



27 November 2019

AHPRA  
GPO Box 9958  
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To whom it may concern

## **Consultation on a draft proposed *Supervised practice framework***

Thank you for the opportunity to provide feedback on the *Supervised practice framework* and supporting documentation. The Occupational Therapy Council of Australia (OTC) believes the draft *Supervised practice framework* is not fully appropriate to the work of the OTC, and it is recommended the process for internationally-qualified occupational therapists be exempt from the supervision requirements as outlined in the fact sheets of the *Supervised practice framework*.

The OTC is committed to the highest standards of risk management in the area of supervised practice, and committed to uphold and ensure the Principles of Supervised Practice are undertaken. The *Supervised practice framework* will suit practitioners who do not meet recency of practice requirements or those who fail to meet practice standards. The *Supervised practice framework* will **not** be suitable for the assessment of internationally-qualified occupational therapists as it has a different purpose. The OTC process allows internationally-qualified occupational therapists to engage in a work environment to apply relevant professional skills within Australia, and to develop an understanding of Australian customs and cultures.

The OTC endorses the overarching principles within the framework, and agrees with a risk-based approach to assessment of internationally-qualified practitioners. In this framework, OTC supports continuation of a period of supervised practice for all internationally-qualified therapists leading to general registration to practise independently in Australia.

The OTC has a robust system in place for the assessment of internationally-qualified practitioners, and is currently refining the risk-based approach to the assessment of internationally-qualified occupational therapists undertaking the Stage 2 period of supervised practice, thereby ensuring the protection of the public.

In all areas of OTC work:

- the risks are identified;
- the likelihood and possible consequences are assessed;
- the responses are proportionate, and
- the risks are managed.

Additionally, the OTBA/AHPRA Levels of Supervision do not articulate clearly with the processes and practices of supervision to be undertaken within the Stage 2 period of supervised practice for internationally-qualified occupational therapists, the naming of the levels is confusing to applicants, and will likely continue to create confusion amongst applicants in completion of the required paperwork.

Therefore, OTC requests the recommended exemption from the supervision requirements outlined in the guidelines.

Yours sincerely



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Chair  
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