action

Low risk	Medium risk
There is a low risk that an IQHP's knowledge, skill, judgement, or the care they provide, is below a reasonable standard.	There is a medium risk that an IQHP's knowledge, skill, judgement, or the care they provide is below a reasonable standard.
High risk	Extreme risk
There is a high risk that an IQHP's knowledge, skill,	

## Appendix H: Future work to support implementation of the registration standard

Future work	Considerations	
Staged release	Ahpra and the National Boards will implement new pathways in stages by profession. We will consult with relevant stakeholders.	
Applicant guidance	Ahpra and the National Boards will create clear guidance materials for applicants, which could include:  information on the documents applicants must give us to support their application clear guidance for applicants for accessing pathways profession-specific case studies frequently asked questions (FAQs) information about review processes.	
Monitoring outcomes	Ahpra and the National Boards will create formal processes to monitor outcomes. This will allow the National Boards to evaluate outcomes and identify any unforeseen risks. This could include:  • registration processing times  • applicant satisfaction  • public safety indicators, including notifications  • cultural safety outcomes, and  • ongoing evaluation of the success and learnings, including the current hours of practice, to ensure they meet contemporary practice standards.	
Assessment option A	Ahpra and the National Boards will give clear instructions to the supervisors and employers who will be completing the assessment checklist. This will make sure all supervisors and employers understand the checklist and use it in the same way. If the applicant had more than one employer or supervisor during this period, each employer or supervisor must complete the checklist.  Ahpra and the National Boards will create profession-specific assessment checklists for each profession. The checklists will be in line with the profession's capabilities or competencies.	
Assessment option B	Ahpra and the National Boards will decide who will be the assessor(s) for assessment option B. Clear information will be given to assessors to:  • guide the assessment and moderation process, and • ensure consistency and fairness across professions and jurisdictions.  Ahpra and the National Boards will create templates for written submissions, case summaries and reference checks. Ahpra and the National Boards will create profession-specific assessment and moderation checklists for each profession. The checklists will be in line with the profession's capabilities or competencies.  Ahpra could also explore options for technology-assisted assessments (secure video interviews, digital case log reviews). These assessments would:  • ensure public safety, and • reduce the burden caused by travel and international time zones on applicants outside Australia.	
Training modules	Ahpra and the Australian states and territories are looking at training options to support the National Boards in giving IQHPs appropriate training modules for Aboriginal and Torres Strait Islander cultural safety education.	
Workforce considerations	Ahpra and the National Boards will keep consulting with the Department of Home Affairs about Australian migration processes for specific occupation groups. We will consider requirements for IQHPs to work in regional Australia, given the shortage of practitioners in these areas.	

## Appendix I: Patient and Consumer Health and Safety Impact Statement

#### **DATE** 2025

#### **Statement purpose**

The National Boards' Patient and Consumer Health and Safety Impact Statement (statement)<sup>70</sup> explains how a proposed registration standard, code or guideline might affect the health and safety of the public, particularly people who are more likely to experience harm in the community. This includes people subject to stigma or discrimination in healthcare, Aboriginal and Torres Strait Islander Peoples and/or people who are more likely to experience stigma or discrimination. This statement will be updated after consultation feedback.

#### The statement considers:

- The possible effect the suggested changes to the registration standard, code or guideline might have on the health and safety of patients and consumers, particularly people who are more likely to experience harm in the community. This includes ways to prevent any potential negative or unintended effects.
- The potential effect the suggested changes to the registration standard, code or guideline might have on the health and safety of Aboriginal and Torres Strait Islander Peoples. This includes ways to prevent any potential negative or unintended effects.
- Engagement with patients and consumers about the proposal, particularly those more likely to experience harm in the community.
- Engagement with Aboriginal and Torres Strait Islander Peoples about the proposal.

The statement aligns with the <u>National Scheme's Aboriginal and Torres Strait Islander Health and Cultural Safety Strategy 2020-2025</u>, <u>National Scheme engagement strategy 2020-2025</u>, the <u>National Scheme Strategy 2020-25</u> and reflects key aspects of the <u>Ahpra Procedures for the development of registration standards</u>, codes, guidelines and accreditation standards.

Patient and consumer health and safety impact statement:

1. How will this proposal affect the health and safety of patients and consumers, particularly those who are more likely to experience harm in the community? Will the impact be different for people vulnerable to harm in the community compared to the general public?

