From: Steve Osborne [mailto:Steve.Osborne@nzpb.org.nz]

Sent: Tuesday, 21 December 2010 1:45 PM

To: NationalBoards

Cc: lois.surgenor@otago.ac.nz

Subject: Attention: Chair, Psychology Board of Australia

Dear Professor Grenyer (Brin);

Thank you for this opportunity to comment on the Psychologist Board of Australia's proposed registration standard for "Limited Registration (Teaching and Research)".

Under section 17 of the Trans-Tasman Mutual Recognition Act 1997, a person is entitled to registration in New Zealand if he or she is registered in an "equivalent occupation" in Australia. A person will be deemed to be in an equivalent occupation if "the activities authorised to be carried out under each registration are substantially the same" or if "equivalence ... may be achieved by the imposition of conditions". [refer section 14]

Given the significant disparity in qualifications between the Australian limited registration and the New Zealand "Psychologist" scope of practice, coupled with the fact that in New Zealand a person can undertake research and teaching in the field of psychology without being registered (provided that he or she does not use any version of the title "psychologist"), I consider that there is no "equivalent occupation" in New Zealand to the limited registration, and that there are no conditions that could bring the two into line. Accordingly, in my opinion (and based on legal advice) a person holding only limited registration in Australia will not be able to register in New Zealand via the TTMRA.

It is of significant concern that in Australia registration under the limited registration standard entitles the registrant to use the title 'psychologist'. This is likely to give rise to confusion and unrealistic expectations for both consumers and practitioners, and may present a risk to the public. I urge the Psychologists Board of Australia to consider adding a mandatory modifier to the term to make the situation clear (e.g., "Academic Psychologist" or "Research Psychologist").

I would be happy to be contacted directly if any questions arise from this submission.

With thanks,

Steve Osborne Chief Executive and Registrar New Zealand Psychologists Board