

To whom it may concern:

Regarding: SUBMISSION to Psychology Board of Australia (PBA): “Public Consultation: March 2018: Reducing regulatory burden: Retiring the 4+2 internship pathway to general registration.”

I believe there should be a moratorium on this proposal and an independent body should be appointed to review and weigh whatever evidence can be gathered for and against the proposal/declaration-of-intention to retire the 4+2 pathway.

Because the PBA members have several conflicts of interest apparent in their biased proposal as this document will attest in some detail.

There are many issues to be addressed with this “Public” “Consultation” and the 74 page “confidential” document accompanying the “Public” “Consultation”.

1) Is this in fact a “Public Consultation” worthy of the substantial time and energy required of a properly considered response?

This question arises because of several issues with the “Public Consultation” form and content.

a) Firstly, it is clear from the title and onwards and throughout the document that there is a strong bias by the Board towards a particular outcome (retiring the 4+2), which raises the question, “Is this a genuine consultation, or just going through the motions in order to appear to satisfy statutory requirements for a consultation? The board has clearly made up it’s mind to retire the 4+2 internship pathway and the entire 74 page document is biased in that direction repeatedly stating the case for

retiring the 4+2 internship, but very little for the case against. It does not appear to be a “*consultation*” but a declaration of intention.

b) Secondly, every page of the document bares the footer:

“**CONFIDENTIAL** – *Psychology Board of Australia – public consultation paper - .. etc.*”

Which begs the question, “How can a document entitled Public Consultation be Confidential?” Surely a public consultation ought not to bear the word...

“**CONFIDENTIAL**”

...in bold type on all 74 pages, while the words “*public consultation*” only appear in a handful of places in the entire document.

c) The actual consultative contact with the public, the sector and profession was minimal and restrictive. Apparently only one public meeting was held to discuss this proposal and many questions and concerns of those concerned with the proposal/declaration of intent were ignored.

d) The content of the paper has been “cherry picked” and makes many attributions to “*stakeholders*” without actually identifying which stakeholders, or which sectors are supporting the proposal/declaration of intention.

e) The paper refers to “regulatory burden” as the PBA’s most compelling reason for retiring the 4+2 training pathway, but provides no clear evidence to support that assertion.

f) The PBA doesn’t address the fact that the “*regulatory burden*” would simply be shifted to other entities such as Universities, who are not statutory authorities to regulate as id the PBA under the purview of AHPRA. Whose interests are being served by this declaration of intention to retire the 4+2 pathway.

2) Some initial concerns raised about the content by myself and colleagues are:

a) There will not be enough university places which will lead to a further shortage of Psychologists.

b) It appears that this intended change will increase demand for already overstretched university places, which will benefit the academic psychology

community more than anybody else. Please note that the PBA is largely a body of academic professors of psychology.

c) The change doesn't simplify anything if 5 + 1 becomes the alternative. It simply gives academics more revenue and power and influence over people's careers. It would reduce the earning capacity of Psychology graduates who must stay another year at University before entering the full-time workforce, which reduces the size of the workforce and disadvantages the sector and the public.

d) It looks like the clinical psychology academics are the only real winners if the PBA carries out it's intention to retire the 4+2 pathway. This is Hegemony at it's very worst and adds nothing to the good of the public.

e) It also appears to be a way to sell degrees to overseas students and those Australian students wishing to work overseas, which isn't particularly helpful to the Australian public's need for more practicing mental health workers in Australia here and now.

f) Given the sheer volume of the 74-page document and the limitations on time and energy as privately practicing psychologists, these responses have of necessity been presented in a listwise fashion in direct response to important issues raised within the paper. Not every point is answered but the points that are answered are number in the manner of the "proposal" as follows:

10. "The Board's proposal to retire the 4+2 internship pathway will not affect psychologists with general registration, but rather a future date of retirement is proposed."

Of course it will affect psychologist who have been registered via the 4+2 pathway, by implying that they are inferior in training and ability, which is often not only implied but stated, by academics. This is another nail in the coffin of the careers of industry trained psychologists, who are progressively relegated to second class status by clinical psychologists and their lobby.

