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Justin Goh  
HWNZ  
Wellington

By email: [Justin.goh@moh.govt.nz](mailto:Justin.goh@moh.govt.nz); [info@healthworkforce.govt.nz](mailto:info@healthworkforce.govt.nz)

Dear Justin

**Regulating the paramedic workforce under the HPCA Act**

Thank you for the opportunity to provide feedback on this consultation. Our responses are below.

1. Do you agree that the paramedic workforce provides a health service as defined under the HPCA Act, and poses a risk of harm to the health and safety of the public?

Yes

2. Do you agree with the consultation document's description of the nature and severity of the risk of harm posed by the paramedic workforce? If not please provide comment.

Yes

3. Do you consider there is a high frequency of harm being caused by the practice of the paramedic workforce? Please provide comment about your answer.

No from the information provided, it appears that there is not a high frequency of harm but this may be that not all incidents are reported. However, given the tasks associated with the workforce there is a high potential for harm to occur.

4. Are you aware of any instances of harm to patients being caused by the paramedic workforce? If so please provide further information.

No

5. If you are a non-government funded ambulance provider, does your workforce practise high-risk interventions?

NA

6. Do you consider that, under the Ministry's guidelines, it is in the public's interest to regulate the paramedic workforce under the HPCA Act?

Yes as stated previously there is a potential for risk of harm. This is a largely unsupervised sector of the health workforce that has the ability to and frequently does perform intensive procedures. The only current governance or regulation is provided by their employers. Having a regulatory system will ensure that the workforce must meet defined levels of competence as prescribed by their regulator. There is also an avenue to address performance and conduct matters should they arise.

7. Do you consider that the existing mechanisms regulating the paramedic workforce are effectively addressing the risks of harm of the paramedic practice? Please provide comment about your answer.

While on the face of it they appear to, as you have stated in your document, there is no compulsion for non-government funded providers to meet minimum standards. This indicates that there can be variation in competence and services provided.

There is no evidence of continuing competence programmes for these staff which is mandatory under HPCA Act.

8. Can the existing regulatory mechanisms regulating the paramedic workforce be strengthened without regulating the paramedic workforce under the HPCA Act? Please provide comment about your answer.

Again as has been stated if there are private providers, there can be variation. This needs to be minimised and the potential for harm mitigated, by having a standard process as provided by the regulatory framework this will ensure consistency of expectation, skills and continuing competence.

9. Should the ambulance sector consider implementing a register of paramedics suitable/unsuitable to practise instead of regulation under the HPCA Act?

This would potentially be confusing to the public who expect that health care providers have some degree of oversight and provides for separate but parallel process that would be provided by regulation.

One of the key requirements of the HPCA act is the need to maintain competence. As stated in the discussion document having a register does not mean that an individual has maintained their knowledge and skills at the required level.

10. Are there other regulatory mechanisms that could be established to minimise the risks of harm of the paramedic workforce? Please provide comment about your answer.

We are not aware of this under current legislation.

11. Do you agree that regulation under the HPCA Act is possible for the paramedic workforce? Please provide comment about your answer.

Yes the information provided in standard 5.3.3 should mean that regulation under HPCA is possible.

12. If you are an ambulance organisation or ambulance provider, do you consider that the paramedic workforce:

- (a) understands the individual responsibilities required under the HPCA Act? Refer to Appendix Four of the consultation document for the list of individual responsibilities.
- (b) is prepared to pay the estimated annual practising certificate fee (and other regulatory fees) set by the proposed Paramedic Council?
- (c) understands the purpose of obtaining professional indemnity insurance?

NA

13. Do you have anything to add to the consultation document's list of benefits and negative impacts of regulating the paramedic workforce under the HPCA Act?

A potential benefit could be a greater understanding by other health professionals of the roles, scope and requirements of paramedicine which could assist them to become more of a part of the integrated health care team. The Midwifery Council would welcome greater collegiality with the paramedic workforce.

14. Do you consider that the benefits to the public in regulating the paramedic workforce outweigh the negative impact of regulation? Please provide comment about your answer.

Yes, the negative impacts on the individual are a consequence of being a professional. Ensuring that the employees have the knowledge and skills is a requirement of employers who must also address gaps if identified.

The service would need to consider how to manage the loss of volunteers. It is noted that a loss of volunteers who are unable to meet their competencies is cited as a negative impact. The public expect that people who attend them are competent and fit to practise.

Yours sincerely



**Dr Susan Calvert**  
**Deputy Registrar: Midwifery Regulation and Outreach**