



27/02/15

Mutual Recognition Schemes Study  
Productivity Commission  
By email: mutual.recognition@pc.gov.au

Kia ora, and warm Pacific greetings from Aotearoa New Zealand.

The New Zealand Psychologists Board (**NZPB**) welcomes this opportunity to comment on the current review of the Trans-Tasman Mutual Recognition Arrangement (**TTMRA**).

### **Background<sup>1</sup>**

According to our records, 234 psychologists have registered in New Zealand under the TTMRA since 1998:

#### ***TTMRA registrations per calendar year:***

'98	'99	'00	'01	'02	'03	'04	'05	'06	'07	'08	'09	'10	'11	'12	'13	'14
2	6	10	10	14	13	17	23	15	18	10	17	18	14	11	23	13

Pre-HPCA Act average = 9.2

Post-HPCA Act average = 16.3

- Of these 234 registrants, only about 127 (just over half) obtained academic qualifications in Australia.
- A further 48 registrants obtained a qualification in New Zealand. It appears that 38 of these registrants would not have qualified for registration if they had applied directly in New Zealand, rather than through TTMRA.
- Of the remaining 'over-seas' registrants, at least 23 appear to have applied to Australia with qualifications that would not have met the New Zealand requirements, and then came to New Zealand under TTMRA.

It is notable that there has been a significant increase in TTMRA registrations since the implementation of the HPCA Act in 2004. In implementing the Act the NZPB set the Masters Degree as the lowest acceptable academic qualification and more robustly specified the nature of the practical training also required:

*A minimum of a Masters degree in Psychology from an accredited educational organisation, or an equivalent qualification. Eligibility for a general scope of practice*

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<sup>1</sup> The figures provided in this section are minimums, as 18 of the 234 TTMRA records on our database are incomplete and therefore could not be used for the examples given.

*requires a Board-approved practicum or internship involving 1500 hours of supervised practice.*

### **Our concern**

While the NZPB supports the ability of similarly qualified and experienced people freely moving between New Zealand and Australia, we have very serious concerns about the ability of applicants to exploit the different registration standards in each jurisdiction and to use the TTMRA to gain registration where they do not meet local statutory requirements. This has been appropriately labelled by the Commission in the Issues Paper as “shopping and hopping”. The evidence cited above shows that our concern is not a theoretical one, but rather that this practice is occurring with increasing frequency.

We are confident that the standard set in New Zealand for registration as a Psychologist is necessary for protection of the public. Our standard is very much in line with international norms. There appear, however, to be significantly different assessments of risk to the public in each jurisdiction. Our Australian colleagues seem to have recognised this and have been working with their legislators for many years to ‘raise the bar’ to a more defensible level. To date they have been only minimally successful. As a result the TTMRA continues to fundamentally undermine our ability to protect the New Zealand public.

As noted above, a significant number of applicants – including those who are of the greatest concern – were not resident in Australia when they initially gained registration there. As we understand it the TTMRA was never intended to be used by persons in third countries to circumvent Australia’s or New Zealand’s regulations. Further, it does not seem in any way repugnant to the purpose of the TTMRA to require that practitioners using it must first actually be practising in one of the participating jurisdictions.

As we suggested to the Commission in 2008 there is, however, one relatively simple change that could be made that would greatly improve the situation, that is, a *residency requirement*.

Such a requirement would honour the purpose of the TTMRA, but would very likely eliminate the worst of the “shopping and hopping”, and we urge the Commission to give the idea full consideration.

### **Past efforts to harmonise standards**

The NZPB meets at least annually with the Psychology Board of Australian (**PsyBA**) to discuss issues of mutual interest – including the TTMRA – and our working relationship has always been strong. Over the years we have heard repeatedly from our Australian colleagues that they believe their standards for registration need to be raised to a level closer to the global norm. They also advise us, however, that their government(s) have not been willing to lift the standard, primarily due to workforce (recruitment) concerns. This has been greatly frustrating not only to our board, but also to the Australians. Some gains were made via the harmonisation brought on by the establishment of the National Registration and Accreditation Scheme, but the simple fact is that Australia still lags behind. Most recently, the PsyBA have set up a national examination that should provide more assurance that new registrants are competent and safe to practise with the public, but it may also have the unintended result of some registrants using the TTMRA (via New Zealand) as a way to avoid having to take the exam.

Our thanks for hearing and considering our submission.

New Zealand Psychologists Board