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Professor Brin Grenyer  
Chair  
Psychology Board of Australia  
G.P.O. Box 9958  
Melbourne VIC 3001

Dear Professor Grenyer

I wish to respond to the proposal *Limited Registration for Teaching or Research* which has been distributed for comment. At this stage, I would suggest that the initial proposal should be withdrawn and that a new proposal put forward, once the intentions and consequences of the proposal are made clear and limited.

The proposal as circulated provides an unworkable and intrusive approach to the oversight of Psychology in Australia. The definitions and tone of the proposal are not in line with previous briefings provided, nor do they match the recent letter circulated to Heads of Psychology.

The definition provided for Psychological practice is so wide-ranging as to be extremist. It conflates Psychological practice with a range of duties and activities that are carried out in a whole host of employment and voluntary situations. It does not seem to distinguish between client groups, students, organisations, patients, or anything else much. The simple idea that using skills or knowledge equates to Psychological practice cannot be supported.

The direction of the proposal as circulated would require all academic staff to apply for Registration – independent of their actual duties or qualifications. This provides a narrowing of the discipline of Psychology by preferencing the applied training over research training. It also provides a significant intrusion into the ways in which I staff my programs – and may even conflict with Accreditation requirements for my programs by limiting the scope of staff who could be employed.

If the various sections of the proposal were adhered to, I would have significant difficulty in recruiting across the range of activities that are undertaken in my School. I do not have an IELTS score for employment, even if overseas applicants must achieve a lower score than 7 for immigration purposes. I do have some requirements for Police checks, but these are moderated against the specific activities that the staff member is to perform. So, some criminal record may be acceptable, but this could rule out Registration.

It can be hard enough now to recruit, and retain, staff. Imagine if they had to also meet the requirements for some over-inflated definition of practice and gain Registration, with all the associated costs.

I find that the statements regarding assessing staff performance to maintain Registration to be well beyond the remit of the PBA. When I assess staff performance it is within an industrial and legislative framework. This provides me with both the requirements and limits of what I am able to do, and to whom I may communicate any outcomes. To think that the PBA would have any right to such information, let alone say in the employment status of my staff, clearly is working on a set of principles which have little to do with the employment and management of staff in the Australian work environment.

Of course, there are staff in my School who are Registered – academic and general staff. They are Registered either because it has a direct relationship with their duties (e.g., clinic director, placement coordinators), or because it is their choice to undertake what is normally considered as Psychological practice. The reasons for this range from personal income, to informing their teaching and research with direct client interaction.



The proposal as circulated is seriously flawed. It seems to conflate the idea that the Board *may* make regulations to a position where it seems that they believe they *must*. It is this slippage of logic that has provide a proposal that is not supportable at any level. It is intrusive to the management of independent bodies, and one that potentially would require contravention of industrial agreements and legislation, as well as privacy laws.

Fundamentally, the proposal demonstrates little understanding of educational employment in universities and confuses the role of regulating the profession with the necessity of the ongoing maintenance of the underlying discipline of Psychology.

If there were to be a clear rationale to this proposal, sadly not evident in the current document, it really needs to be clearly stated, and the logic of the approach needs to be clearly explicated. If it is to be mandatory, there needs to be a very strong case built to support the proposition.

Whichever of these directions, or possibly others, are intended, the current proposal must be withdrawn and replaced by a proposal that is clear, has a definite rationale, a definition of practice that is realistic, and options that suit the workforce to which it is intended to speak.

Yours sincerely,

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