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Associate Professor Brin Grenyer
Chair
Psychology Board of Australia

via email: natboards@dhs.vic.gov.au

Dear A/Prof Grenyer

The AMA has reviewed the proposed registration standards for each of the health profession boards required to be registered on 1 July 2010 under the *Health Profession Regulation National Law Act 2009*, as passed by the Queensland Parliament.

In making our submissions to each of the health profession boards on their respective consultation papers on the proposed registration standards, we have considered the consistency of the proposed standards across the health professions.

Our submission to the Psychology Board of Australia comments on the proposed standards that we believe should be reconsidered by the Board to ensure the psychology profession is required to meet registration requirements similar to the other health professions, where appropriate.

In making this submission, the AMA wants to ensure that the new national registration and accreditation scheme commences from a high base, and that it delivers on its primary objective to protect the public by ensuring that only health practitioners who are suitably trained and qualified to practise in a competent and ethical manner are registered.

Specialist registration and the use of the title 'doctor' or 'Dr'

The *Health Practitioner Regulation National Law Act 2009 (QLD)* does not protect the use of the title 'doctor' or reserve its use by particular health professions. As such, the National Registration and Accreditation Scheme for the Health Professions does not meet its responsibility to the public to ensure non-medical health professionals, or other people, do not hold themselves out as medical practitioners.

The AMA supports the statement on page 18 of the consultation paper that "Specialist registration protects the public interest by ensuring the public is fully informed about the extent and type of qualifications possessed by a practitioner."

The AMA supports the Psychology Board of Australia proposal that the minimum qualification for specialist registration for a registered psychologist be an accredited professional doctorate in psychology in the specialty.

However, the AMA requests that the Psychology Board of Australia require its registrants who hold specialist registration, when they use the titles 'doctor' or 'Dr', to include explicit advice that they are not medical practitioners.

Further, if the public register for psychologists includes the title 'doctor' or 'Dr' where the registrant possesses an accredited professional doctorate, the register should also include the doctorate qualification to make it clear the registrant is not a medical practitioner.

We ask the Psychology Board of Australia to impose these simple requirements on its registrants to ensure that the public is not deliberately or inadvertently misled into believing they are seeing a medical practitioner when in fact they are seeing a registered psychologist.

Criminal history standards

In relation to the standard on the likelihood of future threat to a patient of the health practitioner, the AMA believes the Psychology Board of Australia should first assess the likelihood of a future threat to a patient of the health practitioner and then determine the weight to be placed on the criminal record according to the likelihood of the threat.

We raise this issue with you because the AMA has made the same submission to the Medical Board of Australia in respect of this standard for medical registrant applications. We understand that there will be a strong desire for consistency of approach on such issues across the health profession boards.

A copy of this submission will be provided to the Medical Board of Australia, the Australia Health Practitioner Regulation Agency and the Australia Health Workforce Ministerial Council for their consideration.

Yours sincerely



Dr Andrew Pesce
President

24 November 2009

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