

20 December 2010

Professor Brin Grenyer  
Chair  
Psychology Board of Australia  
GPO Box 9958  
Melbourne Victoria 3001

Dear Professor Grenyer

**Re Consultation Paper 7 – Exposure Draft – Guidelines on area of practice endorsements**

I am one of the many clinical psychology registrars in Western Australia who was approved by the Psychology Board of Western Australia to undertake a board approved supervision contract towards specialist registration as a Clinical Psychologist. I am represented by ACPA however felt the need to also raise my concerns directly with the Board.

Prior to the Health Practitioner Regulation National Law Act 2009 coming into effect for WA, I was practising in the speciality in the health profession, as a clinical psychologist registrar and had commenced diligent undertakings towards completing my supervision for the purpose of gaining specialist registration in Clinical Psychology. I have been assiduously committed to this process, fully funding my own external supervision by a Specialist Clinical Psychologist, knowing that at the completion I too would obtain specialist registration which has been operating in WA for over 30 years.

Just like specialist registration in Clinical Psychology is recognised as a speciality in the community and health profession in WA and in your transitional arrangements, under clause 270 (1) (a) and 270 (1) b (i), 270 (2), supervision too towards specialist registration in Clinical Psychology has been long recognised and accepted in the health profession in our jurisdiction, Western Australia. Additionally this supervision for specialist registration in Clinical Psychology has also been recognised and accepted in several large WA government Departments and Hospitals, non government departments as well as psychological societies and their memberships operating in WA and in Australia including the Australian Psychology Society.

Given the longstanding history and recognition of supervision towards specialist registration, I strongly believe that registrars like myself, who too have invested heavily in terms of our time and monies, should be granted the opportunity to complete our specialist registration as it was intended. We were not afforded the opportunity for consultation and there has been a mountain of information for the profession to digest and then respond to. It is apparent that the PBA is also recognising this as evidenced by their continued submissions and revisions being undertaken.

In keeping with this, just as the PBA have issued recent updates for example approving additional transitional arrangements for students currently in full time or part time Doctorate or Masters programmes, and psychologists who are recent graduates (in the 5 years prior to 1 July 2010), I would ask the Board to consider and approve additional transitional arrangements for psychology

registrars who were, prior to the National Act coming into effect, undertaking Psychology Board of Western Australia - Board Approved supervision contracts in good faith that upon completion they too would secure specialist registration in Clinical Psychology. There was a serious lack of consultation on this issue at the time, so little opportunity to have this particular issue raised and a possible interval for completion set. Therefore this issue is one that should also be seriously reconsidered now during this current submission process.

I also consider this important as specialist registration for those in Western Australia does indeed remain in place and on the National public register until 18 October 2013, and that registrars like myself, as we speak will be completing their two years of professional and specialised registration and all prior to the 18 October 2013. Therefore the Psychology Board of Australia should continue to honour what was intended by the registrations and sanctioned by the Psychology Board of Western Australia and governing Act at the time. Furthermore, we should be distinguishable from those at present that are being transitioned into endorsement with a lack of post graduate training

Lastly, unless interpretations are incorrect, from a perusal of information released by the PBA there is intended to be continued consultation regarding the issue of specialist registration by the Ministerial Council in this intervening period up to 2013, thus the issue should not be considered final.

Thank you for considering the above submission.

Yours sincerely