

Dear Sir/Madam,

The consultation paper generally outlines the issues clearly. My feedback concerns the choice between options 2 and 4 as outlined on page 8. On that page, the paper identifies that one of the potential benefits of choosing option 2 would be that requiring CCCs with applications would be a deterrent to those with a criminal history. I would like to make two points about the observation which I believe weaken its strengths as an argument for choosing option 2.

1. While requiring CCCs may act as a deterrent for those with a criminal history, the onerous nature of the task and potential associated costs to the individual likely means that it would act as a deterrent to those without a criminal history as well. Thus, by requiring applications to obtain a CCC, you are actually introducing unrealistic and onerous hurdles for people without a criminal history and potentially reducing the number of appropriately qualified practitioners who could work in Australia and provide services to the Australian community.

2. Requiring international applicants to universally obtain a CCC and present it with their application has the potential to set an unfortunate precedent. We have seen in other areas that as one national board demands more information and evidence from applicants, their equivalents in other countries follow the precedent they set. This has meant that international applications have become so time consuming and costly as to dissuade people from applying. Setting such a precedent would have a detrimental impact on Australia as a recipient of international applicants, and also on Australian practitioners who wish to apply overseas should other national bodies follow suit. I suggest that adding to the time and cost of the application process for the individual applicants is not in the interest of the psychology profession, particularly given that it would likely only prevent applications from 'honest' people who choose not to obtain fraudulent documents (as discussed in the consultation paper).

It is my belief that the profession would be sufficiently protected by option 4. The PBA already uses random audits of PD diaries for registered psychologists to ensure that people engage in PD and keep appropriate records, so they clearly believe that this method is an effective method of encouraging appropriate behaviour. This type of random audit of CCCs would have the desired deterrent effect on the very small number of people with an international criminal history that would affect their registration, but not deter those without such a history from applying.

I hope this is useful in your deliberations.

Kind regards,

Dr T McEwan