

CONSULTATION ON PROPOSED CHANGES TO REGISTRATION REQUIREMENTS FOR OVERSEAS-TRAINED PSYCHOLOGISTS

27 November 2023

What is the consultation about?

1. This consultation follows on from the consultation about registration pathways for psychologists, held during June and July of this year. The previous consultation had proposed:
 - the introduction of a provisional psychologist scope of practice for overseas-trained psychologists; and
 - the introduction of a competence programme for all provisional psychologists, focused on culturally competent practice, with specific attention on culturally safe provision of psychology services to tangata whenua, in Aotearoa New Zealand.
2. Following strong feedback from the profession, the Board decided at its August meeting not to proceed with the provisional psychologist scope of practice at this time. The main reasons for this were:
 - The Board acknowledged and agreed with views that introducing a provisional scope of practice will risk dissuading competent psychologists from applying to register in New Zealand, given the period of uncertainty that they would face while provisionally registered; and
 - The Board has identified a way to achieve the same goal by proceeding only with the competence programme element of the original proposal, as a post-registration requirement instead of as a hurdle to full registration.
3. Given the significant shortage of psychologists in New Zealand, the Board must ensure that regulatory policy it implements does not inhibit the public's access to competent psychologists. The Board also has an obligation to ensure that all psychologists who practise in New Zealand are both clinically and culturally competent to practise. We are of the view that the amended approach achieves the right balance.
4. The Board is pleased that a simpler and fairer approach has been identified, and we thank you for your contribution to the changes. We consider this process a good example of improvement through consultation.

Re-consultation

5. The Board agreed to re-consult on this matter to share the updated cultural safety competence programme after reviewing the feedback we received from you. We seek your input on the updated version of the programme.



Draft updated competence programme for overseas trained psychologists

6. Although the Board is not proceeding with the provisional psychologist scope of practice, it intends to proceed with the requirement that newly registered overseas trained psychologists complete a competence programme in culturally safe practice for Aotearoa New Zealand.
7. We consulted on the proposed programme framework during June and July, and generally received good support for it from the profession. We have now reviewed the feedback we received and have made a few changes, including:
 - Allowing applicants to complete the online portion of the programme prior to registration, if desired;
 - Being clearer that completion of the competence programme is not the end of the journey towards culturally safe practice – it is simply the first stepping stone;
 - Reframing the language to reflect that the programme is intended to support psychologists who are new to New Zealand into practice here.

Other changes – for information only

8. The Board has developed guidance for overseas trained psychologists considering applying for registration. The intent of the guidance is to set out the quality hallmarks we look for when assessing overseas qualifications to satisfy us that the qualification is “equivalent to or as satisfactory as” a prescribed qualification. This will provide transparency for applicants, and will assist them in understanding their prospects of success before deciding whether to pay the fees for assessment of their application. The updated guidance is available on our website [here](#).

Proposal

1. To introduce the attached competence programme for all newly registered overseas trained psychologists.

APPENDIX 1

Raka Maui: A cultural safety competence programme for all newly registered overseas trained psychologists

About the programme's name

1. The name of the programme is derived from an ancient Māori whakataukī (wisdom, proverb):

E raka te maui, e raka te matau.
The left hand is adept and the right hand is skilful.

2. In the context of the programme, a psychologist already has their own professional knowledge, expertise and experience. But on the other hand, they need to begin to develop their cultural competency through training, guidance and support. That is what the competence programme offers to them.
3. The whakataukī also refers to a community (i.e., the profession of psychologists) that is able to use all the skills and cultural competence of its people.

Policy statement

The Psychologists Board (the Board) has statutory obligations to ensure that all registered psychologists are providing safe and competent psychology services to the New Zealand public. This includes the provision of culturally safe psychology services to Māori – New Zealand's indigenous population.

The Board believes that, while overseas-trained psychologists approved for registration in New Zealand will have the appropriate qualifications and professional practice skills, the application of these in the context of the unique New Zealand health sector - and the unique needs of tangata whenua (*literally "the people of the land" - a phrase which refers to Māori as New Zealand's indigenous population*) - can present challenges and risks to the public.

The Board has therefore set Raka Maui as a competence programme under section 40 of the Health Practitioners Competence Assurance Act 2003 (the Act) for all newly registered overseas-trained psychologists. The programme must be completed within two years of registration.

Raka Maui is designed to:

- Provide a supportive framework for overseas-trained psychologists to learn and develop knowledge and competencies specific to providing psychology services in the New Zealand context, with particular focus on equitable and safe psychology services for Māori; and
- Provide the Board with assurance that psychologists who trained outside of New Zealand are safe and competent to practise independently in the New Zealand context.

Background

1. The principal purpose of the Act is to protect public health and safety by ensuring health practitioners are competent and fit to practise. As the national responsible authority for registered psychologists, the Board has obligations to (among other things) satisfy itself that any applicant for registration as a psychologist:
 - Is fit to practise in terms of section 16 of the Act; and
 - has both the qualifications and the competence to provide psychology services in New Zealand.
2. The Board has accredited New Zealand training institutions that deliver education in psychology to the standard required by the Board for registration in each of the psychology scopes of practice. The Board has prescribed these qualifications for registration in the appropriate psychologist scope of practice under section 12 of the Act.
3. The Board has not accredited any overseas training institutions for this purpose. To satisfy itself that overseas-trained registrants are competent to practise in the New Zealand context – including providing equitable and culturally safe psychology services for tangata whenua - the Board has set requirements for all new overseas-trained registrants to demonstrate development of specific skills and knowledge, within two years of registration.

