



14 April 2010

Assoc Professor Brin Grenyer,
Chair
Psychology Board of Australia

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Dear Assoc Professor Grenyer

The Psychologists Registration Board of Tasmania has reviewed the Consultation Paper on codes and guidelines issued by the Psychology Board of Australia.

The Board wishes to provide the following comments:

General

As a general comment the Board believes that the lack of a clear statement at the beginning of each document indicating its status and the authority it holds (regulatory or advisory) creates confusion, particularly when combined with the varying and inconsistent terminology used throughout the documents. For example, on page 7 of the Guidelines for advertising, in the first column, paragraph 3, dot point list, practitioners: 'are advised against', 'should not', 'must not'.

The Board recommends that an explanatory note referring especially to Section 41 of the National Law be added to the introduction of each document. Additionally terminology used should be reviewed to ensure consistency and clarity throughout the documents.

Guidelines on advertising

Page 2, column 2: Include the website addresses for the State and Territory Fair Trading Acts.

Page 3, column 2, paragraph 1: Add 'or media and advertising agencies' to the second sentence.

Page 4, 5 (b): Include an example relevant to psychologists to ensure the meaning of the paragraph is clear to non-psychologists.

Page 6, first paragraph: This paragraph should be rephrased to clarify how this applies to doctorates gained by a psychologist in other disciplines.

Guidelines on mandatory notification

General Obligations:

A comment on the consequences of mischievous or frivolous reporting should be included in the Guidelines.

An explanation of the differences between voluntary and mandatory reporting including protections if reporting is voluntary should also be added.

Section 2, paragraph 2: The last sentence is unclear and should be rewritten. The implications regarding patient confidentiality for treating practitioners should be clarified.

Page 4, column 2, paragraph 1: Clarification is required as to whether this paragraph also applies to practitioners conducting human research with ethical approval, given that innovative practices may be employed.

Page 7, column 2, editorial errors:

Section 41: spacing error between co-regulatory and jurisdiction

Section 140 the list should commence with a) not c)

Section 140 f): the bracket in front of 'placed' should be removed.

Code of conduct for psychologists

Paragraph 2, list point b): It is unclear whether it is the intention of the Psychology Board of Australia (PBA) to develop a new code of ethics in addition to the Australian Psychological Society (APS) code of ethics.

The Board does not believe it would be useful for the practice of psychology to have two national codes of ethics and urges the PBA to work with the APS to develop a joint code.

The Board recommends that in addition to the website address provided for the APS Code of Ethics, website addresses for existing State/Territory codes also be provided to ensure informed discussion as part of the consultation process.

Continuing professional development policy

Peer consultation

This section requires clarification to clearly indicate whether all the hours spent in a group peer consultation may be counted as professional development or whether this applies only to those hours spent discussing a psychologist's own practise.

References

To ensure clarity this paragraph should include 'see Attachment B'

Guidelines on area of practice endorsements

References

To ensure clarity this paragraph should include 'see Attachment A'

Guidelines for 4+2 internship program: provisional psychologists and supervisors

The guidelines deal comprehensively with the roles of the supervisor and intern and their relationship. However, even though the PBA's core duty is that of protecting the public, the primacy of the client's well being is referred to only briefly throughout the guidelines.

The Board recommends that an additional section be inserted in the introduction of the guidelines clearly dealing with the primacy of the client's well-being.

Post Graduate students who are also employed as provisionally registered psychologists

The Tasmanian Board currently grants provisional registration to post graduate students wishing to take up employment as a psychologist outside of their PG clinical placement requirements. Such provisional registrants are currently required to lodge the same supervision documentation and to seek approval from the Board for their employment as a 4+2 provisional registrant, while still maintaining their six year degree pathway to full registration.

These provisionally registered psychologists are employed in a range of occupations throughout Tasmania and the Board is concerned that if they are no longer able to work as psychologists it will cause serious workforce issues, particularly in the public sector where the clients are the most disadvantaged groups

The Board requires clarification regarding post graduate students following a six year pathway to full registration as a psychologist who are also employed as provisionally registered psychologists and recommends that a section specifically dealing with this be included in these guidelines.

4. Internship program: psychological practice and professional development

4.4 Professional development: objectives and requirements

To what extent will opportunities for training in these competencies be available in Tasmania? Does the Board have a responsibility to provide them?

5. Supervision

5.1 Definition and aims

Page 10, column 1, fifth dot point: payment arrangements of supervisors is mentioned here but nowhere else in the document. Should there to be guidelines on what the payment rates may be or how agreement on payment is reached?

6 Core capabilities for the internship program

6.3 The core capabilities

Research and evaluation

Page 17, column 2, first point d): This point should also include 'disposal' or 'destruction' of data. This is considered a serious issue by human research ethics committees.

Ethical legal and professional matters

Page 18, Knowledge of legal issues: Add 'ethical human research' to the list.

7 Supervised practice program

7.3 Change in supervisory arrangements

Page 21, column 1, paragraph 2: The transitional progress report should be provided to the provisional psychologist as well as the Board, especially in view of the second sentence.

8 Recording and reporting requirements

8.2 Progress and transitional reports

Page 22, column 2, Transitional report: Should be provided to the provisional psychologist as well as to the Board.

9 Information for principal and secondary supervisors

9.2 Responsibilities of principal supervisors

Page 23, paragraph 2: The appointment of 'secondary supervisor(s)' is referred to here but not spelled out or even referred to elsewhere in the document. The paragraph needs to be expanded to clarify the role and intent of a secondary supervisor or multiple secondary supervisors.

Page 26, column 1 – editorial error

Final paragraph: third last line change 'me' to 'met'.

Yours sincerely



JAYNE WILSON
Registrar