



The New Zealand Psychological Society

*Te Rōpū Mātai Hinengaro o Aotearoa*

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Dear Michael

**Submission on the proposal for modifying all health-related regulatory authorities  
on behalf of the New Zealand Psychological Society**

The New Zealand Psychological Society (NZPsS) would like to comment on the proposal to combine all secretariat and office functions of health-profession regulatory authorities now constituted under the HPCA, and reducing the current number of board members.

We have a number of concerns in respect of this proposal. The essence of our concerns is about the loss of necessary and valuable specialisation, as expressed in the Psychologists Board's submission in paragraph 30. The professions are necessarily different, in their concepts, theories, methodologies, subject matter and, importantly, language. If they weren't different, we could have one profession and one scope of practice. To think that they could be amalgamated for regulatory and operational purposes into one ignores the difference that this diversity makes in each level of regulation, as well as practice. If the risks were the same for all professions' publics, we could have one code of ethics and conduct and simple enforcement. This is not so, and has been a major part of the reason for the previous failure of joint secretariats (paragraphs 4-6, 13, 23 of the Board's submission). To be able to efficiently, justly and reliably respond to issues of practice, an amalgamated Board will have no option but to augment the generalist skill set of staff with regular and costly reliance on contractors or consultants, or they will not have the expertise need. We are deeply concerned by the proposal as it stands.

## **Our interest on behalf of our public**

The NZPsS represents over 1000 members who are psychologists and more than 200 students and subscribers, many of whom will become psychologists. It is in the interests of our members to have a regulatory authority which functions effectively and efficiently in relation to its HPCA requirement to protect the health and safety of members of the public through the registration of psychologists.

It is also in the interests of our members that this Board effectively manages the costs which directly impact on the cost of annual practicing certificates (APCs), whether these are paid for by employers such as DHBs or by the psychologist. Ultimately, the public pay — 25% through DHB employers of psychologists while other psychologists' costs are passed on to non-health employers or private clients.

The current structure and functioning of this Board has advantages which the NZPsS would not like to see diluted or compromised. These include a thorough, consultative approach, its efficient regulatory function and a well informed and proactive approach to resolving professional concerns. The Board is working with practitioners and training institutions across the full range of psychology — including clinical, educational, counselling, forensic, organizational, and community psychology.

## **Our other comments on the proposal**

We note that analysis of the amalgamation of overseas regulatory authorities does not appear to support the view that combining boards will result in savings which are then passed on to practitioners.

We are mindful that our profession is the subject of complaints of moderate number but high complexity. The diversity of matters for which clients seek psychological assistance makes the safe practice of the profession sometimes more contentious than is the case with other health concerns. In case of a lapse of professional standards, and because of potentially severe impacts on members of the public, complaint costs are high for the Board. We are concerned that the suggested modification of regulatory authorities will in fact lead to increased costs through less effective processing of complaints, delayed conclusions and additional costs. As noted, Board costs are passed on through our psychologists to their employers and, ultimately the public.

We are in support however of any changes related to boards which would assist the sharing of workforce data and subsequent workforce development planning.

We would be concerned to see the number of board members reduced further, as the Board has already made a reduction. Psychologists practice in diverse areas and the Board must keep abreast of major trends and risks in all areas to do its work well. We believe that the present level of diversity assists in winning compliance from the profession and their engagement with the work of the Board in facilitating safe and effective public practice by the profession.

**In summary**

In summary the NZPsS is not supportive of the amalgamation proposal as put forward by Health Workforce New Zealand. We welcome realistic opportunities to reduce costs and we are supportive of any actions that assist boards to share information and expertise with one another. We believe that HRANZ could provide the focus for this sharing amongst boards.

Yours sincerely



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