



THE AUSTRALIAN
CLINICAL PSYCHOLOGY
ASSOCIATION

Submission in response to Consultation Paper 6:
Limited Registration for Teaching or Research

Contact:

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Professor Brin Grenyer,
Chair, Psychology Board of Australia
3rd December, 2010.

Dear Professor Grenyer,

We appreciate the opportunity to respond to the Psychology Board of Australia's (PBA) Consultation Paper 6 on Limited Registration for Teaching and Research Psychologists. While the Australian Clinical Psychology Association (ACPA) fully supports the proposals put forward in this document in regard to teaching and research psychologists having the scope of Limited Registration. This support is based on the underlying premise that this form of registration is available to those academics and researchers who wish to use the protected title of 'psychologist,' and it is not mandated that all academics and researchers in psychology are required to register. We would also like to ensure that this option is not available to those teaching on professional training programs where the Australian Accreditation Council has deemed it necessary for full registration to be required. We believe that these two points require clarification in the guidelines for Limited Registration.

We are, however, deeply concerned that the proposed definition of practice represents a significant danger to the public, particularly as applied to areas of clinical endorsement (clinical psychology, clinical neuropsychology and forensic psychology). In these scopes of practice it would be expected by any reasonable person that recency of practice requirements to mean practice specifically involving clinical populations. The proposal of Limited Registration for those involved in teaching or research addresses the need to register psychologists who are not providing direct services of a psychological nature to clients, but who are training for or undertaking key roles and duties that are central to the field of psychology. It does not resolve the issue of those "working in management, administration ... advisory, regulatory or policy development roles," not being required to meet recency of practice standards in areas of clinical endorsement and the risk this poses to the public.

In terms of re-registration, we would question the rationale for any requirement that includes standards not applied to other forms of registration, such as feedback from the employer or educational institution. Given that other forms of registration for psychologists do not require such feedback, it is considered fairer that the PBA should simply review notifications lodged with and/or disciplinary action taken by the Board to determine suitability for re-registration.

In regard to fees, we are deeply concerned about the costs of application and registration fees for students for all types of registration. The application fee and annual fee when combined are exorbitant for these members of the profession who are under significant financial pressure. We strongly recommend that student fees be reviewed for all forms of registration and any shortfall in revenue be rectified through increased fees for those members of the profession who have completed all training requirements, including registrar programs.

In terms of the proposals in Consultation Paper 6, we support a waiver of the application fee for those who are employed in their current position and practising within the definition of the Limited

Registration and have not previously been required to register. We also support a waiver of the application fee where psychologists apply for re-registration in the Limited Registration category prior the expiry of their previous period of Limited Registration, as other categories of registrants are not required to pay application fees every three years. Finally, we support the introduction of pro rata fees as proposed to enable the Board to grant temporary or short-term registration.

Thank you for this opportunity to comment on this registration category that relates specifically to research and teaching psychologists.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Judy Hyde', written in a cursive style.

Dr Judy Hyde

President, Australian Clinical Psychology Association