

December 15, 2010
hod-psych@unimelb.edu.au

(03) 8344 6378

Professor Brin Grenyer
Chair, Psychology Board of Australia

Dear Brin,

Thank you for your letter of December 13 clarifying the Psychology Board of Australia's current thinking on the subjects of limited registration, fees for limited registration, and general registration. I understand that various bodies of which the University of Melbourne is a member are making formal submissions on one or more of these matters, but I would like to take this opportunity to express my own views and the views of my department.

1. The Consultation Paper on Limited Registration

I shared the alarm of my academic colleagues in universities across the nation at the consultation paper and its implication that the teaching and research activities of universities should be regulated by the PBA. The primary cause for concern was the statement that: "Previously individuals who used their psychological skills and knowledge working in areas of education and research were not considered to be engaging in the practice of psychology and therefore were not required to be registered, but under the new scheme they are required to be registered." This statement seems at odds with the assurance in your letter that "[t]here is no intention to make registration mandatory." You have undoubtedly seen the very cogent opinion paper by Diamond and O'Brien-Malone arguing that, in making this proposal, the PBA is exceeding its powers under the act. I would find it very helpful at this juncture to have a clear statement from the PBA of its understanding of its powers under the act, as it could avoid an awkward legal situation later on.

I have only one further point to made in addition to those already made by Diamond and O'Brien-Malone. In seeking to enlarge its definition of psychological practice to include the teaching and research activities of universities, I assume that the PBA is seeking to interpret its mandate to protect the public in the broadest possible way. In particular, universities are responsible for training psychology professionals who are, in turn, responsible for "delivery of services in the profession." This is, of course, laudable. However, I believe those protections are already adequately afforded by APAC accreditation of academic programs. As part of the accreditation of academic programs, APAC certifies that the individuals responsible for delivering those programs are appropriately qualified and equipped to do so. I therefore believe that such protections as

the public may be deemed to require in relation to the teaching and research activities of universities are already provided by the existing accreditation requirements. In seeking to bring the teaching and research activities of universities under its scope, the PBA is, it seems to me, encroaching on the domain of responsibility of another statutory body. As well as being legally questionable, this is also the kind of wasteful duplication of bureaucratic function that one might have hoped to avoid under a uniform national scheme.

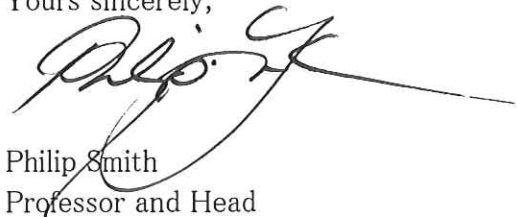
2. Fees for Provisional Registration

I am pleased to hear the Board is reviewing the issue of fees for provisional registration for trainees. This has been a matter of great concern for our combined M.Psych/PhD students, as their period of training is a long one and the registration fee impost is correspondingly severe. Because of their combination of professional skills and advanced research training, we expect these students to develop into leaders in their profession. However, the proposed provisional registration fee structure is a disincentive for students to undertake advanced professional training of this kind. This seems a perverse outcome at a time when there is a shortage of psychologists with high-level skills. I would welcome any move by the PBA to revisit the fee structure and its impact on trainees.

3. General Registration after 6 years

My clinical colleagues are supportive of the general registration initiative. However, there are unresolved issues surrounding the certification of equivalency. The issue is that M.Psych students complete a small piece of research in its entirety (literature review, study design, data collection, data analysis, write-up). D.Psych and M.Psych/PhD students complete a much more substantial piece of research over a longer time. If one takes "equivalency" to mean "completion of a piece of research whose scope is equal to, or greater than, an M.Psych" it is arguable that this requirement will not be met, and cannot be met, until the thesis is completed in its entirety. Can one, for instance, regard the literature review and design of a large study as equivalent to the completion of a small study in its entirety? There appears to be a real problem of comparing incommensurables here. I would welcome further analysis of the concept of "equivalency" and of how, in practice, it would be possible to certify it. The issue for me is not the design of the form but the concepts the form embodies.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Philip Smith', with a long horizontal flourish extending to the right.

Philip Smith
Professor and Head