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Attention: Chair, Psychology Board Endorsement Guideline

Dear Brin,

Thank you for providing the opportunity for the School of Psychology at the University of Sydney to respond to Consultation Paper 6, "Proposed registration standard – Limited Registration for Teaching and Research".

This Consultation Paper has created considerable controversy among academics who have interpreted it as stating that, because of the PBA's broad definition of the practice of psychology, limited registration will be mandatory for individuals who engage in teaching or research in psychology. You have provided written assurance to HODSPA that "there is no intention to make registration mandatory" for academics "who would not identify or call themselves a 'psychologist'", because it is this title that is protected. While understanding and endorsing the importance of legally protecting use of the title of psychologist by those who present themselves as health professionals, we support the Psychology Foundation's submission in calling for a clear response from the PBA to the claims that it is exceeding its legal powers and obligations, and practice in other health professions, by extending the definition of psychologist outside the domain of the professional provision of health services. We also endorse the Psychology Foundation's elaboration of the range of negative implications of the PBA's excessively broad definition of the practice of psychology for both the profession and discipline.

We therefore support the submissions by HODSPA, the Psychology Foundation and others in calling for the Consultation Paper to be rewritten to make explicit that any form of Limited Registration is optional, and directed towards only those academics and researchers who wish to use the protected title 'psychologist' "in a way that could be reasonably expected to induce a belief the person is registered under this Law in the profession", since that is the context in which the use of the title is protected. The question that would then need to be addressed is whether there is a demand for this qualified version of 'Limited Registration' and what role it would serve.

If such a form of Limited Registration *were* available for the small number of teachers and researchers in psychology who wished to pursue it, a number of safeguards would need to be implemented to ensure that it did not negatively impact on standards for psychology training and the protection of the public.

Specifically, there would need to be an explicit statement in accreditation standards that academic staff who teach substantially on professional post-graduate courses have full registration. If these programs come to be taught largely by individuals with Limited Registration, there will be a dilution of standards for staffing of professional courses, with potential flow-on effects for the quality of professional teaching within those courses. While accreditation falls within the province of the Australian Psychology Accreditation Council, we believe that the PBA has a duty to ensure that the introduction of Limited Registration does not have unintended consequences.

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Secondly, as registration falls within under the Health Practitioner Regulation National Law, and its main purpose is protection of the public, it is essential that the information on the register explicitly states that psychologists with Limited Registration for Teaching and Research cannot undertake any clinical practice. It is essential that the public is accurately informed about this constraint on Limited Registration to avoid confusion in the community about the meaning of the title 'psychologist; and ensure that any risk of psychologists practicing outside their competence is minimised.

Yours sincerely

Sally Andrews