

THE PSYCHOLOGY FOUNDATION OF AUSTRALIA

(Incorporated in New South Wales)

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19 December 2010

Assoc Prof Brin Grenyer
Psychology Board of Australia

Response to Consultation paper 6: Limited registration for Teaching and Research

The Psychology Foundation of Australia is a grouping of research oriented Schools of Psychology that has as its primary focus the aim of ensuring high standards of teaching and research in the discipline of Psychology and its professional training outcomes. In considering issues pertaining to this aim we try to strike a balance between the need to produce a highly qualified, competent graduate, the need to ensure the health of the discipline of Psychology in Australia and the practical limitations on what Schools of Psychology can deliver. It is our view that the suggestions contained in the current consultation paper pose a serious threat to the health of the discipline of Psychology and the quality of the teaching within it, and furthermore appears to provide no additional benefit of protection of public safety which would seem to be the primary responsibility of the Psychology Board of Australia.

We have sought legal opinion through the University of Western Australia in formulating our views but the primary input has come from the Heads of School of our members and this document represents the considered opinion of people who deliver and also manage the delivery of the teaching and research in the discipline within Australia at the highest level. The schools represented (shown on our letterhead) have experience in doing this that covers nearly 100 years (e.g. University of Sydney since 1921, The University of Western Australia since 1930).

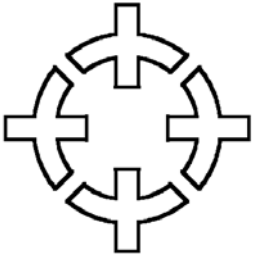
We divide our comments into **several** sections: the stated aim, the mismatch between the focus of the PBA and the discipline of Psychology, the central problems with this Consultation paper and, the likely costs of implementing the proposed scheme.

The stated aim: The document claims to address two issues. The first is a consequence of the broad definition of practice that has been adopted for Psychology. This definition now includes teaching and research and while the definition restricts itself to "...roles that impact on safe, effective delivery of services in the profession." the consultation paper moves beyond this to impact on the operation of the Discipline of Psychology in its entirety. The PBA asserts that this extension requires the broader set of contributors to the discipline to register in order to teach and conduct their research. We share the views of Diamond and OBrien-Malone (in a separate submission but supported by our own legal advice) that the PBA would be exceeding its powers in asserting these requirements.

The second aim arises from the public assertion by the Board (represented by Brin Grenyer at a HODSPA meeting) that many academics wish to register so they can call themselves a psychologist which at present they are unable to do because of lack of professional training components in their qualifications. The proposals in this discussion

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paper would allow those people to register although this motivation was not listed in the Discussion paper itself. We know of no evidence that large numbers of academics do want this option and since most academics teaching in Psychology do not offer professional services that are likely to generate a risk to the public the suggestion of enforced registration of the entire teaching and research workforce, with its ensuing bureaucracy and very high cost, seems to be entirely unwarranted.

The mismatch between the focus of the PBA and the discipline of Psychology

The Psychology Board of Australia is one of a set of boards created to regulate the health industry. That does entail overview of the accreditation of training programmes but unlike most of the allied health areas Psychology is also a discipline (a very large and diverse one) and plays a role as a hub science for many other disciplines. In fact, only a small proportion of people who study psychology ever proceed to professional work in the health sector and therefore it is inappropriate to regulate the whole discipline as though this was the primary student outcome. However it is important to note that even in the other health areas regulated by national boards and where the professional application of skills in a health setting is the main outcome, there is no requirement that everyone conducting teaching and research in their training programmes must be registered. This suggestion is excessive and, as we will describe below, poses serious threats to the discipline base and the subsequent quality of professional training because of the likely impact on the availability of individuals who could contribute to that training and the generation of the research data base.

The central problems with this consultation paper

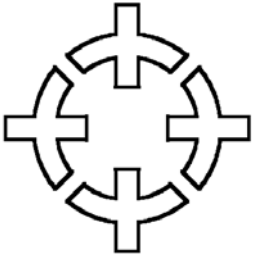
The advice we received echoes the arguments of Diamond & O'Brien-Malone in advising that the stated intentions of the Board in this Consultation paper exceed the powers of the Board and the paper should therefore be withdrawn and reconsidered. To facilitate that reconsideration we provide additional commentary.

Since the primary aim of registration and accreditation is to protect the public when they receive professional services, it is reasonable to ask whether the issues raised in the Discussion document advance that aim. It is our view that they do not. All Psychology courses leading to professional outcomes are currently subject to regular accreditation and that process also considers the qualifications of the people delivering the programmes. This is an appropriate quality control measure and the requirement of registration of teachers within the programmes will not enhance the quality, although it will add a substantial layer of administration and expense. Indeed, in nearly all such programmes some elements will currently be delivered by people with specialist expertise that are essential for the teaching of the discipline but who would not be eligible for the proposed registration and their elimination from the teaching could only be detrimental to the training.

