



AUSTRALIAN
PHYSIOTHERAPY
COUNCIL

RESPONSE TO INDEPENDENT REVIEW OF HEALTH PRACTITIONER REGULATORY SETTINGS

March 2023



Email: HealthRegReview@finance.gov.au

8 March 2023

Ms Robyn Kruk AO
Independent Reviewer

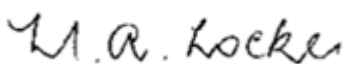
Dear Ms Kruk,

On behalf of the Australian Physiotherapy Council, we are pleased to contribute a response to the Independent Review of the Australian healthcare workforce challenges.

As the assigned physiotherapy accreditation and assessment authority, the Council is uniquely positioned to respond and welcome the invitation to provide this submission in response to the Consultation Paper.

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

Warm regards,



Ms Melissa Locke
Chair, Board of Directors
Australian Physiotherapy Council

Submission contact: Anton Barnett-Harris, CEO

Note: The Australian Physiotherapy Council consents to the following questions

- I consent for the Secretariat to contact me in relation to this submission.
- I consent for my submission to be published.
- I consent for the Independent Reviewer to cite my feedback in the interim/final review reports.
- I consent for the Independent Reviewer to share my feedback with other relevant parties.

I. Australian physiotherapy workforce shortages

I.1. Do you agree there are current and/or projected skills shortages in these professions?

I.2. If yes, is there any data or evidence you can provide to demonstrate these shortages?

The Australian Physiotherapy Council agrees with official Government data sources and key stakeholders across the physiotherapy profession that we continue to have an unmet physiotherapy workforce demand.

Physiotherapy has been an occupation included on the Department of Home Affairs *Medium and Long-term Strategic Skills List* for a number of years. The Council provides Skills Assessment for migration purposes which we deliver on behalf of the Department of Home Affairs. As evidenced in the National Skills Commission's (now Jobs and Skills Australia) 2022 Skills Priority List data, a shortage of physiotherapists exists across all states and areas (i.e., both regional and metropolitan), with moderate future demand predicted.¹

National Skills Commission, Skills Priority List, 2022

Occupation		Current National Labour Market Rating	National Future Demand Rating	Current State and Territory Labour Market Ratings							
ANZSCO Code	Occupation title	NS - No Shortage S - Shortage R - Regional Shortage		NSW	VIC	QLD	SA	WA	TAS	NT	ACT
252511	Physiotherapist	S	Moderate	S	S	S	S	S	S	S	S

The Australian Physiotherapy Association (APA) in their White Paper, identify a workforce shortage of physiotherapists across the country, including metropolitan and regional.²

During the years of the COVID-19 pandemic and prolonged periods of border and travel restrictions, the Council saw a reduction in successful completion of assessment pathways. This led to less overseas qualified physiotherapists entering the Australian workforce as fully registered practitioners.

Another indicator of ongoing expected shortage of physiotherapists is the growth in Australian university education programs. As the Accreditation Authority for entry-level Physiotherapy programs, we have seen a doubling of the number of programs over the last 10 years.³ We believe that universities investing in developing new physiotherapy courses demonstrates the ongoing demand by the profession, the community and students to train more physiotherapy practitioners.

However, the Council also notes the shortage of Indigenous physiotherapy students participating in university programs and for the last several years the Council has been collecting data on Indigenous student participation. There are limited numbers of university programs accessible in rural and remote communities, which could be leveraged as a strategy for retaining physiotherapy graduates in those communities. One solution for retaining physiotherapists in underserved geographical locations, is to financially incentivise universities to provide programs in these areas.

Another contributing factor to the physiotherapy workforce supply issues is the retention of registered physiotherapists. Generally, physiotherapists remain in clinical practice for only five to 10 years⁴, with clinicians known to move onto other professional roles within healthcare or leave the profession entirely.

Growing demand for physiotherapy services remains high, recognising the value and contribution of physiotherapy treatment across a range of clinical settings from private practice, hospital-based care, community healthcare environments and within multidisciplinary collaborative models of care.

A landmark analysis and 2020 Report by the Nous Group highlighted the economic value and impact of physiotherapy interventions for patients and the Australian healthcare system.⁵ The study found that treatments by physiotherapists deliver both health and economic benefits. Interventions are clinically effective and deliver net economic benefits, with quality-of-life improvements exceeding treatment costs.

¹ [Skills Priority List | National Skills Commission](#)

² The Australian Physiotherapy Association, Future of Physiotherapy in Australia – A 10-Year Vision Policy White Paper (2022), page 14, [APA Future of Physio White Paper FW.pdf \(australian.physio\)](#)

³ The Australian Physiotherapy Council's own trend data of number of programs which the Council accredits.

