



Optometrists and Dispensing Opticians Board

Te Poari o ngā Kaimātai Whatu me ngā Kaiwhakarato Mōhiti

30 June 2017

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Ministry of Health
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Dear Justin

Submission on proposal to regulate the paramedic workforce

Thank you for offering the Optometrists and Dispensing Opticians Board (the Board) an opportunity to comment on the proposal to regulate the paramedic workforce. As the Board does not feel it has sufficient knowledge or detail of the paramedic workforce to answer some of the proposal questions, the Board will confine its feedback to the following points:

- The Board is in agreement that regulation of the paramedic workforce *is* in the public's interest and that the profession *does* meet the criteria for regulation under the HPCA Act.
- The Board believes it will be important that the difference between the regulated and non-regulated paramedic groups be clearly defined, so as not to cause confusion for members of the public.
- The Board agrees that regulation of practice levels 1 and 2 professionals is not needed at this time, but agrees that it *is* needed for practice levels 3 and 4.
- In regard to the differentiation of practice levels, the Board is concerned that these different levels will cause confusion for the public. With some trained and registered and some not, it is unclear how the public will be expected to tell the difference, and also how this will be affected by double-crewing. The Paramedic Council will need to take steps to ensure adequate information is available to the public.
- The Board is not aware of any instances of harm being caused to patients by the paramedic workforce.

In addition, while the proposal didn't call for feedback on the make up of the Responsible Authority, the Board did note that only five members are proposed to be appointed to make up the Paramedic Council. In the Board's experience, having started with 11 members and been reduced to 8, having just five members does not sound sufficient to effectively regulate. However, if it is proposed that the five members will be a governance-only Council and will not also be involved in operational activity

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of any kind (like the other small Responsible Authorities under the HPCA Act) then this may work. The Board suggests that the membership be reviewed and be left open to change once the newly-appointed Council is more familiar with its workload and responsibilities under the HPCA Act.

If you have any queries regarding this submission, please feel free to contact me on 04 474 0705 or email Lindsey.Pine@odob.health.nz.

Yours sincerely

Lindsey Pine
Registrar