A similar argument applies to the proposal to register researchers. All research projects are currently scrutinized by institutional ethics committees to ensure safe conduct. Given that there is already a properly constituted process for this evaluation, that cannot be replaced, it is clear that the proposed registration would add nothing in terms

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of protection of the public during such research and thus a second process should not be created.

The likely costs of implementing the proposed scheme

The wide-ranging implications of the Consultation paper are considerable and uniformly detrimental to the discipline and training of professionals within the discipline, without any redeeming features that might enhance the protection of the public.

Inequity of provisions for students:

The proposed registration of students during their training is unique to the PBA amongst all of the newly created boards. Furthermore the proposal extends beyond those in front-line service delivery settings to include all students in post-graduate programmes, including research degrees. In all other Health disciplines the supervision of students by registered professionals in service delivery settings is deemed sufficient to protect the public and we can think of no examples where Psychology would need additional measures to ensure the same goal. Neither is it needed for research applications where the current ethical approval processes and university monitoring of staff behaviour is adequate to maintain safe conduct in that subset of research projects that impact directly on the public.

Given that there is no additional benefit it is not reasonable to impose such a heavy administrative and financial burden on students during their training. This is an impediment to training that is not consistent with the desire to build the numbers in the professional psychology workforce and will act as a substantial financial disincentive for students to enrol in research programmes in the field of psychology and we strongly recommend that the current requirements for students to register be removed.

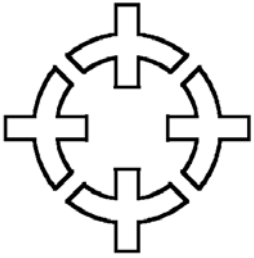
Teaching

The discipline of Psychology has direct links with many areas of scientific endeavour. This ensures that there is substantial cross-talk between disciplines in both teaching and research. The cross talk improves the quality of the work conducted in the discipline and teaching delivered by individuals trained in other disciplines is often central to course delivery in Psychology at both undergraduate and postgraduate levels. A registration requirement placed on all teachers is likely to lead to the withdrawal of the expertise provided by these contributors to our courses. It would also severely hamper the ability to draw on the services of visiting, or immigrating, international experts which currently adds breadth to our training. These individuals will not have completed courses accredited in Australia and many of them will not have Psychology degrees but their expertise is often invaluable. These impacts will diminish the quality of training and potentially stultify the growth of the discipline in this country. Since there appears to be no public-safety benefit of this suggestion we strongly urge the PBA to remove this registration requirement.

Research

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As noted above, research in psychology is already subject to mandatory regulation to ensure public safety and there is no need to extend this regulation. Extending the research registration requirement might, instead, have the consequence of restricting research in the discipline since psychological research projects incorporating interdisciplinary colleagues may lose their direct input.

The suggestion that registration may be required for researchers in Psychology may also isolate Australian psychologists from globally-influential researchers. Requesting that international leaders in their own research fields register before they can conduct collaborative research in Australia is likely to be seen as offensive and a strong disincentive for collaborations that are of great value to Australian Psychology. This must not be required since any safety concerns are already covered by the Ethics approval process.

Administrative burden and cost

The proposed scheme involves both substantial reporting requirements and very high cost on an annual basis. Such an onerous administrative burden could only be justified to obtain a significant public-safety benefit. Since there appears to be no additional benefit the time consuming and costly nature of the proposal and costly nature of the scheme is unacceptable. This is true for teachers, researchers and particularly for students. These factors are likely to act as a strong disincentive to participation in Psychology and are therefore against the national interests.

The suggested elements of performance appraisal are perhaps even more likely to act as a disincentive to participation in the discipline. Universities already appraise the performance of staff annually and, as their employers, quite appropriately see it as their role to determine who has the expertise and the ability to deliver a high-quality academic programme. Since those programmes are already accredited in Psychology there is no need for additional performance appraisal and it is not reasonable to expect universities to divest this function to the PBA, nor to expect them to devote the time to providing the paperwork to allow the PBA to make such a judgement on their employees. It doesn't occur in any other discipline and there are no special reasons why Psychology should be different in this regard.

In summary we believe the issues raised in this Consultation paper fail to meet the aims stated and instead could damage both the discipline and the profession.. We regret that the proposals in this paper are so poorly justified and we urge the PBA to withdraw it. A voluntary limited registration of academics who wish to have it, such as exists in the UK, is perhaps a more reasonable goal but we urge that any revisiting of this issue consider the broader implications for the discipline.

Yours sincerely

David Badcock

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