

To whom it may concern

### **Public consultation paper on the definition of practice**

The Australasian College of Podiatric Surgeons (“ACPS” or “the College”) thanks you for the invitation to make comment on the public consultation paper on the definition of ‘practice’. The College’s response to your direct questions is outlined below:

1. The College agrees that there is minimal risk to the community if practitioners are not registered or are registered in the non-practicing category when items (1)-(6) are considered in their entirety. The College would expect that the person does not advertise services for which they are not registered for. The College is not able to determine any other factors that should be considered;
2. The College supports this statement. Advice needs to be inline with current accepted practice and have an evidence-based focus. The individual in this role would be expected to keep abreast of current practices relevant to their field of expertise through documented continuing professional development activities as agreed by the College;
3. The College supports this statement. These roles are viewed as senior type roles and one of having extensive or specialized knowledge of a subject. Health practitioners in this role earn respect from their peers when they have the appropriate qualifications and when it can be seen that their knowledge base is being maintained and updated, they are publishing, presenting and or involved in research;
4. Health practitioners in the role described above are not imparting advice to their professional peers or to patients that will directly affect the outcome of a treatment. As such we do not believe that this constitutes ‘practicing’. There should however be a clear understanding of the role at hand to avoid any cross over. Role cross over may pose a problem. When the role of administrator for example, also includes some patient advisory role, then ‘practicing’ is occurring. A potential gray area exists in this regard; and
5. Health practitioners in all of the aforementioned settings should be registered. They are giving advice and imparting knowledge and skills, which the health practitioner may chose to adapt and use in a direct patient context and hence affect treatment outcomes and safety. Again registration becomes important in ensuring minimum standards are being met.

Settings whereby advice or instruction is given remotely or through media that may not be necessarily be conducted in real time needs to be considered.

Yes the College does support option 1. We feel that this definition is all encumbering, appropriately descriptive and represents what we believe is the true nature of the word ‘practice’ in this context.

The College does not support option 2. The current definition of ‘practice’ captures all activities and settings an individual with qualifications as a health practitioner might be involved in professionally. It protects the public by requiring health practitioners to be registered, to meet the registration standards and be accountable for safe and effective delivery of health services.

The College does not have further to add to this consultation paper and once again thanks you for the invitation to respond.

Yours sincerely

ACPS