



Public consultation on draft revised registration standards and relevant guidelines

19 May 2014

Responses to consultation questions

Please provide your feedback as a Word document (not PDF) by email to podiatryconsultation@ahpra.gov.au by close of business on 14 July 2014.

Stakeholder Details

Organisation name
Australian and New Zealand Podiatry Accreditation Council (ANZPAC)
Contact information <i>(please include contact person's name and email address)</i>

Your responses to the consultation questions

Registration standard: Professional indemnity insurance arrangements <i>Please provide your responses to any or all questions in the blank boxes below</i>
1. From your perspective how is the current Professional indemnity insurance (PII) arrangements registration standard working? In general the policy is fairly clear, however confusion can arise as to whether a podiatrist is sufficiently covered by their employer or require further cover as an individual.
2. Is the content and structure of the draft revised registration standard helpful, clear, relevant and more workable than the current registration standard? It appears clearer than the current version
3. Is there any content that needs to be changed or deleted in the draft revised registration standard?

Registration standard: Professional indemnity insurance arrangements

Please provide your responses to any or all questions in the blank boxes below

ANZPAC does not endorse the status quo or option 2 in the current draft form.

Given that a considerable number of podiatrists work in general private practice, ANZPAC recommends that the Board seek actuarial advice about the level of cover required for a podiatrist in a typical practice and use this to determine a minimum level of cover with advice to seek professional advice.

Option 2 as proposed may or may not set a minimum cover level with the option of self-assessment for a higher level of cover dependent on the individual's level of practice risk as determined by the individual and their advisor.

ANZPAC would prefer that the Board adopt a similar approach to the Nursing and Midwifery Board of Australia (NMBA) and approve a standard based around cover being required for the areas of practice and a requirement to seek professional advice on the level of cover appropriate for the individual's practice.

Under the current draft standard, the Board is imposing a minimum \$5 million cover and then giving the option of assessing higher cover over and above \$5 million. It may well be that professional advice determines that the minimum level of cover of \$5 million is too high and that a policy covering the areas of practice may well be deemed sufficient at a lower monetary amount e.g. \$2 million. Alternatively, it may be determined that an individual requires a higher level of cover based on the risk assessment.

As the draft stands there is no benefit to offering self-assessment over and above a minimum if a minimum monetary amount is already set. As the minimum is just that - a minimum - there already exists no impediment to taking more than the minimum cover in the current standard. Our preference is that the revised standard be practice based cover rather than a set monetary level of cover. A policy more in line with the NMBA PII standard is recommended.

4. Is there anything missing that needs to be added to the draft revised registration standard?

ANZPAC recommends that a flow chart similar to the one included in the NMBA registration standard be adapted and included in the revised registration standard.

5. Do you have any other comments on the draft revised registration standard?

No

6. Do you think that that the current review period of at least every three years should be maintained or would an alternative period be appropriate e.g. five years, with the option to review earlier if the need arises?

The current 3 year review period is sufficient

Registration standard: Continuing professional development (CPD)

Please provide your responses to any or all questions in the blank boxes below

7. From your perspective how is the current CPD registration standard working?

No comment

8. Is the content of the draft revised registration standard helpful, clear, relevant and more workable than the current registration standard?

The basic aim of the revised standard regarding improvements in clarity is effective.

9. Is there any content that needs to be changed or deleted in the draft revised registration standard?

Registration standard: Continuing professional development (CPD)	
<i>Please provide your responses to any or all questions in the blank boxes below</i>	
	No
10. Is there anything missing that needs to be added to the draft revised registration standard?	
	No
11. Do you have any other comments on the draft revised registration standard?	
	No
12. Do you think that that the current review period of at least every three years should be maintained or would an alternative period be appropriate e.g. five years, with the option to review earlier if the need arises?	
	The current 3 year review period is sufficient

Guidelines on continuing professional development (CPD)	
<i>Please provide your responses to any or all questions in the blank boxes below</i>	
13. From your perspective, how are the current guidelines on CPD working?	
	No comment
14. Is the content of the draft revised guidelines helpful, clear, relevant and more workable than the current guidelines?	
	The basic aim of the revised standard regarding improvements in clarity is effective.
15. Is there any content that needs to be changed or deleted in the draft revised guidelines?	
	No
16. Is there anything missing that needs to be added to the draft revised guidelines?	
	<p>ANZPAC supports the changes recommended in option 2 with the following recommendation.</p> <p>The Board's preferred option 2 limits the CPD activities eligible to be attributed to those listed in the <i>Guidelines for continuing professional development (The Guidelines)</i>.</p> <p>As the standard indicates, CPD should be relevant to the practitioner's area of professional practice and meet their individual requirements. For podiatrists in private practice there may be CPD activities that meet this definition that fall outside of clinical areas of practice. These areas may include CPD activities related to podiatry practice management, financial management, records management and human resources e.g. requirements of a podiatry practice to employ overseas trained podiatrists.</p> <p>A broadening of the approved scope of CPD activities to recognise that business best practice is a vital part of professional podiatric practice is recommended.</p> <p>This recommendation could fit under the guidelines categories of Further Education or Quality Improvement.</p>
17. Do you have any other comments on the draft revised guidelines?	
	No

Registration standard: Recency of practice (ROP)	
<i>Please provide your responses to any or all questions in the blank boxes below</i>	
18. From your perspective how is the current Recency of practice registration standard working?	No comment
19. Is the content of the draft revised registration standard helpful, clear, relevant and more workable than the current registration standard?	The basic aim of the revised standard regarding improvements in clarity is effective.
20. Is there any content that needs to be changed or deleted in the draft revised registration standard?	No
21. Do you have any comments on the minimum practice requirements in the draft revised registration standard?	No
22. Do you think that the following alternative for minimum hours of practice would be better? (i.e without the option of 150 hours in the 12 month period prior to applying for registration or renewal of registration). Please provide the reason for your answer:	<ul style="list-style-type: none"> ○ <i>450 hours of practice in the three year period prior to applying for registration or renewal of registration</i>
	ANZPAC support the flexible approach to accruing 450 hours detailed in the draft standard table that provides various examples for example practitioners a-f.
23. Is there anything missing that needs to be added to the draft revised registration standard?	No
24. Do you have any other comments on the draft revised registration standard?	No
25. Do you think that that the current review period of at least every three years should be maintained or would an alternative period be appropriate e.g. five years, with the option to review earlier if the need arises?	The current 3 year review period is sufficient
26. Do you have any comments on the draft <i>Guidelines about recency of practice?</i>	no

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