



Submission to the Productivity Commission

Mutual Recognition Schemes Study

February 27 2014

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Submission to the Productivity Commission

This submission

Osteopathy Australia appreciates this opportunity to comment on the issues paper and contribute to the *2014 Review of the Mutual Recognition Agreement and the Trans-Tasman Mutual Recognition Agreement*.

We consider this submission to be a public document and are pleased for it to be posted on the Productivity Commission's website. It will be posted at www.osteopathy.org.au.

Osteopathy Australia

Osteopathy Australia is the national professional body representing over 85% of osteopaths across Australia. This gives us a unique voice for representing the profession and lobbying to ensure high standards—of healthcare and of regulation—are established and maintained.

Our core work is liaising with state and federal governments, regulatory or other statutory bodies, and key stakeholders throughout the healthcare landscape. We always welcome opportunities for input or collaboration, such as this. Indeed, we have been looking forward to this review.

Osteopathy Australia has extensive experience in working with osteopaths and osteopathic clinics seeking to employ overseas-trained osteopaths, with Australian osteopaths seeking a rewarding professional experience working abroad, and with overseas-trained osteopaths seeking registration in Australia.

Responses to the Questions

Our remarks primarily address Questions 25 and 26 of the January 25 Issues Paper.

- 25. How effective has the National Registration and Accreditation Scheme been in improving the mobility of health professionals? In what ways can it be improved?*
- 26. How well does mutual recognition between Australia and New Zealand work for health professionals other than doctors?*

The National Registration and Accreditation Scheme (NRAS) is currently the subject of a planned review after three years of operation. In respect of labour mobility it is a splendid scheme: it permits a health practitioner registered in any state or territory to practice in every state or territory, without additional fees or bureaucracy. Coupled with TTMRA, this means a New Zealander coming to Australia needs only to decide on an initial practice location before migrating; he or she is then entirely free to move and practice elsewhere within Australia.

Prior to NRAS, an osteopath of New Zealand origin would have had to satisfy the registration requirements of his or her first Australian practice location and any future practice locations separately and serially.

As we said in [our NRAS submission](#):

It should be remembered that however partial and sometimes frustrating the achievements of NRAS are, it is leaps and bounds ahead of 97 separate boards and committees that preceded the 14 National Boards.

Osteopathy Australia strongly supports improvements to NRAS and its constituent Agency and Boards. We do not support the return of state and territory regulation and the inefficiencies that resulted. The benefit to interstate practitioner mobility alone is worth preserving—and this would necessarily be one of many consequences of returning to state and territory based regulation.

The Productivity Commission should be aware that the benefit to the Australian population via labour mobility is theoretical rather than demonstrated. (Health Workforce Australia, which was engaged in some efforts to quantify it, but has been abolished.)

NRAS coupled with TTMRA is good for health practitioner mobility but only for its own sake and its incidental benefits; the actual Australian workforce numbers are probably neutral, with equal numbers of Australians and New Zealanders crossing the Tasman.

From a professional development and lifestyle/amenity perspective, this is appreciated by our members, some of whom take the opportunity to practise for a time in New Zealand. From the perspectives of Australian public health and equitable access to healthcare, TTMRA probably does little or nothing to improve either.

Osteopathy Australia estimates there is a current national shortage of nearly 1900 osteopaths. We regard the density (though not necessarily the distribution) of osteopaths in Victoria as meeting the needs of the Victorian community. The number of osteopaths sufficient to meet the needs of the population nationwide can be estimated on this basis.

This number is 3524 osteopaths.

On this basis **the national workforce has a current shortage of 1842 osteopaths.**

We anticipate this trend will remain in effect for the foreseeable future, and certainly for the two-10 year timeframe.

Even within Victoria, only metropolitan residents can truly be said to have their osteopathic needs met, and there are still rural and regional areas that experience constrained access to osteopaths and patients who experience long waiting times.

The pipeline of students is significant but also long (it being a 5-year degree course), leaving significant opportunity for overseas-trained osteopaths to contribute to the needs of Australian patients.

Aside from a new, rather experimental, and apparently little-used Competent Authority Pathway for recent, UK-trained osteopaths, there is no ready remedy for this shortage.

