

31st July, 2013

Osteopathy Board of Australia
Australian Health Practitioner Regulation Agency
111 Bourke Street
Melbourne VIC 3000

Thank-you for the opportunity to comment on the revised Framework: pathways for registration of overseas-trained osteopaths released by the Osteopathy Board of Australia on July 12, 2013. The Discipline of Osteopathic Medicine at Victoria University supports the proposal to include supervised practice within the competent authority pathway as it strengthens the Board's ability to execute its responsibility to protect the public under the National Law.

While the revised Framework contains improvements on the previous draft, staff members from the Discipline have identified a number of concerns that we hope the Board will consider in subsequent revisions. These issues and comments are listed below.

Attachment A

1. Introduction

In the second paragraph, 'osteopathy practitioners' should be replaced with 'osteopaths' to ensure consistency throughout the document.

2. Summary of the framework

It is not clear why osteopaths with GOsC recognised qualification are offered either the standard pathway or the competent authority pathway. This standard pathway appears to be redundant in this situation.

3. Assessment of overseas authorities

In paragraph 3, the timeframe for qualifications is those recognised between 1999 and 2012. What about those qualifications recognised after 2012? Do these applicants have to undertake the standard pathway?

In paragraph 6, clarify that all applicants will complete the Australian health care system module regardless of the pathway they are following.

4. Qualifications, assessments and supervision

It is worth providing information about the process for osteopaths who hold a GOsC recognised qualification from between 1999 to 2012 but are practicing in a jurisdiction other than the UK. It is not clear how these applicants would be dealt with.

The fact sheet 'Competent authority pathway: provisional registration and supervised practice' does not appear to be available for review

6. Applying for provisional registration

There is no rationale provided for why an applicant would be required to undertake supervised practice for 6 months. Provisional registration under the National Law can be granted for up to 12 months. A 12-month provisional registration period would allow the applicant to complete their supervised practice in the same timeframe required under the Osteopathic Council of New Zealand competent authority pathway. This is an important consideration given the Trans-Tasman Mutual Recognition process.

Attachment B

Within this attachment, there is no reference to the competent authority pathway in the Purpose and Summary.

These guidelines should clearly state the process for supervision under the competent authority pathway. At present it appears that a competent authority pathway applicant could be required to undertake any of the 4 levels of supervision, at the Board's discretion. Applicants, supervisors and employers would require a degree of certainty at the start of the supervised practice pathway about which level the applicant is being supervised at. There also needs to be transparency and consistency about this process and this is not clear in the attachment as it stands.

General comments

Staff members from the Discipline are still concerned that a number of issues raised in the previous consultation around supervised practice have not been addressed or incorporated into the documents provided as part of this current consultation. These issues include:

- Potential supervisors should be required to undertake any formal training prior to being able to supervise an applicant under this pathway. This should also be applied to other situations where supervised practice of a registered osteopath is required;
- Supervisors who have completed initial training should be required to undertake professional development around supervision as part of their registration requirements if they wish to continue as a supervisor;
- There is no indication as to whether supervisors will be remunerated for their time supervising an applicant. Given the experience, time commitment and expertise the supervisors are bringing to the process, the University feels that some form of remuneration of appropriate. This is consistent with the supervision requirements undertaken in Psychology;
- It is prudent for the Board to provide some degree of certainty around the professional indemnity insurance (PII) coverage for supervisors, that is, is the PII coverage for these activities covered by the Board or as part of the supervisors own PII? This could impact on the willingness of osteopaths to supervise practitioners. Although the requirement for the supervisor to hold PII in accordance with the Board's registration standard is stated, this standard does not require the osteopath to ensure that insurance coverage for supervision of practitioners is part of their policy;
- The conflict of interest guidelines should be substantially tightened. In the interest of proper supervision and protection of the public, the supervisor should not have any personal, professional or business relationship with the supervisee. This should also extend to the supervisor not having any personal, professional or business relationship with the person employing or engaging the osteopath in their practice (where applicable).

Thank you again for the opportunity to comment on this revised Framework.

Regards,

A/Prof Gary Fryer