Based on our first consultation and careful assessment, Ahpra and the National Boards have put forward the draft registration standard for public consultation. We have created an option that gives experienced IQHPs a faster way to register without changing the minimum standards that keep the public safe. We expect the draft standard will grow the number of much needed safe, competent and effective registered health practitioners. This will improve consumers' access to health services.

<sup>&</sup>lt;sup>70</sup> This statement has been developed by Ahpra and the National Boards in accordance with section 25(c) and 35(c) of the Health Practitioner Regulation National Law as in force in each state and territory. Section 25(c) requires Ahpra to establish procedures for ensuring that the National Registration and Accreditation Scheme operates in accordance with good regulatory practice. Section 35(c) assigns the National Boards functions to develop or approve standards, codes and guidelines for the health profession including the development of registration standards for approval by the Ministerial Council and that provide guidance to health practitioners registered in the profession. Section 40 requires National Boards to ensure that there is wide-ranging consultation during the development of a registration standard, code or guideline.

In the standard, all IQHPs must do Aboriginal and Torres Strait Islander cultural safety education. This is an important part of making sure IQHPs are providing culturally safe care.

We expect the consultation will help us understand the possible effects of introducing these standards. It will also help us to protect public safety and healthcare quality.

2. How will National Boards engage with patients and consumers, particularly those vulnerable to harm in the community, during consultation?

We plan to engage the following groups during the public consultation:

- patients and consumer representatives
- professional associations
- peak bodies
- peak Aboriginal and Torres Strait Islander groups

We will promote the consultation publicly and welcome participation by others in the community including:

- Aboriginal and Torres Strait Islander Peoples
- multi-cultural organisations
- intersectional communities and organisations
- · healthcare organisations, and
- other relevant organisations and communities

This allows us to hear from members of the community, particularly members of the community at risk of experiencing poorer health outcomes.

The public consultation will be a large-scale, eight-week consultation process, working directly with the groups listed above. We will reach the groups by direct email, social media, the National Board's newsletter, and the National Boards' websites.

3. What might be the unintended effects for patients and consumers, particularly people vulnerable to harm in the community? How will these be managed?

Because IQHPs will still need to meet the National Boards' core registration standards, professional codes, guidelines and standards for practice we do not expect there to be any unintended effects on patients, consumers and vulnerable members of the community.

If any possible negative effects are found through the consultation process, the Board will consider the impact and act.

4. How will this proposal affect Aboriginal and Torres Strait Islander Peoples? How will the impact be different for Aboriginal and Torres Strait Islander Peoples compared to non-Aboriginal and Torres Strait Islander Peoples?

Because they trained and practised internationally, IQHPs are unlikely to understand Australia's colonial history and its ongoing impact on Aboriginal and Torres Strait Islander Peoples. This means that IQHPs need extra training to make sure they can provide culturally safe care to Aboriginal and Torres Strait Islander Peoples within the Australian healthcare system.

As well as meeting the standard requirements, all IQHPs must pass a Board-approved program for orientation to the Australian healthcare system and Aboriginal and Torres Strait Islander cultural safety education. This program will help IQHPs understand how to practise safely in the Australian healthcare context. It must include key content on giving culturally safe and effective care to Aboriginal and Torres Strait Islander Peoples.

The National Boards have considered the possible effects the draft registration standard might have on Aboriginal and Torres Strait Islander Peoples and how these effects might differ to those experienced by

non-Aboriginal and Torres Strait Islander Peoples. The public consultation will help us find any other effects. It will also help us meet our responsibilities to protect safety and healthcare quality for Aboriginal and Torres Strait Islander Peoples.

The National Boards do not expect there will be any negative effects for Aboriginal and Torres Strait Islander Peoples as a result of the draft registration standard.

## 5. How will consultation about this proposal engage with Aboriginal and Torres Strait Islander Peoples?

We will keep engaging with Aboriginal and Torres Strait Islander organisations and stakeholders during the consultation process so we can hear more from Aboriginal and Torres Strait Islander Peoples about our proposal. This includes the National Scheme's Aboriginal and Torres Strait Islander Health Strategy Group.

The National Boards are also committed to the National Scheme's <u>Aboriginal and Torres Strait Islander Cultural Health and Safety Strategy 2020-2025</u>. This document focuses on having patient safety for Aboriginal and Torres Islander Peoples as the norm. It also considers how clinical and Cultural Safety are linked.

