

**10 March 2025**

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Re: Submission on HPCA Act initial policy change proposals

Tēnā koutou,

The Council of Medical Colleges is the collective voice for eighteen medical colleges in Aotearoa New Zealand. Medical colleges are not-for-profit educational bodies responsible for the training, examination and recertification of medical practitioners. The colleges support over 9000 specialist medical practitioners working in a range of disciplines in the Aotearoa New Zealand health system.

The Council received a broad high-level presentation in August 2024 from the Ministry of Health for initial reactions on ideas for regulatory shifts however, we haven't received any update since then nor have we been given the ability to have a substantive discussion on changing the approach (or the need to) for scopes of practice.

We would like to provide some initial thoughts on the presentation that the Ministry of Health gave to the Council considering the possibility that policy proposal decisions may be going to Cabinet.

Overall, we agree with the need to update legislation due to newer proficiencies and taking a patient-centred view of regulation. It is important that the health sector evolves to meet changing

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community needs and we recognise the opportunity the review provides to improve the regulatory framework for unregulated and less regulated workforce groups.

If the next steps are to proceed with specific public proposals for changes without any further input, then the risk is that consultation is constrained to binary positions on regulation that doesn't take a robust look at the wider health team, changes that have occurred in current models of care, and into the future.

We believe that to achieve the objectives of proportionate regulation that can adapt to changing needs and models, particularly for medical practitioners, urgent work is undertaken on:

- 1) What the clinical and wider multidisciplinary team needs to look like in our health system to deliver in an interprofessional way?
- 2) What are ways to flexibly learn and recognise new skills to support this team e.g. is it a greater range of advanced scopes of practice?
- 3) A new framework for clinical delegation and supervision for this team
- 4) What regulatory mechanisms are required to support the above?
- 5) Examine and decide what points in training including post vocational training pathway could there be more support and/or options for broader skill development and cross pollination
- 6) Commence work on mapping individual patient journeys to ensure coordinated care whatever service is being utilised.

We believe that the mapping and planning work on the clinical team will then provide clear answers for the proportionate regulatory environment for the various health professions that have variable study and training requirements. It is critical that we have a clear view of what the workforce needs to look like as a key driver for regulatory change.

There are significant risks with expanding what doctors and non-medical professionals are allowed to deliver without standardised regulation that ensures competency. Patient safety as well as cost implications for the health system will be impacted due to potential over-investigation and increased supervision requirements. A good example of how regulatory authorities can work together on standards of a cross-profession practice is the Principles of Quality and Safe Prescribing Practice<sup>1</sup> developed in 2023/24. We believe there are many opportunities that can come from a review of the HPCA act but this work needs to be done with wisdom, consultation, and due diligence.

We would like to work with the Ministry of Health and Health New Zealand to look at how we can

<sup>1</sup> Medical Council of New Zealand, Principles for quality and safe prescribing (17 September 2024), available at: <https://www.mcnz.org.nz/assets/standards/Resources/Principles-for-quality-and-safe-prescribing.pdf>

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improve the current settings around scopes of practice to see what changes we can make to what isn't working before we completely revise the act with no vision of what a new act is trying to achieve.

The Council of Medical Colleges is keen to urgently support this work with a cross-section of college leaders and/or senior staff. We want to emphasise that collaboration throughout this process among all stakeholders involved in patient care is important to avoid fragmented services (as opposed to one-off consultations with each group in the coming months). We appreciate that the Government has made this work a priority for delivery, and we understand the need for timely action.

Nāku noa, nā



Dr Samantha Murton

Chair of the Council of Medical Colleges

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