

State Insurance Regulatory Authority Level 14-15, 231 Elizabeth Street Sydney NSW 2000

Via email: healthpolicyandsupervision@sira.nsw.gov.au

2 March 2023

Dear Sir / Madam

Re: Draft Guidelines for the Provision of Relevant Services (Health and Related Services)

Occupational Therapy Australia (OTA) is the professional association and peak body for occupational therapists in Australia. OTA welcomes the opportunity to provide feedback on the *Draft Guidelines* for the Provision of Relevant Services (Health and Related Services).

OTA appreciated the opportunity for a representative to attend the SIRA consultation on the 17th February 2023. The information that was provided by SIRA regarding the purpose of the *draft Guidelines* was valuable. Further, OTA was pleased SIRA acknowledged that investigations into any clinical or misconduct issues are the responsibility of Australian Health Practitioner Regulation Agency (AHPRA) and not SIRA.

OTA suggests that the *draft Guidelines* could be enhanced with clarity of some of the wording contained within:

- Definition of <u>Relevant service provider</u> expanding on the definition to outline if a relevant service provider is an individual or business or both;
- Part 3, 21c) 'Been convicted of any criminal offence' consider rewording this to 'any relevant criminal offence'.

OTA would welcome the opportunity to discuss further, if this feedback raises any additional queries.

Yours Sincerely



Karen Brown NSW Divisional Manager Occupational Therapy Australia