⁴ The Australian Physiotherapy Association, Future of Physiotherapy in Australia – A 10-Year Vision Policy White Paper (2022), page 14,

⁵ The Australian Physiotherapy Association, Value of Physiotherapy in Australia (Oct 2020) [APA | Economic value of physiotherapy \(australian.physio\)](#)

2. What, in your view, are the key strengths and weaknesses of the current regulatory settings relating to health practitioner registration and qualification recognition for overseas-trained health practitioners?

Strengths:

The Australian physiotherapy profession is well regarded globally and the Council believes the regulatory environment plays a vitally important role in upholding the standards of practice as defined by the Australian and Aotearoa New Zealand Physiotherapy Practice Thresholds.

One of the strengths the Australian Physiotherapy Council brings to assessing international physiotherapists is our flexibility to innovate the methodology and models of assessing applicants to ensure they meet the threshold standards.

This includes initiatives such as moving to a simulation model for the Clinical Assessment (practical assessment) following extensive research, offering remote delivery of our Written Assessment since the COVID-19 pandemic, and introducing a streamlined pathway known as FLYR.

The FLYR pathway leverages a risk-based approach to recognise physiotherapists from countries that have similar education systems, practice environments, and regulatory requirements. This allows this category of international physiotherapists to fast track through the Council's assessment processes, reduces costs involved in assessment and begin contributing to the workforce more quickly.

Weaknesses:

In an ever dynamic and competitive international labour force environment, Australia's hesitation to positively promote the Australian healthcare workforce as a destination of choice, could be considered a weakness. The Council has complied with the expectation that we do not currently seek to attract international physiotherapists, but respond to inquiries once the Council is contacted by a prospective Australian physiotherapist. As the champion of quality and standards, we could positively promote the Australian physiotherapy profession to international physiotherapists, without compromising our role, function or upholding standards. We believe the Council could be far more proactive in this pursuit if funded or in partnership.

The length of time candidates take to complete the Standard Assessment Pathway is often protracted due to their decision not to complete the pathway as quickly as the Council can offer, often quoting lack of adequate finances or preparation. The Council continues to review how to support and encourage participation and engagement in progressing through the assessment pathways. A possible solution to financially supporting participation is offered under response to question 4.

Limited registration is designed to enable overseas physiotherapists to prepare for the Council's clinical assessment and gain valuable supervised clinical experience in diverse Australian settings. However, this can be used by employers as a short-term solution to workforce shortages, which is not a sustainable or optimal solution.

The Council has significant concerns regarding recent changes to Physiotherapy Board of New Zealand's process for assessing overseas-qualified physiotherapists and its impact on Australia's public safety. The new process involves only a desktop assessment (and in some cases no assessment at all), which then leads to registration in NZ, and application to Ahpra for registration under TTMRA, without any further assessment or consideration of being a safe physiotherapist in Australia.

3. During the pandemic, a range of regulatory settings and processes relating to registration and qualification
 - 3.1. recognition of overseas-trained health practitioners were temporarily waived, relaxed or had greater flexibility.
 - 3.2. Are there settings or processes that were particularly beneficial or challenging from a professional or employer perspective?
 - 3.3. Do you believe any of these temporary changes were beneficial or potentially detrimental to patient safety?
 - 3.4. What opportunities/challenges may arise if these settings and/or processes are retained permanently?

The Australian Physiotherapy Council has consistently demonstrated our innovative and flexible approach to assessing overseas qualified physiotherapists seeking to join the Australian workforce. With a long-term view to patient safety, the standards of physiotherapy were upheld during the pandemic whilst considering pragmatic responses to overcoming barriers.

The Council automatically extended interim certificates for an additional year for international physiotherapists undertaking Council assessment pathways. This allowed these practitioners to retain their limited registration, and continue working under supervision and contributing to the healthcare workforce needs.

Government imposed restrictions during the pandemic meant the Council were unable to conduct face-to-face clinical assessments. With restrictions eased, the Council scaled our operations and delivered 443 clinical assessments during FY21-22 and expect to deliver 1,000 clinical assessments in FY22-23, addressing the pandemic backlog within 6 months to December 2022. This demonstrates the Council's ability to scale up or down as the need and demands warrants.

In mid-2020, the Council developed a new model of remote written assessment, which enabled significant numbers of overseas physiotherapists to undertake this key stage of the assessment journey, despite travel restrictions. The positive impact of this innovative change to service delivery was that overseas qualified practitioners could complete most of their Australian physiotherapy assessment pathway from an overseas or remote location⁶. This has remained an option for physiotherapists who prefer to undertake the remote mode rather than attending a physical assessment venue.

In the case of applicants from FLYR countries, they could complete their entire streamlined assessment pathway from outside of Australia, reducing the impediments caused by travel restrictions.

