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Cc:  
Bcc:  
Subject: Fw: Attention: Chair, Psychology Board of Australia

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Dear Associate Professor Grenyer

**SUBMISSIONS IN RESPONSE TO THE PSYCHOLOGY BOARD OF AUSTRALIA CONSULTATION PAPER ON REGISTRATION STANDARDS AND RELATED MATTERS DATED 27 OCTOBER 2009**

Further to our phone conversation yesterday I write to summarise my comments on the above consultation paper.

As you know this department did seek an extension of the deadline for comments. In our phone conversation you kindly explained that the final deadline is now 27 November 2009 and cannot be extended further.

With over 100 psychologists, Ageing Disability and Home Care (ADHC) is one of the largest government employers of psychologists in NSW. Given the time frame here, I am unable to canvass the views of all ADHC psychologists. However, the feedback I have received to date all concerns the same issue, namely the use of the title 'specialist'.

In brief, the concern is that some departmental psychologists who have previously been re-classified as specialist psychologist, and senior specialist psychologist, in accordance with the Crown Employees (Psychologists) Award would not meet the proposed criteria for use of the title 'specialist'.

The Crown Employees (Psychologists) Award was ratified by the Industrial Services Commission of NSW in October 2006. I have attached a copy of the Award for your information (TAB B).

To explain further, some departmental psychologists were re-classified under a (now expired) grandparenting clause that allowed re-classification to specialist psychologist based on training and experience without an APAC accredited masters degree. These psychologists were able to demonstrate extensive experience and expertise in the disability field .

Other departmental psychologists have been re-classified due to having overseas postgraduate qualifications. The reclassification panel deemed these as adequate when considered in association with that candidate's experience. However, these overseas qualifications may not always be deemed as adequate for membership eligibility of an APS college.

On page 44 it states under Transition Issues

***In transitioning to the new scheme, any person who held specialist title immediately before the participation day for a participating jurisdiction will be taken to hold specialist registration under the new law from the participation day.***

If government psychologists currently employed as specialist psychologists are protected by this clause it is unclear to me what those without a specialist postgraduate degree might refer to themselves as after any such transition. This is because all the proposed specialist titles contain descriptors referring to a postgraduate specialisation. There is no provision for specialist psychologist only.

In order to support any proposed national registration of specialist titles ADHC psychology would require amendments to the proposal. In particular, we would want to see a provision ensuring the rights of all psychologists who have earned the use of this title already (in accordance with the Crown

Employees Psychologists Award) are fully protected.

Yours sincerely

Dr David Manchester

Clinical Psychologist, & Neuropsychologist

Practice Leader - Psychology

**Ageing, Disability and Home Care, Department of Human Services NSW**