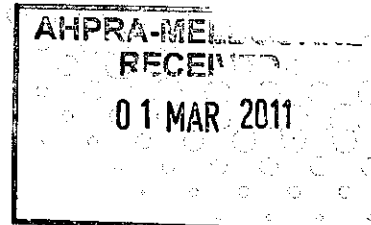




Our Ref.: DH:DH HO.046.11

Prof Brin Grenyer
Chair, Psychology Board of
Australia
GPO Box 9958
Melbourne Victoria 3001



23 February, 2011

Dear Prof Grenyer

**Re: Professional Indemnity Insurance Registration Standards –
Consultation Paper No 8**

Thank you for the opportunity to comment on the proposed revisions of the PII Registration Standard for Psychologists. I commend the Psychology Board of Australia in taking the lead in reviewing professional indemnity issues that have arisen. It is to be hoped that the other national Boards follow suit and that AHPRA moves to ensure that some uniformity prevails across nationally registered Professions.

The Health Services Union of WA membership includes Psychologists employed in the public sector, NGO sector and in private health. All financial members of the Union are automatically covered by the HSU's professional indemnity insurance policy. This policy is underwritten by Vero Insurance Ltd and meets all the proposed minimum requirements of the Boards PII standard. For members directly employed it operates in addition to any employer insurance policy or employer self insurance.

The policy also covers members for any disciplinary matters that are commenced against the member. Members are also covered for any private practice work they may do in addition to their paid employment provided the income derived from private practice does not exceed that earned from their paid employment.

The HSU of WA considers that the minimum amounts proposed and the revised PII Standard detailed in Consultation Paper 8 is appropriate. However we believe that the Standard should include some clarification of what is meant by individual cover.

The HSU's PII policy is written so as to cover all financial members of the Union. We can and do provide members with a copy of the Certificate of Currency and if required a declaration by the Union Secretary that they are a financial member and therefore covered by the Policy. The onus of course is on the Psychologist member to maintain their financial membership in order to be covered by the policy.

We therefore suggest that the proposed Registration Standard wording be amended as follows:

1. Add an additional sentence following the second sentence in the "Summary" at page 8, being *"An individual insurance arrangement includes a policy that either*

specifically names the registered psychologist or a policy that covers the registered psychologist as a particular class of person."

2. Add an additional sentence following the first sentence in the "Employer cover" at page 10, being *"An individual insurance arrangement includes a policy that either specifically names the registered psychologist or a policy that covers the registered psychologist as a particular class of person"*

In addition it may be helpful to include a definition of "individual insurance arrangement" in the list of definitions along the lines outlined above.

Thank you for the opportunity to comment and I trust that the Board will see fit to amend the proposed Standard as suggested. I would be happy to discuss this with you and provide further clarification if necessary

Yours Faithfully



Dan Hill
Secretary