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Health Services Union

Our Ref.: DH:DH HO.177.11

Dr Mary Russell
Chair, Occupational Therapy Board of
Australia
GPO Box 9958
Melbourne Victoria 3001

BY EMAIL

6 October, 2011

Dear Dr Russell

Re: Proposed Mandatory Registration Standards

Thank you for the opportunity to comment on the proposed mandatory registration standards for Occupational Therapists to apply from 1st July 2012.

The Health Services Union of WA is a union registered under the WA Industrial Relations Act. We also operate as the WA Branch of the nationally registered Health Services Union. Our membership in WA includes all Occupational Therapists employed in public hospitals & health services, private hospitals, non government disability & community services and private practices.

We have encouraged our occupational therapy members to make individual submissions on any or all of the draft standards and have received feedback specifically on the Continuing Professional Development CPD and Professional Indemnity Insurance standards. Our submission will deal with those two standards only.

Continuing Professional Development

The HSU submits that the requirement for a minimum of 30 hours CPD per year is excessive and is out of line with standards in place for other similarly registered practitioners. Podiatry, Nursing and Physiotherapy only require a minimum 20 hours per year. Dental requires a minimum 60 hours spread over a 3 year cycle and we note that the Medical Radiation Science Board is proposing something similar in their draft standard.

The HSU is also concerned that any level of mandatory CPD is more onerous on practitioners working in rural and remote health. This should be borne in mind by the Board when setting the standard. We also believe that consideration should be given to a reduced requirement for those in part time practice.

The Guidelines propose maximum hours in each of the CPD categories and this could act as a disincentive for a practitioner to undertake a valuable CPD activity in excess of the maximum hours in any one year as the additional hours would not count. If the total hours were spread over a three year cycle the disincentive may be reduced.

In summary the HSU submits that the minimum CPD hours should be 20 per year and that consideration be given to adopting 60 hours spread over a three year period.

Professional Indemnity Insurance

All financial members of the Union are automatically covered by the HSU's professional indemnity insurance policy. This policy is underwritten by Vero Insurance Ltd and meets all the proposed minimum requirements of the Boards PII standard. For members directly employed it operates in addition to any employer insurance policy or employer self insurance.

The policy also covers members for any disciplinary matters that are commenced against the member. Members are also covered for any private practice work they may do in addition to their paid employment provided the income derived from private practice does not exceed that earned from their paid employment.

The HSU would prefer to see some consistency in the description of the PII standards across the various professions. This is not currently the case and is not required by the Act. Nevertheless there is commonality of PII issues that would benefit from a uniform approach. The experience of the existing national boards since 2010 has led to the clarification of many issues and the Psychology Board is in the final consultation phase of revising their PII Standard prior to submission to the Ministerial Council for approval. We urge the OT Board to consider the current Psychology PII consultation draft in their deliberations.

On the specifics of the draft PII Standard the HSU submits as follows:

- We have no objection to the minimum cover required other than the issue of consistency raised above.
- The factors listed to consider the need for additional cover are reasonable.
- Cover by third party arrangements is supported and these include cover provided by unions, professional associations or an employer.
- The drafting of the standard needs to be amended to ensure consistent reference to third party cover. The HSU prefers the reference to Union rather than Industrial Organisation.

Should you require any clarification of our submission please do not hesitate to contact the undersigned.

Yours Faithfully



Dan Hill
Secretary