A clear example of how this manufactured prejudice occurs is on the PBA website itself. The PBA states on it's website in the questions and answers section regarding the proposal/statement of intention, in answering their own question, "*What would the retirement of the 4+2 internship mean for clients of psychologists?*", they say:

“Public safety is at the heart of the National Scheme. The public can be confident that their psychologist is suitably trained and qualified to practice in a competent and ethical manner.”

(<http://www.psychologyboard.gov.au/Standards-and-Guidelines/FAQ/4-2-internship-FAQ.aspx>)

This suggests that the 4+2 training pathway produces unsafe practitioners more readily than more academic pathways, but this is unsupported by facts and is mere prejudicial assertion by a self-interested lobby group, the clinical psychologists and academics. Public safety is not compromised by the 4+2 pathway. If it is proven to be so then we must address this. It is not.

Retiring the 4+2 pathway certainly does affect psychologists who are already registered via that path, especially if the PBA is publishing comments like that about public safety, insinuating 4+2 trained psychologists pose a greater risk to the public, which they don't.

11. The truth that *“the 5+1 internship pathway is a relatively new pathway”* is stated clearly at 11. However, no evidence is provided to support the assertion that the 5+1 pathway is “preferred” by trainees and employers.

Given that the 5+1 internship pathway is relatively new it is not properly bedded down and sufficiently reviewed and therefore needs longer monitoring for long-term consequences to the workforce and the public of this approach to training.

15. *“In line with the consultation requirements of the National Law, as well as the request from the Australian Health Workforce Ministerial Council (Ministerial Council), the Board is undertaking wide-ranging consultation on the proposal to reduce the regulatory burden of the training pathways to general registration as a psychologist in Australia.”*

It is doubtful whether this approach of the PBA fully complies with the requirements for proper consultation and if it does comply with the letter of the law, it certainly doesn't follow true ethical principles for properly informed participatory consultation, not least because they appear to have already made up their mind and the Australian Psychological Society (closely aligned with the PBA) is referring openly to the retiring of the 4 + 2 as a sure thing which is about to occur, suggesting it is a

teleological certainty, and an expression of manifest destiny of the annihilation of the 4+2 pathway.

Regulatory burden for whom? The PBA? The very reason, purpose and role of the PBA is to regulate under AHPRA.

They command large fees from tens of thousands of registrants to do so and can well afford to manage the regulation of a, by necessity, diverse profession with diverse training pathways.

Shifting regulatory burden to Whom?

Shifting power and oversight of the professional development to whom?

Why should psychologists be shy of regulatory activities? The process of applying oneself during the +2 internship to the Practice Standards and Competencies were a great introduction to and training in regulatory power and capacity. Do they want psychologists to be less capable of self-regulatory and regulatory intelligence? Because that will be the result of shifting more regulation to external authorities such as Universities or the APS training branch.

17. *“The Board considers that the case for retirement of the 4+2 internship pathway at this time is favourable with:*

- a. *a growing workforce*
- b. *a viable training alternative (the 5+1 internship program)*
- c. *the decline of interest in the 4+2 pathway by both interns and employers, and*
- d. *general agreement among key stakeholders to explore streamlining the pathway to general registration.”*

17.a. We have a growing population and a growing need of trained mental and emotional health and wellbeing workers with industry/sector experience.

17.b. A better trained workforce results from more time training on the job, not less along with supervised professional development.

17.c. The anecdotal ‘decline of interest in the 4+2’ is not properly supported by evidence here and no attempt to understand or admit that the forces operating against the 4+2 pathways including a reduction of support for the pathway from

academia and the PBA, and long promotion of, and lobbying for, the elevation of academic pathways of training and clinical psychology, in the absence of any evidence.

17.d. Please define “*key stakeholder*” and “*general agreement*” with regards to the context and content of this proposal. What evidence has been presented to enable such an assertion to be so glibly made as it is elsewhere in this document? Where are the references or footnotes to consultations and research papers? Another bold authoritarian assertion with no evidence to back it up. Could this ‘proposal’ be an attempt to sway policy/regulation/law-maker’s opinions by repetitive assertion of a favored alternative truth? Is it a basic advertising ploy, to repeat ideas as if they were facts so as to give the impression that they are accepted facts, when they are not proven facts.

