



Health Reference: removing the health reference as a requirement for entry to the Register.

Response from the College of Occupational Therapists

The College of Occupational Therapists (COT) is pleased to provide a response to the consultation on removing the health reference as a requirement for entry to the register. We have been assisted by the Practice Placement Tutors Forum (OTAF), and Council of Occupational Therapists Educational Directors (COTED), in formulating this response.

The College of Occupational Therapists is the professional body for occupational therapists and represents over 28,000 occupational therapists, support workers and students from across the United Kingdom. Occupational therapists work in the NHS, Local Authority social care services, housing, schools, prisons, voluntary and independent sectors, and vocational and employment rehabilitation services.

We agree that a formal health requirement at the point of registration is necessary and all those applying to join the register should be able to demonstrate insight and understanding of any condition they may have. Health requirements should be necessary, proportionate and appropriate to that which the regulators need to know to carry out their role of protecting the public.

On the whole, it is felt appropriate to remove the requirement for the health reference and replace it with a self-declaration. This would seem fair in light of the procedure for registrants and there are systems in place when there are concerns highlighted through self declaration. The fitness to practice procedure is also in place to deal with issues of ongoing concern. The proposal embraces a climate of transparency and responsibility.

However, a note of caution is offered as we are aware of students who have not declared medical conditions during their occupational health check but then issues arise whilst on placement, in mental health settings in particular. There is also concern for those practitioners who lack that insight, a point made clear by the small, but nevertheless still present, number of people who have been refused entry on health grounds.