



School Psychologists' Association of Western Australia (Inc).

PO Box 2139

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Associate Professor Brin Grenyer
Chair
Psychology Board of Australia

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Dear Sir

Thank you for the opportunity to provide feedback to the *Consultation Paper on Registration Standards and Related Matters* for the Psychology Board of Australia.

The School Psychologists' Association of Western Australia (SPA) provides professional support to, and advocacy for, School Psychologists in Western Australia. Currently SPA has over 160 members and provides a regular newsletter, recognition of members through annual awards, professional development opportunities, information and resources. Professor Carmen Lawrence has been the Patron of the Association since 2007. SPA is affiliated with the Australian Guidance and Counselling Association (AGCA) which is the national professional body representing psychologists and counsellors working in the education sector.

The Association is particularly concerned with the lack of contextual reference to psychologists who work in non-health settings and organisations such as education, which employ a significant proportion of psychologists in the public sector. The consultation paper appears to have given little consideration to the implications of its proposals for these psychologists and the organisations for which they work.

Psychologists who work in schools engage not only in a practitioner role (direct client contact, psychological assessment and intervention), they also engage in significant consultative work with teachers and administrators, systems level work including delivery of professional development, facilitation of organisational development and change and, at a regional level, managerial work such as performance and resource management. In the Association's opinion, the way in which the consultation paper defines the work of psychologists is too narrow and fails to appreciate the varied roles that psychologists perform in large organisations. The draft *Competency Framework for School Psychologists* (attached) clearly depicts the breadth and depth of the work of School Psychologists in the Department of Education (Western Australia). The Association argues that the minimum four years' training plus two years' supervision needs to remain in place.

The continuing professional development standard should include pro-rata provision for psychologists who work part time. There is also concern that this requirement, if not flexible, is likely to impose significant extra costs (in time and money) on individual psychologists and / or their employers.

The recency of practice standard raises issues of discrimination particularly against parents who remain out of the workforce for a number of years to raise young children. It also raises questions as to what work is, and is not, of a psychological nature.

In relation to the specialist title, the Association supports options 1 or 2; option 3 is not supported. The requirement that only psychologists who hold a PhD can have access to a

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specialist title is excessive; a PhD is based on research frequently with a very narrow focus. A Masters degree provides a broader range of applied skills in a specialist area.

The timeline for providing feedback to the consultation paper was very limited and did not provide sufficient time for quality consultation to occur with key stakeholders.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Stuart McKenzie', with a stylized flourish at the end.

STUART MCKENZIE
PRESIDENT

23 November 2009

Att.