I would like to make comment on the Consultation paper.

I support all that is said and have no further comment on the CPD, criminal history, English language and indemnity insurance.

I would like to make comment on the recency of practice.

My understanding from the paper is that if an OT is out of the workforce for 5 years or more that the preceding year they need to do min 30 hours CPD. if they remain registered I cant see how this is any different than any other registered OT except they have had no "practice" I feel we need to be more prescriptive especially around the area of "practice' eg that an OT entering the workforce after 5 years need to do 30 hours 'practice' in the year prior to registration as well as the 30 hour CPD.

I really like and support your definition of "practice' as it is broader than just direct clinical practice

Regards A. Barton