Keeping osteopathy on the Skilled Occupation List, and adding incentives such as reduced paperwork, red tape, and application fees for overseas applicants, would partially address the matter, and we have sought meetings with the ministers responsible in the Industry and Immigration portfolios to propose such measures.

Additional Remarks

Since the “Commission wishes to receive information and comment on issues which participants consider relevant to the study’s terms of reference” beyond those raised in the issues paper, we take the opportunity to raise two.

- In our annual submission in relation to the Skilled Occupations List Team, we always lament that the Australian Bureau of Statistics collects data in a way that inappropriately groups osteopaths and chiropractors together. Please see “Matter Two” in the accompanying letter sent to the Department of Industry in November 2014. Reliable data are critical to informed policy development, and we urge the Productivity Commission’s endorsement of our request.
- The arrangements for overseas-trained osteopaths satisfying the criminal history registration standard are not ideal. We acknowledge the challenges involved in administering the scheme in a way that is fair to applicants while protecting the public.

However, the need for an expensive and time-consuming criminal check for TTMR-applicants imposes a significant burden on the applicants, their prospective employers, and ultimately their patients.

The recently announced regime for [international criminal history checks](#) means that practitioners who have been registered under TTMR from 4 February 2015 must undergo a third-party obtained check (at the cost, currently, of \$150 per country) if they declare a criminal history outside of Australia and/or “have lived, or have been primarily based in any one or more countries other than Australia for six consecutive months or longer, when aged 18 years or more.”

Since that encompasses every single NZ-registered osteopath by definition, it is a significant additional layer of bureaucracy and cost to a TTMR scheme that is designed precisely to eliminate such bureaucracies and costs.

Our submission the Osteopathy Board of Australia on this subject is available [here](#).

Conclusion

Osteopathy Australia appreciates the opportunity to contribute to the review.

We look forward to the release of the draft report in May 2015.

For further information, or to seek clarification or elaboration of any part of this submission, please contact Samuel Dettmann, Policy Advisor



November 4 2014

Carl Windhorst (Analyst)
Skilled Occupations List Team
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Dear Mr Windhorst

This letter serves as part of, and as an introduction to, Osteopathy Australia's submission to the Department of Industry about the Skilled Occupation List for 2015.

Matter One

Because the online form does not permit the pasting of tables into the text box, please consider the following table in conjunction with our response to the first question.

State	Registered Osteopaths (30/06/14)	Population (31/03/14)	Osteopaths per 100,000
NT	1	243,700	0.4
TAS	40	514,700	7.8
WA	56	2,565,600	2.2
SA	34	1,652,600	2.1
ACT	34	385,600	8.8
QLD	166	4,708,500	3.5
NSW	529	7,500,600	7.0
VIC	979	5,821,300	16.8
Total	1865	23,425,700	8.0

Matter Two

Osteopathy Australia is concerned about the use of Australian Bureau of Statistics data. The ABS compiles its statistics in a way that inappropriately groups osteopaths and chiropractors together.

While there are similarities—as there are to some degree among all regulated health professions—the two are in fact distinguishable in material respects.

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Certainly from a supply and demand perspective, any analysis on the basis that the two professions are one is likely to be unreliable at best and misleading at worst.

There are approximately three times as many chiropractors as there are osteopaths.

There is no reason to assume their demographic breakdown or geographical distribution is identical.

The AOA understands that the ABS currently classifies osteopathy thus:

Major Group 2	Professionals
Sub-Major Group 25	Health Professionals
Minor Group 252	Health Therapy Professionals
Unit Group 2521	Chiropractors and Osteopaths

This accords with the current Skilled Occupation List, which includes osteopaths, who are given the same occupation number as chiropractors (252111).

However, Osteopathy Australia notes that the SOL summary sheet for the two professions indeed confers separate occupation numbers thus:

252111	Chiropractor
252112	Osteopath

Could you please clarify the status of occupation numbers 252112? What does this mean for the consideration of osteopathy as a separate and unique profession?

We asked this question last year but received no response. We respectfully repeat our request for consideration of this matter and correspondence about it in due course.

For further information or elaboration, please contact Samuel Dettmann, Policy Advisor, on 02 9410 0099 or policyadvisor@osteopathy.org.au.

Yours sincerely



Samuel Dettmann
Policy Advisor