I would like to contribute my comment to the Consultation Paper regarding the National Registration of Occupational Therapists. As a fully registered Physiotherapist with AHPRA, I feel this consultation process bypassed me when Physiotherapy was changing over to National Registration, and my feedback was not heard. I was born in Australia and completed all my secondary and tertiary education in Australia.

The area I feel strongest about within the new registration guidelines, relates to English Language Skills Standards. As an educator that deals primarily with the education of tertiary level University students learning physiotherapy, it seems absurd to me that further testing needs to be obtained by internationally secondary schooled students, regardless of the fact they have successfully completed the Australian University degree in their field of study (this applies to Occupational Therapy as well) to get registration. It seems ridiculous that there is the need for a second system to assess the suitability of language and communication in international schooled students, when we appear more than happy to register graduates that are locally schooled. I know within Physiotherapy that a graduate who's knowledge and/or physical manual therapy skills are lacking is much more dangerous than one with a slight reduction in their communication skills. It appears that AHPRA are happy to accept the clearance of the Universities and tertiary organisations that their graduates are theoretically and manually skilled enough to practice on the public, but second guess their ability to assess the communication levels needed by graduates to be effective in their chosen health professional fields. This appears contradictory to me.

I feel that if internationally trained therapists can prove that they have received qualifications in secondary and tertiary education in English, and pass all relevant practical and theoretical training as decreed by professional bodies (including communication), then they should be registered to practice. In the same way, if a internationally secondary schooled person completes an Australian Tertiary qualification in any health field requiring registration, then it should be automatically granted without further IELTS or OET testing.

Australia has always been a country of equality and opportunity, but these rules since becoming a National Register with AHPRA appear to borderline on xenophobia. Although this is current in Physiotherapy, I feel Occupational Therapy has the opportunity to right an injustice in this matter if it hasn't yet been implemented.

Thank you for time in reading this and I hope that it does not fall on deaf ears.

J. Shori