



Consumers  
Health Forum  
of Australia

3 January 2012

Executive Officer  
Occupational Therapy Board of Australia  
Australian Health Practitioner Regulation Agency  
GPO Box 9958  
MELBOURNE VIC 3001

Dear Sir/Madam

**Consultation paper on proposed Codes and Guidelines – Occupational Therapy Board of Australia**

The Consumers Health Forum of Australia (CHF) welcome the opportunity to respond to the Australian Health Practitioner Regulation Agency's (AHPRA) consultation paper on the proposed *Codes and Guidelines* relevant to the Occupational Therapy Board of Australia (the Board).

CHF is the national peak body representing the interests of Australian healthcare consumers. CHF works to achieve safe, quality, timely healthcare for all Australians.

Health practitioner regulation, and its contribution to the safety and wellbeing of health consumers, is an area of considerable interest to CHF, and CHF is supportive of national registration standards. Some brief comments on the Codes and Guidelines are provided below.

**Proposed Codes and Guidelines**

CHF has previously welcomed the establishment of a National Registration and Accreditation Scheme (NRAS) for health professions, as we believe it will improve safety and quality in healthcare. We have also argued in many previous submissions that consumers must be involved in all aspects of the NRAS. A national approach to healthcare, including registration, accreditation and health complaints handling, will work towards reducing inconsistencies between States and Territories.

CHF also supports common National Board Codes and Guidelines including:

- Advertising guidelines
- Code of conduct for registered health practitioners
- Guidelines for mandatory notifications.

CHF indicated its support for the Codes and Guidelines in previous submissions related to the 10 health professions covered by NRAS as of 1 July 2010. As the preliminary drafts for the common National Board Codes and Guidelines were subject to public consultation prior to their implementation in July 2010 we are comfortable that they are also applicable to Occupational Therapy practitioners. CHF is not aware of any profession-specific guidance that needs to be included in the Codes and Guidelines for Occupational Therapy.

CHF considers that there is value in the registration of health practitioners involved in work that affects the treatment of consumers, to ensure that patient safety is prioritised. The Codes and Guidelines support this.

CHF looks forward to the outcomes of the consultation. Should you wish to discuss this submission in more detail, please do not hesitate to contact CHF on 02 6273 5444.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Carol Bennett', written in a cursive style.

**Carol Bennett**  
**CHIEF EXECUTIVE OFFICER**