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Sent: Tuesday, 30 November 2010 2:54 PM
To: NationalBoards
Cc: Nicola.Roxon.MP@aph.gov.au
Subject: Attention: Chair, Psychology Board of Australia

To the Psychology Board of Australia:

I am writing to you in relation to the proposal to require that teachers of, and researchers in, psychology hold limited registration. Before addressing the details of the proposal I will make the following points: (1) I am currently a generally registered psychologist, and, as such, I would not personally be directly effected by the proposal. (2) I currently work as a psychology academic so I have a first-hand perspective on the likely impact of this proposal on academic psychology departments at universities, and (3) my global evaluation of the proposal is that is it not a good idea and should not be proceeded with.

Some of the most concerning aspects of the proposal to require limited registration of teachers of psychology relate to “qualifications” and “fees” (page 6 and 7 of the discussion document).

Many academic Schools of Psychology at Australian universities have difficulty recruiting casual tutors. The qualifications and fees required in the proposal are likely to further reduce the pool of potential tutors. There are three problems I can see, but I’m sure there are others: (1) Making potential tutors ineligible: anyone who has an honours degree and then takes a gap year before starting post-graduate study is ineligible to be a tutor in that gap year because the minimum qualification is a four year degree plus enrolment in, or completion of, a post-grad qualification. (2) Sending potential tutors to other schools: When I was a PhD student at UWA I tutored in both the School of Psych and the School of Organisational and Labour Studies because my interests overlapped psychology and business. If I was put in the position today where I was a dirt-poor PhD student who had to pay to register to teach in Psychology I’d just go and tutor in another School that didn’t require it such as Organisational and Labour Studies. Note also that if the board includes organisational psychology issues such as worker motivation, etc in its definition of using psychological “skills and knowledge as a psychologist” you may have the ludicrous situation of putting business academics in breach of the law or requiring psychology PhD students but not business PhD students to be registered to teach organisational behaviour. (3) Bureaucracy: every academic school of psychology will need to check that all its staff and tutors hold limited registration. This is a large administrative burden not at all needed or welcome in our grossly under-funded universities where the bulk of staff already report working well over their paid hours of employment.

Under the definition, limited registration would apply to High School psychology teachers (psychology is a high school subject in some states). It is “using professional knowledge in a non-clinical relationship working with clients in...education”. These teachers would almost certainly NOT meet the eligibility requirements of holding a 4-year psychology degree, let alone a postgraduate enrolment or degree.

Many casual research assistants in psychology at Australian universities are 4-year psychology graduates who have not enrolled in post-graduate qualifications. These workers would be required to obtain limited registration under the proposal but would not be eligible based on the qualification requirements. Additionally, these are often low-paid casual positions and the imposition of the same registration fee as is required for a fully-qualified psychologist is abominably inequitable.

The renewal of registration clause is particularly nasty. Limited registration can only be renewed three times and then the holder has to reapply. This means that anyone on limited registration for teaching and research (which I think would be about half of the staff in academic psychology departments and most PhD students who tutor) will be going through the application process every four years. A new application costs \$410 on top of the \$390 registration fee. So, most academics will need to send the board \$390 three years out of four and \$800 every fourth year. As most PhDs run a little over 4 years, any psychology PhD student who tutors is going to be faced with applying at least twice during their PhD – which means they'll do about 4 weeks of tutoring work during their candidature just to earn the money necessary to register to be a tutor! That doesn't really sound economically viable to people already living hand-to-mouth.

A further problem with the proposal is that many academics in university psychology departments do not see themselves as health professionals and their qualifications and teaching, while related to psychology as an academic discipline, bear very marginal relevance to psychology as a health profession. A former colleague of mine is an author of an introductory psychology textbook that is used in several Australian universities. She holds a PhD in taste and smell perception from a psychology department at an Australian university. Any time my friend is described by someone as a psychologist says "I'm not a psychologist, I'm a chemo-sensory scientist". It is ludicrous to ask an outstanding academic (teacher and researcher) who specialises in perception (or cognition, social psychology, biopsychology, evolutionary psychology, etc.) to be registered by a board that oversees the work of health professionals.

It is bad enough that the Board is making our Masters students fork out a big wad of cash to be provisionally registered when no other "health profession" under the National laws requires students to register or pay them fees. This new proposal is flawed in a number of ways and, as with the provisional registration requirement for Masters students, should be chucked out altogether.

Sincerely,
Dr Guy Curtis

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