The Council's experience of navigating COVID-19 led us to invest in research to consider alternative modes of delivering Clinical Assessment, beyond the face-to-face model within our Melbourne Simulation Lab. We are currently undertaking a formal research project to investigate suitable models of Remote Clinical Assessment.⁷

4. The end-to-end process for overseas health practitioners seeking to work in Australia can be complex, time consuming and costly. Current regulatory requirements may set unduly restrictive barriers, which in turn may deter potential practitioners from seeking to work in Australia.
 - 4.1. Do you agree with this premise? If so, why?
 - 4.2. What practical changes could be made to current regulatory settings to most significantly improve the end-to-end process:
 - 4.2.1. over the next 12 months
 - 4.2.2. in the medium- to longer-term? What opportunities/challenges may arise if these settings and/or processes are retained permanently?

The Australian Physiotherapy Council recognises the time and complexity for an international physiotherapist to join the Australian physiotherapy profession and workforce because this is the feedback we receive from our candidates.

However, a recent Independent Review undertaken in 2022, concluded that the Council's assessment processes are "an examination suite that is well-designed, professionally delivered and fit-for-purpose".

Over a number of years, the Council has grown our capacity and capabilities to improve the international physiotherapist assessment experience including investing in and innovating new models of assessment (the move from hospital based clinical assessment to a simulated model), delivering people focused customer service, developing resources and contemporary communications content and supporting international physiotherapists through their various stages of assessment.

⁶ [Written Assessment - Australian Physiotherapy Council \(physiocouncil.com.au\)](https://www.physiocouncil.com.au)

⁷ [Remote Clinical Research Project Update - Australian Physiotherapy Council \(physiocouncil.com.au\)](https://www.physiocouncil.com.au)

What could be done within 12mth horizon?

Government could offer financial incentives to international physiotherapists who successfully complete their physiotherapy assessment pathway and become eligible to be registered with Ahpra and enter the Australian healthcare workforce.

Specifically, we believe our **FLYR pathway offers** a scalable, efficient and robust assessment solution that can be completed by **international physiotherapists within 6 months**. The government providing grants to promote application to the FLYR pathway can facilitate expedient entry of competent overseas qualified physiotherapists into the workforce.

Government funding for Customer Research to better understand the barriers, drivers and opportunities to attract international physiotherapists to be assessed for registration as an Australian healthcare practitioner. It seems that international physiotherapists still desire to work abroad. Additional funding could research how to support the journey of an internationally qualified physiotherapist and how they interact with Ahpra, the Physiotherapy Board and the Council.

With greater customer insights regarding what would make it more attractive to come and work in Australia, Australia would be better positioned to attract international physiotherapists to our healthcare workforce, rather than choosing alternative countries.

The Australian Physiotherapy Council is currently funding the **development of additional supports to assist international physiotherapists** to successfully complete the Council's assessment pathways. These supports include: helping bridge gaps in understanding of the Australian healthcare setting, coaching international physiotherapist's on how to use existing skills and competencies in a new country like Australia and developing systems which could provide individual feedback if candidates do not pass exams on their first attempt. We believe this will increase the number of candidates successfully passing assessment on their first attempts, and facilitate faster entry into the workforce.

What could be done over medium-longer term:

The Council's research and consideration of a Remote Clinical Assessment model is expected to deliver greater accessibility, reduce travel costs for applicants and lower barriers for applicants to successfully completed the assessment pathways.

Aligning the Ahpra registration and Home Affairs migration processes, as per the 2017 *Independent Review of Accreditation Systems within the National Registration and Accreditation Scheme for health professions* (Woods Review). Skills assessment for those who have been already successfully assessed by Council for registration purposes would reduce duplication and increase speed of registration and entry into the Australian workforce.

Technology and data sharing between organisations, such as Ahpra, National Board and the Council, who are involved in international physiotherapists' entire journey to join the Australian physiotherapy profession. These solutions would consider the whole candidate journey including interactions with the Council and Ahpra, the efficiency gains and improvement in user experience for overseas physiotherapists, such as a single point for submitting documents once, rather than multiple times for different organisations.

As first contact practitioners, the scope of physiotherapy needs to be extended, such as diagnostic imaging referrals, prescribing and describing etc. This would reduce the reliance on General Practitioners and the number of circular referrals, while delivering greater efficiency across the healthcare system and better health outcomes for patients.

The Council believes that appropriately trained physiotherapy assistants have a greater potential role to play in serving the Australian community. Accrediting physiotherapy assistants would increase the perceived value within the healthcare system and complement the services offered by physiotherapists. Currently the Physiotherapy Board of Australia do not regulate physiotherapy assistants or their education programs.

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