



Ag Rialáil Gairmithe Sláinte
agus Cúraim Shóisialaigh

Regulating Health +
Social Care Professionals

Public Consultation Report

Bye-Law on a Code of Professional Conduct and
Ethics for Occupational Therapists

June 2014



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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 a Code of Professional Conduct and Ethics for Occupational Therapists.

When finalised, the Code will specify the standards of conduct, performance and ethics expected of registered occupational therapists, and it is intended to reflect the needs of patients.



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	3
Institution	

Submissions were received on behalf of the following institutions and organisations:

- **Irish Society of Chartered Physiotherapists**
- **National Occupational Therapy Vocational Group**
- **Contributing combined input from various representatives of AOTI**



Issues emerging from the consultation process

The report highlights the key issues that emerged from the consultation process. They include:

- 1.1 Speaking out on behalf of service users
- 1.2 8- Keep your professional knowledge and skills up to date
- 1.3 9- Get informed consent
- 1.4 Self-employed occupational therapists
- 1.5 Incentives which could affect intervention and treatment
- 1.6 Willingness to work as part of a multi-disciplinary team
- 1.7 Drafting Amendments
- 1.8 Further amendments arising out of the public consultation responses

1.1. Speaking out on behalf of service users

1 –

You must:

- c. respect and, where appropriate, speak out on behalf of service users and carers;**

One respondent suggested that this be broken into 2 parts – requirements in respect of service users and in respect of carers, as had been done in the SLTRB draft code

Decision:

The OTRB considered the SLTRB wording which is –

You must:

- c. respect and, where appropriate, speak out on behalf of service users;
- d. recognise and respect the role of carers;

The OTRB agreed with the need to distinguish between service users and carers and made the amendment.

1.2 8 – Keep your professional knowledge and skills up to date

One respondent commented that clear reference to supervision has been omitted. They proposed the following insertion –



“You should seek and engage in supervision in professional practice on an on-going and regular basis”.

Decision:

The OTRB made a decision to insert the suggested wording in section 8 “Keep your professional knowledge and skills up to date”.

1.3 9 – Get informed consent from service users

One respondent says that the client’s right not to become involved in treatment needs to be respected.

Decision:

The OTRB agreed that section 9.d which states “you must respect the service user’s right to refuse treatment or examination” adequately covers the matter raised and no amendment is necessary.

1.4 Self-employed occupational therapists

Respondents asked whether the Code needs to be amended to recognise the position of self-employed occupational therapists. Examples were given in relation to record keeping, health and safety.

Decision:

The OTRB agreed that the requirements in relation to record keeping and health and safety are applicable to occupational therapists working in any context. The OTRB further agreed that self-employed occupational therapists must ensure that they can meet these requirements and access supports in these areas where necessary. The OTRB decided that no amendment is necessary.

1.5 Incentives which could affect intervention and treatment

A respondent suggested that wording which is included in the draft Code for the DRB in relation to financial incentives which would affect judgement be included in the Code.



Decision:

The OTRB decided that this was adequately covered by section 1.a and 1.b “You must not” and made no amendment to the Code.

1.6 Willingness to work as part of a multi-disciplinary team

One respondent suggested that the Code include reference to willingness to work as part of a multi-disciplinary team, as provided for in the RRB Code.

Decision:

The OTRB decided to retain the wording in the OTRB Code as follows: “be willing to work in collaboration with service users, professionals, support staff and others to optimise and enhance service user care.” The OTRB agreed that no amendment was necessary.

1.7 Drafting amendments

1.a: You must treat each service user as an individual in a client-centred manner;

One respondent suggested changing “client-centred” to “person-centred” as not all recipients of occupational therapy services are clients.

Decision: The OTRB decided not to make the amendment.

In section 2, there is a paragraph starting with “Registrants must” in relation to use of social media. One respondent suggested that this is an abrupt change from the rest of the language in the document which talks directly to the registrant – “You”.

OTRB may wish to amend the wording to “you”. And if it is a “you must”, would it be appropriate to include it in item 2?

Decision: The OTRB agreed to make the amendment and also that it should be a “you must” requirement rather than a “you should” requirement.

Section 11 – assist and advise. First sentence refers to “help and advise” – should there be consistency? NALA had proposed to change “assist” to “help” – plainer English.

Decision: The OTRB decided to retain the use of the word “assist” and did not make the amendment.



1.8 Further amendments arising out of the public consultation responses

The OTRB considered comments received in relation to the issue of informed consent in the context of undertaking research. The OTRB decided to elevate the requirement to obtain informed consent from research participants from a “you should” to a “you must” requirement in section 21.c.

The OTRB further agreed to amend the wording of section 21.e to delete specific reference to scientific journals having considered the feedback received during the public consultation.



Acknowledgments

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 Dietitians Registration Board.

Conclusion

The Occupational Therapists Registration Board considered all submissions in detail. The Board made amendments to the Bye-Law as detailed in the decisions above.



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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Regulating Health +
Social Care Professionals

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.





Appendix 3: Copy of Online Feedback Form

Occupational Therapists Registration Board: Public Consultation on Code of Professional Conduct and Ethics

Thank you for taking the time to participate in CORU's consultation process on a bye-law on Code of Professional Conduct and Ethics 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.

The Code of Professional Conduct and Ethics for Occupational Therapists has been drafted using the framework code developed by the Health and Social Care Professionals Council at CORU. The Occupational Therapists Registration Board, consisting of both lay members and representatives of the profession, have carefully and thoughtfully adapted the framework with additional assistance from experts.

The Code specifies the standards of conduct, performance and ethics expected of registered speech & language therapists and it is intended to reflect the needs of patients and the standards they can expect when interacting with the practice of occupational therapy. Failure to meet the standards specified in the Code could result in a complaint of professional misconduct being made about the registrant.

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 Approved Qualifications for 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 approved qualifications

http://www.coru.ie/uploads/documents/OTRB_Code_Bye-Law_for_public_consultation.pdf