

As Psychotherapy has only just become a registered health profession, The New Zealand Association of Psychotherapists (NZAP), believes that we do not yet have sufficient experience of the registration process to make informed comments with regard to most of these questions.

However we do have a view on the following questions.

6. Are the provisions in section 9 and the current list of restricted activities operating effectively and what, if any, changes, amendments or additions would you recommend?

NZAP previously objected to the description of the restricted activity;

"Performing a psychosocial intervention with an expectation of treating a serious mental illness without the approval of a registered health practitioner."

We still believe that the terms " psychosocial intervention" and "mental illness" are so broad that the statement is almost meaningless and the restriction unworkable. If a restriction is made in this way it will not serve the public interest.

We can offer no better alternative than that is removed from statute.

36. Are the provisions for adding new professions or health services working and what, if any, changes would you make?

As the Association representing most of the psychotherapists in the country, our experience of having the profession of psychotherapy added to the professions covered by the Act, has been a positive one and we have no changes to recommend.

37. Are the current membership and appointment provisions working (e.g. is the size and mix right, are people with the best skills being appointed, should the power to hold elections be retained and/or used, are lay and professional members appropriately trained and supported) and what changes, if any, would you recommend?

It is really too early for us to comment. So far we think that the number and the mix seems right (we are very keen to see the fees for registration kept as low as possible so a small Board is appealing to us)

In principle we would like to see registered psychotherapists in the future, have some input into the selection of Board members and also believe that conducting face to face interviews of the candidates for Board membership would be an improvement. Finally we would suggest that the process of selecting Board Members be as transparent as possible.

Thank you for the opportunity to comment.

Roz Broadmore (President NZAP)