I would like to make some comments on the section in relation to CPD of the registration draft.

I refer to page 6, requirement number 2. It is stated that the CPD must be on improving the practitioner's competence in their chosen area of practice. My concern with this is it dissallows those practitioners who a) have two or more positions, eg mental health and paeds, and b) those practitioners who want to keep up to date with other areas of practice to enable them to continue to have choices about the areas within which they would like to work. Some OT's, especially after graduation, may want to keep abreast of several areas in order to keep their options open for work in different areas. Indeed I have met several OT's at CPD sessions who are there to keep abreast of other streams.

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CPD portfolio

**Reflective descriptions of learning experiences and examples of how the learning has been applied to practice.**

I have several concerns with this. I cannot see how describing to the Board a process of reflecting on a learning experience and then explaining how a learning has been applied is relevant to registration as an Occupational Therapist. I think it has a place in the developing OT at university level, but it is a process that occurs on a daily basis in the work environment (and afterwards) regardless of whether it is information that has been gleaned and incorporated into clinical reasoning from structured CPD or from working with clients or team members and learning from them. If it is growth and development, as well as contemporary competence that you are measuring or policing, then how can you separate this from the lessons we learn from our clients and from the process of clinical work?

Additionally the feelings I have from this sort of expectation of registration are one of being professionally insulted. I should not have to describe or justify my thought processes, or indeed suggest how my CPD experience is being applied to my work. Suffice that I am working hard towards being the best practitioner that I can be to my clients by additional learning experiences, it is to them I have a responsibility, not to the Board. To the Board I have a responsibility to be COMPETENT. I dont believe you can measure competence by documenting thought processes. The onus is on us to have thoughts. Not to reveal them to you. This makes it a very unnatural process.

I would be happy to discuss my thoughts further, should you wish to.