

To the Psychology Board of Australia,

Re: Consultation Paper 9, on the Proposed National Examination for Psychologists' Registration

Over the past months the Psychology Board of Australia (PsyBA) has released a series of Consultation Papers – papers which together serve to shape and frame the profession of psychology in Australia.

Alarming, each paper has revealed a view of the psychology profession that is out of step with the conduct and composition of the profession today. Many of the proposed Codes, Guidelines and Rules are simply unworkable or regressive, adding bureaucracy and inefficiencies for all involved. The motive seems to be to position PsyBA as the ultimate ruler of psychology, forsaking all other parties involved and overriding a long history of respectful shared leadership of the profession. Consecutive papers have disregarded the needs of a variety of stakeholders, including:

- psychology students (denying them the right to register as a student, forcing them to pay heavily to be categorised as a provisional psychologist)
- academics (previously proposing that all teachers in psychology programs would need be registered with the Board, whether they are from another discipline eg statistics or an overseas academic visitor – this has since been dropped, thankfully)
- psychology practitioners (introducing time-consuming and impractical CPD reporting requirements, making supervision harder to do)
- the professional bodies central to the development and maintenance of psychology standards in Australia (the Australian Psychological Society and the Australian Psychology Accreditation Council)
- aspiring psychologists (the new system emerging is very restrictive, expensive, confusing and hard to access, such that many have observed that other career paths look and are easier to take).

In my view the resulting system that PsyBA is crafting will lead to an Australia with fewer people willing to work through the red tape to become psychologists, fewer appropriately trained psychologists able to sacrifice their own practice time to supervise or nurture the next generation, and fewer psychology academics to teach those future generations.

All this alarms me as a Psychologist. But also, as an Organisational Psychologist who works solely in the business world, I have many further concerns. I am dismayed to see that PsyBA has ignored the fact that not all psychologists work in the health system. Instead of ensuring that any new Codes and Guidelines for the profession can be comfortably and clearly applied to the diverse range of psychology roles that are currently performed in Australia, PsyBA is choosing to deliberately define psychology as being about mental health. As I stated in my submission on Consultation Papers in March 2010, Medicare has not been, and should never be, a mandatory part of being a psychologist.

Consultation Paper 9 is a clear indication that PsyBA has not been open to previous feedback submitted in response to earlier Consultation Papers. Those responses repeatedly raised and described the problems that were likely to result if PsyBA recast the psychology profession as one focused on mental health. In Consultation Paper 9 PsyBA states yet again about what it's new definition of psychology is to be – and mental health is central to its definition.

The thrust of the new national examination seems to be on making sure all those trained in psychology can be clinicians. This is completely at odds with the reality that there are a range of psychologist roles that don't have anything to do with clinical work – and thus don't need clinical training. By forcing psychology students to study clinical topics for an exam, you are reducing the number of hours and attention they would otherwise have to learn about their specialty of choice. Why should our Universities be told to produce less-trained Organisational Psychologists? It's not that these new topics are essential for our work.

I didn't need to learn about memory tests, suicidal behaviour or children's development to be effective at what I do as an Organisational Psychologist (eg. designing performance management systems, advising on talent management processes, reviewing and restructuring teams and organisations) - and future generations of Organisational Psychologists won't need such knowledge either. The businesses and Government Departments that Organisational Psychologists work with will not be impressed with lesser-trained Organisational Psychologists.

The use of an examination is also not well justified in Consultation Paper 9. If those undertaking supervision in the 4+2 pathway are all signed off by their supervisors as being competent, why add another step? And why add it so late in the process, after competence has already been demonstrated? PsyBA needs to be clearer around what the exam is meant to reveal at such a late stage of the training process.

There are other more detailed problems with the national examination. These are explored in the submission from the APS College of Organisational Psychologists on this matter. I urge PsyBA to review that submission as a priority.

In this new world it seems PsyBA will do it all: defining what psychology is (and ignoring its diversity outside the health domain), setting educational and practice standards (which registration boards don't typically do), assessing competence (using administrators rather than psychology experts), as well as the standard disciplinary and complaints processes that all registration boards deal with. My plea is this: PsyBA please don't create a new world where those interested in studying, teaching or working in psychology outside the health domain are not supported by their own Registration Board.

Yours sincerely



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