

New Zealand Psychological Society Inc. Submission to the New Zealand Psychologists Board

Re: Consultation on Proposed Framework for Scopes of Practice

February 2024

The New Zealand Psychological Society (NZPSS) represents over 2,100 people in the field of psychology, including students. Our members range across the breadth of psychological practice – Clinical, Educational, Health, Forensic, ABA, Community, Counselling, Child and Family, Organisational, Coaching - as well as researchers and academics, and work in various settings from schools to the health system to private practice to universities and organisations.

As a Society we recognise and support the need for a review of Scopes to ensure greater clarity, transparency and certainty to our members in their practice of psychology. However, we urge the Board to reconsider its proposal and implement a more collaborative approach with representatives from across the profession to develop a more robust and flexible framework.

It is also essential that the purpose of the review, and the ‘problem that is being solved’ by this alteration to the framework, is clear with an explanation as to how it came about. We acknowledge the legal advice the Board received indicating that some psychologists may be acting out of scope – through no fault of their own. We encourage the Board to share the legal opinion that led to the concerns about the previous operation of Scopes in order to support the professions understanding.

Key Principles

When considering a Scopes Framework, we believe the following are key principles to be met, and finding the right balance between the different aspects is essential:

- ❖ Provides protection for the public through:
 - Valid expectation that the person holding a particular Scope has the requisite skills
 - Knowing what type of practitioner to engage with
 - Practitioners having the ability to develop appropriate skills to bring the best practices to bear for the client in front of them.
 - Not unnecessarily restricting practice, such that people are able to access a psychologist when one is needed
- ❖ Clarity and transparency in the Scope/s description: so that both the public (including employers) and the practitioners are clear about what a person holding a particular Scope can and cannot do.

- ❖ Flexibility to enable the workforce to develop and grow: Ability for psychologists to safely develop their practice and move into different areas through professional development, experience and supervision.
- ❖ Meeting obligations to Māori health and psychological wellbeing as agreed to in He Whakaputanga and Te Tiriti o Waitangi: a commitment to resourcing Kaupapa Māori psychology strategic planning and development is essential.
- ❖ Recognition of specific skills needed in different areas, without unduly restricting psychologists ability to work holistically.
- ❖ Minimising barriers to entry to the profession, or to continuing in the profession, in order to support increasing diversity in the workforce and increasing the number of psychologists to meet demand.
- ❖ Ease of administration for the Board to minimise costs.

NZPsS held meetings in late January and early February with its members to hear their feedback on the proposed framework and it was clear from those discussions that our members have strong concerns about the proposal. Some members were pleased to see the possibility of the creation of a Scope for their specific field, particularly where they had previously advocated for one to be established. Overwhelmingly however, members felt that the proposal did not meet the principles above and instead would have the effect of segmenting and dividing the profession, unnecessarily restricting psychologists practice and deterring people from registration.

Central to these concerns is that people we work with, and psychological practice, do not fit neatly into predetermined boxes – people, families, systems and organisations often have multiple, interacting issues or areas that a psychologist may need to work with. Having a skilled workforce that can work across these different areas, whilst recognising when an issue goes outside of their competency, benefits the public in continuity of care, minimising disruption to their service and enabling the best evidence-based practices to be selected and used at the appropriate time.

Siloing the profession into discrete areas is a significant concern for our members. Many examples were given of members who have worked across fields – following appropriate training/professional development and supervision. This type of movement is beneficial to society and the psychologists in question – allowing them to develop their skills to meet the needs of the community they are working with. Restrictive Scopes are likely to further restrict practice due to psychologists exercising caution in ensuring they are ‘within Scope’. In areas of the country where there are few psychologists available to the community it is even more essential that they are able to practice across a number of areas (assuming that they are skilled in these areas).

Discussions on the fragmentation and siloing highlighted concerns that the proposal does not reflect Te Ao Māori ways of working; specifically ways where a kaupapa Māori and bi-cultural approach to psychology is prioritised. While we defer to NSCBI and He Paiaka Totara in consideration of what would work best for Māori, our members have noted potential

benefit in having a Scope for Kaupapa Māori. It is also important to consider the application of Kaupapa Māori for psychologists regardless of whether they are working as Clinical, Educational, Community etc. Here we recognise that different aspects of psychology prioritise different approaches and each are layered, with overlap, rather than discrete practices. We recommend that a strategic plan is developed in regards to Kaupapa Māori recognition and practice.

