



## Public consultation on draft revised registration standards and relevant guidelines

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19 May 2014

### Responses to consultation questions

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

#### Stakeholder Details

<b>Organisation name</b>
<b>Contact information</b> <i>(please include contact person's name and email address)</i>
Noami Zakarias

#### Your responses to the consultation questions

\*\*\*\*I am commenting on the recency of practice registration standard draft\*\*\*\*

<b>Registration standard: Professional indemnity insurance arrangements</b> <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?
2. Is the content and structure of the draft revised registration standard helpful, clear, relevant and more workable than the current registration standard?
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*

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

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

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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?

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**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?

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

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

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

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

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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?

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**Guidelines on continuing professional development (CPD)**

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

13. From your perspective, how are the current guidelines on CPD working?

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14. Is the content of the draft revised guidelines helpful, clear, relevant and more workable than the current guidelines?

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15. Is there any content that needs to be changed or deleted in the draft revised guidelines?

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16. Is there anything missing that needs to be added to the draft revised guidelines?

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17. Do you have any other comments on the draft revised guidelines?

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**Registration standard: Recency of practice (ROP)**

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

18. From your perspective how is the current Recency of practice registration standard working?

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

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

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21. Do you have any comments on the minimum practice requirements in the draft revised registration standard?

I think this is fair

**Registration standard: Recency of practice (ROP)**

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

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:

- *450 hours of practice in the three year period prior to applying for registration or renewal of registration*

I think that this alternative accommodates practitioners taking a period of absence from practising for a range of reasons (maternity/paternity or illness) more flexibility of when in the 3year period the hours are worked, while still protecting the safety of the public. It is particularly relevant to practitioners who are parents trying to stay at home full time with babies and young children, especially mothers who are breastfeeding.

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

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

In the draft consultation paper it states that there will likely need to be a period of transition to the proposed standard. I support this statement as practitioners may have already made their maternity/paternity leave arrangements with their employer/s, made decisions about the care of their young children and become pregnant (once or subsequently) to work within the current standard. For this reason I would argue if the 3year period was retrospective it would disadvantage this small group (e.g. there may be practitioners that are part way into a <3year period of absence, as per the current standard, that would have to work their 450hours in the remaining time). I propose that a future date for the commencement of the revised standard be given, and that the period of absence is either effective from that start date or provisions be written into the standard for those that are currently taking a period of absence and would therefore be working from the previous standard.

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?

I think registered podiatrists should be in line with other AHPRA registered professions

26. Do you have any comments on the draft *Guidelines about recency of practice?*

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