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Professor Brin Grenyer  
Chair  
Psychology Board of Australia  
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Dear Professor Grenyer,

I write in response to the Board's Consultation Paper 6: Limited Registration for Teaching or Research.

First, the School of Psychology, University of Adelaide, wholeheartedly endorses the response on this paper by the Chair of HODSPA, A/Professor Mick Hunter.

Second, what follows are comments on the proposal from members of the School of Psychology, University of Adelaide. These responses are from members of academic staff, students, and research staff. You will see they are uniformly opposed to the proposals outlined in the paper. In some cases opposition can be characterised as vehement.

**Mr Peter Chamberlain (Combined Master (Clin.)/PhD candidate):**

I too endorse Mick Hunter's draft response and Ted's comments. The proposed registration requirements epitomise the self destructive nature of the clinical bureaucracy of our profession. Not only does the PBA require students to pay full tote odds for registration (unlike the other professions subject to the Australian Health Practitioner Regulation Authority) it now appears to require limited registration for anyone associated with teaching clinical students. This is both unnecessary and foolish. Clinical students require more than clinical skills (scientist/practitioner model) and those teaching such skills should not be required to be registered; it makes no sense. Moreover, the risk for clinicians is that limited registration may be obtained and promoted by disciplines outside psychology. My current placement has rudely reminded me that clinical psychologists are faced with employment in the public system that lumps us together with the 'allied health' professionals and does not acknowledge or remunerate us having special skills and is one of the reasons for the increasing numbers taking up private practice. Consequently, I strongly support Mick Hunter's response to prevent what might become an unpleasant slippery slope for clinicians and academics alike, and encourage all clinical students to reject this proposal.

**Ms Victoria Dennington (HDR candidate/Research Officer):**

The way I understand it the definition of practice would include ALL researchers – if this understanding is correct does it mean that any researcher employed by an academic (via grants etc) has to be 'registered'? If so this not only has serious implications for future researchers without Masters or PhD it will have has serious implications on an academics' ability to conduct research!

**Dr Linley Denson:**

I agree with Ted. I also wonder whether there is a logical problem at the PBA / AHPRA. To my mind, acknowledging teaching and research in psychology as 'practice', so that full-time academics and researchers who are already registered psychologists can meet the 'recency of practice' standard and maintain their registration, does not imply that all academics and researchers need to be registered.

**Dr Daniel Navarro:**

I strongly endorse everyone else's negative comments regarding this proposal, and would like to add my own concerns. In my view this proposal makes no sense whatsoever: the (entirely legitimate) policy goal that "psychologist registration" serves is to prevent unqualified personnel from offering psychological services to the public, who may not have the training or expertise to be able distinguish good from bad. It is, at a fundamental level, about consumer/citizen protection. As such, it makes a lot of sense that individual practitioners (esp. clinicians) be registered, and for the **programs** that train those people to be accredited.

In contrast, there is **no** security/public policy risk that this new proposal addresses. It does **not** matter whether we as teachers or as researchers are registered, so long as the teachings that we offer to our students are appropriate. But this threat is already addressed by the existing system: much as I'm inclined to grumble about them, accreditation processes serve a real purpose. In sharp contrast, there is no risk/problem that this new idea addresses. The proposal doesn't even **try** to make a case to suggest that it does so.

On those grounds alone it should be rejected, but the situation is considerably worse. By "offering" limited registration to those of us who work in a largely research-oriented environment and whose teaching is oriented towards non-health care aspects of psychological science, pressure will then slowly but surely be placed on the universities to offer employment in psychology departments only to people who are eligible for this "offer" of registration. (Indeed, the draft HODSPA response seems to be very sensitive to this concern, which I'm really glad to see.)

So who is eligible?

"It is proposed that the minimum educational requirement for Limited registration for teaching or research will be successful completion of a **four year accredited sequence of study in psychology (or equivalent)** plus evidence of current enrolment in or successful completion of a postgraduate psychology qualification which is a suitable qualification for teaching and research but is not accredited for the purposes of obtaining General registration (i.e. a research PhD or Masters degree in psychology)." (emphasis added)

... only those people whose **undergraduate** degree is in psychology. So who becomes ineligible then?

Well, unless the BPA deems "mathematics" or "computer science" to be an "equivalent" of "study in psychology, this would mean that about 30% of my PhD students would be ineligible. If I recall correctly, it would also exclude people like Michael Lee, Simon Dennis and Amy Perfors from registration. Since these people (all of whom, I would argue, have been or will be among our top research performers) have all taught into accredited programs, in practice we would have been unable to hire them, or indeed a great many of the "big names" in cognitive psychology.

