

New Zealand College of Clinical Psychologists Response to NZ Psychologists Board Review of Scopes of Practice, 2008

Please consider the issues raised by the discussion document and then **comment or leave blank** as you feel inclined. Submissions will be received up to **Friday 23 May 2008** and a provisional report will be provided to the Board to consider at the next Board meeting on 28-29 May 2008.

You may also complete this electronically by either accessing the consultation document on the Board's website www.psychologistsboard.org.nz or by requesting it from Anne Goodhead, Psychology Advisor, via email to anne.goodhead@nzpb.org.nz.

2. What Stakeholder Group(s) Do You Belong To?

Professional Association, New Zealand College of Clinical Psychologists .

3.3 Are the existing scopes essential for public protection?

Yes, but we are concerned that they are not functioning in the way the legislation intended.

Question 3.3(a): Do the existing vocational scope titles make a useful distinction for the interested public and thereby improve public safety?

Yes – perhaps. This does depend on the knowledge of the public, we are not sure that the public in general are clear about the differences between professional groups (psychologists, psychiatrists, psychotherapists), let alone fine distinctions within these groups. However, certain groups or sectors (referring GP doctors, government agencies and departments) are aware of the distinctions and use them in deciding what sort of psychologist is needed for particular tasks or roles.

We are concerned about the stand the Psychologists Registration Board has taken, that is, that protection of title is not intended to restrict practice, that practice is not restricted by scope but by competence and that only title use is restricted by scope. This seems counter to the intent of the legislation and is not the approach that other registration authorities have taken with respect to scopes of practice. The Ministry of Health's recent paper on the review of HPCA ("Identification of issues and solutions") talks about the intent of scopes of practice – "the purpose of registration and APCs is to provide the public with an assurance that a practitioner is competent by certifying that the practitioner meets the requirements to work within a specified scope of practice". Our reading of this is that practitioners should not undertake work described within a scope of practice without actually holding that scope.

The development and use of vocational titles is an issue that has been discussed by psychologists for many years, with some of this summarised by the Psychologists Board Consultative Committee in 1993. The conclusions they reached about specialist titles and the reasons given then still apply. "The interests of consumers are not safeguarded by the Act's general registration provisions when there is a need to identify an appropriately qualified and experienced specialist. There are no real constraints on a person claiming specialist skills when they have not received the required training or supervision" (p8).

Question 3.3(b): Does it matter that practitioners with the same vocational scope may vary considerably in their knowledge and skills?

No, as long as the core skills necessary are well defined.

Question 3.3(c): What risks or advantages may exist for the Board to rely on practitioners to declare their own competence without specifying vocational scope specialist knowledge?

No advantages seen for this.

Question 3.3(d): Do you know of any examples where the safety of the public has been at risk due to misuse of scope title? If so, please supply a brief outline.

No

3.4 Do scopes clearly define areas of practice which are different from other scopes of practice?

Question 3.4(a): Do you consider that there is a high degree of overlap between scopes and if so, does it matter?

There are some inevitable overlaps, but many areas of distinct knowledge and application, these are the crucial distinctions and do not overlap. The draft Clinical Scope definitions were more tightly defined and should be revisited.

3.5 Are there clear qualifications for entry for each scope as set out in the HPCA Act section 12(2)?

Question 3.5(a): Do you agree with the existing policies about qualification pathways to the vocational scopes? What, if any, changes would you like to see?

NZCCP holds the view that completion of one of the Postgraduate clinical psychology courses is the only valid entry into the clinical scope for people training in New Zealand. While it is necessary to make provision for people who train overseas there is no need to make such provision for NZ trained practitioners.

Question 3.5(b): Is it feasible to establish a vocational scope without an established New Zealand qualification pathway?

No. A relevant qualification should be part of the definition of the scope.

Question 3.5(c): What alternative criteria for vocational scope qualification, if any, would you regard as practical?

None for people training in New Zealand

Question 3.5(d): Can this learning by pathways other than qualifications be taken into account in determining scope title? Do you consider it sufficient to establish eligibility for practising safely in an area/vocational scope title?

No

3.6 Are the qualifications for the vocational scopes of practice necessary for the protection of the public?

Question 3.6(a): Is the distinction between “Psychologist” and vocational scopes also necessary for safe practice?

Yes

Question 3.6(b): Do you agree the prescribed qualifications for the vocational scopes are reasonable, or do you consider the prescribed qualifications to be unreasonably restrictive?

Both reasonable and necessary - the combination of academic theoretical knowledge and supervised practice is required, with both having examination processes to ensure that standards have been achieved.

Question 3.6(c): Do the scopes introduce more benefits than the costs and disadvantages imposed?

Yes.

3.7 Do scopes of practice unnecessarily restrict some areas of practice?

Question 3.7(a): Do you perceive restrictions imposed by having vocational scopes? If yes, is this a cause for concern?

Restrictions are inherent in vocational scopes, they are meaningless without them. It is more a cause for concern that the board has downplayed this aspect and promoted the scopes as restricting title only.

Question 3.7(b) – for registered practitioners: Are you in the position of being either promoted or demoted linked to a vocational scope?

No, this is not what scopes of practice are about.

Question 3.7(c) – for respondents representing organisations: Do you employ or issue contracts through a decision-making process partially or wholly based on vocational scope?

No. Eligibility for membership of NZCCP is determined by academic qualifications not by scope of practice.

Question 3.7(d) – for all respondents: Should the Board be concerned about these apparent restrictions on some psychologists?

No.

Question 3.7(e): What are the risks and advantages of vocational scope being used for selection purposes?

3.8 How should cultural competence be incorporated into the scopes of practice?

Question 3.8(a): Should there be a mechanism to enable the members of the public and other psychologists to identify those with specialist cultural knowledge? If yes, what should be the criteria to determine such identification?

Assessing specialist cultural knowledge and the competence of the practitioner to work with different cultures is likely to be too difficult. It would be worthwhile having the capacity to identify and acknowledge practitioners who are making the effort to develop knowledge and skills in working across cultures. Some way for practitioners who are making the effort to promote this, for example by completion of specific training, would be good.

4. Options For The Way Forward

Option B is preferred, along with some focus on informing and educating the public.

Question 4(a): What is your preferred way forward?

Question 4(b): Do you have any other comments or suggestions?

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Thank you for taking the time to consider this matter. Your input is much appreciated.

Please return this Consultation Paper and your responses to the questions to Ms Anne Goodhead, Psychology Advisor, New Zealand Psychologists Board:

By email to: anne.goodhead@nzpb.org.nz

By mail to: Ms Anne Goodhead
Psychology Advisor
New Zealand Psychologists Board
PO Box 10626
Wellington 6143
New Zealand