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DearDavid

Re: TTMRA – OSNZ submission

The following document is the Osteopathic Society of New Zealand's submission for the 5-year review of the Trans-Tasman Mutual Recognition Act.

The Osteopathic profession has been affected by the TTMRA since it became statutorily regulated in Sept 2004, under the HPCAA.

Yours sincerely

Emma Fairs
President
OSNZ



Notes from the Workforce Meeting held October 17th 2007 in Wellington

Present

ISOP – Michael Jones, Jan Green, Linda Caplin

Immigration NZ: Sam Foley

Min of Economic Development; David Lilley, Sirma Karapeeva

Min of Health: John Marwick

Council: Jean Drage, Matthew Cooper, Stiofan Mac Suibhne, Mike Fitzgerald, Deepa Ranchhod

OSNZ: Emma Fairs, Alison Kerr

Unitec: Maurice Drake, Clive Standen

Enclosed in this document are 3 Documents from the Osteopathic Council

- 1) Osteopathic Council Entry Examination for Overseas Candidates
- 2) Small size of work force
- 3) Breakdown of registered osteopaths

Introduction:

The meeting was arranged by OCNZ to discuss the workforce issues present in the profession with the relevant groups attending.

The Council presented statistical information relating to the profession's composition and examination process. The Societies were then asked to provide feedback from their members relating to these issues.

Jean Drage was acting as Chair. Following explanation of the 3 documents the Council provided Jean asked that the Societies tabled the issues they found from their member feedback.

Comments from ISOP

ISOP commented that communication between the Societies and the Council needed to improve.

ISOP noted that in their view osteopaths moved practices frequently and this was not beneficial to the public.

ISOP requested that Unitec run more post graduate courses for the profession. Clive noted that the difficulties with this is that courses don't make any money, and are incredibly difficult to staff.

Comments from OSNZ

The OSNZ noted that there are chronic shortages within the profession with members finding it increasingly difficult to fill vacant positions, both for long term and short-term employment. Some members noting they had closed satellite clinics due to this shortage. The OSNZ made reference to a survey its members had completed earlier this year supporting this anecdotal evidence from its membership. Sima and the Council requested we send this information to them.

The OSNZ discussed that in its view there was both short term and long-term possible solutions. In the society's view short-term solutions may include providing a locum category for Australian osteopaths wishing to work in NZ, i.e. a 3-month registration period. This should improve locum positions being filled in NZ.

Another short-term solution would be increasing the number of examinations for non-Australian entry into the profession. At this time there is some delay in a potential candidate obtaining an examination slot. The OSNZ is aware that demand fluctuates and this can be difficult for the Council to manage, combined with a potential shortage of examiners.

Longer-term solutions may involve reciprocal accreditation with Europe and changes to the degree structures at Unitec.

The OSNZ noted we have always had difficulties staffing the profession but these have become more serious since the enactment of the HPCA act. The Society commented that the cost of the examination process was a factor in osteopaths deciding not to come to NZ.

The OSNZ talked about the possibility of examinations occurring in other centres as there had been talk that Unitec was unable to cope with demand. Clive however, refuted this and in fact Unitec has ample space and availability.

The OSNZ encouraged the Council to look at the possibility of restricted practice for incoming members similar to the process used by the midwifery council. This could possibly provide an alternate route into the NZ profession for European Osteopaths. The OSNZ is aware this would need to be managed in a manner that ensured public safety.

Comments from New Zealand Immigration

The NZ Immigration service simply detailed that it was a straightforward process for incoming osteopaths and they did not have issues with this process. It was noted at the table that Immigration was not a hurdle for Osteopaths wishing to enter the profession.

Comments from the Ministry of Economic Development

The Ministry of Economic Development brought interesting comments to the table regarding the Trans Tasman Mutual Recognition Act (TTMRA). The TTMRA allows for movement of statutorily regulated professions across the Tasman. Every 5 years, TTMRA is reviewed, the next review being 2008. Sirma noted in the last review discussion around temporary registration was mooted and this issue would arise at the 2008 review. Temporary registration was discussed, as a route to bring European osteopaths without an examination process. The general consensus of temporary registration was that it could create serious issues around competency. It was noted that other professions had encountered competency difficulties with a temporary registration processes.

Sirma will contact the OSNZ before the next TTMRA review to allow us to provide our input.

It was noted by the group that Australia and NZ need to aim to have the profession at a similar level of competency given the ability of the profession to move across the Tasman.

