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Professor Brin Grenyer
Chair, Psychology Board of Australia
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Dear Professor Grenyer

I write in response to the Psychology Board of Australia's discussion paper entitled *Limited Registration for Teaching or Research*. Having reviewed this proposal, I must express Victoria University's concern about its direction and content. The intent of the proposal is unclear, but the impacts on the recruitment and staffing of universities is a challenge if the proposal were adopted as set out.

The way the proposal is currently expressed would require mandatory Registration of all psychologically qualified academic staff in our Psychology program, in other Schools of the University, and in administrative areas in which staff with Psychology training are employed. The cost and time involved in obtaining and maintaining Registration would be an impost on the staff and the University for what appears to be little protection of the public.

Much of the problem with the proposal is related to the definition of practice that is put forward. Indeed, that definition is so all encompassing that almost any activity that staff with Psychology qualifications undertook would require Registration. That is, the person may have a role as a marketing officer – using skills and knowledge from their Psychology training – and this would require Registration. There are many staff with Psychology training who undertake roles with the administration of universities, because a background knowledge of Psychology and some skills are very valuable. However, they are not practising as Psychologists in the normal understanding of the term.

I use these examples to demonstrate the potential intrusion on universities' hiring and employment practices inherent in the proposal. As stated, the employment of staff is based on a range of factors, and their duties are also based on a range of factors. If they had to hold Registration to be employed, then universities could look to other disciplines when hiring their staff. In this way, the proposal could actually be a detriment to the employment prospects of Psychology graduates.

Academic staff are employed to undertake a range of activities from teaching to research, from thesis supervision to administration. Psychological practice is limited to a few staff in quite specific areas of endeavour, and these members are required to hold the appropriate level of professional qualifications and recognition. For example, Clinical Psychology supervision and clinic work is clearly an area in which academic staff would hold Registration.



The nexus between what appears to be mandatory Registration and employment is of importance to the independence of universities. The clause that indicates that continued Registration can be based on the quality of the staff member's employment performance is outside the scope of the Board. How we judge our staffs' performance is our business – and is clearly governed by privacy legislation in the state and nationally. How the Psychology Board would presume to be able to judge is a mystery.

It has apparently been indicated to the Head of Psychology at VU that this proposal may in fact be a voluntary scheme in which academic staff could gain temporary Registration to meet specific limited work demands. If that is the intention, the current proposal should be withdrawn and replaced by one in which the voluntary nature is highlighted and the definition of practice is narrowed to provide a realistic picture of the nature of practice that would be covered.

As it stands, this proposal is an intrusion into the relationship between universities and their staff. It provides no clear rationale, and there is no clear benefit identified for individuals to take out this Registration.

Yours sincerely

Professor Linda Rosenman
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