

[To:](#)
Cc:
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Subject: Fw: PBA proposal for new national registration framework

To whom it may concern

I am writing in relation to the PBA's consultation paper on codes and guidelines for the new national registration framework. There are a number of points in this document which are difficult to reconcile for an organisational psychologist. Some of these points are discussed below.

* Overall, the document is biased towards the clinical/medical context which raises a number of issues for organisational psychologists and provisional psychologists who wish to pursue a career in organisational psychology.

More specifically, there is a clinical bias in the internship program and more relevant requirements for such a program in organisational psychology need to be included. For example, the internship program for organisational psychologists should meet the realities of employment for this group. This could be done by allowing for one primary placement or work role with additional placements recommended but optional, particularly if the primary placement provides a diverse range of experiences. Further, the assessment and intervention experiences for an intern in the organisational psychology speciality should be appropriate to the field and not of a clinical nature. There should not be the requirement for this intern to have experience working with children either.

It is also of concern that the PBA states that "The Board has an obligation to the community that all psychologists who hold registration are safe and competent to practice psychology, including delivering psychotherapy for mental health problems using focused psychological strategies." This statement must be removed as psychotherapy is not the core practice of psychology and only those with a clinical focus would see it as such.

I trust that the PBA will seriously consider my comments as well as those of other organisational psychologists and the document prepared by the APS College of Organisational Psychologists' National Regulatory Developments Working Party.

Yours sincerely

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Allworth Juniper - *bringing psychology to work* in the selection and retention of talent

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