

[To:](#)
Cc:
Bcc:
Subject: Fw: response to the PBA paper

TO whom this will concern

I want to make know concerns that I have in relation to the proposed guidelines for the registration of psychologists within the National registration framework. As a psychologist working within the area of organsational psychology, I think that there are some specific concerns that do not seem to be understood by the registering bodies.

Firstly is the issues of advertising. Organisational psychology is very competitive. Many organsational psychologists work as private consultants within a highly competitive industry. We are not like medical specialists all of whom need to be registered by their respective College. Organsational psychologists complete in the open market with people for whom there are no regulatory requirements. An equivalent would be for medical practitioners to competing for their clients against any 'quack' who wanted to nail up a shingle as a doctor. To be unable to advertise and especially to be unable to use testimonials, except in a highly restricted manner is highly likely to mean that organsational psychologists will be invisible to their clients, and unable to compete.

Further, given that non-psychology competitors regularly advertise competence in administration of certain tests, and other types of competence, organsational psychologists will be at considerable commercial disadvantage if they are unable to advertise eg be unable to complete the requirement of a tender.

The mandatory requirement for peer supervision is too restrictive, especially within small states with small populations. More evidence should be gathered to determine the merits of peer supervision within the discipline of psychology, especially within the beyond health areas. Requiring people to consult beyond their area of employment will also difficult to implement with the main problems being cost, and loss of competitive confidentiality as the people who are likely to be my supervisors are also my competitors in a manner not generally found in the 'within health' field.

The use of titles by people who come under the national registration framework should be consistent. Not one rule for one group (however traditional) and another rule for everyone else. The attempt to eliminate vanity titles is to be commended. As a practitioner within an endorsed area of practice, will someone like me be able to use the title 'Organsational Psychologist' after my name?

Kind regards

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