



Incorporated in WA.
This Association has limited liability

National Office: 6/340 Gore Street, FITZROY VIC 3065
Telephone: +61 3 9415 2900 **Fax:** +61 3 9416 1421
Email: info@ausot.com.au **Website:** www.ausot.com.au
ABN: 65 470 069 906

THE PEAK BODY REPRESENTING OCCUPATIONAL THERAPY IN AUSTRALIA

Facsimile Transmission Sheet

TO: Jenny (phone 08 8443 9375)	FAX NO: 08 8443 9550
FROM: Belinda Ralph	DATE: 27 September 2006
NO. OF PAGES: 18 (including this page)	
RE: Copy of letter re: National Registration	

Dear Jenny,

As discussed, please find attached the letters sent to the below recipients:

Prime Minister	The Hon John Howard MP
Deputy Prime Minister	The Hon John Anderson MP
Minister for Health and Ageing	The Hon Tony Abbott MHR
Premier - Victoria	The Hon Stephen Philip Bracks
Chief Minister - Northern Territory	The Hon Clare Martin MLA
Premier - New South Wales	The Hon Morris Iemma
Premier - South Australia	The Hon Mike Rann MP
Premier - Tasmania	The Hon Paul Lennon MP
Premier - Western Australia	The Hon Alan Carpenter MLA
Premier - Queensland	The Hon Peter Beattie MP
Chief Minister - Australia's Capital Territory	The Hon Jon Stanhope MLA
Health Minister - Victoria	The Honourable Bronwyn Jane Pike
Health Minister - Northern Territory	Dr Chris Burns MLA
Health Minister - New South Wales	The Hon John Hatzistergos BEc LLM MLC
Health Minister - South Australia	The Hon John Hill MP
Health Minister - Tasmania	Lara Giddings
Health Minister - Western Australia	The Hon Jim McGinty MLA
Health Minister - Queensland	The Hon Stephen Robertson MP
Health Minister - Australia's Capital Territory	The Hon Katy Gallagher MLA
Deputy Secretary, Prime Minister and Cabinet	Dr Louise Morauta PSM

If you have any questions or need anything else, please let me know.

Yours sincerely
BELINDA RALPH

OT AUSTRALIA
Administration and Marketing Coordinator

The information contained in this fax message is intended for the named addressee only. If you are not the intended recipient you must not copy, distribute, take any action reliant on, or disclose any details of the information in this fax to any other person or organization. If you have received this fax in error, please notify us immediately.



12 September 2006

The Hon Tony Abbott MHR
 Minister for Health and Ageing
 House of Representatives
 Parliament House
CANBERRA ACT 2600

Dear Minister

**RE: COAG AGREEMENT – NATIONAL REGISTRATION BOARD
 FULL REGULATION OF OCCUPATIONAL THERAPY PROFESSION**

We write to you on behalf of the Council of Occupational Therapists Registration Boards (Australia & New Zealand) Inc. ("COTRB") and OT AUSTRALIA regarding the regulation of the occupational therapy profession. The Productivity Commission has recommended that inclusion under the proposed National scheme of other health occupations currently registered in a limited number of jurisdictions (of which Occupational Therapy is included) be determined during implementation of the scheme.

This recommendation was agreed to by COAG at its meeting on 14 July 2006 with the determination to be made against criteria agreed by a Ministerial council comprising Commonwealth, State and Territory Health Ministers.

The regulation of occupational therapists presently exists in South Australia, Western Australia, Queensland, Northern Territory and New Zealand, but not in New South Wales, Victoria, Australian Capital Territory or Tasmania.

We fully support the registration of occupational therapists Australia-wide by either:

- (a) registration under a national registration Board ; or
- (b) the introduction of legislation in those jurisdictions which do not have regulation

The Australian public is entitled to be provided with occupational therapy services of the highest possible standard. Statutory regulation of occupational therapists plays a vital role in ensuring that appropriate standards of occupational therapy practice are achieved and maintained.

The main purpose of statutory regulation of the occupational therapy profession is therefore to protect the public from inadequately trained or incompetent practitioners. Registration achieves this objective in a number of ways:

- It provides assurance of minimum standards of competence and training;

Australian Association of Occupational Therapists Inc. (Incorporated in Western Australia)
 National Office: 6/340 Gore Street, Fitzroy VIC 3065 Phone: +61 3 9475 2900 Fax: +61 3 9475 2911
 Email: info@ausot.com.au Website: http://www.ausot.com.au
 Incorporated in WA. This Association has limited liability
 Member of the World Federation of Occupational Therapists



- It prevents or restricts practice by unregistered and unqualified practitioners; and
- It provides a mechanism through which poor conduct or incompetence of practitioners can be reported, investigated and dealt with.

The need for full registration of occupational therapists in Australia is summarised as follows:

(a) Maintenance of Standards

- Registration provides effective maintenance of professional and practice standards.
- It ensures that the public can identify practitioners who are trained and competent to provide occupational therapy services
- It prevents unqualified persons practising, thus protecting the public.
- Limited/provisional registration provides an incentive and process for retraining/return to work and enables assessment and supervision of overseas trained persons.

(b) Harm to Public

- Occupational therapy is a highly skilled and diverse health profession. As such in the hands of unskilled or unethical practitioners the public is at risk of harm. Many examples of such risks to clients are provided in the attached documentation.
- The vulnerability and limited knowledge of clients must be taken into account.
- Registration Boards provide the public with effective and inexpensive complaint and monitoring mechanisms.

(c) National Focus Mutual Recognition

- Mutual recognition exists and works well between the States and Territories with registration (SA, WA, Qld & NT) and also between Australia and New Zealand. It leaves therapists from unregulated States and Territories with no automatic right to have their qualifications recognized and move between States in Australia and to New Zealand.
- Therapists found to be unprofessional or incompetent in registered States can move freely to unregulated States and establish an occupational therapy practice.
- The respective Registration Boards work on national issues as a coordinated Council and have been given responsibility from the Commonwealth for the assessment of the qualifications of overseas trained therapists seeking to migrate and work in Australia.
- The national process for assessing overseas qualifications which requires competency demonstration in the first six months of work is hampered because there is no registration authority in the unregulated States to enforce this. As such therapists working in these jurisdictions cannot be mandated to demonstrate competence.

(d) Evidence from the Rest of the World

- Registration is mandatory in USA, Canada, Britain, New Zealand, South Africa and other countries.
- In order to register and hence to practise in those countries, an occupational therapist must show proof of registration and good standing in their own country.

Unregulated States in Australia potentially disadvantage those occupational therapists and are out of step with the rest of the world.

(e) Support for Registration

- The profession clearly supports registration.
- Governments in States and Territories of Australia with registration have all recently reviewed and maintained registration for occupational therapists.
- Registration does not limit competition.

(f) Costs

- Registration boards are self funding.
- There is no cost to the public and minimal cost to government.

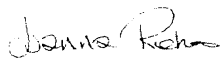
(h) Self Regulation

- Professional association membership is optional.
- Professional association has no power to prevent incompetent, negligent or unprofessional therapists from working.
- Around 50% of occupational therapists work in private practice or organisations with their own referral rights and health fund rebates for clients.

The case for full registration was published by the Council of Occupational Therapists Registration Boards (Australia & New Zealand) Inc. (COTRB) in July 2004 and we have enclosed a copy of that document for your reference.

We seek your support for the regulation of occupational therapy nationally. Representatives of the COTRB and OT AUSTRALIA are also seeking an urgent meeting with you, to further discuss issues raised in this letter.

Yours sincerely



Joanna Riches
Chairperson
COTRB



Carol Crocker
President
OT AUSTRALIA