
Submission to NSW WorkCover regarding provider recognition criteria for remedial massage therapists



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AMT is a national, not-for-profit association representing qualified Massage Therapists and Massage Therapy Students. Established in 1966, we are the oldest association in Australia to represent massage therapy in its own right. We advocate vigorously on behalf of our members to advance the profile and standing of massage therapists, and promote the health benefits of massage therapy. AMT is deeply committed to the safe and ethical practice of massage therapy in Australia.

Vision:

Our vision is to establish massage therapy as an allied health profession in Australia.

Mission:

Our mission is to:

- support our members
- professionalise the industry
- educate and inform the public and other health professionals.

AMT Values:

- **Best practice:** we support our members to deliver evidence based, skilled, ethical and professional treatment
- **Participation:** we encourage our members to connect with and contribute to their professional community
- **Innovation:** we have set the agenda for industry advocacy since 1966
- **Governance:** we operate to the highest standards of transparency and accountability
- **Client focus:** we place quality and safety at the centre of all we do.



Background

In 2002, National Competency Standards were introduced for Massage Therapy as part of the Health Training Package. Certificate IV and Diploma level massage therapy programs delivered by Registered Training Organisations (RTOs) should be consistent with the provisions of the Australian Quality Training Framework (AQTF).

Competency Based Training (CBT) is an approach to vocational education and training that places emphasis on what a person can do in the workplace as a result of completing a program of training.

CBT programs are comprised of competency standards set by industry that each student is assessed against.

Unlike the curriculum-based model of training delivered within the higher education sector, progress within a VET-sector CBT program is not necessarily based on time or hours. Programming and delivery of health training package qualifications is based around the achievement of units of competence.

However, in March 2006 the (then) Department of Education, Science and Training (DEST) endorsed a concept of nationally consistent nominal hours for units of competence for the purpose of recording and reporting training activity under Commonwealth-State training fund agreements. All State/Territory Governments have agreed to adopt the national nominal hours for each training package, though there are instances of variation where a state authority approves an alteration to the hours of some specific units to suit local purchasing arrangements.

The nominal hours of training assigned to qualifications and units of competence are essentially an estimate of the time taken for structured (or formal) training and assessment. They do not reflect the total hours that may be spent by each trainee in acquiring competence through skill development in a workplace or simulated workplace.

The national nominal hours for the HLT50307 Diploma of Remedial Massage are 1034. In the NSW TAFE system, the nominal hours assigned to the qualification are 1545. In the Victorian TAFE system, the nominal hours assigned to HLT50307 are 1020.



The HLT40307 Certificate IV in Massage Therapy Practice is a pre-requisite for entry into the Diploma Level training. The Certificate IV contains 15 units of competence, comprising 10 common units drawn from the Health Training Package and 5 units of specialisation:

Common Units

BSBCMN204A	Work effectively with others
HLTCOM404B	Communicate effectively with clients
HLTCOM405B	Administer a practice
HLTCOM406B	Make referrals to other health care professionals when appropriate
HLTCOM408B	Use specific health terminology to communicate effectively
HLTFA301B	Apply First Aid
HLTHIR301A	Communicate and work effectively in health
HLTOHS300A	Contribute to OHS processes
HLTIN301A	Comply with infection control policies and procedures
HLTAP401A	Confirm physical health status

Specialisation Units

HLTREM401B	Work within a massage framework
HLTREM406B	Provide the massage treatment
HLTREM407B	Plan the massage treatment
HLTREM408B	Apply massage assessment framework
HLTREM409B	Perform massage health assessment

The HLT50307 Diploma of Remedial Massage contains 14 units of competence, comprising 6 common units, 5 specialisation units, and 3 elective units (drawn from a wide range of units within the Health Training Package):

Common Units

HLTCOM502B	Develop professional expertise
HLTCOM503B	Manage a practice
CHCORG28A	Reflect and improve upon professional practice
HLTHIR506B	Implement and monitor legal and ethical requirements
HLTAP501A	Analyse health information
HLTIR501A	Maintain an effective health work environment

Specialisation Units

HLTREM502B	Provide remedial massage treatment
HLTREM503B	Plan remedial massage treatment strategy
HLTREM504B	Apply remedial massage assessment framework
HLTREM505B	Perform remedial massage health assessment
HLTREM510A	Provide specialised remedial massage treatments



Despite CBT being task focused, units of competency also detail the required knowledge (essential/ underpinning) that must be applied to the task(s) in order to achieve competency. The content of units can be directly mapped to that of the old modules from the curriculum-based delivery.

