
POSITION STATEMENT: RELATIONSHIP BETWEEN STATUTORY REGISTRATION AND PEER CREDENTIALING BY SACNA

Background

The practice of psychology in South Africa is governed by legislation. According to this legislation, the Health Professions Council of South Africa (HPCSA) is the statutory body, comprised of appropriately qualified professionals and representatives of society, which is responsible for determining minimum standards of practice in order to ensure the safety of clients of the professionals registered under the particular legislation. The motto of the Health Professions Council is "*Serving the Professions and Protecting the Public*", most frequently with the emphasis on the latter component.

The HPCSA consists of various Professional Boards, representing the various health professions registered under Council. The Professional Board for Psychology is one such Board, and is mandated to determine and ensure compliance with the minimum standards of training and conduct of those professionals registered with the board. In order to do so it promulgates standards, monitors these and where necessary acts to ensure compliance.

Among the standards promulgated are the minimum criteria to be met to register in one of the categories of Psychological practice in South Africa. Until recently there were five categories of practice at Master's level of qualification, being Clinical, Counselling, Educational, Industrial and Research Psychology. In order to practice as such, academic and practical criteria had to be met.

A recent development has been the creation of two additional categories at master's level, namely Neuropsychology and Forensic psychology. Currently the register for Neuropsychology is promulgated and work is apparently being done by the Professional Board to formalise the steps for entry into that register.

The recognition many years ago of the specialised nature of neuropsychology resulted in a group of experts founding the South African Clinical Neuropsychology Association (SACNA). SACNA had, in line with the principle of Non-Malificence, as its guiding purpose the assurance that professionals working with people who had suffered neurological compromise for whatever reason, had a minimum level of knowledge of brain-behaviour relationships and competence in describing, diagnosing and intervening therapeutically in order to alleviate the impact of such neurological compromise.

As a means of ensuring such competence, and in line with international practice in such instances, SACNA designed a process of assessing the competence of professionals who requested such assessment, and awarded those who met the established criteria with a category of membership of the Association recognising that competence.

That category is Full Membership, which means that the holder of such membership status has demonstrated to a committee of peers knowledge and competence at a level of proficiency which is greater than that required for registration in one of the five pre-2008 registration categories, and is aligned with international standards regarding the recognition of expertise as neuropsychologist.

Clearly, therefore, there are two sets of criteria at play when talking of neuropsychology. The first is the statutory requirement established by the HPCSA, which must be met by all registered psychologists before one may practice as a psychologist. The second is the set of criteria defined by SACNA which a statutorily registered psychologist must meet in order to be accorded the status of Full Member of SACNA.

Relationship between HPCSA and SACNA accreditation

HPCSA registration is a statutory requirement, which **must be met by anyone wishing to practice as a psychologist** in any category or at any level of registration. This registration must be maintained by the annual payment of fees, adherence to defined standards and maintenance of professional development. Performing “psychological acts”, as defined by law, without such registration can result in criminal prosecution, while failure to meet the set standards can result in de-registration and withdrawal of the right to practice.

Full Membership of SACNA is a **voluntary affiliation and commitment to the maintenance of standards of practice at an additional level of competence higher than that currently required for independent practice in South Africa.**

Full Membership of SACNA is awarded to practitioners who have demonstrated knowledge and competence at a level higher than the established, and currently operational, minimum standards set for registration in the respective registration categories.

- Full Membership does not supercede any registration category. The awarding of Full Membership status by SACNA does not, in any way, replace the statutory requirement for registration as set by the HPCSA.
- Full Membership does not waive any standard set by the HPCSA.
- Full Membership does not entitle one to practice in any manner contrary to the regulations promulgated by the HPCSA, including that Full Members who make reference to their accredited status with SACNA on their practice stationery, may do so only "*providing such mention meets the guidelines provided by the Professional Board for Psychology of the Health Professions Council of South Africa*" (SACNA Constitution Clause 6.e).
- The practitioner is compelled to make the pertinent registration category known on letterheads and other stationary, in the prescribed manner. Substitution of the pertinent registration category with "*Full Member: SACNA*" (or similar) is an offence in law, while also a misrepresentation and offence against the regulations of the Professional Board for Psychology.

Position of SACNA

SACNA is an association of psychologists, across registration categories, and other interested professionals, all of whom belong to a statutory body which carries out the functions similar to those carried out by the HPCSA.

Full Members of SACNA are all registered psychologists, in good standing at the HPCSA. Full members of SACNA who are not in good standing with the HPCSA may have Full Membership of SACNA terminated or suspended.

SACNA does not condone any conduct or practice which is in conflict with the statutory prescripts as promulgated by the HPCSA. SACNA will not support such acts by any member of the Association and may, of its own accord, institute disciplinary steps against any member who may be acting in such conflict.

SACNA encourages its Full Members to make known to interested parties that Full Membership constitutes a recognition by peers of competence over-and-above the minimum standards set for registration as a psychologist in one of the pre-2011 categories of registration. However, such dissemination of information must comply with established standards of professional and ethical conduct, and as such should not be derogatory to non-members of SACNA.

SACNA continues to hold the position that Clinical Neuropsychology is a specialist field of practice which requires additional qualification at a level higher than that which is required for entry into practice as a psychologist, and continues to pursue that objective within the parameters laid out by the HPCSA.

Conclusion

Neuropsychology is a field of practice which requires more knowledge and expertise than currently required to register as a psychologist with the HPCSA. SACNA has defined that knowledge and competence, in line with international benchmarks and with due regard for South(ern) African society, and has established a credentialing process by which registered psychologists can apply for evaluation of their competence. Successful candidates are then awarded Full membership of SACNA, a category of membership which recognises additional competence but which, in no way, absolves the psychologist of adhering to the regulations as set out by the HPCSA. SACNA continues to engage with the HPCSA as developments around the category of Neuropsychologist unfold, in order to contribute to the best interests of the users of such services.