

Proposed Registration Standards

Please find my comments as below;

1. Continuing professional development (CPD) and CPD Guidelines

When considering the above, please be mindful that many of us

- Work for not for profit agencies and my training allowance for this year is \$150.
- Registration fees currently running at just under \$700 per year which is a huge amount of money to find in one go or quarterly (\$169.43) and so we have even less money available in the family budget. Many of us have families to support and budgets that just do not allow for hundreds of dollars to be spent on training.
- Many of us have families and so our ability to attend or contribute to boards, meetings, SIG etc outside of work, is for me non-existent
- Many of my current training needs are met through in-house training, which many companies are now providing as a cost efficient way of training staff e.g. pressure care, wheelchairs etc could this be counted?
- We also have to do a substantial amount of mandatory training; CPR / health and safety / first aid / manual handling / infectious disease related / epilepsy / etc to do, without which we cannot do our jobs – would these be counted?
- We are only allowed 20% non-billable time over the whole week i.e. admin, so CPD record keeping must be manageable e.g. Copy of certificate enclosed in file, with dates, there is no need for an additional written account of the course – most come with notes or powerpoints anyway, so this would be an additional burden of work. Most workplaces require the applicant for a training course to justify why they should do this training anyway, in terms of how it will add to their knowledge and improve either their or others practice at work, before it is submitted to management, and then it may / may not be approved – a copy of this could be included instead of lengthy writing.
- With the restrictions placed upon me by the nature of my job, my employing company and their expectations of my job, I am concerned that I am unable to meet the recommendations;
 - With reference to Category 1 Formal Learning Activities – we are only allowed one hour per term for this and then it is organised by management to cater for the greatest need e.g. last one was a review of documentation and standards for all staff to attend,
 - Category 2: Informal Learning Activities – we have no time allocation for this at work
 - Category 3: Engagement with the profession – the majority of this section appears to be geared towards larger organisations such as hospitals where these activities regularly occur. In small companies, most of these activities are designated to individuals as part of their role, as the rest of us have to work so that 80% of our time is billable to another agency and generates income for the company. It has been my experience that providing ongoing supervision or mentoring to an occupational therapist (as described) in these smaller companies tends to occur frequently on a daily basis, and it would be impossible, in terms of being time consuming, to write down the many times a day we are all helping one another, after all OT is not always so straightforward.
- The example of Appendix 2, is more of a performance review as found with staff review and development appraisals. GP's and Consultants are required to complete CPD but don't have to do this. It just feels a bit patronising in this context.

4. Professional indemnity insurance (PII)

"A registered occupational therapist must be covered by either an individual insurance arrangement or a third party's insurance arrangement, or both. However, if covered by a third-party, the cover must meet this standard. "

- I work for a Company and I have been assured that the Company provides appropriate PII. However I have never seen any documentation to this effect. How can I prove this exists and that it is adequate – ultimately is this my responsibility to do this or the Company's?
Can't there be an obligation on the Company to provide this evidence if it exists as a condition of employing a registered OT?