Most third party payment providers for remedial massage therapy services have adopted the HLT50302/7 Diploma of Remedial Massage as the benchmark for recognition. It has been recognised by the following private health funds:

A.C.A Health Benefits Fund	HBF	Overseas Student Health Cover (HBA)
ANZ Health Insurance (HBA)	HCF	Peoplecare Health Insurance
Australian Health Management Group	HealthCover Direct (HBA)	Phoenix Health Fund
Australian Unity	Heath Care Insurance Limited	Police Health Fund
Cardmember Health Insurance Plan (HBA)	Health Partners	Queensland Country Health Ltd
CBHS Health Fund Ltd	HIF WA	Railway & Transport Health Fund Ltd
CSR Health Plan (HBA)	Latrobe Health Services (Federation Health)	SGIC (MBF Alliances)
Cessnock District Health Benefits Fund	Manchester Unity	SGIO (MBF Alliances)
CUA Health Limited	MBF	St George Protect (HBA)
Defence Health	Medibank Private	St. Luke's Health
GMF Health	Mildura District Hospital Fund	Teachers Federation Health
GMHBA	Mutual Community (HBA)	Teachers Union Health
GU Health	Navy Health Fund	Transport Health
HBA (formerly AXA)	NIB	VSP Health Scheme (HBA)
	NRMA	Westfund
	Onemedifund	

It is also recognised by:

The Victorian WorkCover Authority
 WorkCover South Australia
 Comcare



AMT Membership criteria

There are three different levels of full practitioner qualification for AMT members:

1. General Level
2. Senior Level One
3. Senior Level Two

These three levels of membership equate to the standards outlined in the Australian Qualifications Framework.

Graduates of Certificate IV programs are admitted to AMT at General Level and are competent to perform general health maintenance treatments.

Graduates of Diploma programs are admitted to AMT at Senior Level One and are competent to perform treatments involving specific remedial techniques to alleviate common musculoskeletal presentations such as low back pain.

Graduates of Advanced Diploma programs are admitted to AMT at Senior Level Two and are qualified to treat complex musculoskeletal presentations with a more extensive range of treatment protocols.

Appendix 1, AMT Membership Criteria, outlines the qualifications that AMT recognises at each level of membership.

It also outlines AMT's membership criteria prior to September 2006, including the competencies required for each level of membership.

Process for verifying qualifications and membership eligibility

Applicants for membership must submit copies of their qualification and the corresponding academic transcript issued by the Registered Training Organisation (RTO). Applications are received and processed by AMT's Membership Officer.

If there are any concerns about the adequacy of the documentation that has been submitted, further evidence is requested from the applicant. Additionally, AMT may contact the relevant RTO for clarification and/or verification of qualifications.

AMT also collects the names and contact details of three referees for each applicant.

All evidence in respect of a membership application must be in writing. Membership will not be granted unless the correct documentation is produced.

Membership will not be granted unless the applicant fulfils AMT's membership criteria, as outlined in Appendix 1. All new applicants to AMT must hold a Nationally Recognised Qualification.

Documentation is stored securely in AMT's member's filing system.

Number of members by level of membership

Table 1 shows the number of members by each level of membership, including student members, and non-practising categories of membership.

Table 1: Number of members

Students	246
Maternity Membership	14
Honorarium and Life	8
Auxiliary	50
Subtotal	318

Practitioner level membership

General Level	207
Senior Level One	848
Senior Level Two	221

Total Membership all Divisions **1617**

Member renewal process and verification of continuing professional education

AMT members are required to complete at least 100 continuing education units per annum. This equates to around 20 hours of continuing professional education every year. Members who achieve more than 100 CEUs in a single year can have up to 50 CEU points rolled forward into the following year.

