

To all Registered Professionals,

PROFESSIONAL BOARD FOR PSYCHOLOGY

Department: Executive Company Secretary

Designation: Deputy Company Secretary/NM

Reference:

Date: 4 November 2021

Dear Practitioner,

POLICY FRAMEWORK REGULATING THE PROFESSIONAL ACTS OF PERSONS REGISTERED UNDER THE AMBIT OF THE PROFESSIONAL BOARD FOR PSYCHOLOGY

Allow me to advise that the Professional Board for Psychology was constituted by the Minister of Health and the newly constituted Board conducted its inaugural meeting on 3 November 2020. Dr Justin August was elected as Chairperson of the Board and Prof Charles Young was elected as Vice Chairperson of the Board.

A strategic planning meeting was held on 1 and 2 February 2021 and the vision was determined “ *to regulate and advocate for responsive, relevant, and equitable psychological health care and wellbeing for all*”

In the mission statement, *the Professional Board for Psychology will strive to enable regulations that protect the public, guide and uphold the integrity of the profession via-*

- The development of progressive regulations, standards, guidelines, and policies.
- Engaging and advocating the work of the Board to all relevant stakeholders.
- Ensuring compliance to legislation.
- Implementing effective, efficient, and transparent procedures and processes.
- Promoting equitable provision of psychological health care services and wellbeing for all.

It has come to the attention of the Board that the Council for Medical Schemes (CMS) received numerous complaints from various Psychological practitioners across all categories regarding the non-payment of their claims by various medical schemes. Medical schemes rejected their claims on the grounds that the provider was acting outside of his/her “scope”.

Circular 34 of 2011 was previously issued by the Council for Medical Schemes on the rejection of claims by medical schemes and administrators from some categories based on the scope of practice.

The Board supported the communication made in the circular that the Medical Schemes Act did not confer upon medical schemes any legislative authority or mandate to adjudicate on the scope of practice for psychologists or any other health care discipline.

The basis for the new practice by these medical schemes was apparently a decision by the Board of Health Care Funders of SA (BHF) to implement sub-speciality numbers for the psychology

discipline with effect from one March 2011. This was done by BHF as part of their activities in managing the practice code numbering system (PCNS) on behalf of the Council for Medical Schemes.

The Practice Framework for Psychologists, Psychometrists, Registered Counsellors and Mental Health Assistants dated 12 December 2008 was an outdated document and it should be emphasised that the document should not be used to define the scope and should be withdrawn in its totality.

As was previously communicated and after an extensive review process and having considered all comments from the profession, the Board in 2019 resolved to advise the Minister not to proceed with the promulgation of the Regulations defining the scope of the various categories in the profession of Psychology.

The repeal of the 2011 regulations by the High Court in effect implied that Regulation R 704 of 11 September 2011 fell away, and Regulation 993 of 16 September 2008 remained in place to protect the psychological acts that only appropriately trained and registered psychology practitioners may perform.

Apart from the above, the documents that were relevant in determining the areas of practice of the different psychological practitioners included the following:-

1. the Ethical Rules of Conduct and in particular Rule 21 of the Ethical Rules of Conduct for practitioners registered under the Health Professions Act, 1974, which states that a practitioner shall perform, except in an emergency, only a professional act for which he or she is adequately educated, trained and sufficiently experienced and under proper conditions and in appropriate surroundings;
2. the minimum standards for the education and training of Psychologists, primarily provide guidance to education and training institutions on the training of the different categories of psychologists and minimum competencies expected of the different Psychological practitioners. Minimum standards for the education and training of Psychologists are not to be used to determine the scope of the different categories of Psychologists.

As a result of the confusion on this matter which impacted on practitioners and service rendering to clients/patients, the Board resolved to arrange consultations with representatives of the Council for Medical Schemes on this matter via the office of the Acting Registrar/CEO in an attempt to resolve the issues with medical aids.

The Board wishes to thank and appreciate psychological practitioners for their continued support provided to clients and patients since the COVID-19 pandemic begun in 2020. This dedication has enabled many to better cope and manage their mental health challenges.

Yours faithfully.



**DR JUSTIN AUGUST
CHAIRPERSON
PROFESSIONAL BOARD FOR PSYCHOLOGY**