## 6. What might be the unintended impacts for Aboriginal and Torres Strait Islander Peoples? How will these be addressed?

The National Boards have carefully considered any unintended effects the proposal might have.

Engaging with organisations and Aboriginal and Torres Strait Islander Peoples will help us find other possible effects. The findings will help us make a draft registration standard that meets our responsibilities to protect patent safety and quality for Aboriginal and Torres Strait Islander Peoples. If any unintended effects are found during the consultation process for Aboriginal and Torres Strait Islander Peoples, we will consider these and take action.

#### 7. How will the impact of this proposal be actively monitored and evaluated?

The National Boards' regularly review standards, codes and guidelines to keep the public safe.

National Boards may review the standard early if there are any issues, new evidence or unintended effects on the health and safety of the public, vulnerable members of the community and Aboriginal and Torres Strait Islander Peoples. This maintains public safety standards and makes sure the standard is still relevant and workable.

# Appendix J: Statement of assessment against Ahpra's Procedures for the development of registration standards, codes and guidelines

#### **DATE** 2025

Draft registration standard: General registration for experienced internationally qualified health practitioners

#### Introduction

Section 25 of the Health Practitioner Regulation National Law as in force in each state and territory (the National Law) requires Australian Health Practitioner Regulation Agency (Ahpra) to establish procedures for the purpose of ensuring that the National Registration and Accreditation Scheme (the National Scheme) operate in accordance with good regulatory practices.

The Ahpra *Procedures for the development of registration standards, codes and guidelines* (2023) is available on the Ahpra Resources webpage.

#### Context - issue or problem statement

The National Boards assess applications for registration as a health practitioner. This includes applications from internationally qualified health practitioners (IQHP). Recently, there was a review to find ways to make it easier and faster for international practitioners to work in Australia, while still making sure patients get safe, high-quality care (the Kruk review).<sup>71</sup>

In response to the review's recommendations, the National Boards have developed a proposed new multi-profession registration standard. The Boards are asking the public for feedback on the Draft registration standard: General registration for experienced internationally qualified health practitioners (draft registration standard).

The draft registration standard allows the Board to consider the skills and experience of IQHPs when assessing applications for registration. If needed, the Board can put conditions on a practitioner's registration as a temporary way to reduce risk (recommendation 10). The draft registration standard creates three faster pathways to registration in a profession that has a shortage of practitioners (recommendation 9).

Although we do not need a registration standard to act on the review's recommendations, the National Boards consider setting out the requirements in a registration standard will give IQHPs clarity and transparency and support them to decide whether to apply for registration under this pathway.

#### **Assessment**

The National Boards used Ahpra's procedures to assess the draft registration standard.

#### 1. The proposal

- considers the paramount principle, objectives and guiding principles in the National Law<sup>72</sup>
- draws on available evidence, including regulatory approaches by health practitioner regulators in countries with comparable health systems.

The key role of the National Boards is to protect the public. One way the National Boards do this is by making sure we only register health practitioners with the right qualifications, skills and knowledge to

<sup>&</sup>lt;sup>71</sup> Kruk, R. <u>Overseas Health Practitioner Regulatory Settings Review - Final Report,</u> 2023. Australia. Australian: Department of Finance; 2023 (The Kruk Review)

<sup>&</sup>lt;sup>72</sup> See section 3 and section 3A of the National Law

practise. The National Boards also oversee the assessments we use to test if an IQHP is suitable for registration in Australia.

There are a number of pathways for IQHPs to register in Australia based on the IQHP's qualification(s). If the IQHP's qualification does not meet the National Board's requirements, they must pass an exam or other assessment. They could also consider upgrading their qualification to one that meets the National Board's requirements.

Enabling more suitable IQHPs to register in Australia is a priority for state, territory and federal governments, the National Boards and Ahpra. The draft registration standard has three new pathways that make the registration process in Australia more flexible for IQHPs. This could grow the number of much needed safe, competent and effective practitions. In turn, easing the workforce pressures on health, aged and primary care in rural, remote and metropolitan areas.

The draft registration standard aims to make the application process more flexible and clearer for IQHPs without changing the minimum standards that keep the public safe. IQHPs will still be assessed carefully to make sure we only register health practitioners who have the right qualifications and experience to practise in a competent and ethical manner.

The National Boards have used evidence from the Kruk review<sup>73</sup> and from the Nursing and Midwifery Board (NMBA)'s *Registration standard: General registration for internationally qualified registered nurse* to inform the review.<sup>74</sup> The draft registration standard would allow National Boards to progress IQHPs directly to general registration as long as they meet the criteria, including the requirements in other registration standards.