Comments from the Ministry of Health

The Ministry of Health noted that it may be worthwhile for the OCNZ to look at what other councils under HPCA are doing in terms of managing competency, workforce and entry and exit into the profession from other countries.

The Ministry of Health commented that the Chiropractic Assn had recently taken a vote of no confidence in their Council. The Ministry encouraged the relevant groups to make a submission to the Ministry for the review of the HPCA act.

Comments from Unitec

Unitec acknowledged the anecdotal evidence relating to shortages within the profession, but also noted the ratio of osteopaths per head of capita was higher than in England. Unitec also noted that the vast majority of its graduates stay in the greater Auckland region.

Unitec discussed the structure of the 5-year course and expressed a desire for the course to become a 4-year course with the 5th year comprising work placements and block courses on site. This would both shorten the time a student would have without income, and could provide an increase to the workforce. It would also potentially provide graduate with more relevant clinical training.

Unitec also thought it may be worthwhile to look at a short course to prepare incoming examinees. This issue has previously been discussed by the OSNZ. The question was raised as to why examinees are failing. Matthew noted that a reasonable number are failing on basic case history taking. A concern the Council have with reciprocal rights of entry for UK graduates, relates to a number of UK graduates failing the Council's entry exam. Matthew also noted that NZ osteopaths would need to improve the terms they were offering to fill their vacant positions. Clive commented that Unitec did have the capacity to increase the number of examinees examined on a weekend. Clive added that the 5 year (or equivalent) full time requirement under the legislation would need to be changed in order for the course structure at Unitec to alter.

Comments from the Osteopathic Council

The Council noted they have increased the number of examinations they are running in the first part of 2008 to comply with demand.

The question was raised as to what examinees are tending to fail on when sitting the entry exam.

The Council noted that a reasonable number are failing on basic case history taking. A concern the Council have with reciprocal rights of entry for UK graduates, relates to a number of UK graduates failing the Council's entry exam.

The Council also noted that NZ osteopaths would need to improve the terms they were offering to fill their vacant positions, as the workplace environment had changed since the enactment of the HPCA Act

The Council commented that there was a dramatic increase in French osteopaths sitting the exam, this being due to a change in the French regulatory environment. The Council commented that the failure rate of the exam was in fact less than the failure rate for many other professions.

The Council agreed to look at the possibility of a locum category for registration.

Promotion of Osteopathy to the NZ public

A general discussion was held about the need to promote osteopathy to the public. The OSNZ has been co-ordinating some promotional projects with Unitec and will continue to look at this and expand over the next few years. It was clear most students entering the profession had had direct contact with an osteopath. Ways to increase the visibility of osteopathy to school leavers needed to be addressed. The Visibility of Osteopathy to ACC, PHO's, and Private health insurers and other relevant groups were discussed. It was noted that Osteopaths and the profession as a whole are very poor at promotion.

Everybody thanked the Council for instigating the meeting, which was most worthwhile.



OSTEOPATHIC SOCIETY OF NEW ZEALAND

What have been the benefits of mutual recognition under the MRA and TTMRA, and what evidence is there to support your assessment?

Since the Osteopathic profession became statutorily regulated under the HPCAA in Sept 2004 a number of changes have occurred to the ongoing composition of the profession within New Zealand.

Historically the profession attracted a large number of Osteopaths that had graduated through the English training system.

There were, pre-HPCAA, a negligible number of Australian Osteopaths within the NZ profession.

The composition of the NZ profession has for many decades been dominantly English. Following the implementation of the HPCAA the process for an English trained Osteopath to enter NZ has involved an examination and an onerous cost. The examination is only completed in NZ; hence candidates from England are required to travel to NZ.

The OSNZ has previously assessed the numbers of incoming Osteopaths from the UK and compared the numbers with those since the HPCAA. On average the number of UK entrants to the profession has reduced by at least 50%.

Previous to HPCAA the profession had experienced staffing problems, since HPCA it has been increasingly difficult to maintain and grow the profession.

The OSNZ completed a survey of its members in 2006 to assess the issues we were seeing (Ref 1). The survey found that chronic staff shortages were impacting negatively on the profession. This was also discussed at a workforce meeting organised by the regulatory council (Osteopathic Council of New Zealand) in October 2006 (ref 2, OSNZ minutes of the workforce meeting attached).

This situation with UK trained Osteopaths has exacerbated the crisis in the NZ profession.

