



***Psychologists Registration Board of Tasmania***

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National Registration/Registration Sids/Response psychs

24 November 2009

Assoc Professor Brin Grenyer  
Chairman  
Psychology Board of Australia

E-mail: [natboards@dhs.vic.gov.au](mailto:natboards@dhs.vic.gov.au)

Dear Brin,

**NATIONAL REGISTRATION AND ACCREDITATION SCHEME  
CONSULTATION ON REGISTRATION STANDARDS**

The Psychologists Registration Board of Tasmania wishes to provide the following feedback on the draft registration standards issued by the Psychology Board of Australia for comment:

**1. Criminal history**

This standard appears to apply to students registered under the National Law. It is not yet apparent whether there will be any student registration for psychologists. However if there is, then all students will need to be made aware, from the time that they commence their studies, of the requirements and effect of this standard. Students in breach of the standard may be prevented from completing their course due to an inability to complete any clinical components for which student registration would be required. Universities need to be made aware of the implications and address this.

**2. English language**

It is noted that students will need to meet the standard of IELTS 7 at the time they are required to be registered under the National Law. The Tasmanian Board has the same concerns about the implications for students and universities as expressed above.

**3. Professional Indemnity Insurance (PII)**

The Board supports the application of this standard but questions whether the scope of the standard should not exclude non-practising registrants as they are required to have runoff cover.

The Board considers that requirement 2 is unnecessary and may be confusing as it does not refer to the core coverage of PII such as negligence, misdiagnosis, malpractice etc.

The distinction between requirements 7 and 8 is unclear and requirement 9 does not appear to be an alternative but merely an extension of requirement 7.

#### **4. Continuing professional development**

This Board does not support the exclusion of provisional registrants from the scope of application of the standard. Provisional registrants should be required to undertake CPD.

It is suggested that, similar to other professions, psychologists be required to maintain a portfolio which would incorporate their learning plan, records of their CPD activities and a review of how their learning plan has been met by these activities. These portfolios would then form the basis for the random audit by the Board.

#### **5. Recency of practice**

The Board considers that the standard should be more specific in terms of what is considered to be a sufficient amount of time spent practising psychology to meet the objective of maintaining competency. For example it would not seem appropriate for a psychologist to "practise" for half a day every three years, yet they would meet the requirement of the standard in its current form.

#### **6. Specialties**

The board supports the specialties proposed.

#### **7. Endorsements**

The Board supports the standard for endorsement as a psychology supervisor.

If you have any queries in relation to the points raised in this submission, please do not hesitate to contact me.

Yours sincerely,



**JAYNE WILSON**  
Registrar