



September 11, 2020

Tim Mbugua  
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**RESPONSE TO CONSULTATION OF THE COLLEGE OF OCCUPATIONAL THERAPISTS OF  
ONTARIO REGARDING PROPOSES CHANGES TO  
THE CODE OF ETHICS**

**September 2020**

Dear Mr. Tim Mbugua,

The Ontario Society of Occupational Therapists (OSOT) is pleased to have had the opportunity to review the Amendments to the Code of Ethics circulated by the College of Occupational Therapists of Ontario for stakeholder consultation on August 14, 2020. We are pleased to forward the following comments and input to contribute to the further development of this import document.

**Addition of Professional Boundaries and Conflict of Interest**

OSOT offers no objection to the addition of these two components. With respect to professional boundaries, there is no mention of relationships and the requirement to maintain professional relationships (e.g. preventing sexual abuse, personal vs. professional relationships, etc.) which would be key to establishing trust with the client.

Would it be appropriate to direct occupational therapists to the *Standards for Professional Boundaries* and/or the *Standards for Prevention and Management of Conflict of Interest* to encourage a deeper understanding of the expectations or is the intention to discontinue these older Standards? If the intention is to discontinue these Standards, OSOT would express concerns that the proposed amendments to the Code of Ethics do not sufficiently guide the profession on these potentially high-risk areas and

we would be in favour of maintaining the Standards as a compliment to the Code of Ethics. We would suggest adding the following “Set and manage boundaries relating to personal dignity, control, professional relationships, privacy and confidentiality in keeping with standards of practice to ensure that the trust a client has placed in the occupational therapist is not betrayed.”

We hope that these comments will be constructive to the Council’s review of the Code of Ethics and would be considered when determining the future of the *Standards for Professional Boundaries (2015)* and the *Standards for Prevention and Management of Conflict of Interest (2012)*.

Sincerely,

A handwritten signature in black ink that reads "Christie Brenchley". The signature is written in a cursive, flowing style.

Christie Brenchley  
Executive Director