

7 December 2010

Professor Brin Grenyer,  
Chair, Psychology Board of Australia,  
GPO Box 9958,  
MELBOURNE,  
VIC 3001.

Dear Professor Grenyer,

On behalf of Bond University I would like to respond to the PBA communiqué on “Limited Registration for Teaching and Research”.

My major concern with the Board's proposal appears under the heading "Definition of Practice". Under the Board's broad definition (below) it will become mandatory for all teaching, research and administrative staff to take up limited registration.

“Any role, whether remunerated or not, in which the individual uses their skills and knowledge as a psychologist in their profession. For the purposes of this registration standard, practice is not restricted to the provision of direct clinical care. It also includes using professional knowledge in a direct nonclinical relationship with clients, working in management, administration, education, research, advisory, regulatory or policy development roles, and any other roles that impact on safe, effective delivery of services in the profession.”

“Previously individuals who used their psychological skills and knowledge working in areas such as education and research were not considered to be engaging in the practice of psychology and therefore were not required to be registered, but under the new scheme they are required to be registered”.

The PBA's proposal of adopting mandatory registration for teaching, research and administrative staff is a very different position from that discussed at the recent HODSPA meeting in Adelaide. It was my understanding that limited registration for non-practicing psychologists would be optional – not a requirement. Other Heads have indicated that they were under a similar misapprehension.

The mandatory registration requirement for teaching, research and administrative staff will be administratively and financially restrictive for Departments and Schools of Psychology. A few examples are below.

- Under the Board's proposal, suitably qualified and experienced lecturers who teach specialised content (e.g., statistics, psychopharmacology) would not be able to contribute to teaching in accredited psychology programs unless they are registered. Losing expert teachers dilutes the quality of training received by students.
- Unlike registered practitioners who are also academics, non-practicing academics are unable to offset the costs of registration through their own private practices – the costs associated with limited registration will be borne by them.
- The requirement for PhD students to be registered to gain employment on research projects and/or as tutors is restrictive. PhD students often rely on research and teaching positions as their sole source of income – this group is least able to afford registration fees.

Under the current proposal and "Definition of Practice" the PBA will dictate which members of staff are eligible for teaching, research, administrative and managerial positions within Departments and Schools. My Dean (who is a philosopher) uses his professional knowledge in managerially overseeing the Psychology AOU, and as such falls under the PBA's definition of a psychologist. Should I advise him of the need to apply for limited registration? Should he not meet the requirements for limited registration, does the PBA have the authority to decide that he is not qualified to hold the position of Dean?

It seems absurd to me that the PBA will assume the role of determining the appropriateness of staff to contribute to accredited programs of study in Psychology – surely this task remains the responsibility of APAC, not the PBA. At present, APAC determines the suitability of teaching staff using eligibility for membership to the APS as the criteria. Should the Board's definition of a psychologist be adopted, APAC may replace the APS eligibility criteria with the criteria registration and inadvertently create an additional layer of administrative complexity during already complex accreditation processes.

My final concern on the Board's proposal centres on the connotations associated with the terminology "Limited Registration". Academics should either be registered as psychologists, or not - limited registration sounds second rate!

I would like to see the PBA retract the consultation paper in its current form, reconsider their "Definition of Practice", and offer the option of registration to non-practicing psychologists rather than making it mandatory.

Sincerely



Dr Mark S Edwards  
Head & Chair of Psychology  
Bond University