Programme requirements

4. If you register as a psychologist after [DATE OF IMPLEMENTATION], and you were not trained in New Zealand, you must satisfactorily complete the requirements of Raka Maui within the timeframes set out in this document. Upon registration, and pending completion of Raka Maui, the Board will include conditions in your scope of practice that you must:
 - Practise under the supervision of a Board-approved psychologist who is registered in the same scope of practice as you; and
 - Work in a Board-approved practice setting.

Task	Evidence	Timeframe
1	Satisfactorily complete the online programme Cultural Competency (Maori) delivered by www.mauriora.co.nz	Provision to the Board of the certificate of completion issued by Mauriora.
2	Satisfactorily complete either: <ol style="list-style-type: none"> 1. Foundations Course in Healthcare and the Treaty of Waitangi delivered by www.mauriora.nz, or 2. The Ministry of Health's First Module Nga Paerewa Te Tiriti elearning module 	Provision to the Board of the relevant certificate of completion. Evidence must be submitted to registration@nzpb.org.nz within 3 months of registration.

3	<p>Work with your supervisor to develop a continuing competence plan that focuses on New Zealand-specific issues. This will depend on the scope of practice in which you are registered, and must include, but is not limited to:</p> <ul style="list-style-type: none"> • Knowledge of NZ legislation relevant to role • Knowledge of the Board’s Continuing Competence Programme • Knowledge of Board Guidelines (including, but not limited to) Cultural Safety, Keeping Records, Informed Consent, and Supervision • Knowledge of Code of Ethics/Code of Conduct • Understanding and application of te Tiriti o Waitangi • Understanding third-party funding arrangements and any related expectations or standards set by funders (e.g., ACC, Ministry of Education, Employers). 	Provision to the Board of first year’s CCP, with supervisor’s sign-off.	Evidence must be submitted to registration@nzpb.org.nz within 3 months of registration.
4	Review the Ministry of Health’s Māori Health Models and reflect on how you can incorporate these models into your psychology practice when working with Māori. Seek advice and/or support from a colleague if required.	Reflection provided to Board.	Evidence for Tasks 4, 5 and 6 must be submitted to the Board together (i.e., in a single email) after at least 9 months and before 18 months of registration.
5	In supervision, reflect on your first year in practice, including observing any biases or assumptions you had when you arrived, and how these have changed since you started practising in New Zealand.	Reflection signed off by supervisor and provided to Board	
6	<p>Read:</p> <ul style="list-style-type: none"> • Board standards of clinical competence • Board standards of cultural competence • Board Code of Ethics <p>And complete a reflection on practice experiences that relate to each of the above. All reflections must be discussed with, and signed off by, your supervisor.</p>	Each reflection signed off by supervisor and provided to Board.	

5. In addition to the above tasks, your supervisor will be required to provide the Board with quarterly supervision reports until you have completed Raka Maui.
6. The Board expects that Raka Maui will take around 18 months to complete. The reason for this is that several tasks require you to develop understanding of culturally safe practice when working with tangata whenua, and to apply that understanding to your practice before you will be in a position to reflect. The Board is therefore unlikely to consider that you have satisfactorily completed the requirements of Raka Maui if you submit your evidence for Tasks 4, 5 and 6 before you have been registered (and practising) for at least 9 months.
7. The Board strongly recommends that, while you are completing Raka Maui, you engage with as many Māori colleagues and clients as possible, to provide you with depth and breadth of experiences upon which to reflect and grow your understanding.

Completion of requirements

7. The Board strongly recommends that you aim to complete Raka Maui within 18 months of registration. This will allow time for you to submit your documentation for assessment and to address any feedback provided well before the two-year time limit for completion of the programme.
8. You will be advised by email when the Board determines that you have satisfied the requirements of Raka Maui and the condition on your practising certificate will be lifted.
9. The Board will conduct outcome evaluations with up to 50 percent of all participants in Raka Maui. The purpose of the evaluation is to assist the Board in identifying whether the programme is working as intended, and to make improvements where necessary. Evaluation is conducted *after* completion of Raka Maui; that is, it will not affect an individual's results.

Failure to complete requirements

10. Under section 43 of the Act, the Board may impose conditions, or suspend the registration of a psychologist who does not complete the requirements of a competence programme. If a psychologist has not completed the requirements within the timeframe, the Board may consider a one-off extension for completion of requirements of no more than six months. This is likely to depend on the reasons for the delay, and evidence of a realistic plan to complete requirements within the given timeframe. If the Board is not satisfied that the individual psychologist has made or will make a reasonable effort to complete requirements, it may utilise its powers under section 43 of the Act.

Additional/optional activities

11. Raka Maui sets out the *minimum* expectations of overseas-trained psychologists for commencing your cultural safety journey. The Board strongly encourages all psychologists to continue expanding their knowledge and understanding of te Ao Māori (the Māori world) throughout their careers, and in a range of ways, including (but not limited to):
 - Seeking regular cultural supervision;
 - Lessons in te reo Māori (Māori language);

- Connecting with local hapū to explore working together;
- Connecting with other psychologists (the Board strongly recommends that psychologists join a professional association);
- Sourcing appropriate webinars, online and in-person learning – including through psychology professional associations
- Reading both non-fiction (refer to the [reading list](#) on our website) and fiction, poetry and other material by Māori authors;
- Exploring Māori art, history and culture through museums and art galleries;
- Familiarising yourself with government initiatives to address inequities for Māori, such as:
 - [Whakamaua](#): Māori Health Action Plan 2020-2025
 - The role of the [Waitangi Tribunal](#), its inquiries (including the WAI-2575 claim relating to healthcare) and findings
 - The role of Te Aka Whai Ora (Māori Health Authority) in leading change for the hauora (health) and wellbeing for whānau Māori.