

1 November 2009.

Attention: Chair, Psychology Board of Australia

Consultation Paper on Registration Standards and Related Matters, 27 October 2009.

With respect, I ask the Board to consider ways to ensure the new standards measure up:

1. Different vantage points and stakeholders.

Consider the level of consistency between current approaches across different Federal government portfolios/agencies? For example, consider principles espoused in the Federal Government's reform agenda ... for higher education (ie. pathways, recognition of prior learning)? ... for employee relations (ie. changes to award classifications for psychologists, seniority /pay structures and qualification requirements)?

2. Building distinctive competence.

Consider a straightforward split of definitions - "applied" and "research/education"? Consider the implications of past policies, limited funding and limited provision of higher level educational programs? Consider and respect the characteristics and qualifications of the "current workforce" and historical or practical reasons why some practitioners have not sought "specialist titles"?

3. Values and Innovation.

Consider the implications of a proposed "definition of Practice" that only recognizes "Clinical Psychology" and "Academics"?

Consider how limited the focus of current accredited higher degrees and why some universities are ending programs in certain specialties? Consider the bigger picture and the diversity of practitioners/ specialties/service providers? Consider the ways the profession of psychology contributes to all major institutions in our society and during an individual's life cycle? Consider the extent to which the proposed "titles" and "specialist titles" reflect society's future needs?

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|---------------|---------------|
| - Government | |
| - Law | |
| - Business | - Child |
| - Political | |
| - Education | - Adolescent |
| - Family | |
| - Economic | - Young Adult |
| - Work | |
| - Health | - Adult |
| - Religion | |
| - Social | - Elderly |
| - Cultural | |
| - Sport | |
| - Environment | |
| - Community | |
| - Research | |
| - Development | |

4. Flexibility and Adaptation.

Consider how each standard applies in different future scenarios and in practices of different size and scope (eg. a micro business/solo practitioner, to a small business to a large private practice, to a corporate employer to a government department employer)? Consider implications of the new standards for survival of small business/solo practitioners? Consider the implications for balance of work life for practitioners (self employed versus employees)? Consider the implications of a narrow and clinical psychology based definition of activities of “non-psychological nature” for other specialties?

5. Quality and Resources.

Consider the ways the roll out of recent Government reforms has implications for day to day practice management and running expenses? Consider ways to enlist government support for assisting business/practice management for psychological services of different size? Consider access and costs of “external supervision” and “continuing professional development” for small business/solo practitioners? Consider the limited availability of experienced practitioners to be “supervisors” – current numbers, qualifications, specialties? Consider the lack of access and quality of “professional development activities” for different specialties?

The current changes to laws, regulations and standards have the potential to contribute to the development of the profession of Psychology. Importantly, these changes have the potential to improve the effectiveness of the profession’s services for individuals, groups, organizations, communities and our nation.

I hope that you will take into account the myriad of compliance requirements continually being placed on psychologists in small private practice settings. I hope that you will design a system that supports all specialties in the profession of Psychology.

Thank you.

Sincerely,

Mariana Brkich, M. App. Psych (Occ), MAPS
Psychologist.

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