On behalf of the OT Registration Board of the NT I wish to make the following comments on the Consultation Paper on Proposed mandatory registration standards.

As a Board in a jurisdiction with a large rural and remote region we have a particular concern for occupational therapists who live and/or work in the more remote areas being able to fulfil the requirements of registration.

In particular we have concern about their ability to access Continuing Professional Development. Other current OT CPD programmes are difficult for remote therapists to fulfil. The requirements as proposed under this standard should be achievable by remote therapists.

However it is noted that the CPD plan should be" directed towards the OT's area of practice". This can be difficult to achieve in a remote region due to small numbers of therapists in particular areas of practice and minimal access to profession-specific and area of practice specific professional development. In these regional areas OTs tend to have a CPD plan that reflects their broader OT interests and includes what PD is available to them.

The requirements state that "practicing occupational therapists" need to meet these CPD requirements. Will there be different requirements for non-practicing therapists? Will absences from work for such things as maternity leave and leave without pay be taken into consideration when determining CPD requirements?

The standard around Criminal History reflects requirements for employment as an occupational therapist.

Having different options for English language testing makes this standard more accessible depending on which assessment is available to prospective applicants.

The requirements for Professional Indemnity Insurance seem to be fair and reasonable. It needs to be noted that in the NT it has been difficult to locate and get the required information from the Public Sector employer.

The Recency of Practice standard reflects similar requirements for current OT Registration jurisdictions and also other professional registration requirements.

The Grandparenting standard offers therapists with other qualifications, particularly those who trained before the introduction of degree courses, the opportunity to continue to work as OTs under the new national registration requirements.

I would like to congratulate the National Board for the work that they have done in the area of standards for registration.

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