



This submission is made by the Council of Psychologists Registration Boards of Australasia. It results from consultations amongst the Boards and presents their united view. If you have any queries please contact the Chair, Assoc Professor Brin Grenyer (grenyer@uow.edu.au) or the Executive Officer: Ms Jayne Wilson, 03 62249331 jayne@regboardstas.com.au

---

The Secretary  
Senate Community Affairs Committee  
PO Box 6100  
Parliament House  
Canberra ACT 2600

### **Submission to Inquiry into National Registration and Accreditation Scheme for Doctors and Other Health Workers**

From: Council of Psychologists Registration Boards

The Council of Psychologists Registration Boards (CPRB) welcomes the opportunity to put forward a submission to the Senate Inquiry. The CPRB is the peak body representing the 8 State and Territory Psychology Registration Boards in Australia. It also incorporates the New Zealand Psychology Registration Board although NZ is not part of this submission as it is outside the jurisdiction of the Australian scheme and has chosen to remain silent in this matter.

The CPRB is mostly supportive of a National Registration and Accreditation Scheme. Psychology as a mature profession already enjoys considerable national organization and focus, through the three key national organizations - the CPRB (representing the registration boards), the Australian Psychology Accreditation Council (accrediting all 36 university schools and academic programs of psychology), and the Australian Psychological Society (representing the psychology profession and its members).

The move to national registration is consistent with the aims of the CPRB, which has worked hard to ensure as much as possible national consistency in registration standards, and operates with the mutual recognition act so that registered practitioners have mobility across State and Territory borders. CPRB believes that a national scheme is a natural maturing of registration and is a needed reform.

CPRB however expresses several significant reservations with regards the current scheme as it is being implemented:

1. Independence of accreditation. Worldwide it is recognized that accreditation should be independent of government. For example, the World Health Organization/World Federation of Medical Education Guidelines for Accreditation of Basic Medical Education (2005) states "The legal framework must secure the autonomy of the accreditation system and ensure the independence of its quality assessment from government the medical schools, and the

profession" (p.4). CPRB is concerned that the current scheme proposes that Boards must seek Ministerial Council approval of professional accreditation standards and processes.

2. Fiscal responsibility to be held by registration boards. Registration Boards will be vested with significant powers and responsibilities to protect the public by ensuring psychologists are fit to practice. Registration processes offer significant protection from incompetent, unqualified and unethical practitioners. However, the effective operation of Boards will potentially be at risk, because unlike in ordinary company boards, they will have no fiscal control. At present, the National Agency will hold financial and operational control of the system and thus of the Boards as well. It is recommended that Boards should hold funds from registrants and in turn broker agency services with those funds, rather than the other way around.

3. The national scheme should ensure consistent standards for the complaints management and disciplinary processes across all of the health professions. Ethical codes for each profession should be integral to the scheme. These processes should be fair disciplinary procedures that abide by the principles of natural justice and provide for adequate protection of rights for complainants and practitioners.

There should be hearings for serious matters by an independent tribunal, as set out in the inter-government agreement on the establishment of the national registration and accreditation scheme. The cost of such independent hearings will be a significant aspect of the new scheme and in the public interest governments should assist with funding, rather than put the whole burden of the costs of justice on registrants.