33. *“The Board considered the following principles as the foundation for the reform agenda to propose to retire the 4+2 internship pathway to general registration:*

a. any proposal must result in a training and education model that is more streamlined than the current model

e. in order to maintain workforce supply, a proposal to retire the 4+2 internship pathway could only occur in the context of a favourable (stable) environment with a growing workforce

f. if the 4+2 internship pathway is recommended for retirement, there must be a viable training alternative to ensure a flexible, responsive and sustainable workforce

g. any proposal should be aligned with the objectives and guiding principles of the Health Practitioner Regulation National Law, as in force in each state and territory (National Law), in particular, any policy changes must:

i. provide for the protection of the public by ensuring that only health practitioners who are suitably trained and qualified to practise in a competent and ethical manner are registered

ii. facilitate the provision of high quality education and training of health practitioners

- iii. *continue to facilitate access to services provided by health practitioners in accordance with the public interest, and*
- iv. *enable the continuous development of a flexible, responsive and sustainable Australian health workforce and to enable innovation in the education of, and service delivery by, health practitioners.*
- h. *any proposal would be closely aligned with the objectives of the Australian Qualifications Framework (AQF) . In particular it should:*
 - i. *support the development and maintenance of pathways, which provide access to qualifications and assist people to move easily and readily between different education and training sectors and between those sectors and the labour market, and*
 - ii. *support and enhance the national and international mobility of graduates and workers through increased recognition of the value and comparability of Australian qualifications, and*
 - i. *stakeholder views about the proposal must be further explored and general agreement for retirement obtained."*

The PBA proposal fails on at least 3 elements of it's own guidelines or underlying principles in point 33:

33. a. *"streamlined education and training"* for a complex and diverse profession such as psychology, is not necessarily a good thing for the profession or the public, due to a tendency towards a monoculture and a stifling of initiative, creativity, reflexivity and originality, although it would benefit the board and the academic institutions to streamline processes to keep their lives simple yet profitable.

However, that notwithstanding, the 5+1 pathway has not been proven to be any more 'streamlined' than other pathways yet.

33.g.iii access to services provided by health practitioners would be reduced as a result of less psychology graduates in the workforce due to longer time at university.

33.d.iv *"...enable the continuous development of a flexible, responsive and sustainable Australian health workforce "*

Really?! How does removing an option for training enable development of a flexible, responsive and sustainable health workforce?

It simply doesn't. 4+2 training produces flexible and versatile practitioners via rigorous mentoring and high standard with low ratios, and competency-based, in-vivo training for in-vivo practice in the real world.

33.f. *“Stakeholder views about the proposal must be further explored and general agreement for retirement obtained.”*

This is an important point, but we are not clear who has been consulted and what the consensus actually is. This has not been explicated here.

It is the firm belief of the writer(s) that it is of the utmost importance to have a moratorium on this decision until all stakeholders' views have been adequately canvassed by a neutral party or agency, through properly informed, lengthy consultations, over several times and places, so that concerns and issues are adequately addressed and discussed and appropriate compromises made in order to reach a general consensus on the way forward with this momentous decision.

This full steam ahead approach of the PBA is pushing through a single agenda of a particular interest group and disenfranchising a large section of the psychology stakeholders, many of whom feel powerless to influence anything at all to do with their professional bodies who openly display an attitude of autocratic singlemindedness and fixity about their governance of the future of the profession.

