



To whom it may concern:

I write to express my concerns with the national PBA proposals as to how the new national registration framework will operate for psychologists from 1 July 2010.

Organisational psychology is the science of people at work. Organisational Psychologists analyse organisations and their people, and devise strategies to recruit, motivate, develop, change and inspire.

My primary concern is addressed in the APS College of Organisational Psychologists' National Regulatory Developments Working Party (NRDWP) draft response submitted to you on behalf of the profession: The PBA's view of the profession is clinically biased and this bias pervades its construction of the internship program. As the PBA notes in the second paragraph: 'The Board has an obligation to the community that all psychologists who hold registration are safe and competent to practice psychology, including delivering psychotherapy for mental health problems using focused psychological strategies.' The first part of the sentence is incontestable, but the second is a *non sequitur*. Focused psychotherapy is not the core of the practice of psychology, and only those with a clinical bias would see it so.

This statement contrasts with the broader recognition by the Board noted earlier: '...the Board recognises that significant numbers of psychologists provide essential services beyond the health system' (Proposal for a Code of Ethics, p. 1), and its recognition later (p. 9) that students in undertaking supervision have or should have a career plan and that this can quite legitimately not include health-related psychology. It contrasts too with the Ministerial Council's approval, noted earlier, of a number of areas of practice in psychology. The PBA needs to take the broader view of the profession captured in these statements in developing its internship program.

In summary, the PBA needs to rethink its approach to internship training and develop a more realistic and coherent view of what is to be expected of a person entering the psychology profession, and what can be achieved in an internship program that recognises the range of services delivered by psychologists in and beyond health.

For example:

Provide for an internship program in organisational psychology that meets the realities of employment and that specifies

- Only one placement or work role, with additional placements recommended but optional, depending on employment conditions and experience options
- The provisional psychologist to develop skills in assessment and intervention appropriate to the field of organisational psychology, which does not require clinical subjects such as diagnosis of psychological disorder, study of systems of psychiatric diagnosis, or focused psychotherapy
- The provisional psychologist to study the application of modern psychometric theory and be familiar with a

range of psychometric tests used in organisational psychology, but not require the development of knowledge or skill in the use of individual intelligence or specialised memory tests used in clinical settings

- Familiarity with working with clients in one of the three age groups, adolescence, adulthood, or late adulthood, and no requirement for familiarity in working with children

With regards

Marianne Coughlin