

9 August 2013

Dr Cathy Woodward  
Executive Officer  
Osteopathy Board Of Australia

via email: [osteoboardconsultation@ahpra.gov.au](mailto:osteoboardconsultation@ahpra.gov.au)

Dear Cathy

Thank you for your invitation to comment on the draft paper *Framework: pathways for registration of overseas-trained osteopaths* ("Framework") issued on 12 July 2013. ANZOC has reviewed the paper and wish to comment on the following areas.

### **Important information**

It is important that terminology is consistently used throughout the Framework. Module was the working term to describe the *Information on the Practice of Osteopathy in Australia: A guide for graduates trained overseas* ("the Guide") and should not be used going forward. The preferred terminology is Guide. Candidates undergoing either the competent authority or standard pathway will be required to undertake an examination on the content of the Guide.

### **2. Summary of the Framework**

ANZOC notes that candidates are able to choose either the competent authority pathway or the standard pathway. ANZOC would like the document to clearly state the last point in the process at which candidates are able to change pathways. For example, a candidate eligible for the competent authority pathway decides to switch to the standard assessment pathway as they feel that they will obtain general registration in a shorter period of time. If so, would any criteria be established to facilitate this transition?

### **3. Assessment of Overseas Authorities**

ANZOC notes that candidates who do not pass the competent authority desktop assessment by ANZOC may be eligible to apply for registration through the standard assessment pathway. It is important to emphasize that eligibility for the standard assessment pathway is not guaranteed. If a candidate does not hold a qualification at Australian Qualification Framework (AQF) level 7 or higher, or hold an IELTS at level 7 or above in each category, then they are not eligible for either pathway.

Further, ANZOC does not recommend the use of the word "pass" rather recommends the term "eligibility" so that it becomes "*candidates who are deemed ineligible for the competent authority pathway by way of the desk-top assessment...*"

## **Section 4 – Qualifications, Assessments and Supervision**

Our view is that the first paragraph is vague and potentially confusing. The *Report on Equivalency of the General Osteopathic Council (GOsC) and GOsC Recognised Qualifications* undertaken by ANZOC in July 2012 determined that candidates registered with GOsC who are graduates from a UK Recognised Qualification program **do hold** qualifications deemed to be substantially equivalent to, or based on similar competencies to an approved program of study. However, this paragraph states that they do not.

Further clarification of why it was deemed necessary for these candidates to successfully complete an assessment under s.53(c) would be appreciated.

## **Section 5 – Summary of Requirements for Overseas Qualified Osteopaths**

In point 2, ANZOC recommends that the sentence be re-worded to read “*An overseas qualification assessed by ANZOC as being eligible for either the competent authority, or standard assessment pathway.*”

### **General Comments about the Period of Supervised Practice**

ANZOC’s overarching observation is that the Osteopathy Board of Australia (“the Board”) is attempting to apply a generic supervisory framework to a process that requires specificity. In particular, ANZOC recommends:

- all candidates are required to demonstrate relevant competencies
- that supervisors work under the terms of a clear contract that sets out what is expected of them, their obligations and their rights
- that supervisors receive procedural guidance in the form of a guidebook so that they can understand the requirements of the Framework and also how the period of supervision fits within the whole assessment process. This will provide supervisors with an understanding of what their role is, as well as the roles of ANZOC and AHPRA and the Board as well any insurance and other medico-legal considerations
- that supervisors have access to someone who will act as a mentor and resource for them in their role; that person needs to be experienced and familiar with this style of supervision
- there needs to be further clarification of the reporting frequency. Noting the Board intends to introduce a “level 4” supervision, the reporting periods are vague and need more definitive timeframes attached to them
- management of conflict of interest needs to be further explored as a number of osteopaths are sponsored under the 457 visa scheme with their employer also likely to be their supervisor. This creates a conflict of interest that could potentially impede objectivity

ANZOC is further concerned that a pool of supervisors will not be available to handle the expected demand. There are 11 candidates undertaking the written examination in September 2013, of whom 9 would be eligible for the competent authority pathway. Should these 9 candidates pass this exam and choose to enter this pathway, it is not clear whether or not enough suitable supervisors be available prior to the end of the calendar year.

Further, the number of queries from overseas qualified osteopaths has increased significantly since the introduction of a competent authority pathway was first mooted and ANZOC is concerned that these candidates will not be able to identify a suitable supervisor to enable them to complete their period of supervised practice in a timely manner to ensure full registration. ANZOC would appreciate advice from the Board as to the process of obtaining a supervisor if the candidates are unable to identify one themselves.

ANZOC thanks the Board for the opportunity to comment on the consultation paper and looks forward to receiving a final determination on the pathways for registration of overseas trained osteopaths in due course.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Rachel Portelli', written in a cursive style.

Rachel Portelli  
**Executive Officer**