



# 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 PBA CONSULTATION PAPER 5 GUIDELINES ON AREA OF PRACTICE ENDORSEMENTS August 2010

#### Prime Purpose of the Paper

Full support is given to the revisions that ameliorate conditions for the several categories of applicants for Endorsement, referred to in the Paper.

#### Omission of Endorsement Provision for Psychologists in Clinical Private Practice

There are psychologists who were in clinical practice for many years before higher academic qualifications in specific areas of psychological practice were offered. Many of these still are practising, mostly as private consulting psychologists. These psychologists obtained Provider Numbers under an arrangement between the Private Health Funds, State-based Organisations of Private Practising Psychologists and Medibank Private – the Fund which vetted applicants and issued Provider Numbers. Failure to recognise the very important element of this psychologist cohort's professional strength – extensive professional work experience coupled with continuing professional development – as a qualification in Section 2.3 of the Paper is a serious discriminatory omission from the Paper. It also enshrines the assumption that has no empirical support, that academic teachers are more competent psychological practitioners than those qualified psychologists who have been at the grass-roots of applied practice of the profession for 30 or more years.

It is suggested that in Section 2.3 of the Paper, the following be inserted as the first dot point of 'equivalent qualifications':

- five years or more continuous experience before 1 November 2006 in an area of psychological practice, holding a practising psychological professional certification, if available, for the whole of that period (an example is the Medicare Provider Number for clinical practice), a substantial record of continuing Professional Development throughout the period of practice, and a clear indication of having obtained appropriate academic qualifications that were available at the time of entering on practice of the profession of psychology.

#### Note

When the Board makes good its discriminatory omission, it may need, consonantly, to amend the 'equivalence' statements in its website.

#### General Matters Concerning the Paper as a Whole

- (1) It would be useful if the "Definitions" were to be brought forward to the beginning of the paper.

...../2

---

#### President

Ms S. M. Wilkie  
32/101 Wickham Tce  
BRISBANE Q 4000  
Ph (07) 3832 5454  
Fax (07) 3839 8716  
Email: smwilkie@bigpond.net.au

#### Vice President

Mr K. Harris  
262 Melbourne St.  
North Adelaide SA 5006  
Ph (08) 8267 1397  
Fax (08) 8267 3105  
Email: kym@psychology-private.org.au

#### Secretary

Mr E. P. Milliken  
4 Macartney St.  
Fannie Bay NT 0820  
Ph (08) 8981 7772  
Fax (08) 8941 3043  
Email: epmilliken@ozemail.com.au

#### Treasurer

Ms Sharon Daniels  
Suite 3 175 Bunda Street  
Cairns Qld 4870  
Ph: (07) 4031 6448  
Fax: (07) 4041 3094

- (2) There are ambiguities throughout the paper caused by the lack of a definition in the Paper of 'full' general registration as against 'provisional general registration'.
- (3) The '*second person*' wording of the first (long) paragraph of Section 3.1 is lacking in congruity with the rest of the Paper and needs revision.
- (4) In Section 2.2 the placement of the word 'only' in each of its four appearances would be better if shifted to a position immediately preceding the numerical value to which each relates.

S M Wilkie  
President

E P Milliken  
Secretary

10 September 2010