#### 2. Steps that have been taken to:

- achieve greater consistency within the National Scheme (for example, by adopting any available template, guidance or good practice approaches used by National Scheme bodies)
- meet the wide-ranging consultation requirements of the National Law

The NMBA's registration standard: General registration for internationally qualified registered nurses has informed the development of this draft registration standard. The NMBA developed two pathways to recognise experienced internationally qualified registered nurses (IQRNs) who have practised in comparable regulator jurisdictions. These jurisdictions have comparable:

- · regulatory approaches,
- regulatory standards for education and registration,
- · regulatory processes, and
- procedures.

Drawing on the NMBA's approach creates a consistent approach to qualification assessment for IQHPs across professions.

The National Law requires wide-ranging consultation on proposed standards, codes and guidelines including consulting with other National Boards on matters of shared interest. Our consultation processes are designed to meet these consultation requirements.

Ahpra and the National Boards first consulted on the draft registration standard from 11 August 2025 to 8 September 2025. Many stakeholders from ten professions were sent the preliminary consultation paper, including the draft registration standard. We received responses from 43 stakeholders. Overall, respondents from the priority professions supported the draft registration standard. The priority

<sup>73</sup> The Kruk Review.

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<sup>&</sup>lt;sup>74</sup> The NMBA registration standard was approved by the Ministerial Council on 26 September 2024.

professions<sup>75</sup> also generally agreed that the proposal could increase the number of IQHPs registering in Australia.

The National Boards made changes to the draft registration standard based on the feedback we received in the first consultation. We are now asking for feedback during an eight-week public consultation. We will publish the consultation paper on the National Boards' websites and Ahpra's website. We will also inform health practitioners, stakeholders and the community members of the review via the National Boards' electronic newsletters. We will consider all feedback when finalising the draft registration standard.

The National Boards have not suggested any changes that may cause unnecessary regulatory burdens or that would create unreasonable costs for the profession or the community. The National Boards followed the principles set out in Ahpra's procedures to make this assessment.

#### 3. Addressing the principles:

a. whether the proposal is the best option for achieving the proposal's stated purpose and protection of the public

The National Boards have considered two options:

- Option one is to keep the current pathways and not create new streamlined pathways. This does
  not align with the Kruk review's recommendations and is a missed opportunity to improve and
  expand available pathways to registration. We did not find any benefits to keeping the current
  pathways; we do not consider option one to be viable.
- Option two is to create and propose the adoption of a new registration standard. This option
  allows us to include research and feedback from key stakeholders, consumers and community
  members, including Aboriginal and Torres Strait Islander Peoples. The draft standard clearly and
  consistently sets out the requirements for IQHPs seeking registration in Australia.

Option two is the National Boards' preferred option because it:

- aligns with Ahpra and the National Boards' ongoing commitment to making registration faster and more efficient for suitably qualified and experienced IQHPs.
- aligns with the Kruk review's recommendations.
- eases pressures on the health workforce by improving registration processes for IQHPs wanting to register in Australia. This would encourage more IQHPs to register in Australia.
- b. whether the proposal results in an unnecessary restriction of competition among health practitioners

The proposal is unlikely to restrict competition because it will give IQHPs more ways to become registered in Australia.

c. whether the proposal results in an unnecessary restriction of consumer choice

The proposal is unlikely to restrict consumer choice because IQHPs will have more and faster pathway options to become registered in Australia.

d. whether the overall costs of the proposal to members of the public and/or registrants and/or governments are reasonable in relation to the benefits to be achieved

<sup>&</sup>lt;sup>75</sup> The states and territories have prioritised five for faster pathways dentistry, medical radiation practice, occupational therapy, podiatry and psychology.

The National Boards have considered the possible costs related to the draft registration standard during the preliminary round of consultation and expect the costs to be minimal. Public consultation is a further opportunity to ask about potential costs and benefits that may be achieved.

#### Costs to the public and governments

The three new pathways in the draft registration standard will streamline the registration processes for eligible IQHPs, reducing the time from application to registration. We do not expect any costs to be passed on to the public or governments from this proposal.

#### **Costs to Ahpra and the National Boards**

There will be a cost for Ahpra and the National Boards to update resources and deliver flexible work-based assessment options to the IQHPs. We expect these costs to be minimal and would mostly be covered by application fees. We will consider this more during the public consultation.

