



NZCCP

The New Zealand College
of Clinical Psychologists

Te Whare Wānanga o te Mātauranga Hinengaro

30 November, 2010

Sandra Cumming
Senior Policy Analyst
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Health Workforce New Zealand
Ministry of Health
PO Box 5013
Wellington 6145

Dear Sandra

Draft Self Regulation Programme

The New Zealand College of Clinical Psychologists was sent a copy of the discussion document, "Draft Self Regulation Programme", by the Allied Health Professional Associations' Forum, of which the NZCCP is a member.

We wish to take the opportunity to give you some feedback, further endorsing the points made in the letter sent to you on this matter by the NZ Psychological Society on 18 November.

As you state in your introduction, the Health Practitioners Assurance Act 2003 (HPCA Act) was established with the "principal purpose...to protect the health and safety of members of the public from harm by providing mechanisms to ensure that health practitioners are competent and fit to practise their professions." The College believes that to provide an alternative "mechanism for health professions to gain formal recognition outside the current Act" fundamentally contravenes this principal purpose, and that that a step in this direction would be detrimental to the safety of the public

Whether or not a health profession has "formal recognition of [their] ability to self regulate" has no bearing whatsoever on the health and safety of the public.

Rather than giving the public confidence in a profession's capability to self-regulate, such a programme will instead engender a bewildering two tier system delineating those professions who are registered under the HPCA Act and those who aren't.

More worryingly, without "government endorsement of the content of an organisation's policies and procedures" and without protection of title there would be no way to ensure that practitioners, who choose not join an association, are adequately qualified to deliver health services, further compromising the safety of the public.

Further to this, self-regulation for health professional groups will be prohibitively expensive both financially and administratively, and any auditing and subsequent litigation required by the Ministry will cost the professional association, and consequently its members, dearly.

To summarise, with public safety as the paramount concern, the College would like to see all health professions, where there is a risk of harm to the public, regulated under the HPCA Act, and we emphasise that a self regulation programme would only jeopardise public health and safety.

Please include the College in any further consultation on this matter.

Yours sincerely



Nigel Fairley
President