



24 April, 2026

Question 1

Do you agree that the proposed qualification framework (bachelor's degree in psychology plus a Board-accredited postgraduate diploma with a supervised practicum) is appropriate to support safe and competent practice within the Psychology Assistant scope?

Response:

No, we do not agree. The proposed qualification framework does not adequately support safe and competent practice.

Current bachelor's degrees in psychology do not consistently require foundational learning in culturally responsive practice, Te Tiriti o Waitangi obligations, or working effectively with Māori—core competencies for psychological practice at any level in Aotearoa New Zealand. In addition, bachelor's programmes are highly variable and often allow students to graduate without sufficient grounding in applied health contexts, as upper-level study may focus on areas such as brain imaging, comparative cognition, forensic or organisational psychology.

As the PGDipPsychAsst emphasises the practical application of psychological knowledge, it is crucial that students are equipped with adequate knowledge of Te Tiriti o Waitangi and non-Western psychological knowledge systems during their undergraduate studies. This theoretical grounding will provide context for a deeper engagement with psychological care when they come to learn about it in the Psychology Assistant training. The recommendation for earlier exposure to non-Western psychologies also came from the WERO report (Waitoki et al., 2024) and the lodged Tribunal claim (Levy et al., 2023).

Requiring these foundational competencies to be developed during a postgraduate diploma is unrealistic and places undue pressure on both trainees and supervisors. A bachelor's degree should provide a prescribed, practice-relevant foundation—particularly at 300-level—for those intending to enter the Psychology Assistant pathway. Students who have taken courses in Kaupapa Māori psychology, Pacific health, and cultural diversity should be recognised in the programme selection process for embracing diverse knowledge systems and models of care relevant to the training.

Without this foundational learning, the proposed framework risks producing graduates who are underprepared for safe, culturally competent practice in the health workforce.

Question 2

With respect to the principles set out in s 13 of the HPCA Act, are there any risks, barriers, or unintended consequences associated with the proposed qualification framework that the Board should consider before prescribing qualifications for the Psychology Assistant scope?

Response:

When considered against the principles in s 13 of the HPCA Act, the proposed qualification framework presents several risks and unintended consequences that warrant careful consideration by the Board.

(a) Qualifications must be necessary to protect members of the public

The proposed framework does not appear sufficient to ensure public protection. In particular, the reliance on a general bachelor's degree in psychology—without prescribed requirements for cultural safety, Te Tiriti o Waitangi obligations, or working effectively with Māori—creates a material risk to safe and competent practice. These competencies are essential for protecting the public in Aotearoa New Zealand's health context, including at assistant level.

Placing responsibility for developing these foundational competencies primarily within a postgraduate diploma and supervised practice of only 600 hours risks inconsistent learning, variable competence, and increased reliance on supervisors to manage gaps in trainee preparedness. This creates heightened risk of harm, particularly to Māori and other communities who already experience inequitable health outcomes, and undermines the intent of s 13(a) to prioritise public safety.

(b) Qualifications must not unnecessarily restrict registration

While the framework may appear flexible, it risks creating indirect barriers to entry by shifting essential foundational learning into postgraduate and supervised settings. Candidates who have completed psychology undergraduate degrees that are theory-focused or non-clinical may struggle to meet expectations in postgraduate training without additional, unfunded bridging learning.

This may disadvantage otherwise suitable applicants, particularly Māori and Pacific candidates or those from less resourced institutions and could limit the pool of registrants in practice. A clearer, more prescribed undergraduate foundation aligned with Psychology Assistant practice would provide transparency and fairness, reducing unnecessary obstacles to registration while still maintaining standards.

(c) Qualifications must not impose undue costs on practitioners or the public

The proposed framework risks imposing undue costs on both practitioners and the health system. Underprepared assistants are likely to require higher levels of supervision, increasing workload pressures on psychologists in already stretched services. This has cost implications for employers, reduces supervisory capacity, and contributes to workforce stress and burnout. If the cost implications are ignored, and adequate supervision is not provided, then there is a risk of failing to protect the public (s 13 [a]).

There are also potential downstream costs to the public if assistants are used as substitutes for psychologists without adequate preparation, leading to delayed access to appropriate care, poorer outcomes, and increased demand for corrective or escalated services. Proceeding with a framework that does not adequately front-load essential competencies therefore risks shifting costs onto practitioners, services, and ultimately service users.

In summary, the proposed qualification framework does not yet demonstrate clear alignment with s 13 of the HPCA Act. It risks falling short of what is necessary to protect the public, may create avoidable barriers to registration, and is likely to impose undue costs on practitioners and the health system. A more prescribed, practice-relevant undergraduate foundation may better support safe, equitable, and sustainable implementation of the Psychology Assistant scope.