

Psychologists Registration Board of Western Australia

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Mr Elton Humphery
Committee Secretary
Senate Community Affairs Committee
PO Box 6100
Parliament House
Canberra ACT 2600

Dear Mr Humphery

Inquiry Into The National Registration & Accreditation Scheme For Doctors And Other Health Workers

The Board is in receipt of your letter of 18 June 2009, inviting comment on whether the issues and concerns that were raised in our earlier submission have been satisfied with the release of draft Bill B.

In our earlier submission, we specified a number of significant concerns about the proposed scheme, specifically in terms of its potential impact on professional standards, public safety, and costs. In our view, these concerns have not been satisfied in Bill B. To specify our ongoing concerns in relation to the Bill, we will make reference to particular clauses in the Bill.

The complaints procedures described in Part 8 are a cause of concern for this Board, as they specify a dual complaints assessment procedure, with the inclusion of the Public Interest Assessor in addition to the Board's own processes. This represents a costly and cumbersome procedure to ensure that sufficient attention is paid to the perspective of health consumers. Over some years, this Board has found it to be both efficient and effective to have a consumer representative on the Complaints Assessment Committee as well as the full board, and whose viewpoint carries equal weight to that of the other members.

In clause 10 (4), the concerns we expressed in our earlier response regarding the possibility of lowering of professional standards in order to ensure a greater number of health professionals have been confirmed. Inadequately trained psychologists represent a risk to the general public, as they can frequently be dealing with deeply troubled people. Not only may they be insufficiently trained to adequately assist such people, but they may also compound such people's disturbance and put them at risk to themselves or others.

In clause 12, provision is made for specialist registration of some health professions, but this does not include psychologists. As we stated in our earlier submission, specialist title is an important component of registration, as it provides protection to the public by ensuring that they are consulting properly trained and more highly qualified professionals, and enables them to differentiate between the different types of specialty. This Board has recognised specialist title for many years and strongly supports the inclusion of psychologists as one of the professions with specialist registration. Specialist registration should be based on appropriate high level qualifications, including for example, relevant College membership with the flexibility at its initial introduction to enable those who currently practise at a specialist level to retain this status.

In clause 45, regarding Board membership, we are pleased to see that there is consumer representation, but are disappointed that there is no legal practitioner member. As stated in a previous letter, this Board has found it invaluable to have a legal representative on the Board.

The Board therefore urges the inclusion of both a legal practitioner and consumer on the Board established by Bill B.

This Board has also been a party to the submission on Bill B made by the Council of Psychologists Registration Boards (CPRB) and I enclose a copy of that submission for your information. This submission is fully supported by this Board.

The Board has also made a separate submission on Bill B to the National Registration & Accreditation Implementation Project and I attach a copy of that submission for your information.

Thank you again for this opportunity to submit our comments on the draft Bill.

If you require any further information or clarification, please do not hesitate to contact me.

Yours sincerely

A handwritten signature in black ink, appearing to read 'John Manners', written in a cursive style.

Dr John Manners B.Psych., M.Psych., Ph.D.
Presiding Member
Psychologists Registration Board of Western Australia