

PSYCHOLOGISTS REGISTRATION BOARD OF VICTORIA



The Psychologists Registration Board of Victoria (PRBV) welcomes the opportunity to respond to the Community Affairs Committee enquiry into the National Registration and Accreditation Scheme. PRBV notes that the inquiry is to report on six key areas including:

- (a) the impact of the scheme on state and territory health services;
- (b) the impact of the scheme on patient care and safety;
- (c) the effect of the scheme on standards of training and qualifications of relevant health professionals;
- (d) how the scheme will affect complaints management and disciplinary processes within particular professional streams;
- (e) the appropriate role, if any, in the scheme for state and territory registration boards; and
- (f) alternative models for implementation of the scheme.

PRBV will provide a response to each of the six key areas discussed above. PRBV notes that it is difficult to make a definitive response to some areas of the enquiry with the delay in release of draft legislative which will define the operation of the scheme.

The impact of the scheme on state and territory health services

PRBV believes that there are significant advantages to health services, the public and health practitioners which arise out of the implementation of the national registration and accreditation scheme. These benefits include:

- Consistent national standards for health practitioners which assist in improving patient safety;
- Decreased administrative burden and standardisation of registration requirements for health practitioners which will lead to greater mobility, flexibility and may result in improved workforce supply; and
- One point of contact for health services in relation to health practitioners, which will improve the provision of timely and comprehensive information to health services.

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The impact of the scheme on patient care and safety

PRBV believes that the impact of the scheme on patient care and safety are similar to those listed above for health services. These arise out of consistent national standards, decreased administration burden and standardisation of registration processes and a single point of contact for the public in relation to health practitioners.

PBRV believes that the full impact on patient care can only be evaluated once the legislation governing the scheme has been determined, as the complaints investigation process to be used in the scheme will be vital to the overall effectiveness of national registration and accreditation.

The effect of the scheme on standards of training and qualifications of relevant health professionals

PRBV supports that a single standard for the education and qualifications for registration of health practitioners is a positive outcome for a national registration and accreditation scheme. PRBV asserts that this can only be effective by the continued linkage of the accreditation and registration functions within the one regulatory scheme.

The psychology profession has embraced national standards for qualifications via the establishment of the Australian Psychology Accreditation Council (APAC), which accredits programs of education and training in psychology in Australia on behalf of the State and Territory Registration Boards for the purpose of registration as a psychologist. The Australian Psychology Accreditation Council (APAC) was established in November 2003 by a Memorandum of Understanding between the Council of Psychologists Registration Boards of Australasia (CPRB), and the Australian Psychological Society (APS).

The PRBV is pleased that APAC will continue as the accrediting agency into the new scheme, and believes that the regulatory boards must maintain an active role in APAC and the other accrediting agencies.

Whilst acknowledging that workforce implications must be considered when considering training and qualification requirements, PBRV is concerned if the model allows a Ministerial Council to veto the decisions of national boards in relation to the training and setting of registration qualifications for health practitioners.

How the scheme will affect complaints management and disciplinary processes within particular professional streams

The scheme will ensure consistent standards for the complaints management and disciplinary processes across all of the health professions. These processes should be fair disciplinary procedures that abide by the principles of natural justice and provide for the adequate protection of complainants and practitioners. Any scheme needs to take into account that the disciplinary process maintains the standards of conduct and competence of the profession, and does not necessarily settle the particular

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dispute between the person and the registered practitioner. The purpose of the registration process including the disciplinary scheme is to protect the public.

There should be independent hearings for serious matters by an independent tribunal, where the boards are parties to the matter, as set out in the IGA. However the independent tribunal needs to have an in depth knowledge of the practices of a particular profession, and the standards of conduct and competence the particular profession has developed.

As stated previously it is difficult to respond to this question without the legislation governing the scheme being determined. PRBV has provided responses to the discussions papers and has indicated its concerns if a model, similar to that currently operating in New South Wales is adopted in the national model.

The appropriate role, if any, in the scheme for state and territory registration boards

There will need to be at each State and Territory level representation for each of the health professions. The National Boards should be bodies which determine the needs of their respective health profession in each State and Territory. The National Board will need to consider appropriate arrangements in each State and Territory based on a number of factors including, but not limited to, the number of registrants across the health profession and the numbers of complaints received in each State and Territory.

A simple duplication of the current existing State and Territory boards combined with a National Board will be cost prohibitive for a number of professions, increase the bureaucracy and limit the efficiencies proposed by the scheme.

Alternative models for implementation of the scheme

PRBV has supported the implementation of a national registration and accreditation scheme, and therefore does not support any alternate models for the implementation of the scheme.

Additional Comments

PRBV would like to add the following additional comments. The focus of the regulatory scheme remains on the provision of clinical services within a health care model. The proposed registration and accreditation scheme does not recognise the diversity of specialities within the profession of psychology, such as organisational and educational psychology, which provide significant services to the community, but are not appropriately regulated within a health care regulation and accreditation scheme.

PRBV again emphasises its opposition to the implementation of a New South Wales style complaints management scheme and believes that if implemented, it will only result in increased costs, time delays and decreased efficiencies in complaints handling. Currently other schemes, such as that in operation in Victoria do maintain separation of the profession from the hearings of serious matters, and ensure the involvement of the community on the panels at the Tribunal.

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PRBV has also continued to promote the role of the community in the national scheme, and believes that community members on the current state based boards only enhance their effectiveness.

PRBV does not support any separation of the accreditation and registration function and believes that the regulatory boards must continue to play a role in the accreditation of qualifications that lead to registration.