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Our Ref: DD2010/07372

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Professor Brin Grenyer
Chair
Psychology Board of Australia
By email: chair@psychologyboard.gov.au

ATTENTION: PROFESSOR BRIN GRENVER

Dear Professor Grenyer,

RE: PSYCHOLOGY CONSULTATION PAPER – OPTIONS FOR THE PROTECTION OF THE PUBLIC POSED BY THE INAPPROPRIATE USE OF PSYCHOLOGICAL TESTING

Thank you for extending the opportunity for the Northern Territory to comment on the Psychology Board of Australia's consultation paper on the inappropriate use of psychological testing.

The following comments are provided in response to the consultation paper.

A key point is that the paper does not define what a psychological test is: nor does it differentiate between the use and impact of psychological testing; or the treatment resulting from psychological testing. For example, it is unclear if a Mini Mental is a psychological test and whether this would be subject to any restrictions in who should administer it.

In the absence of a clear definition of psychological tests and in reference to the examples given in the paper, it is difficult to know the extent of the problem and hence if any legislative/regulatory action is required. It is also impossible to understand the impact any of the suggested responses might have on the practice of psychology without this definition.

The paper does not specify the type of testing or the complexity of tests which are under scrutiny; this would need to be further clarified. The use of more complex tests could be restricted to professionals with relevant qualifications and familiarity with psychological testing.

It would be untenable should all tests, ie the Mini Mental, be restricted to be used only by psychologists as this would significantly increase the time taken to complete assessments on clients and implement much needed supports.

Registration of professionals is the quality control method used to protect society from poor practice. There is no specific evidence offered that there is a significant problem in Australia.

A further issue to consider is the availability of professionals to complete the assessments in regional and remote Australia, which suffer greater skills shortages than urban centres. If assessment tools are restricted to one Allied Health professional then this would restrict access for some people. Many assessments have recommended professions that can use the assessments or suggest training prior to use.

Disadvantages perceived with more stringent restrictions:

- Increased expense due to greater regulation of psychologists.
- Delay in diagnosis/implementation of testing due to increased workload and presumably higher wait times for psychologist appointments.
- Resultant delays in implementation of support programs
- Possible/probable requirements for outsourcing.
- Difficulty in implementation of restrictions given the easy accessibility over the internet.

Advantages perceived with more stringent restrictions:

- Possible increased quality in results of tests and options for outcomes.

Recommendation/s

If a system is shown to be required, a tiered model may have merit. In this, psychological tests could be categorised from simple to highly complex. The simple tests could be administered by a practitioner who has had training in the test and who works with the client, through to implementation of an accreditation system for higher level testing.

The Northern Territory would not support the recommendations in their current form, especially those related to legislative change, which have the potential to be high cost and create restrictive work practices in response to an unspecified and unquantified problem. However, the Northern Territory would be willing to contribute to further discussion on these issues should problems across Australia become evident.

Yours sincerely



Peter Beirne

23 August 2010