37. *“In the current context there is:*

- a. *a growing workforce*
- b. *a viable alternative program of education in the 5+1 internship pathway, and*
- c. *most psychologists are no longer trained via the 4+2 internship but rather via the higher degree pathway.”*

a) There is a growing monoculture of pseudo-medicalisation in psychology which is dangerous to the public in that it reduces diversity and flexibility and adaptability to paradigm shifts and epidemiological change on a macro-scale, while encouraging non-medically trained professionals to attempt to adopt medical status and power such as prescribing rights.

b) It is too soon to say if 5+1 is a viable alternative to 4+2. It will certainly benefit the academic careers of those who deliver the extra-mandatory 5th year at university, but may not make the trainee any more competent, having spent longer at university and less time in the field. Where is the research? Let's do the research first.

c) The higher degree pathway to applied psychology is severely limiting the diversity of courses available at post graduate level as clinical psychology is promoted as superior and remunerated at a higher rate due to spurious unfounded assertions about its 'superiority', and 5+1 is probably going to be phased out once it supersedes 4+2 and clinical psychology masters becomes the entry level to the monoculture, if we are to go down the path of retiring the 4+2 broad highway to producing diverse, versatile, and highly competent practitioners as supported by the research.

49. It is somewhat telling that the writers of the 'consultation paper' got their statistics for workforce participation from the Education sector but as an aside make footnote reference is also made to the employment sector with a link to a skilled migration page www.employment.gov.au/SkilledMigrationList. What is really going on here? Whose interests would be serviced by increasing the need for university programs for a 5th year of study?

52. Masters programs are increasing in number but decreasing in diversity of content. Clinical programs dominate the university sector as other subspecialisations of psychology are diminished and disappearing, including sport, health, community, forensic, counselling, education and developmental psychology programs.

Table 1.

Table 1.

APAC Accredited Postgraduate Psychology Programs 2011-2017

Postgraduate Programs	2011	2014	2017
Clinical Neuropsychology	14	14	14
Clinical Psychology	96	97	90
Community Psychology	3	3	1

Counselling Psychology	11	10	4
Educational and Developmental	16	9	7
Forensic Psychology	14	10	2
Health Psychology	8	7	4
Organisational Psychology	21	19	16
Sport and Exercise Psychology	4	3	2
Professional Psychology (5+1)	4	9	18

Note: Table includes Masters, Masters/PhD and Doctorate programs. Source: ACPA

As shown in Table 1 there has been a significant decrease in the availability of psychology postgraduate programs in many endorsed areas of practice. Of particular concern is the lack of programs in counselling, health, forensic, community, sport and exercise, and educational and developmental psychology. While postgraduate programs in clinical psychology have also decreased over this period they continue to outnumber all other psychology programs combined. The only program that has increased in availability over this period is the Master of Professional Psychology (5+1).

Any biologist will tell you that genetic diversity is key to sustainability of a species amidst a changing and unpredictable landscape or ecology. We must promote the conditions that foster a plethora of psychological subspecialisations and strategies, rather than a thin monoculture with limited focus that is emerging within universities where lecturers may have little or no teaching qualifications or industry experience and may be more interested in their research programs and careers than teaching.

54. *“With a steady growth in the profession and community demand being met, the time is right for review and change without any unintended impacts on workforce supply.”*

a) If community demand is being met under current arrangements, there is no need to change them.

b) The time may be right for review, but it is impossible to say with authority, before proper review, that change would not bring about *“unintended impacts on workforce supply.”* There is a strong possibility that many people would opt out of the

psychology training pathway as they have to stay at university another year, rather than entering the workforce. This has not been properly analysed. The eagerness of the academic PBA to surge ahead with this change is probably driven by an elitist agenda designed to create more demand for university programs within their areas of interest, namely clinical psychology and clinical neuropsychology at the expense of all other pathways and subspecialties. Who can say with authority that there will be no unintended consequences? That is just another demonstration of ivory tower hubris.

55. "Unlike in 2009 when the Board first proposed to retire the 4+2 internship pathway, when around 50 per cent of the workforce was trained via the 4+2 internship pathway, the pathway of choice is now the higher degree pathway (53 per cent). Never before has the training environment been more ready for workforce reform than it is at this time. Retiring the 4+2 internship pathway to general registration is possible in the current context, without a major impact on the workforce, in a way that it never has been previously."

This is 'spin', or advertising hyperbole (hype), pure and simple. Once again the potential impacts have not been properly analysed and this analysis ought to be done by a neutral party or parties with no vested interests or conflicts of interest.

