



This submission is made by the Council of Psychologists Registration Boards of Australasia Inc in relation to the Consultation Paper on Proposed Registration Arrangements under the National Registration and Accreditation Scheme for the Health Professions. It results from consultations amongst the Boards and presents their united view.

This paper lists the responses of the CPRB to the proposals put forward in the consultation paper listed by proposal. Attached is the original document with the CPRB responses highlighted in yellow throughout the document.

**If you have any queries on these responses please contact the Executive Officer:
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Responses

Proposal 4.1.1:

CPRB supports the making of enquiries regarding registration on line but has concerns regarding authentication of documentation and identification of applicants in an on-line application process. Fail proof procedures would need to be developed to enable direct verification of the information detailed below in 4.2.

CPRB supports the availability of on-line re-registration with payment by BPay or other electronic transfer. There needs to be a means for making legal declarations incorporated into this process to cover issues such as competency, fitness to practice, convictions, Professional Indemnity arrangements etc.

Proposal 4.2.1:

CPRB supports the information required in 4.2 for initial application for registration. Evidence to prove identification should also be required and also English language proficiency.

Proposal 4.3.1:

CPRB supports Option 3. CPRB considers that criminal history checks are important on initial registration as psychologists are often in close relationships with vulnerable members of the public. It is preferable to obtain a declaration from the practitioner every year rather than obtaining criminal history checks every year.

Proposals 5.1, 5.2 and 5.3:

CPRB supports the proposal that the national board has the power to prescribe the necessary qualifications, periods of internships and examinations required for registration.

Proposals 6.1.1 and 6.1.2:

CPRB supports the powers outlined in 6.1 and supports the term “health assessment” in (e).

Proposal 6.2.1:

CPRB supports the proposed structure for local committees responsible for registration except that the Chairperson be a registered psychologist. Such committees should be paid sitting fees and allowances, but CPRB questions whether sitting fees should be set by Ministerial Council. Sitting fees should be set by the National Board within the budget process. It is suggested that legal expertise should be available rather than mandated in the membership.

It is suggested that the number of committee members which forms a quorum should be included in the legislation.

Proposal 6.2.2:

CPRB supports the power of the Board to be able to delegate, in writing, the registration powers with regard to routine registrations to a member of a board or committee or an employee or contractor to the national agency. This is important to allow timely processing of applications.

Proposals 6.3.1 and 6.3.2:

CPRB supports compulsory professional indemnity arrangements, this may be through the employer or through an individual's insurance, and supports the national board issuing a guideline regarding suitable arrangements.

Proposal 6.4.1:

CPRB supports the grounds listed in 6.4.1 for refusal of registration. It suggests j. should include 'or a foreign law'.

Proposal 6.4.2:

CPRB strongly supports the Board having powers to refuse an applicant's fraudulent application and refer the matter to the police.

Proposal 6.5.1 and 6.5.2:

CPRB supports both proposal 6.5.1 and 6.5.2.

Proposal 6.6.1:

CPRB supports initial appeal to the National Board (or its delegated committee) and then, as a last resort, appeal to a State Tribunal

Proposal 7.1:

CPRB supports general registration.

Proposal 7.2:

CPRB supports a "specific registration" for the registration of interns who are required to practise under a supervision plan.

Proposals 7.3.1 and 7.3.2:

CPRB supports a category of non practising registration being available and strongly considers that such registrants should not practise at all.

Proposal 7.4.1:

CPRB supports Option 2 but only for students at the point at which they commence to undertake practical training where they are interacting with members of the public.

Proposal 7.5:

CPRB supports proposal 7.5.

Proposal 8.1.1:

CPRB supports the protection of the title psychologist and the catchall provision. It is important that the public is protected from individuals who use terminology which implies that they have the skills of a registered psychologist.

CPRB does not support the use of courtesy titles in psychology. For example, the title 'Doctor' should only be used by those with relevant doctoral qualifications.

Proposals 8.3.1, 8.4.1, 8.4.2 and 8.5.1:

CPRB does not wish to comment on these proposals

Proposals 9.2.1 and 9.2.2:

CPRB supports proposals 9.2.1 and 9.2.2

Proposal 9.3.1:

CPRB supports proposal 9.3.1. However under 9.3.1 (b) all charges and convictions and findings of guilt by a court or tribunal should be notified to the Board. A practitioner's ability to practise should be left to the discretion of the Board. A person may be found guilty of an offence but might not receive a term of imprisonment. This does not necessarily lessen the seriousness of the offence, particularly as it relates to professional practice and close dealings with members of the public.

9.3.1 (c) should refer to professional negligence not medical negligence.

Proposal 9.4.1:

CPRB supports proposal 9.4.1

Proposal 9.4.2:

CPRB supports proposal 9.4.2

Proposal 9.4.3:

CPRB supports proposal 9.4.3 with the same comments as for 9.3.1 above.

9.4.3 (b) should be changed to "any professional negligence claims". In addition, there should be a more general requirement to notify for suspension or termination of employment for reasons of impairment, misconduct or incompetence.

Proposals 10.1.1 and 10.1.3:

CPRB supports the proposals of 10.1 on the basis that it is in the public interest for psychologists who possess specialist qualifications to be identified in the register. It also supports the power to be able to prevent unauthorised practitioners from holding themselves out as a specialist. CPRB supports the use of endorsement to general registration to cover areas of specialist practice such as clinical psychology, forensic psychology, organisational psychology, counselling psychology, health psychology, community psychology, clinical neuropsychology, sports psychology and

educational psychology. These are specialities recognized by the possession of appropriate postgraduate qualifications.

Proposal 10.2.1:

Prescribing rights exist for psychologists in some overseas jurisdictions. A working party is presently reviewing this for Australian psychologists. CPRB would support this being available for a restricted number of scheduled medicines provided psychologists have adequate training.

Proposal 10.3.1:

CPRB supports proposal 10.3.1. This would allow highly specialised procedures and techniques to be regulated to ensure that only those with appropriate training are endorsed. CPRB supports the use of endorsement to general registration to cover areas of practice such as clinical psychology, forensic psychology, organisational psychology, counselling psychology, health psychology, community psychology, clinical neuropsychology, sports psychology and educational psychology.

Proposal 11.1.1:

CPRB supports proposal 11.1.1

Proposal 11.2.1:

CPRB supports proposal 11.2.1.

Proposal 11.2.2:

CPRB supports proposal 11.2.2.

Proposals 11.2.3 and 11.2.4:

CPRB supports the imposition of a penalty for non notification of change of address, unless there are exceptional circumstances

CPRB would also recommend provision be made in the legislation to impose an obligation on registered practitioners to notify the responsible Board of a change of name.

Proposal 11.2.5:

CPRB supports the requirement for a practice address, with arrangements for those doing locums.

Proposal 11.3.1:

CPRB supports the alternative option that there be no "Grace" period.

Proposal 11.4.1:

CPRB supports the first proposal with a period of five years.

Proposal 11.5.1:

CPRB supports proposal 11.5.1

Proposal 12.1:

CPRB supports proposal 12.1