

From: S Bracher

### Mandatory Registration Comments.

1. Page six Requirements, items 3 and 4. Why do essentially the same thing twice? The Garling Inquiry states we should be moving away from un necessary duplication especially of paper work. A CPD record and portfolio are essentially the same thing. Please do not make us do it twice.
2. Page seven, point 5. Reflective descriptions of practice... This is an undergraduate concept. In the real world when learning a new point of practice you either incorporate it or not for the benefit of your patients. No need to do an Anne Frank diary about how you feel about it.
3. Page nine, items 3 and 4. Again the same comments as my item 1 above. See no need to do the same thing twice.
4. Page nine. Please explain why CPD during your day to day work should not be counted. I was trained to be an evidence based practitioner; as such it is a part of my work day and something that I also pursue outside work hours. Some of the things highlighted in Category 1, 2 and 3 on pages 10 and 11 are completed as part of day to day duties at some facilities. Examples include journal club, in-service education, health presentations, case reviews and supervision.
5. Page twelve, Failure to comply. No mention of appeals process or arbitration, is the boards decision final?
6. Page twenty nine. Professional indemnity insurance. Item 4.4. At what stage is this? Some people who do a little bit of work privately use their union insurance as cover.