

To the Psychology Board of Australia,

Re: Consultation Paper on Codes and Guidelines issued by the Psychology Board of Australia, March 2010

I would like to begin by commending the Board on the extensive work completed on the proposed Psychology Codes and Guidelines. Clearly a significant effort has been made over quite a tight timeframe. This is particularly appreciated as these Guidelines go a significant way towards clarifying the framework under which all psychologists will be working under the new national regulatory system.

I am also heartened to see acknowledgement in some parts of the Consultation Paper that the Board recognises that not all psychologists work in the health system. The challenge for the Board, as it is for all psychologists working outside the health system, is to ensure that the new Codes and Guidelines can be comfortably and clearly applied to the diverse range of psychology roles that are currently performed in Australia. That is why this consultation process is a much valued opportunity to help the Board identify any areas of the proposed Codes and Guidelines that don't sit comfortably with some parts of the psychology profession, or that are potentially ambiguous in interpretation. Accordingly, I thank you for this opportunity to contribute to the refinement of the Codes and Guidelines.

As an organisational psychologist, I particularly reviewed the proposed Codes and Guidelines from the perspective of those of us psychologists that work solely in the business world. Our focus day-to-day and year-to-year is assisting public, private and not-for-profit organisations in the strengthening of their employees' capability and the ultimate enhancement of their operations, performance and delivery of services to the public. There were a number of aspects of your Paper that warranted detailed comment - but rather than detail those areas in this email I will instead refer you to the Submission to the Board prepared by the APS College of Organisational Psychologists on this matter. The College of Organisational Psychologists Submission is thorough, and in my view a good representation of the concerns and ideas, recommendations and needs that organisational psychologists will be looking for the Board to address. I look forward to seeing the Board's response to that Submission.

Across the entire Consultation Paper, the matter that stood out for me personally as most alarming was the statement made in relation to internships on page 53-54, which seemed to be a summary of the Board's view of the future of psychology in Australia: "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." I fundamentally disagree with this. The Paper also states "As psychologists often change the direction of their career over time however, the Board considers it essential that provisional psychologists undertake a broad generalist training program in the practice of the profession prior to being granted general registration." This is certainly not true for organisational psychologists - we do not change careers in terms of specialty. I can say this with confidence as I have been highly active in my specialty, organisational psychology, over many years, including recently performing the role of National Chair of the APS College of Organisational Psychologists (2006-2009). I have never come across an organisational psychologist who has left the specialty to re-emerge as a different kind of psychologist.

So I put it to you that there is absolutely no necessity for any organisational psychologist to train in anything other than their speciality for their 4th and 5th years of training and supervision. As a professional, you work within your area of training and capability, and it is unethical to go beyond those boundaries. If the Government or other stakeholders in the health system are worried about psychologists from outside the health system crossing those boundaries to apply for Medicare provider numbers in order to join the health system, then they should be advised and reassured that this is simply not possible for a professional psychologist to do. Our Professional Code of Conduct and Ethics (on which future registration is also going to be based) ensures we work only in those areas for which we have been trained. Hence the implication that psychologists working outside the health system might be tempted to cross the line and do the wrong thing is offensive, to say the least.

Making all probationary psychologists do mental health placements feels to me like the tail wagging the dog. It feels like the Board may be endeavouring to rewrite the definition of the profession to suit the health system. If adjustments are still sought to be needed to maintain public safety then I think it would be far simpler and less damaging to the psychology profession if the Medicare system tightened its entry requirements for psychologists such that it only allowed those with the pertinent health system-related psychology qualifications to be given a Provider Number. Then the rest of the profession of psychology would not need to make such significant sacrifices for the sake of the health system (e.g. finding placements to cover topics of little ongoing value to either party, which then replace highly relevant specialty-specific placements). Medicare has not been, and should never be, a mandatory part of being a psychologist.

This is the most critical issue from the Paper that I wished to comment upon in this response. I do not wish to see psychology reduced in its diversity and contribution, which will surely happen if non-health speciality training is to be eroded by additional hours of mental health training. I hope this commentary helps ensure this does not happen. Thank you in advance for taking my submission into consideration.

Yours sincerely



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