

14 September 2007

Ryan McLean  
Policy Analyst  
Workforce  
Sector Policy Directorate  
Ministry of Health  
Wellington

Dear

The Osteopathic Society would like to put forward a number of comments regarding the HPCA Act to be included in the submissions process that the Ministry of Health is undertaking.

The Society has concerns with the transparency of the Councils governed under the Act. The Society would like clarification of why the Councils do not fall under the Official Information Act or the Ombudsmen's Act.

The Society notes the position of Registrar, under the Act, is an appointment made by the Councils. The Society notes the position of Registrar is one of wide ranging power. The Society questions why this is not a Ministerial appointment, as with the members of the Council.

The Society is aware that each Council under HPCA may interpret the legislation differently. However the society has concerns that the cost of compliance for the professions under the HPCA Act can vary so dramatically. The Society also has concerns that the cost of running the Councils under the HPCA Act also varies widely.

The Society would like it noted that we fully support all endeavours by the Ministry of Health to ensure and increase patient safety and professionalism of health practitioners.

We look forward to hearing from you. Should you need any further clarification on these matter please contact the Society

Yours faithfully

Emma Fairs  
President  
OSNZ