



Ag Rialáil Gairmithe Sláinte
agus Cúraim Shóisialaigh

Regulating Health +
Social Care Professionals

Public Consultation Report

Bye-Law on Application for Registration for
Occupational Therapists

July 2014



Contents

Introduction	2
About CORU	2
The Public Consultation Process	3
Publicising the Consultation Process	3
Overview of responses to the consultation	4
Acknowledgments	4
Issues emerging from the consultation process	5
Conclusion	8
Appendix 1: Press Release	9
Appendix 2: Copy of advertisement	10
Appendix 3: Copy of online feedback form	12
Appendix 4: Draft Bye-Law on application for registration	15



Introduction

About the Occupational Therapists Registration Board

The Occupational Therapists Registration Board has statutory responsibility for the registration of members of the profession; approval and monitoring of education and training programmes; establishing the code of professional conduct and ethics and standards of performance to which occupational therapists must adhere and recognition of qualifications gained outside the State.

About CORU

CORU is responsible for regulating health and social care professions. It comprises the Health and Social Care Professionals Council and the registration boards established under the Health and Social Care Professionals Act 2005 (as amended).

CORU's role is to protect the public by promoting high standards of professional conduct, professional education, training and competence amongst the designated professions.

The designated professions under the Act are social workers, clinical biochemists, dietitians, medical scientists, occupational therapists, orthoptists, physiotherapists, podiatrists, psychologists, radiographers, social care workers and speech and language therapists.



The Public Consultation Process

Background

The Occupational Therapists Registration Board has prepared a draft Bye-Law on the application for registration for consultation.

When finalised, this Bye-Law will detail the process for occupational therapists applying for registration with the Occupational Therapists Registration Board.

Publicising the Consultation Process

A public consultation on the draft Bye-Law was held between 2 May 2014 and 6 June 2014.

A number of channels were used to publicise the consultation process and invite the submission of observations. These included:

- An advertisement was placed in the Irish Times on 2 May 2014 (See appendix one for a copy of the advertisement).
- A press release was placed on www.coru.ie (See appendix two for a copy of the press release).
- An online survey was developed. An email with a link was also sent to a targeted list of over 700 stakeholders, including the Professional Bodies, Trade Unions, educators and other interested parties who have previously corresponded with CORU (see appendix 3 for a copy of the survey).
- Information on the consultation along with a link to the online feedback form was hosted on the CORU website.

People were invited to participate in the consultation process in a number of ways:

- They could ring CORU to request a copy of the draft Bye-Law, and to offer feedback
- They could visit CORU's office to view the draft Bye-Law, and give their feedback in person.
- They could visit www.coru.ie and choose to complete an online feedback form, to print a copy of the form and post it, or email it to CORU.
- They could email submissions to consultation@coru.ie



Overview of responses to consultation

There were 4 responses to the online survey:

Respondents were asked to identify if they were offering feedback on their own behalf or on behalf of an institution or organisation.

Individual	1
Organisation	2
Institution	1

Submissions were received on behalf of the following organisations:

- **Association of Occupational Therapists in Ireland**
- **National Occupational Therapy Vocational Group**
- **University of Limerick**

Acknowledgements

CORU would like to extend our appreciation and thanks to all those that participated in the consultation process. The report from the consultation process was reviewed by the Occupational Therapists Registration Board.



Issues emerging from the consultation process

Comments on the draft Bye-Law

Subsequent years

The Bye-Law details the process of registration, is there a separate document that details the process of registering in the subsequent years? For example yearly garda vetting form etc

Board Response:

This Bye-law covers the initial application for registration. The process for renewal of registration will be published separately following the opening of the Register.

Proof of Practice

Point 4.2.d. Respondents sought clarity on what kind of proof of practice is required? And under what circumstances does require proof of practice – as the Bye-Law states ‘where applicable?’

Board Response:

The registration guidelines will provide applicants with details where circumstances and type of proof of practice are required.

