

# PSYCHOLOGISTS REGISTRATION BOARD OF VICTORIA

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This submission is made by the Psychologists Registration Board of Victoria ('PRBV') in relation to the Consultation paper on Other matters for inclusion in Bill B under the National Registration and Accreditation Scheme for the Health Professions.

If you have any queries on these responses please contact the Chief Executive Officer: Ms Melanie Saba, 03 9629 8722 or [melanie.saba@psychreg.vic.gov.au](mailto:melanie.saba@psychreg.vic.gov.au)

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The PRBV offers these comments on key issues;

## PRBV comments on Proposal 3.5.3:

PRBV supports the above proposal with the following additional comment; there should be times where a lawyer member should be prescribed e.g. health panels.

## PRBV comments on Proposal 3.6.1:

- Disagree with dot point two- if a delegation is properly performed, then the decision is a decision of the board, and should only be able to be reviewed for the same reasons as a decision of the board itself
- Disagree with dot point three- immediate suspension only occurs when public safety is at risk, and adding a time requirement for review only adds to administrative burden and cost. Practitioners should be able to provide additional information to a board at any time if they believe the board should reconsider a decision to suspend registration
- Do concepts such as conflict of interest, procedural fairness and separation of powers require enshrinement in this Act if they are defined in complementary legislation and case law or could be encapsulated within policy?

## PRBV comments on Proposal 4.1.1:

PRBV supports Option 1.

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## PRBV comments on Proposal 4.1.2:

PRBV supports Option 1.

## PRBV comments on Proposal 4.1.3:

PRBV would support a model which mimics the model in place in Victoria pursuant to the *Health Professions Registration Act 2005*.

## PRBV comments on Proposal 5.1:

PRBV support a mixture of Option 1 and 4.

## PRBV comments on Proposal 5.2.3:

PRBV agree however would like to ensure the existing case law applies.

## PRBV comments on Proposal 5.2.5:

PRBV recommends that the financial accountability provisions should reflect best practice as outlined in existing State and Commonwealth Acts. It should also include governance principles.

## PRBV comments on Proposal 5.2.6:

PRBV recommends that these provisions should also reflect best practice and include governance principles.

## PRBV comments on Proposal 5.2.7:

PRBV suggests the incorporation the Commonwealth Acts Interpretation Act. This Act has been interpreted by the High Court on numerous occasions and thus the rules of interpretation are well understood.

## PRBV comments on Proposal 5.2.10:

PRBV prefer Option 4. The provisions would then ensure consistency between the States and territories and make it much easier for overseas visiting practitioners.