



Osteopathy Council of New South Wales

Level 6 North Wing 477 Pitt Street Sydney NSW 2000

Locked Bag 20 Haymarket NSW 1238

Phone: 1300 197 177 Fax: (02) 9281 2030

Online: www.osteopathycouncil.nsw.gov.au

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Dr Cathy Woodward
Executive Officer
Osteopathy Board of Australia

Dear Dr Woodward

Re: *Draft Framework - Pathways for Registration of overseas-trained osteopaths.*

The Osteopathy Council of New South Wales (OC NSW) appreciates the opportunity to comment on the OBA's draft framework.

The Council is responsible for the management of complaints about the conduct, professional performance, health and competence (fitness to practice) of any osteopath working in NSW. The Council is established by and functions in accordance with the Health Practitioner Regulation National Law (New South Wales) Regulation 2010. The paramount consideration of the Council is the protection of the health and safety of the public. As such, the requirements for and the process of registration as an osteopath in NSW is a matter that directly concerns the Council.

The Council is concerned that the draft Framework may afford inadequate protection for the public. The proposal fails to establish how the removal of all elements of competence assessment from certain classes of overseas trained osteopaths is defensible in the context of public protection.

The original overseas assessment process developed by Australian and New Zealand Osteopathic Council (ANZOC) in collaboration with the Osteopathic Council of New Zealand (OCNZ) contained a competent authority pathway that had a yearlong work-based competence assessment component with supervision from trained clinical preceptors. The research and development of the process was primarily funded by the Department of Health and Ageing, and used a panel of Australian experts in the assessment of clinical competence. The Council understands that this process has been adopted and implemented in full by the OCNZ, and understands that the system is working well.

The Council was surprised to learn that neither the OBA nor ANZOC has sought input from the OCNZ on how that process is operating.

The overseas assessment process as originally conceived allowed for mentoring and areas of weakness to be addressed while supporting the osteopath in their new practice environment. Under the current interim assessment process (the standard pathway), all of these candidates had the opportunity to complete a portfolio to address their areas of weakness and opportunities to demonstrate competency in the full range of capabilities through the portfolio and clinical examination stages. It is the Council's understanding and concern that under the revised competent authority pathway, all of the above candidates would be eligible for registration, with no component of assessment or supervision.

The Council is unable to determine in the absence of any details if the proposed module will contain an element of assessment of clinical competence.

The OCNZ have been clear that this proposal is deeply problematic. It would give access to the New Zealand register, via Australia, to osteopaths who have not been subject to any competence assessment processes. The Council is concerned that the adoption of this model in Australia would threaten the TTMRA and reciprocity currently enjoyed by osteopaths in Australia and New Zealand.

The Council respectfully suggests that the current interim overseas assessment process continues to operate and this proposal is withdrawn pro tem so that the academic experts in clinical assessment who contributed to the original assessment process can be consulted. The Council further suggests that the lessons learned by the New Zealand experience should be incorporated into any revised pathway developed for registration in Australia.

The Council feels it would be appropriate to convene a meeting of relevant stakeholders, the OBA, ANZOC, the OCNZ and Australian Osteopathic Association, the panel of academic experts and the Osteopathic Council of New South Wales, to ensure that a best practice model of assessment is developed in Australia.