

Dear Sir/ Madam,

I would like to highlight some concerns that I have with the proposed mandatory registration standards in regards to CPD requirements. I do agree that it is important for the credibility of the profession that practitioners undertake regular continuing professional development to maintain and update their skills. However I feel the proposed manner in which the board plans on doing this is way more difficult than it needs to be. For a start the number of hours I feel is a bit excessive. I am also a registered nurse and in the nursing profession's transition to national registration they are only required to undertake 20 hours of professional development each year which I feel is more than enough - in comparison to Occupational Therapy their skills are more critical in terms of patient safety, as they deal with emergency situations, etc.

Then there is the different categories within which you have to achieve the number of required hours which is also an issue. I only work one day a week. It would be impossible for me to accumulate hours in category 3: engagement with the profession as it would be unfair on both myself and a potential OT student on placement to have the disruption of being supervised one day a week by myself and potentially having to have multiple supervisors to make up for the rest of the working week that I am not there. It is also unlikely that by working one day a week that I would even be able to think about being involved in quality improvement activities, clinical audits or accreditation activities within the workplace as I would barely be able to satisfy my clinical requirements let alone these additional roles. People who work part-time usually do so because they have family commitments outside of work and for me personally whilst I would like to be involved in a special interest group I cannot attend evening meetings which is usually when these activities take place as I would have nobody available to care for my child in the evening as my husband works away a great deal. People work hard and long enough hours as it is in health systems that are often under resourced. Please I implore you to consider making the regular CPD requirements as simple as possible, people have enough stress in their working lives and enough to do already!!!

I think ideally it should be that practitioners are required to do a certain number of hours and they should decide how they are going to achieve that based on their own learning goals not to try to get a certain number of hours in each category. For example you may decide that you want to expand your skills in a certain area but then no formal learning, appropriate courses are available, therefore it should be reasonable that you obtain these skills through your own research or private study to achieve your learning goals.

I also have some questions that I would like clarified if possible. Can mandatory competencies be included in CPD hours? Has the board considered that the number of CPD hours required by each practitioner be pro-rata based on their usual number of working hours per week? Is there provision to not be required to meet CPD hours if the practitioner is on maternity leave? I am also confused by a statement made on page 10 of the draft consultation paper that states, "A mixture of activities from three categories is to be undertaken to make up the required 30 hours of CPD each year. The practitioner is not required to undertake CPD from all categories" My question is do you or do you not need to make up your hours from all 3 categories?

Thank you for taking the time to review my concerns and for the opportunity to give feedback on the the draft proposal.