The reality of the Aotearoa tertiary education landscape, where training programmes for all types of psychology are not currently being offered is another factor behind our concerns with the proposal - with the prediction that a proliferation of Scopes will not be able to be met by the tertiary institutions and that people will face limitations in what they can study based on their location and financial ability to move. This framework is likely to have a disproportionately large impact in geographic regions distant from the relevant training institutions. We also question the strong emphasis on initial training rather than many years of experience and development and the safety of psychologists being forced back to the work area of their original training - particularly given the half-life of professional knowledge and the importance, in working under the scientist-practitioner framework, of maintaining currency of knowledge and ongoing engagement with new knowledge emerging from research.

It is well-known that Aotearoa needs more psychologists across the breadth of the profession. There is a concern that the siloing of psychologists into more specific and specialised Scopes, along with the process to re-register under this new system is likely to decrease these numbers instead. Restricting people to one specialisation, with a high barrier to change or add specialisations (needing to complete a postgraduate diploma and internship in the new field) will discourage people from taking up training and expanding their skills. As mentioned above this leads to less skilled psychologists working with the public and the inability for psychologists to adapt to what is needed in the community.

For those heading towards retirement, requirements to re-register and/or re-train in skills they already possess, are likely to hasten their retirement, or prompt them to de-register and instead offer similar services under a different title. Similarly, those who wish to expand their skill base or who lose interest in their current Scope of practice may well de-register and practice under another non-protected title, rather than going through a full training programme again— reducing the protection for the public who they work with and putting more pressure on remaining psychologists in their workplaces.

One enduring risk with the attempt to embody different kinds of practice specialties within Scopes is that it is hard to adapt the system to accommodate growth in the science and its practice, meaning that newer developments are disadvantaged compared to more

established ones. It would be more beneficial to clarify and strengthen the focus on what are 'Psychology's' core aspects and competencies, rather than dividing it up. Ensuring all psychologists, from all accredited programmes and fields have a central set of competencies. Specialisation can then be managed in other, more flexible ways. This would also assist in providing better recognition of the skills of overseas psychologists who regularly have qualifications that do not fit neatly into our current system.

Concerns and Unknowns

Whilst we appreciate the Board sending this idea out for consultation at an early stage that also meant it was difficult for people to respond constructively to it as there were many questions about different aspects, and with the lack of detail a lot of fear about possibilities.

- Risk Assessment: It is not clear how having multiple Scopes is reducing the risk for the public. Psychologists have been unable to find any evidence of significant numbers of complaints arising due to the current Scopes. What is the risk assessment that supports there being more than one "Psychologist" Scope?
- The Clusters: these were confusing and in general are not seen as an appropriate way to distinguish different areas of work. We are concerned that these could be used to limit activities, employment opportunities, and work within Scopes. A number of the proposed (and current) Scopes have aspects that draw on both cluster descriptions, and some psychologists work in 2 Scopes currently that would be in different clusters – it is unclear what the implication for their future registration/work would be.
- Endorsements: the implementation and intention of these is unclear - whether these are specific to the eventual Scope you are in or more general across Scopes (e.g. if you have a Health Psych diploma, and get an endorsement in 'diagnosis' is that an endorsement in 'Health Psychology Diagnosis', that is different from an "Educational Psychology Diagnosis" endorsement – or is it one endorsement that is the same for all Scopes?)
- Content of each Scope: and how tightly these would be defined: There is significant overlap within the work done by psychologists from different fields. Without detail provided we are concerned that specific activities will be restricted to one or other Scope and this will severely impact others. Language used is also important here as most, if not all, psychologists do 'assessment' of some sort – however what that looks like may differ between an organisational psychologist and a clinical psychologist for example.
- "Depletion" of General Scope: Related to the above is a concern regarding what will be 'left' for those in the Psychologist Scope of Practice. If the various vocational scopes each carve out their own niche what will be able to remain 'in scope' for the Psychologist scope? This is likely to undermine and devalue that Scope.

