



Assoc. Prof. Steven Roodenrys
Head, School of Psychology,
University of Wollongong,
Wollongong,
NSW 2522.

MELBOURNE
10th of December, 2010

15 DEC 2010

Professor Brin Grenyer,
Psychology Board of Australia,
GPO Box 9958,
MELBOURNE,
VIC 3001.

Dear Brin,

I would like to comment on the PBA communiqué, Consultation Paper 6 on "Limited Registration for Teaching and Research". We have previously spoken about this but to briefly reiterate, the wording of the proposal does not reflect your stated intention that this form of registration be voluntary. In the third paragraph on page 4, after the definition of practice, states that "under the new scheme they are required to be registered" when referring to educators and researchers. This is completely impractical and nonsensical. University psychology departments could not function if every person who stood in front of a student had to be registered. It would either be impossible for many regional universities to find registered staff qualified to teach in some content areas, or the university would have to pay the registration cost, which would be an unsupportable drain on finances. The consequence would be counter to the national interest in reducing the quality of education in psychology and the number of psychologists in the long-run.

Assuming that compulsory registration is not the intention, there remains a contradiction or inconsistency in the proposal. The purpose of registration is to protect the public by assuring that practitioners have an appropriate skill set. The skill set identified relates to clinical practice and hence all registered psychologists are expected to have clinical skills. The extended definition does nothing to broaden this set of skills, only broaden the settings in which those skills might be applied and justifiably be thought of as being applied by a "psychologist". That I have skills in experimental design, theorising and pedagogy does not make me a psychologist under



the general registration rules, and unless the skill set that qualifies one to be registered is broadened, they should not make me eligible for “non-practising registration”. In a nutshell, general registration is based on skills while the proposed non-practising registration is based on setting, and the proposed settings do not require the clinical skill set underlying general registration.

I think this is likely to create confusion for members of the public. What is presented to the public is that registered psychologists are clinicians. To say that someone is a non-practising psychologist implies that they have the same skills and are, in effect, clinicians who are currently not practising, and indeed, people in this position are intended to be included in the new category of registration. Most academics working in the discipline of psychology do not fall into that category. Some of these may even like to be able to call themselves psychologists, based on a broader definition that anyone who is educated and works within the discipline of psychology is a psychologist, when acting in a consulting role but I fear the distinction will be lost on members of the public. If the Board wishes to pursue an additional form of registration I strongly urge it to find a better label.

A better solution, but a much harder one and perhaps impractical, is to educate the public as to the nature of psychology and to change the label of registered psychologist to what it really is from a discipline perspective, a clinical psychologist. The PBA, and all previous registration bodies in Australia, through the registration requirements, promote to the public the idea that psychologists are all clinicians, and by implication psychology is restricted to clinical psychology. In the long-term interests of the profession and the discipline this is what needs to change.

Yours sincerely

Steven Roodenrys