



PSYCHOLOGY PRIVATE AUSTRALIA Inc.

THE FEDERATION OF ORGANISATIONS OF PRIVATELY PRACTISING PSYCHOLOGISTS OF AUSTRALIA

CONSTITUENT BODIES

Association of Private Practising Psychologists (NT)
Association of Private Practising Psychologists (QLD)
Australian College of Private Consulting Psychologists (NSW)
Psychology Private Tasmania

Psychologists in Clinical Private Practice (A.C.T.) Inc.
Australian College of Psychologists in Clinical Private Practice (VIC)
Institute of Private Practising Psychologists (SA)

Comments on Consultation Paper 6 Proposed registration standard – Limited Registration for Teaching and Research

General Statement on Limited Registration

In Medicine, teaching and research is carried out mainly by professionals who do not call themselves or probably have no desire to call themselves ‘medical doctors’. They are anatomists, physiologists, neurologists, geneticists, etc.. Psychology is not so fortunate. In this profession, its practitioners, its teachers and its researchers are undifferentiated in professional designation – that is ‘psychologist’.

If the prime, perhaps the only object of practitioner registration is protection of the public, those who must obtain registration are (1) in medicine, medical doctors and (2) in psychology, psychologist practitioners. It would seem that the only reason for teachers of and researchers in psychology to register is to allow them to be described by the protected name ‘psychologist’. Registration for them, even if called ‘limited registration’ lies outside the prime purpose of setting up a registering authority.

Initially, no psychologists were practitioners – all who acquired that professional name were teachers or researchers. Practitioner psychologists now far outnumber teacher and research psychologists. At the present juncture in the development of the profession of psychologist, a teacher of or researcher in the ‘subject – psychology’, should not be denied the right to use of himself/herself the professional name ‘psychologist’. This as an anomaly should not be allowed to exist without being kept under consideration for some semantic solution to be found.

It is thought that in using Section 65 of the legislation as the means of permitting teachers and researchers to use ‘psychologist’ of themselves legally, the PBA should set out clearly and in some detail the Section 83 conditions of such registration; this is required by Section 65. This, it appears has not been done within the ambit of Consultation Paper 6. To do it, however, is an inescapable duty of the Board.

Use of the Designation ‘Psychologist’

The continued use without penalty, by a non-registered teacher of or researcher in psychology should not be permitted to continue beyond 30 June 2011 even if ‘Limited Registration’ processes and general conditions of registration have not, by then been cleared by the Ministerial Council. There is no objection to a teacher being described e.g. as ‘Psychology Lecturer’. No such felicitous descriptor, however has yet been put forward for the psychology ‘researcher’, but one should be sought.

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Use of the Words ‘Clinical’ and ‘Non-clinical’

The Macquarie Dictionary Third Edition gives six meanings for the word ‘clinical’, none of them having any particular application to psychology per se. In the definitions, use is made of the word ‘*intuitive*’. The ‘definition of ‘clinical’ in the Oxford Concise Dictionary is: *Of, at the sick-bed*’. The 2nd meaning of ‘clinical’ in The Penguin Dictionary of Psychology Third Edition, is apposite to psychology: *Characterizing an approach to personality and psychotherapy that focuses on the individual as a whole rather than seeking for general principles or doing normative studies*. The use of the words ‘clinical’ and ‘non-clinical’ appear to be important in the Board’s definition of (psychological) practice.

The Board has chosen to rely on its ‘definition of psychology’ in so far as it distinguishes between clinical and non-clinical activities of psychologist practitioners, in developing a means by which teachers and researchers may be registered as psychologists. If the Penguin meaning is intended by the PBA, this reliance suffers from the confusion posed by the PBA’s actions in the matter of ‘endorsement’. All practitioner psychologists who seek endorsement in any of the seven or more categories focus on the individual as a whole – all, then might be endorsed as ‘clinicals’. Yet, aiming at being scientific practitioners, they all might fall into the category ‘non-clinicals’ – the endorsed ‘clinicals’ as well.

The Board, by adding a very carefully crafted footnote to its definition of practice could probably dispel the confusion.

Summary of Suggestions

1. A general set of conditions imposed on Limited Registration of a Teacher or a Researcher should be clearly stated when ‘Limited’ becomes part of Standards for Registration.
2. The continued use of the designation ‘psychologist’ (and therefore the continuation of the need for them to obtain registration) for those teaching or researching in psychology should be reviewed periodically in the search for an alternative designation for these categories of limited registrants.
3. An appropriate footnote should be appended to the ‘definition of practice’ in order to ensure that there be no confusion as to the special meaning of the terms ‘clinical’ and ‘non-clinical’ as used in the definition.

S M Wilkie, President
E P Milliken, Secretary

22 December 2010