

**Attention: Chair, Psychology Board of Australia**

Comments on the consultation paper on registration standards and related matters, dated 27 October 2009

Dear Professor Grenyer,

I have read the consultation paper on registration standards and related matters and would like to provide some feedback and comment.

Regarding my own background: I am a migrant to this country, from South Africa. I commenced part-time practice in Melbourne as a psychologist in 1989. Since 1991, I have been in full-time practice. I am a member of the College of Clinical Psychologists (CCLIN) of The Australian Psychological Society (APS). I am fifty-seven years of age.

I qualified and registered as a psychologist under the old four (study) plus two (supervision and experience) rules. I have a Masters degree in Business Administration, heavily oriented to psychology and human resources subjects.

I commenced my PhD in Psychology in South Africa. After working on my doctorate for 2½ years, my supervisor left the country. South Africa was in a state of political turmoil at the time, going through the last gasps of the white apartheid government. I left the country in 1987 and migrated to Australia. It has always been a major disappointment and regret that my psychology doctoral studies were interrupted as a result of these political circumstances which were totally beyond my personal control.

My application to become a member of the College of Clinical Psychologists totalled 61 pages. This included very comprehensive documentation to attest to my capacity to operate as a specialist clinical psychologist. I am happy to forward that documentation to you if required at any stage.

Some years ago, under previous regulations, I was registered as a specialist clinical psychologist by the Psychologists Registration Board of Victoria. Specialist title designation was subsequently discontinued in Victoria.

My following comments are specifically in relation to registering as a specialist clinical psychologist, which is directly relevant to me. I note that there is contemplation that a minimum qualification for specialist registration would be an accredited professional doctorate in psychology in the specialty (clinical psychology). I also note your proposed equivalents which would be pathways to specialist registration.

Specifically, I request that the Board consider an additional pathway to obtain specialist registration as a clinical psychologist to include

- Full membership of the APS College of Clinical Psychologists (CCLIN)
- Minimum of seven years full-time relevant professional practice (prior or subsequent to membership of CCLIN)

I run a very busy private practice supported primarily by medical practitioners who for many years have been well aware of my skills in treating complex mental health difficulties.

Given my particular background, I would have no choice but to legally challenge any restriction to my being able to use the title Specialist Clinical Psychologist.

As a highly experienced and successful private practitioner, I would be more than happy to provide any further information which could assist.

A comment also about continuing professional development (CPD). The advent of Medicare covering psychological services in Australia has been a monumental positive change for our profession. To ensure ongoing ability to provide clinical psychology rebates requires CPD meet requirements specified by the APS College of Clinical Psychologists.

I ask the Board to ensure that clinicians are not immersed in massive amounts of red tape, having to satisfy different requirement for Medicare, the APS College of Clinical Psychologists and then the Psychology Board of Australia. Specifically, I request that the Board ensure that CPD requirements undertaken to meet the College of Clinical Psychologists (and Medicare) requirements automatically fulfill the CPD requirements required by The Psychology Board of Australia. If these are different from one another, busy private practitioners like myself, will inescapably and unnecessarily become mired down in bureaucratic red tape.

I am fully supportive of rigorous standards for General and Specialist registration, also for CPD, but please could the Board ensure that busy clinicians in private practice do not unnecessarily have to satisfy separate requirements for Medicare, the College of Clinical Psychologists and the Psychology Board of Australia. One set of CPD requirements should satisfy all the regulatory regimes.

I look forward to confirmation that you have received this document and particularly to your comments and response.

Yours faithfully,

Selwyn Lever  
Clinical Psychologist