Changes in NZ since HPCAA (it was only following HPCAA that the Osteopathic profession was able to utilise the TTMRA)

- The NZ profession is much more proactive in trying to encourage Australian Osteopaths over, particularly new graduates from the Australian institutes
- The OSNZ has a permanent advert in the Australian professional journal citing vacancies
- The OSNZ sends its Registrar to the Australian institutes at the end of the year to meet up-coming graduates and outline the process, under TTMRA, of applying for NZ registration and what NZ has to offer.
- Anecdotal evidence indicates that compared to the pre HPCAA period the number of Australian Osteopaths in the NZ workforce has tripled.
- The OSNZ has assisted a number of Australian Osteopaths moving to NZ and has on more than one occasion heard that they are finding the process straightforward.

What evidence is there that differing laws for the sale of goods and registration of occupations would, without mutual recognition, significantly impede cross-border movements of goods and labour?

Before HPCAA the shortages within the profession were somewhat countered by the influx of UK Osteopaths. This situation no longer occurs to the same extent. For the Osteopathic profession the TTMRA has allowed for easy movement across the Tasman. It has assisted in the movement of Australian Osteopaths into NZ, easing the work force shortages. The OSNZ is fully supportive of the TTMRA.

What have been the costs of implementing and maintaining mutual recognition under the MRA and TTMRA, and to what extent are these outweighed by the benefits?

As the OSNZ, we are not involved in the costs of maintaining and implementing the MRA and TTMRA; this is done by the Osteopathic Council of NZ.

The opinion of the OSNZ on the issue of harmonisation, is that TTMRA, whilst we are aware it has its faults, works for the Osteopathic profession. Harmonisation would take time and resources; we would ask whether it would be necessary to invest in a different approach when the current situation is positive. The OSNZ would hope that NZ would continue to work with other countries to support easier movement of regulated professionals. The NZ training for Osteopaths does not currently graduate enough Osteopaths to grow, or even sustain, the profession. It does not seem as though NZ will in the near future meet these needs. The Osteopathic profession is dependant on the movement of Osteopaths into the country.

How often do occupation-registration bodies impose conditions on people registering under mutual recognition? In which occupations or jurisdictions does this most often occur, and what conditions are imposed?

The OSNZ does not play any part in these processes; the Osteopathic Council assumes this role.

Is a lack of awareness of mutual recognition obligations undermining the effectiveness of the MRA and TTMRA? If so, please provide specific examples and evidence. How significant is the problem, if at all?

The OSNZ has feedback from potential entrants to the profession that they are mostly unaware, or unclear, as the MRA and TTMRA. When the Registrar of the OSNZ visits, and presents to the up-coming graduates in Australia a reasonable amount of time is taken explaining the TTMRA.

Anecdotal evidence suggests that when the TTMRA process is explained there is more enthusiasm and less reservation to entering NZ. If the process is not explained we can infer

that the process may be off putting, potentially resulting in less Australian input to the NZ Osteopathic profession.

The OSNZ are of the opinion that an improvement to awareness would be of benefit.

Bearing in mind the effectiveness of past awareness-raising efforts, what do you recommend to address any awareness problems you have identified?

Contacting the professional associations of relevant groups and the training institutes and ensuring information is available may be of benefit.

The Society wonders if there is funding available to organisations that are involved with increasing awareness of MRA and TTMRA?

Regards
Emma Fairs
President
OSNZ



Results of the OSNZ locum and associate Questionnaire

Approximately 1/3, (56) Osteopaths of the OSNZ membership replied to the questionnaire.

(N=56)

Question; Are you actively seeking an Associate or Locum?

22 osteopaths answered Yes

Question; How long have you been seeking an Associate or Locum?

13 Osteopaths had been looking for 1-3 months

1 Osteopath had been looking for 3-6 months

6 Osteopaths had been looking for 6-12 months

5 Osteopaths had been looking for 12+ months

A number of Osteopaths gave up looking

Question; In 2006 have you placed advertisements for an Associate or Locum?

21 Osteopaths had advertised for an Osteopath in 2006

Question; How many Osteopaths answered your advertisement?

On average between 1-3 Osteopaths replied to the advertisement

Question; Has your ability to supply Osteopathic Treatment to the public in your area been compromised due to a shortage in Associates or Locums in your clinic?

24 Osteopaths replied Yes

Question; Have you had to close a clinic due to a shortage in Associates or Locums?

7 Osteopaths replied Yes