Membership of Professional Bodies

Point 4.2.d. Respondent queried need for details of Membership of professional bodies – as far as they understand you do not have to be a member of the professional body, so why do you look for proof?

Board Response:

Membership of Professional Bodies is not a requirement for registration. Where applicants are members of Professional Bodies, applicants are requested to provide details.



Health and Character of Applicants

Point 4.2.e Two respondents sought clarity on what format must the details of health and character be in and is it written by the applicant or must it be written/signed by someone else?

Board Response:

A series of questions are included in the application form. Applicants are requested to provide any supporting information that would assist the registration board in making its decisions.

Statutory Declarations

Point 4.4.c. Is the statutory declaration included in the application form?

Board Response:

The Statutory Declaration is included in the application process.

Frequency of Garda Vetting

Point 4.4.d.(i) Is garda vetting done on a yearly basis?

Board Response:

Garda vetting is a requirement as part of the application for registration. Going forward, periodic random checks will be carried out.

Returning to practice

Point 6 – what is the length of time referred to? Can it be set out clearly how long? What will this amount of time be and how will it be determined? If a person completes a specified return to practice course (In Ireland or overseas) will they then be able to apply?



Board Response:

The Return to Practice Bye-Law will be published for public consultation later in 2014 as a separate Bye-Law.

Delays in Garda/police clearance

In relation to Garda Clearance, most staff working within the HSE/Voluntary Bodies have received Garda clearance and I am concerned that there is a need to seek this again. Particularly as there can be difficulties in obtaining it from outside the state and delays in getting it inside the state. Another respondent asked could Garda clearance be provided as an update to the last clearance or a signed witnesses statement by a commissioner of oaths suffice?

Board Response:

The Occupational Therapist Registration Board requires all applicants to make a current Garda Vetting application as part of the application for registration process.

Where police clearance from another jurisdiction is required, the applicant must obtain the police clearance. Full guidance on these requirements will be provided to applicants at the time of application for registration.

PPSN requirement

4 a (iii) details of the applicant's personal public service number (PPSN);

If trying to register with the board from overseas the applicant may not have a PPSN.

Board Response:

PPS Numbers can be issued by the relevant Government Departments, if appropriate. It is a requirement that applicants for registration provide a PPSN.

Additions to the Bye-Law

4. e In the case of applicants who have lived outside of the state for a period of time the respondent wishes to specify " a period of 1 year "



Board Response:

The Bye Law provides the Occupational Therapists Registration Board with the power to set and review the periods to be specified for applicants who have lived/worked abroad.

Other issues raised

NONE

Conclusion

The Occupational Therapists Registration Board considered all submissions in detail. The Board determined that it was not necessary to make amendments to the draft bye-law.



Appendix 1: Press release

May, 2014

Background:

The Occupational Therapists Registration Board is responsible for protecting the public by fostering high standards of professional conduct, education, training and professional competence among Occupational Therapists.

The Board is currently putting in place the foundations for the regulation of the profession and wants to hear the views of both the Public and the Profession on the:

- [Occupational Therapists Registration Board Application for Registration Bye-Law 2014](#)
- [Occupational Therapists Registration Board Approved Qualifications Bye-Law 2014](#)
- [Occupational Therapists Registration Board Code of Professional Conduct and Ethics Bye-Law 2014](#)

Bye-Laws for you to view:

The relevant bye-Laws are listed below for you to read in advance of submitting your views:

- To read the text of the Occupational Therapists Registration Board Application for Registration Bye-Law 2014 [Click Here](#)
- To read the text of the Occupational Therapists Registration Board Approved Qualifications Bye-Law 2014 [Click Here](#)
- To read the Occupational Therapists Registration Board Code of Professional Conduct and Ethics Bye-Law 2014 [Click Here](#)

How to submit your views:

The Preferred Option is to use the online consultation feedback forms below. You can comment on each of the bye-laws by selecting the relevant link below. Follow the instructions and when you have completed your response on the selected bye-law just hit submit. It is not necessary to comment on all bye-laws.

