



PSYCHOLOGY PRIVATE AUSTRALIA Inc.

THE FEDERATION OF ORGANISATIONS OF PRIVATELY PRACTISING PSYCHOLOGISTS OF AUSTRALIA

<http://www.psychologyprivate.org>

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Association of Private Practising Psychologists (NT)
Association of private Practising Psychologists (QLD)
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Australian College of Psychologists in Clinical Private Practice (ACT)
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OTHER MATTERS SUBMISSION

ATTENTION: PRACTITIONER REGULATION SUBCOMMITTEE

From: Psychology Private Australia Inc. (PPAI)

Date: 23 December 2008

Introductory Comment

Generally, this paper has caught up and brought together very well, matters that have appeared in earlier consultation papers. However, there are a few issues on which PPAI wishes to make a comment.

Matters for Comment

3.2 *The national scheme environment*

2nd and 4th paragraphs – *differing functions of the national boards as against local State/Territory Boards*

3.3 *Types of committees*

2nd dot point – *‘delegated’ committees*

Comment:

(1) State and Territory Boards as existing on the day immediately prior to the date of introduction of the national registration scheme could be the actual ‘delegated’ committees to handle respective State/Territory operational matters in process, on the **next day under ‘transitional privilege’ in respect of conditions under which persons who were existing registrants or applicants for registration were being treated on the preceding day.**

(2) We may have missed reference to ‘transitional privilege’ provisions being included in Bill B. It is important that no individual – a registrant, an applicant for registration or a complainant member of the public be disadvantaged, hindered or delayed by the disappearance of a scheme existing one day and the emergence of another scheme on the next day.

Recommendation:

Appropriate provisions be included in Bill B to ensure the smoothest transition as possible from the old to the new registration, accreditation, complaints schemes.

Proposal 3.5.1 *More Flexible Committee Arrangements*

Comment:

We agree with the suggestion that there be as few as possible statutory committees established under legislation, and that national boards have maximum discretion to delegate decision-making to ‘delegated’ persons or committees.

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Proposals 3.5.2 to 3.6.1 *Provisions consequential to 3.5.1*

In general we agree with the content of these proposals and wish to compliment the authors of the consultation paper on the thoroughness of the way in which they have thought through the consequences of a decision that might be consonant with Proposal 3.5.1.

Susanne M Wilkie
President, PPAI

Edwin P Milliken
Secretary, PPAI