



Nurse Education in the Tertiary Sector

SUBMISSION, from **Nurse Education in the Tertiary Sector (NETS)**

“Proposal to move treatment provider and registered health professional definitions into regulations; to amend existing definitions and add new definitions; and to amend the Accident Insurance (‘Counsellor’) Regulations 1999”

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Nurse Education in the Tertiary Sector

Thank you for the opportunity to provide comment on the “**Proposal to move treatment provider and registered health professional definitions into regulations; to amend existing definitions and add new definitions; and to amend the Accident Insurance (‘Counsellor’) Regulations 1999**” consultation document.

Nurse Education in the Tertiary Sector (NETS) applauds this proposal. As a group of senior nurse academics, we believe the proposed changes will improve the public’s access to the services of registered health practitioners involved in injury prevention and rehabilitation. These proposed amendments are long overdue from the perspective of the nursing profession. Nurse Practitioners (NP) and Registered Nurses’ (RN) Scopes of Practice, under the Health Practitioners Competency Assurance Act 2003; include both diagnosis and treatment of health conditions. The present legislation is a barrier that prevents the public accessing the health services they require. We endorse the position of this proposal in its entirety.

Particular questions we would like submitters to address

1 What do you think of the proposal to align ACC registered health professionals with the framework set out in the HPCA Act?

We endorse this proposed change. Then as new groups of health practitioners come under the HPCA Act, no further legislation changes would be required. This would provide a more seamless process to access health care.

2 What do you think about new health practitioner groups under the HPCA Act being added to the definition of registered health professionals, with the consequence that these groups would be covered under the treatment injury provisions of the IPRC Act?

We support.

3 What do you think of the proposal to align the counsellor regulations with the framework set out in the HPCA Act?

We support. Further, we believe that if a professional body is not covered by the HPCA Act, but can demonstrate to ACC that they have all the outlined requirements in place to support their membership and the public (eg. Membership fee paid annually; code of ethics; effective complaints procedure; etc) then we would support.

4 What do you think of the proposal to require counsellors to have at least two years' experience before they can provide services for ACC?

We support. It is important that counsellors have experience and can demonstrate a professional supervision process with a peer before they work with even more vulnerable groups of people.

5 What do you think of the proposal to remove specific named employer bodies from the counsellors' regulations?

We support. ACC should use their developed criteria as outlined in the document to determine whether a professional group not covered by the HPCA Act should be resourced to provide counselling services.

6 What do you think of the proposal to align counsellor qualifications with appropriate qualifications under the New Zealand Qualifications Framework?

We support. This is overdue and it is timely to have a more nationally consistent framework.

7 Other comments

Thank you again for the opportunity to comment on these proposed amendments to the relevant legislation. They will improve public access to injury and rehabilitation services and provide a quality framework for public protection.