



Tūmuaki Nēhi Aotearoa | HANGAIA NGĀ KAIĀRAHI NĒHI
Nurse Executives Aotearoa | DEVELOPING NEW ZEALAND'S NURSE LEADERS

30 April 2025

Office of the Ombudsman

PO Box 10152

Wellington 6143

By email: info@ombudsman.parliament.nz

Tēnā koe,

Te Whare Tohu Tapuhi o Aotearoa [The College of Nurse Aotearoa (NZ) (The College); Nurse Practitioners New Zealand (NPNZ) and Nurse Executives Aotearoa (NEA) are a collective voice for registered nurses, nurse leaders, and Nurse Practitioners] Matanga Tapuhi in Aotearoa New Zealand. The College/NPNZ and NEA are not-for-profit professional bodies providing professional advice, education and leadership support for nurses.

We wish to submit a complaint regarding the Ministry of Health's consultation document *Putting Patients First: Modernising health workforce regulation* which sets out a series of policy proposals for changes to the primary piece of legislation that regulates the health workforce in Aotearoa New Zealand, the Health Practitioners Competence Assurance Act 2003.

The Office of the Ombudsman advises that to ensure a fair process, state sector agencies must act independently and have an open mind. The consultation document as currently worded does not meet this standard in the way that it does the following:

- Makes incorrect and subjective assertions about health regulatory bodies decision-making and requirements
- The discussion document provided contains inaccurate information in regard to the processes for internationally qualified nurses gaining NZ registration. We note that there are now more internationally qualified nurses being registered in Aotearoa than domestically educated nurses [Nursing Council Quarterly Data Report - December 2024 Quarter.pdf](#)
- The survey questionnaire contains biased, leading questions. Some have no free text in order to provide any further information or rationale to support the response.
- The consultation period opened on 28 March 2025 and closes on the 30 April 2025 – a short period for such a critically important decision. The period covered 4 public holiday and two long weekends - which may have limited opportunity to respond for some individuals.

It is our view that the poor process of consultation that does not meet the requirements or expectations of consultation outlined in the Department of Internal Affairs guidance on engagement and consultation: [Engagement and consultation - dia.govt.nz](https://dia.govt.nz).

We note the Council of Medical Colleges New Zealand has also raised a complaint with the Ombudsman. We support the Council's position and note the examples given on page two are equally as relevant for the nursing profession.



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We are asking for the Office of the Ombudsman to undertake an urgent investigation into the consultation document and the submission form as to whether it meets the standard of ensuring a fair process as outlined in the guidance for good decision-making by state sector agencies.

Ngā mihi nui

Kate Weston MN(Hons) FCNA(NZ) Executive Director

Te Whare Tohu Tapuhi o Aotearoa|College of Nurses Aotearoa (NZ) Inc

PO Box 1258

Palmerston North 4440

+64 6 3586000 Mobile +64 27 2258287