

23 December 2013

Our ref: 131220-AHPRAMD-DL

Secretariat
Australian Health Practitioner Regulation Agency

By email: standard.consultation@ahpra.gov.au

Dear Secretariat

Re: APA Feedback on the Criminal History and English Language Skills Registration Standards

On behalf of the Australian Physiotherapy Association (APA), I thank you for the opportunity to provide feedback to the review of the National Boards' Criminal history registration standard and English language skills registration standard.

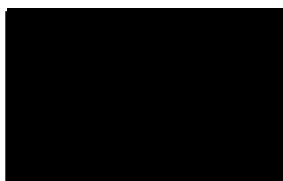
The APA supports the National Boards' preferred options. We would also like to offer the following specific feedback relating to the English language skills registration standard:

- Proficiency in the English language is a critical requirement for safe and effective physiotherapy practice.
- We believe that there is some benefit to be gained in aligning existing requirements with that of the Department of Immigration and Border Protection, as this can promote efficiency and reduce confusion for international applicants.
- Anecdotally, we are aware that some people from countries such as Hong Kong, Singapore and Malaysia may not possess a very high level of proficiency in the English language, and despite completing a physiotherapy education in Australia, graduates from these countries may still not meet the requirements of the registration standard. The APA would not support this proposal.
- We strongly agree with the suggestion that there should be a degree of flexibility for the respective National Boards to accept scores from different sittings of the same language test, subject to the criteria stated in the consultation paper.

The APA firmly believes that the National Boards must ensure patient safety is not compromised by any changes to the registration standards. We welcome further discussion and consultation on any proposed changes to the registration standards.

If you have any enquiries related to any of the points made in this letter, please feel free to contact Paula Bateson, Acting Manager, Policy and External Relations at email

Yours faithfully,



Marcus Dripps
President