In the long run, this is exactly the kind of narrow restriction that will ensure that Australian psychology is no longer influenced by developments in other fields. In cognitive psychology, for instance, this will act to cut off the massive exchange of ideas that has stimulated the field by

having students move into psychology from artificial intelligence, machine learning, linguistics, neuroscience, philosophy, mathematics, statistics and others, and conversely will start to dry up the flow of our students out into those fields, as our teaching becomes more and more shaped by people whose only intellectual exposure is to "psychology", narrowly defined. (Naturally, I don't think that cognition is special in this respect... indeed, I suspect academics in other subdisciplines might have similar concerns, but I can only speak from the perspective of a cognitive scientist.)

As far as I can see, this proposal is disaster at a scientific level, and reflects a mindset that equates "psychology" with "health psychology", and a narrow construction of health psychology at that. I can't see any way in which the net effect would just be to leave Australian psychology as a stranded and unhealthy intellectual discipline. If I were of a more cynical bent, I'd start to suspect that the proposal's actual purpose is simply to extend the leverage of the Board over the universities. Indeed, to continue from the passage quoted above...

"If applicants hold non-accredited qualifications, equivalence will be determined by the Board."

... and coupled with the text that says that ...

"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." (emphasis added)

... it's hard not to interpret this as an attempt by the Board to assert hiring and firing control over academic departments. This is a power they neither need nor deserve. It doesn't bode well for those of us who would like to see the universities retain some degree of academic and scientific freedom, and those would like to push the frontiers of psychological science as broadly as possible. In short, this is one of the worst and dangerous bureaucratic ideas I've seen in quite some time. Which is saying a lot, quite frankly.

#### **Professor Ted Nettelbeck:**

I strongly endorse the sentiments and substance of the draft response from HODSPA. The proposal is ridiculous; and so much so that one's first inclination is to treat it with utter contempt. Nonetheless, it is important that the BPA be sent a very strong message that argues the absolute unacceptability of what is proposed; bureaucracy has a nasty habit of expanding where others fail to take the threat seriously.

#### **Ms Annamaria Quarisema (HDR candidate):**

I wholeheartedly agree with the response letter that the PBA has an extreme view of what constitutes a mental health professional (apparently mental health professionals as well as anyone who uses psychology in any form in their job, even extended to those who are unpaid). It seems as if the BPA is trying to extend its reach far beyond its purpose, and I too believe it is a transparent attempt to draw in revenue based on a faulty and overly inclusive definition of a mental health professional.

In particular, I believe that limited registration will restrict interdisciplinary research. By its nature, interdisciplinary research allows individuals with different knowledge and skills to make discoveries that could not have otherwise been made, and it will be a shame if the PBA decides to hinder such research.

Excessive costs for graduate students: If limited registration comes into effect, the average graduate student will pay \$1580 in registration fees. This is excessive. Most graduate student scholarships provide just enough for the student to live on independently. I am of the opinion

that if graduate students are forced into annual PBA fees, many will be pressured into acquiring a job outside of the PhD.

Problems caused by the PBA's all inclusive definition of practice: Exactly how do they intend to monitor individuals within other academic departments who fit into their overly broad definition of practice? Do they intend that a geneticist who deals with brain and behaviour to register? Or perhaps an individual within reproductive medicine who researches the emotional affects of unsuccessful IVF treatment? It is quite possible that academics might "jump ship" to work in less restrictive disciplines if limited registration comes into effect.

Problems caused by the PBA's vaguely defined right to revoke registration: It is worrying that the PBA chose not to clearly define the circumstances in which registration would be revoked. If an individual is fired from their employment, or indeed chooses to leave and seek other employment, will they have their registration revoked, only to be forced to reapply for it upon undertaking a new job? This would be unreasonable, and yet seems quite possible within a framework that only vaguely mentions circumstances in which registration would be revoked.

Thus, on behalf of the School of Psychology, University of Adelaide, I ask that the Board not proceed with this proposal for limited registration under such a ludicrous definition of psychological practice.

I hope this feedback has been helpful.

A handwritten signature in black ink, appearing to read 'N. Burns', written in a cursive style.

NICHOLAS R BURNS

Associate Professor and Acting Head, School of Psychology