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PROFESSOR DARYL LE GREW, VICE-CHANCELLOR

20 December 2010

The Chair, Professor Brin Grenyer Psychology Board of Australia GPO Box 9958 Melbourne VIC 3001

Dear Professor Grenyer

<u>Proposed registration standard – Limited Registration for Teaching or Research</u>

The discussion paper from the PBA on Limited Registration (Discussion Paper No 6) has been brought to my attention by the Head of the School of Psychology at this University.

In the previous system of registering psychology practitioners, only those who proposed to directly interact with clients by providing psychological services were required to be registered in the state in which they operated. The definition of Psychological Practice proposed in this discussion paper seems to be much more far reaching than previous definitions and therefore captures many more people who might be involved in some way with psychology, particularly in education and research.

It has been raised with me, as the Vice Chancellor of this University, that this change in approach to registering practitioners seems problematic from a number of perspectives. I am advised it will include all staff who teach even undergraduate students, some of whom might not even be studying a psychology major or even be located in the School of Psychology. Such staff may be short term contract or casual employees as well as profile academic staff. I am also informed that it would include all staff and students conducting research in psychology, whether they are engaged in teaching or not. I can foresee major implications in recruiting part time staff and research assistants, as well as post graduate students (other than those training to be clinical psychologists) as the fees would be a deterrent to these employees

and students, thus compromising teaching and research activity in the School.

The University has very rigorous human ethics in research processes, and your own body (through APAC) accredits the School every five years. The combination of these rigorous processes should cover sound practice in psychological research and the quality and credentials of staffing in the School. Universities such as this one also have policies and procedures in place to allow students and the community to lodge complaints about staff in teaching and research.

It also has been raised with me that the need for Limited Registration has been created by the definition of psychological practice, and that if a more mainstream definition of practice was adopted, the Limited Registration category might not be needed. There is concern that the distinction between the discipline and the profession of psychology, and the distinction between undergraduate degrees and postgraduate professional training degrees is ignored, with the risk being, that teaching in undergraduate units of study is far removed from directly influencing postgraduate professional psychology students and the provision of clinical services.

I hope you will be able to consider these concerns as part of review process.

Yours sincerely

Daryl Le Grew

Vice-Chancellor