Under AMT's CEU points system, accredited events and activities are awarded 5 CEU points per hour. Examples of accredited activities include the AMT Annual Conference, workshops offered by AMT-accredited presenters, members' days and branch regional meetings, and a range of home study modules written by AMT.

To become an AMT-accredited presenter, applicants must complete the AMT workshop accreditation documentation. AMT's Education Sub-Committee assesses workshop accreditation applications for quality and suitability. The Workshop Accreditation Application Form is included in Appendix 2.

AMT members can also earn CEU points by attending non-accredited workshops and trainings. Members are awarded 1 CEU per hour for attendance at non-accredited events if the content is assessed and recognised by the Education Sub-Committee as falling within the massage therapy scope of practice.

AMT audits the CPE activity of all members and does not rely on self-reporting. The process for renewal of membership and verification of CPE is as follows:

1. Members are sent a renewal notice one month before their membership renewal is due. They are notified of the requirement to submit evidence of their CEU activity with the renewal notice. Members are given until the end of their renewal month to submit this evidence to AMT Head Office.
2. AMT's Membership Officer receives and processes member renewals. Five points per hour are awarded for accredited activity if documentary proof is included (i.e. copies of attendance certificates). Claims for non-accredited activity are referred to the Education Sub-Committee for assessment of validity and a ruling on the number of points.

Members must provide details/evidence of the content of the training and the hours of attendance for the Education Sub-Committee to make their assessment on non-accredited training.

3. AMT's membership Officer records allocated CEU points in the AMT database, with a brief description of the activity that points have been awarded for. Documentary evidence of the members' CPE activity is retained in hard copy form in their file.

A copy of AMT's renewal form and a blank CEU form have been included with Appendix 2.

Please note:

AMT has a separate class of membership for members who do **not** participate in continuing professional development. Non-CEU members are not eligible for provider status with third party payment providers such as NSW WorkCover and the private health funds.

Professional standards

AMT members must adhere to the AMT Code of Ethics, included in Appendix 3. NSW therapists are also subject to the provisions of the NSW Code of Conduct for Unregistered Health Practitioners, overseen by the Healthcare Complaints Commission. All NSW AMT members are issued with a copy of the Code of Conduct, which they are required to display in their clinic. A copy of the booklet that AMT issues to all NSW AMT members is included in Appendix 3.

AMT has also recently completed work on a Code of Practice for Massage Therapists, which contains a set of benchmark standards for the practice of Massage Therapy in Australia. The document has been provided to members and stakeholders in the form of a consultation draft. The final document will be rolled out in 2012 once feedback has been assessed and the Code finalised. AMT will be seeking endorsement of the Code of Practice from third party payment providers and relevant government agencies.

A copy of the Consultation Draft of the AMT Code of Practice is included in Appendix 3.

Complaints Handling

The AMT Constitution includes provisions for taking disciplinary action against a member. This includes taking action in relation to a complaint received from a member of the public.

AMT's complaints handling policy is available for download from the "Find a Therapist" section of the AMT website. A copy has been included in Appendix 4.

AMT can only initiate the complaint-handling process on the basis of a formal, written complaint. Complaints are investigated and assessed by the AMT Discipline Sub Committee, which makes recommendations to the AMT Board on appropriate disciplinary action. The AMT Board must ratify the recommendation of the Discipline Sub Committee before specific action can be taken in relation to the conduct of a member.

The process for dealing with a formal complaint is as follows:

1. AMT's Executive Officer receives the written complaint
2. The Executive Officer forwards the complaint to the AMT Discipline Committee and the AMT Secretary.

3. The AMT Secretary formally acknowledges receipt of the complaint in a letter to the complainant, giving further information about the AMT complaint-handling process. This letter usually contains information about other possible avenues of complaint, such as the various Healthcare Complaint Entities (HCEs) and/or the police, where appropriate. It is standard protocol to refer the complainant to the police if the complaint contains allegations of a criminal nature (for example, sexual assault).
4. The AMT Secretary informs the member in writing that a complaint against them has been received. A copy of the complaint is provided to the member so that they can respond to the substance of the complaint within a specified time period.
5. The AMT Discipline Sub Committee meets to go through the details of the complaint and assess the evidence supplied by the member. If more information is required from either the complainant or the member, it is requested in writing. Depending on the complexity of the matter, this can occur over several rounds of meetings.