#### Costs to IQHPs

The Board expects the cost to IQHPs to be minor. Costs may be reduced for IQHPs because of the faster and more flexible application process. IQHPs could also complete the assessment process in their home country, reducing travel costs. We will test this more during public consultation.

We are seeking feedback on whether there are any other possible costs or impacts from this proposal that the Board needs to be aware of.

e. whether the proposal's requirements are clearly stated using 'plain language' to reduce uncertainty, enable the public to understand the requirements, and enable understanding and compliance by registrants, and

The National Boards are committed to a plain English approach that will help practitioners and the public understand and apply the requirements of the draft registration standard.

f. whether the Board has procedures in place to ensure that the proposed standard remains relevant and effective over time.

The National Boards have procedures in place to support a review of the draft registration standard, usually every five years. This is consistent with good regulatory practice. National Boards may review the registration standard earlier if any issues or new evidence arise. This will ensure the draft registration standard is still relevant and workable.

#### 4. Closing statement

Feedback on any regulatory impacts identified during the consultation process and/or in developing the registration standard will be provided to the National Board and/or Ministerial Council to inform decision-making.

The National Board has completed a **patient health and safety impact statement** for consultation and will provide a patient and safety impact assessment (if the proposal is approved).

#### Attachment A: Public consultation response template

#### 10 December 2025

Consultation questions on draft - Registration standard: General registration for experienced internationally qualified health practitioners

The Australian Health Practitioner Regulation Agency (Ahpra) and the National Boards are completing a public consultation on the new draft registration standard: *General registration for experienced internationally qualified health practitioners* (draft registration standard). We want your feedback on this standard using the questions below.

#### **Providing feedback**

If you or your organisation wants to give detailed feedback via email:

- 1. Read the consultation paper (questions are on page 2)
- 2. Complete the submission template below
- 3. Save the template as a Word document
- 4. Email your submission to streamlinedpathways@ahpra.gov.au by 5:00pm AEDT, 9 February 2026

If you want to give brief feedback via online survey:

- 1. Read the consultation paper (the survey questions are based on the questions on page 2)
- 2. Complete the online consultation survey by 5:00pm AEDT, 9 February 2026

For further information please contact <a href="mailto:streamlinedpathways@ahpra.gov.au">streamlinedpathways@ahpra.gov.au</a>

#### **Publication of submissions**

Ahpra and the National Boards will choose whether to publish submissions on the Ahpra website. Publishing submissions keeps people informed and encourages discussion. Let us know if you do not want your submission published. Published submissions will include the names of the people and/or the organisations that made the submission.

We will not share submissions that have offensive or defamatory comments or that are unrelated to the consultation topic. Before we publish your submission, we may remove information that could identify you.

You can ask for all or part of your submission to be made confidential. Confidential information will not be published. If someone asks to access a confidential submission, we will use the Freedom of Information Act 1982 (Cth) to decide if the request should be approved. The Freedom of Information Act 1982 (Cth) was designed to protect personal details and information given in confidence.

#### **Next steps**

We will review and consider all feedback before making decisions about the registration standards.

#### Stakeholder details

If you would like to include background information about your organisation, please do this in a separate word document (not PDF).

Organisation name		

Contact information				
Please include the contact person's name, position and email address				
Response to public consultation questions				
Public consultation questions for consideration				
Please give your answers to any or all questions in the blank boxes below. You may give your answers in a separate Word document (not PDF)				
1. Do you support the suggested approach in the draft registration standard? Why or why not?				
Is the information in the draft registration standard clear and are the new pathways clear and workable? If no, what can we do to make this clearer and/or more workable?				
Are the different ways we will assess work-based experience in the comparable qualification and work-based experience pathway and the comparable work-based experience pathway suitable?  Why or why not?				
4. Are the number of practice hours needed for the different pathways appropriate? Why or why not?				

5. Do you support the National Boards' criteria for assessing comparable international regulator

jurisdictions? Why or why not?

6.	Would the draft registration standard have any possible negative or unintended impacts on public safety? If yes, please explain why.
7.	Would the draft registration standard have any possible negative or unintended effects for Aboriginal and/or Torres Strait Islander Peoples? If yes, please explain why.
8.	Are there any other possible regulatory impacts the National Boards need to consider? If yes, please give details.
9.	Do you have any other feedback on the draft registration standard?