

[To:](#)
Cc:
Bcc:
Subject: Fw: Psychology Board of Australia Consultation Paper 2

Dear Professor Grenyer,

The following have been raised as concerns.

1. Re: Guidelines on advertising of regulated health services, specifically section 6.4 Advertising on qualifications and titles (p. 5). The PBA advises that registered psychologists who hold a doctoral qualification and who advertise their services should make it clear when using the title 'doctor' that they are not a medical practitioner or psychiatrist. This seems unnecessary given the earlier statement that "A practitioner should clearly state his or her qualifications" (p. 5). If a psychologist has a PhD or DPsych, why should they have to explain that they are not a medical practitioner or psychiatrist? After all, the use of the title 'doctor' clearly was originally reserved for those with a doctoral qualification.
2. Re: Guidelines for mandatory notification, specifically section 5 (p. 5). The guidelines state that education providers are also required to make mandatory notification in relation to students, if there is a reasonable belief that the student enrolled with the provider has an impairment that, *in the course of the student undertaking clinical training* (italics are mine), may place the public at substantial risk of harm. This seems to be all inclusive and we would need to clarify whether, for example, students undertaking Work Integrated Learning courses in their undergraduate psychology degree are included in this requirement.
3. Re: Guidelines on continuing professional development, specifically pp. 1-2. The requirement for a minimum of 10 hours per annum of peer consultation seems to focus on the practice of psychology. It is unclear whether the teaching of psychology would be included here as part of the practice of psychology.
4. Re: Guidelines for the 4 + 2 internship program, specifically, section 3.11 Dual pathways (p. 7). This section prohibits students who have completed part of a higher degree in psychology from receiving any credit for field placements completed during their enrolment. This means that failure to complete a higher degree is disastrous for the student with nothing gained from their time enrolled. This may impact negatively on students' willingness to undertake higher degrees.

Sincerely,

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