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Chair  
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19 November 2009

Dear Professor Grenyer

At its last meeting, held on the 10<sup>th</sup> November, 2009, the NSW Psychologists Registration Board discussed its response to the *Consultation paper on registration standards and related matters*. It is noted that, due to your current position as both President of the NSW Psychologists Registration Board and Chair of the Psychology Board of Australia, that you excused yourself from this discussion, and therefore, from this response.

The NSW Psychologists Registration Board recognises that although distinct from the Psychology Board of Australia, under the registration framework as set out by the Health Practitioner Regulation National Law Bill [Qld] (2009), and enacted in NSW by the Health Practitioner Regulation Bill (2009), the NSW Psychologists Registration Board will continue to play a role in the registration of psychologists in NSW, and is thus not independent of the Psychology Board of Australia. Furthermore, it is recognised that the proposed standards reflect differing current practices amongst the existing State and Territory Psychology Boards, suggesting that the NSW Board has already made a significant contribution to the proposed registration standards, and is not an independent body in the current discussion. Thus the NSW Psychologists Registration Board acknowledges its full support for the process of consultation, as initiated in the *Consultation Paper*, but in the main, determined that it should be guided by the Psychology Board of Australia in relation to the outcomes of this consultation. However, in the unlikely event that such outcomes conflicted markedly with the Board's present legislative responsibility and any residual jurisdiction generated by the Board's role in consulting with the NSW Health Care Complaints Commission (HCCC), this would be brought to your attention if and when necessary.

The NSW Psychologists Registration Board does, however, offer comments on Part 2 of the *Consultation Paper* related to Mandatory Registration Standards. The NSW Psychologists Registration Board recognizes that these standards reflect differing practices across the health professions brought under the umbrella of the national registration system, and thus will need to be standardized under the new system.

The NSW Psychologists Registration Board supports the case-by-case and risk-based approach to the contribution that a record of criminal offenses should play in decisions about registration. The Board supports the flexible approach proposed by the *Consultation Paper*.

Given the importance of communication within the health professions, the Board endorses the recommendation that the minimum English language standard be set at an International English Language Testing System (IELTS) score of 7 for all four components of listening, reading, writing and speaking.

The NSW Psychologists Registration Board acknowledges that the National Boards may differ in relation to the remaining standards of Section 2 of the consultation paper. However, in relation to the regulation of psychology it endorses the proposal that all psychologists hold current professional indemnity insurance that covers the professional (and thus his or her clients) for civil liability (both retrospectively and prospectively). The 'cover' in relation to that insurance should be in relation to 'the practice of psychology', broadly defined.

Without entering into a discussion on the benefit of specialist and generalist registration, the Board endorses the proposal that psychologists be expected to undertake at least 30 hours of continuing professional development (CPD) each year, and that at least a minimum of 10 hours per annum be devoted to supervision. However the Board found this section to be confusing, and suggests that the requirements for specialist, generalist and specialist + generalist CPD be more clearly specified, if these categories of registration are to be introduced, following the current consultation. For example, where both generalist and specialist registration are held, the psychologist will be expected to undertake a minimum of 15 hours additional CPD (with at least 15 hours related to the area of specialization). The Board agrees that random audits are a way in which this standard can be monitored, and that this will be done under procedures set up by the National Board. However, in so far as those audits may have disciplinary dimensions and that in NSW these remain under the HCCC, we note that the State Board will continue to have a role. The Board also endorses the recommendations of the *Consultation Paper* in relation to recency of practice.

The NSW Psychologists Registration Board appreciates the opportunity to comment upon the *Consultation Paper*. In terms of future deliberations by the Psychology Board of Australia, the NSW Board proposes that whatever disciplinary matters are put in place, the Rules, Guidelines, Policy, Processes and Procedures developed by the National Board, could usefully draw on the State Boards' input into the planning process. In particular, the NSW Board has (a) experience in these matters as managing the largest number of registered psychologists in Australia, and (b) its unique position within the new regulatory framework due to the continuation of the HCCC in NSW.

Finally, the Board recommends the following modifications to the text of the *Consultation Paper*:

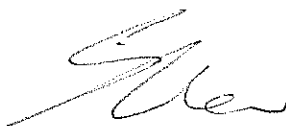
Page 4: A reference to rehabilitation achieved and assessed as likely under 'dot point' third from bottom "... including rehabilitation achieved or assessed as likely in future".

Page 5: Under the second 'dot point' there perhaps should be a reference to a formal risk assessment process

Page 8: Add 'and relevant professional Guidelines' after "codes or ethics" in point 2.

The Board thanks the Psychology Board of Australia for the opportunity to comment on the *Consultation Paper*.

Yours sincerely



Mary Shanahan  
**REGISTRAR**