- Occupational Therapists Registration Board Application for Registration Bye-Law 2014 [Click Here](#)



- Occupational Therapists Registration Board Approved Qualifications Bye-Law 2014
[Click Here](#)
- Occupational Therapists Registration Board Code of Professional Conduct and Ethics Bye-Law 2014
[Click Here](#)

If you do not wish to submit your views online you can forward them directly by email to consultation@coru.ie or in writing to: The Occupational Therapists Registration Board Public Consultation, CORU, 13-15 The Mall, Beacon Court, Bracken Road, Sandyford, Dublin 18.

A report outlining the consultation process will be published on www.coru.ie following consideration of all submissions.

Closing date for receiving your views:

The closing date for receiving your views on the Occupational Therapists Registration Board 3 Bye-Laws is 12.00 noon on Friday 6 June 2014. Submissions received after this time will not be considered.



Appendix 2: Copy of Advertisement



Ag Rialáil Gairmithe Sláinte
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Public Consultation

**The Dietitians Registration Board,
The Occupational Therapists
Registration Board and
The Speech & Language Therapists
Registration Board**

Seek the views of members of the public, the relevant professions and other interested parties on the following consultations:

- **Approved Qualifications Bye-Law**
- **Application for Registration Bye-Law**
- **Code of Professional Conduct and Ethics Bye-Law**

Information on the consultation process and procedure including the text of the bye-laws can be found at www.coru.ie.

The closing date for submitting comments is 5.00pm on Friday, 6 June 2014.

A decorative graphic at the bottom of the advertisement consisting of overlapping, semi-transparent shapes in shades of blue and black, creating a wave-like effect.



Appendix 3: Copy of Online Feedback Form

Occupational Therapists Registration Board: Public Consultation on Bye-Law on Application for Registration

Thank you for taking the time to participate in CORU's consultation process on a bye-law on Application for Registration for Occupational Therapists.

We are currently developing a system of statutory registration for health and social care professionals. The purpose of this regulation is to protect the public.

If you have any queries about the consultation process or completing the survey, please contact CORU on 01 2933160 or email consultation@coru.ie. The closing date for receipt of submissions is 5:00pm on Friday, 06/06/2014. Any submissions received after that time will not be considered. A report on the consultation process will be published on www.coru.ie.

We want to hear the views of the public and the profession and by participating in this consultation process you are helping to shape how occupational therapists are regulated.

Yours faithfully,

Ginny Hanrahan
Registrar



Q1 Contact Details:

You do not need to provide this information but please do if you would like us to provide you with details on the outcome of this consultation process.

First Name: _____
Surname: _____
Email: _____
Telephone Number: _____

Q2 Are you contributing to this survey in (please tick one)

a personal capacity? _____
on behalf of an organisation? _____

If on behalf of an organisation, please specify the name of the organisation): _____

Question 3

Please indicate if you would like your name and/or organisation to be kept confidential and excluded from the consultation report.

- Include in consultation report
- Exclude from consultation report

It would be helpful if you could explain if you regard the information you have provided as confidential.



Question 4:

Please provide any comments you have on the draft Bye-Law on the Application for Registration of Occupational Therapists?

Question 5:

Is there anything you believe should be added to this bye-law?

Is there anything you believe should be removed from this bye-law?

(please tick as many as apply)

- Advertisement in a newspaper _____
- On www.coru.ie _____
- By email _____
- Other (please specify) _____

Thank you for participating in this consultation process. Your views will be taken into consideration. If you have any queries please contact CORU on 01 2933160 or email consultation@coru.ie



Appendix 4: Draft Bye-Law on application for registration

http://www.coru.ie/uploads/documents/Application_for_Registration_Bye_Law_OTRB_Public_consultation.pdf