



To:  
Cc:  
Bcc:  
Subject: Fw: Consultation DRAFT on Registration Standards and Related Matters

---

ATTN: Chair, Psychology Board of Australia

Dear Sir,

I write as comment in response to the Psychology Board of Australia's (PBA) "Consultation paper on [Psychologist] registration standards and related matters".

There are several matters raised in that Draft that I believe are not reflective of Australian workplace, or society, expectations, standards and practice.

#### TRAINING

The Draft consistently compares current Australian training timeframes to European and United States (US) Psychologists' training. Is the implication that Australian Psychologists are currently, insufficiently trained?

The Draft does not address the quality or content or comprehensiveness of European and US training versus current Australian training?

Is the length of time committed to formal instruction, the best or, a sufficient indicator of the quality, relevance and preparedness of Psychologists' training across the range of domains wherein Psychologists practise?

If the PBAs contention is that Australian 4+2 trained Psychologists are insufficiently trained to practise, what remedial training is planned to address such implied lack of training, within our 4+2 trained, sector of our Psychology workforce? (Herein I have a vested interest, I am a 4+2 trained Psychologist.) If remedial training is not on the agenda, is this recognition of the role of experiential learning through practitioner acquisition, maturation and integration?

Where training is deemed insufficient, there are two path-ways for rectification – quantity and quality. PBA does not address the quality (content and relevance) of Psychologists' training. PBA identifies a time-line deficit in Psychologists' training through comparison; PBA has not substantiated an outcomes-result justification for further training – rather it has applied an equivalence measure. Where the PBA believes the current training of Psychologists to be deficient, a better resource allocation and use is to better target training to achieve outcomes. Before increasing the duration of training, the quality of such training should be reviewed and better targeted.

#### SPECIALIZATION

That the proposal for Master and Doctoral training, the time spent training, is not a sufficient indicator of workplace economic productivity is starkly reflected in Australian work force recruitment trends.

It is reflected in the frequent lack of differentiation in workplace vacancy advertisements e.g., job vacancy descriptions that ask for:

"Clinical Psychologist or Registered Nurse or Occupational Therapist or Social Worker".

Therein, the differential role and emphasis, specialty, skills base and workplace value contribution is not defined and/or, more significantly, not appreciated (or not appreciable) by many Australian employers. The economic rationale of Doctoral, clinical Psychologists competing with Bachelors for employment seems ludicrous! The sublime irony is the appliqué of such Doctoral

training – where employers view equivalence from far less time-trained professionals as are nurses, occupational therapists and social workers. It goes to an argument that economic rationalism will pursue professionals who are utilizable in the workplace with the least effort required to actualize and acclimatize, utilize and exploit them.

Further, the Specializations as proposed are exclusive and marginalizing. For example, medical practitioners who choose not to pursue a distinct specialty can progress to recognition as Vocationally Registered General Practitioners – such a pathway should be available to Psychologists who choose to maintain a general, often local and accessible, psychological practice. ‘Vocationally Registered’ Psychologists who, through stint of application, self-education, skills acquisition, and practical engagement, engender that therapeutic relationship of community recognition and referral agency credibility, are worthy of discrete recognition. Psychologists who would not qualify for specialist recognition should be able to earn generalist recognition that society affords us.

#### REMUNERATION

A clear example of the economic earning productivity of Psychologists is in the Australian Defence Force (ADFR), Reserves, Service by Health Practitioners pay scales. ADFR Service by Health Professionals is recognized, remunerated, and utilized according to a fixed, specialty, schedule.

The remuneration for Psychologists is set at \$2,350 per week – the same as an Environmental Health Officer, Pharmacist, Physiotherapist, Radiographer and Scientific Officer.

The only Health Professional remunerated at a lower rate is a Registrar, at \$1,600 pw.

Significantly, all classes of Nurses, including Registered General Nurses and Mental Health Nurses, are remunerated at \$3,150 pw – a positive differential approximating 33%, equal to \$42,000 over one year! ( Forensic Anthropologists and Forensic Archaeologists are similarly remunerated at \$3,150 per week.)

#### TIME, HECS Debt, Earning Potential

Pertinently, typically, base nursing plus specialty training is completed within 4 years – progressive training continues rotations through internships. (Again, the relevance and role of experiential learning through formal internships, as distinct from ad hoc supervision [often self-sourced, self-funded, opportunistic supervision] has not been addressed at all in the PBA’s draft for either base qualification or specialization.)

PBA’s Draft proposal recommends extending Psychologist training to 6 years minimum (base Degree, Honours, Masters) – and 8 years for Specialist recognition and accreditation (Doctorate).

In respect to the workplace participation remuneration attributed to Psychologists by employers such as ADFR, PBAs proposed training/time commitment is not reflected by the attributed value-added remuneration currently ascribed to Psychologists – at least as far as Psychology training is currently delivered/undertaken.

Arguably business, industry cannot utilize (realize an equivalent income earning potential) from Psychologists based on our current training. To justify additional, formalized training for Psychologists beyond the current model (e.g., that would bring the remuneration of Psychologists up to that of nursing personnel) will require the production of a practical, applied element by new Psychologist graduates, at whatever academic level, than is currently occurring.

#### CRIMINAL HISTORY

PBAs draft criminal history check appears to equate ‘charges pending’ with findings of guilt. I submit that ‘charges pending’ represent an allegation to be tested – the presumption of innocence.

Charges pending may constitute reason to suspend consideration for registration, pending their resolution. However, charges pending do not equate guilt.

Spent convictions, and apparently juvenile convictions, are to be considered during examination for Registration. Community standards allow individuals to 'live down their past' – I would like the PBA to endorse a policy that encourages and allows for behavioural change, character maturation, and personal development. Comparable, related community standards, e.g., working with children checks, would be a positive and relevant standard of responsibility.

Thank you for this opportunity.

Yours faithfully

Stephen M<sup>c</sup>Greevy  
GDAP (Dwn), BA (Dwn), DCH (cmh)  
MAPS, FABPS, IAAPA