- Confusion for the Public: With so many different Scopes it will be less clear for the public to understand the type of psychologist they should be seeking out. If you have a child who is experiencing distress, particularly in school, should you be looking for a Child and Family Psychologist, an Educational Psychologist, a Counselling Psychologist or a Clinical Psychologist? Educating employers and the public on the new distinctions would require unnecessary significant investment of time and budget.
- Cost: Will psychologists who now need to register in multiple Scopes in order to continue their current practice be charged the registration fee multiple times, thus increasing their costs (financial and time) exponentially? Time to undertake the re-registration/ retraining process will also often be borne by individual psychologists, at a cost to them in being away from their work.
- Capacity of the Board: It is likely a large number of psychologists will need to re-do their registration to meet the new requirements and register in their new Scope/s. This will cause a huge amount of work for the Board and there are concerns about the Boards capacity to do this in the proposed timeframe, as well as their knowledge of the different fields of psychology to be able to accurately assess people's competence in these areas
- Matching past training to new requirements: with the requirements for registering in the proposed new Scopes unstated there is a concern about how past training programmes will meet the new requirements. If you have previously undertaken a postgraduate diploma in a field that will now be a specialised Scope, what happens if that programme doesn't meet the new requirements? Will you have to do your programme again in order to remain registered or work in your field?
- Liability Insurance: It is unclear what the impact might be from insurance providers as to whether they will only insure particular Scopes

We also wish to draw the Boards attention to the impact that this, and recent decisions or comments by the Board, are having on psychologists wellbeing and their ability to gain work currently. We appreciate that the Board has stated nothing has changed and that these are just proposals but we have heard of employers already taking these potential changes into consideration in their hiring decisions. This and the concern over possible changes and potential impacts – some of which are outlined above- is causing significant stress to the workforce at a time when they are already under significant work stress. Creating an inclusive, collaborative process that truly listens to psychologists is essential alongside taking steps to address these impacts with the wider sector/employers.

We do not support the proposed framework, however if the Board continues to reconsider the existing framework then the NZPsS strongly recommends the following:

- ◆ That a working group including the professional associations is developed to consider the feedback received and refine the proposal – and that this group include at least 2

representatives from each of the proposed Scopes. We are happy to assist with sourcing representatives for this

- ◆ A consultation process with NSCBI and He Paiaka Totara is clearly outlined
- ◆ Ensure that Community Psychology is included as a recognised field of practice.
- ◆ That representatives from the NZPsS Institutes are heavily involved in developing the frames and identifying what constitutes competent practice in their fields - including the Health, Industrial/Organisational, Community, Forensic, Education, Clinical, and Counselling areas.
- ◆ That whatever the eventual framework there is recognition and inclusion of significant overlaps among different types of practice to allow for psychologists to carry out their roles and allow sufficient margin that they will not fear accidentally working outside of their Scope
- ◆ That the resulting system is simple to understand and operate – for the public, employers, psychologists and the Board.
- ◆ That work begins promptly on a system to recognise expertise acquired post-internship year and does not rely only on formal postgraduate training in that area.
- ◆ That the financial impact of any processes for recognition of learning/training and registration(s) are carefully considered and kept to a minimum.

Reflecting the views of a majority of our members, NZPsS strongly recommends that the Scopes framework be revised to reflect the following:

- **One Scope:** There is strong support for having only one “Psychologist” Scope that is well defined and robust - such that all psychologists registered in NZ have the competencies to do a wide breadth of work.
- **Option for endorsement:** Use endorsements differently, such that psychologists who wish to specialise in different areas are able to gain an endorsement in the areas currently operating and suggested for Scopes and possibly others. Similar to how ‘Merits’ work for GP’s.
- **Competence:** Focus should be on competence, not Scope. Making the CCP process more robust, recognising the importance of supervisors and supervision.
- **Kaupapa Māori Strategic Plan:** Partner with Māori psychologists to develop an appropriate pathway and mechanism for recognition of Kaupapa Māori practice, alongside the cultural competency requirements.
- **Alternative Pathways:** That there are alternative pathways to gain endorsements that do not rely solely on postgraduate training programmes, and include professional development, supervision and recognition of other training and experience.
- **Working Party:** A working party is carefully selected, with representatives from across the fields of psychology, different training programmes, etc as well as other appropriate diversity to work on developing an alternative framework. This group to ensure a strong core Psychologist Scope, and that the pathways for a variety of endorsements are workable with regards to options and processes.

