

## **NZOHNA Position Statement on Untrained/Technical Support Staff Performing Occupational Health Tasks**

### **Background**

**New Zealand Occupational Health Nurses Assn (NZOHNA)** are aware there is a rise in health monitoring being provided by technicians who are not registered or enrolled nurses in NZ businesses and therefore not members of NZOHNA. These technicians are not affiliated with or regulated by any professional body, may or may not have undertaken training to the expected NZOHNA standards, and individuals performing these duties are potentially not recognised under the Health Practitioners Competence Assurance Act 2003. However, under the Health and Safety at Work Act 2015 and Health and Safety at Work (General Risk and Workplace Management) Regulations 2016, there remains a primary duty of care to ensure work being undertaken does not put others at risk of harm.

The Health and Safety at Work (General Risk and Workplace Management) Regulations 2016 clarify the **Duty to ensure health monitoring is supervised (Section 35)**:

- (1) A PCBU must ensure that the health monitoring of a worker is carried out by or under the supervision of an occupational health practitioner with experience in health monitoring.
- (2) The PCBU must consult the worker in relation to the selection of the occupational health practitioner.

An **occupational health practitioner (Section 3)** means an individual who -

- (a) is a medical practitioner, a nurse practitioner, or a registered nurse; and
- (b) has the knowledge, experience, and skills in occupational health to carry out a task required by regulations.

### **WorkSafe New Zealand states in their Exposure Monitoring and Health Monitoring Good Practice Guidelines:**

*“It should be carried out by suitably qualified, trained and experienced health practitioners with the knowledge, skills, training and experience to carry out the monitoring you need. For example, an Occupational Health Nurse could carry out initial health assessment (health screening) and subsequent routine regular testing. If suspected, workers should be sent to a health practitioner who understands occupational health for a full medical assessment/formal diagnosis and feedback to the PCBU. This could be an Occupational Physician or GP with relevant experience”*

## Regulation/Scope

A registered nurse's scope of practice is defined by the appropriate use of their nursing knowledge and judgment to assess health needs and provide care, intervention, advice and support. Technicians are not bound or governed by these professional standards.

- The [Nursing Council](#) and the [Health and Disability Commission](#) provide regulation and scope for registered nurses and enrolled nurses in Aotearoa NZ and therefore the standards.
- Nursing Council of New Zealand. (2007). [Competencies for registered nurses](#).
- NZOHNA Knowledge and Skills Framework (KSF)

## Professional Organisation

As these technicians do not have a professional body or registered status, they are not recognised by the Health Practitioners Competence Assurance Act 2003 and at this time are not able to be members of the NZOHNA. Members of NZOHNA, Registered and Enrolled Nurses, have formalised expectations of professionalism, and a complaints procedure should performance not be up to the standard expected – this is not so for Technicians.

## NZOHNA Position

NZOHNA believes that appropriately qualified nurses should provide Occupational Health monitoring services. Any person providing these services should have the minimum qualification of Registered or Supervised Enrolled Nurse with appropriate certification in spirometry, audiometry, etc., with the view to having completed or be working towards the NZOHNA KSF competency or postgraduate qualification in Occupational Health and Safety. The KSF provides a professional framework for NZOHNA Member nurses to be assessed against set criteria to assess their level of occupational health competence. In addition to this, NZOHNA expects that any person performing diagnostic or health monitoring testing, for example, spirometry, audiology, or RPE fit testing, should be trained and certified to perform these services with training provided by an NZOHNA-recognised provider.

The [Health and Safety Association of New Zealand](#) (HASANZ) also has a register of appropriately qualified people that employers should use to assure themselves that they are engaging a peer-reviewed and qualified Occupational Health & Safety provider. If unqualified or underqualified people are providing Occupational Health services, they must do so under the direct supervision of a qualified Occupational Health Practitioner as defined by the Health and Safety at Work Regulations mentioned above.

NZOHNA therefore supports the practice of only Registered and Enrolled nurses providing occupational health monitoring services and applicable supervision, as these practitioners apply a holistic or total worker health view of the client. As such, NZOHNA does not support the engagement of non-registered workers providing health monitoring services except in support and administration roles.