6. The AMT Discipline Sub Committee rules on the complaint based on the provisions of the AMT Code of Ethics, AMT standards, and any other regulatory provisions that are applicable (for example, the NSW Code of Conduct for Unregulated Health Practitioners). The Discipline Sub Committee presents its findings at a full meeting of the AMT Board, where the ruling of the Committee is ratified.
7. The Chairperson of the Discipline Sub Committee formally notifies the complainant and the member of the ruling. The member is notified of disciplinary ruling in accordance with the notice provisions in the AMT Constitution, which includes and appeal process. If retraining of the member is required, the Discipline Committee monitors their progress.

An example of our complaint handling process in action is included in Appendix 4. We have included this particular example as it involved close co-operation with the NSW Healthcare Complaints Commission and the police.

Please note: The contents of this file are strictly confidential. Although the name of the massage therapist in the case was in the public domain via a Prohibition Order published on the HCCC website, the details of the complainant and AMT's deliberations are confidential.



Contribution to VETAB process

The Australian Quality Skills Authority (AQSA) is the newly established national regulator for Australia's vocational education and training sector. AQSA has replaced VETAB as the NSW regulator.

Dr Dianne Orr, Acting Commissioner of the Australian Quality Skills Authority, is due to address massage therapy educators at the AMT National Educators' Forum in October.

In the past, AMT's chief interactions with VETAB centered on providing expert industry advice and knowledge in connection with RTO applications for accreditation or reaccreditation. Over the past 5 years, AMT has not had grounds to make a formal complaint against a particular RTO but we frequently advised disgruntled students / graduates on their options for complaint and referred them to VETAB. These often resulted in a full compliance audit for the RTO in question.

Since accreditation and audit of RTOs is the remit of government regulators such as the now-defunct VETAB, AMT's principle focus is ongoing review and development at the qualification and delivery level. Essentially, this means working closely with the Community Services and Health Industry Skills Council (CSHISC) to ensure that the contents of the Training Package reflect the current needs of industry.

From 2008, the CSHISC instituted a continuous improvement model for health training package qualifications, replacing the old system of periodic reviews. This means that, at any time, industry stakeholders can nominate parts of the training package which may not be currently meeting industry needs and should be amended so that they do.

AMT has worked closely with the CSHISC over the past three years, responding to calls for submissions on issues connected specifically with training package content and, more broadly, on issues associated with the community services and health sector overall. Copies of our submissions to the CSHISC are available on request.

In 2009, AMT established the National Educators' Forum, an annual event held in conjunction with our National Conference. The aim of the Educators' Forum is to enhance the consistency of qualification delivery by providing relevant speakers/presentations and a platform for educators to network, and share information and knowledge. The National Educators' Forum is now in its third year and has grown to represent educators from across every state and territory.



Recommendations for NSW WorkCover Provider Recognition

AMT recommends that NSW WorkCover adopt the HLT50302/7 Diploma of Remedial Massage as the qualification benchmark for recognition as a provider. In addition to holding the HLT50302/7, NSW WorkCover providers should be required to:

1. Be a member of a professional association.
2. Complete 20 hours of fully audited continuing professional development per annum. The auditing could be undertaken by the member's professional association and reported to NSW WorkCover on a schedule agreed to by both parties. AMT has this arrangement in place already with all of the private health funds.
3. Have full indemnity/liability insurance to a limit of at least \$1 million. AMT can also monitor this requirement on behalf of WorkCover.
4. Hold a Senior First Aid certificate or the equivalent. AMT can also monitor this requirement on behalf of WorkCover.
5. Adhere to the AMT Code of Practice.
6. Submit a copy of their clinic policies in relation to record-keeping, informed consent and infection control/hygiene.



APPENDIX 1

AMT membership criteria



APPENDIX 2

Verification of CPE



APPENDIX 3

Professional Standards



APPENDIX 4

Complaints Handling

