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**Response by the Academy of Social Sciences in Australia to Consultation Paper 6  
by the Psychology Board of Australia concerning ‘Limited registration for Teaching  
or Research’.**

As Chair of Panel D of the Academy of the Social Sciences in Australia (ASSA), I am writing to represent the views of the Panel D committee and of Fellows in this panel. The great majority of psychologists and educationists who have been elected as ASSA Fellows are members of Panel D. As such, the views expressed below represent those of people who have made outstanding contributions to their disciplines through research, teaching or community activities.

We note that the core proposal of this Consultation Paper is that anyone teaching or carrying out research in psychology would be *required* to obtain ‘Limited registration’. To quote: “Previously individuals who used their psychological skills and knowledge working in areas such as education and research were not considered to be engaging in the practice of psychology and therefore were not required to be registered, but under the new scheme they are required to be registered”. Furthermore, to become registered would involve both satisfying educational criteria such as an Honours degree in Psychology and paying a considerable annual fee.

If adopted, one consequence would be that a large number of people currently making very valuable contributions to teaching and research in psychology would no longer be



able to do so. Psychology is both a discipline and a profession. The success of the profession is predicated on the continually expanding scientific body of knowledge about mind, brain and behaviour. Many current innovations in research and some areas of teaching occur at the interface between psychology and other disciplines such as statistics, computing, neuroscience, physics, pharmacology, linguistics and philosophy. A healthy research and teaching environment involves collaboration with other disciplines in research and teaching. To require those teaching and doing research in psychology to have limited registration is simply not in the best interests of the discipline, the profession, or scholarship generally nor the public at large.

The impact would not be restricted to departments of psychology, but would also affect, for example, teaching and research in educational psychology within departments of education. We call for retraction of this Consultation Paper for the following main reasons:

1. It is inconsistent with both the letter and the intent of the National Law on 'Health Practitioner Regulation'. This provides an opportunity for appropriate people who are not health practitioners to obtain 'Limited registration' *if they so wish*. (See attached document by Diamond and O'Brien-Malone that spells out this point in detail.)
2. Even if modified to require that anyone teaching in postgraduate professional psychology courses, such as clinical psychology or neuropsychology, must be registered, it would be retrograde step. For example, in many postgraduate Clinical Psychology courses an important unit in psychopharmacology is very appropriately taught by experts in this field, many of whom would be unable or unwilling to become registered for the sole privilege of being able to teach in this unit. After all, medical students are typically taught by a range of specialists without medical degrees.



3. This proposal represents a misplaced extension of legislation concerning the 'Australian Health Workforce' to academics and researchers who cannot in any sense be described as health professionals. This is a result of the proposal's much broadened definition of practice taken from the Psychology Board of Australia's 'Recency of Practice' registration standard. This contains the phrase, "For the purpose of this registration standard...." immediately prior to the paragraph quoted in the recent consultation document. The reasons for adopting such a broad definition in the context of recency of practice are plain, but do not translate to the need or justification for such a broad definition of practice in general.

The title of 'Psychologist' is only protected under law to the extent that it cannot be used where it might reasonably be expected to induce a false belief that a person is registered under law as a psychologist practicing as a health professional. This is simply not the case for most academics and does not prevent them from using this descriptive title in the course of teaching or research.

Yours sincerely,

A handwritten signature in black ink, appearing to read "R.A. Brooks".