A shift towards higher degree pathways is a consequence of chronic and sustained lobbying by the academic and clinical psychology sectors to denigrate the 4+2 pathway to registration, creating a culture of fear of obsolescence in the hearts and minds of psychology trainees and promoting higher rebates and fees for Clinical Masters graduates built on the lie of superiority.

Furthermore, If people are favouring other pathways to registration, why penalise a minority of people who are choosing a more versatile and grounded pathway to registration in the 4+2. The 'regulatory burden' of 4+2 on the PBA is supposedly trending to a lower level without the need to axe the 4+2 pathway, by virtue of people favouring other pathways for a variety of reasons.

57. "The number of provisional psychologists training via the 4+2 internship pathway is declining. Currently 29 per cent of provisional psychologists (1,390 of 4,723) are undertaking the 4+2 internship pathway. This trend is in contrast to 2009, where

around 50 per cent of the psychology workforce was trained via the 4+2 internship – a reduction of 21 percent.”

As per the comments above at 55. If numbers are reducing then the ‘burden’ is reducing, so why bother to diminish diversity if all paths are producing competent psychologists. Diversity is future proofing.

60. *“Even though over half the new psychology workforce is being trained through the higher degree pathway (53 per cent), there remains around one third of the new psychology workforce that is undertaking 4+2 training. Despite the increase in undergraduate and honours places, and the increased popularity and availability of psychology master’s courses, university training places for postgraduate psychology places remain limited in certain states and territories in Australia.”*

1. They acknowledge limitation of places for higher degree training but still want to get rid of 4+2. Why? To create a demand for higher degree places and an argument for more funding.

The reason for the shift in demand for 4+2 is due to the fearmongering PBA sword of Damocles.

63. Since 2010, stakeholders have used the following mechanisms to provide feedback to the Board about the viability of the 4+2 internship pathway for the future:

a. as noted earlier, in December 2015 the Board brought together leaders across government, education, workforce, regulation and the profession to consider challenges with the existing arrangements at a forum. One outcome of this forum was the development of the Collaborative Working Party (CWP). The CWP has been meeting over the last two years to work towards viable solutions to the challenges raised in the green paper and forum. Members of the CWP are the Board, the Australian Psychology Accreditation Council (APAC), the Australian Psychological Society (APS), and the Heads of Departments and Schools of Psychology Association in Australia (HODSPA). The Board publishes information about the CWP meetings in its communiqués on the Board’s website

Points 62 and 63 speak to the selective processes by which the biased “*collaborative working party*” (CWP) was formed from a subgroup of a mutual-appreciation society of “key stakeholders”. No wonder, “*there is considerable concurrence from the*

Board's key stakeholders," as they are all in cahoots. Workforce representation is non-existent on the list of CWP members provided here and most of the parties represented on the CWP have considerable cross over into other parties as many committee members occupy positions on several committees simultaneously and/or rotate through various committees. There will always be a high degree of correlation between two variables that are basically the same variable in different clothing.

69. "Feedback from the various forums, stakeholder conversations, reviews and public consultations indicate numerous challenges, risks and issues with the 4+2 internship pathway. The concerns are listed below:

- a. While many high quality psychologists have previously trained via the 4+2 internship pathway, the 4+2 internship training model is embedded in the past and is not fit-for-purpose in the current and future training and labour market.*
- b. The 4+2 internship pathway is unsustainable both now and into the future, with a high regulatory and administrative burden for employers, supervisors, interns, the Board, and the Australian Health Practitioner Regulation Agency (AHPRA). Increasing red tape and costs associated with compliance requirements renders this pathway obsolete in the contemporary training, workforce and regulatory environments.*
- c. The risks associated with multiple unaccredited pathways to registration are increasing. There are concerns about the Board's ability to effectively manage the risks to the public adequately given the inherent variability in internship experiences and quality of training due to multiple internship providers and supervisors, with small numbers of interns across different sectors.*
- d. The 4+2 does not meet international standards and is no longer recognised across the world as meeting requirements for registration. Australian psychologists with 4+2 internship training would not be able to register and practice overseas unless they undertook significant remediation. Not only does this affect the credibility of Australian psychology training, it limits opportunities for international mobility for these psychologists in a world where there is increasing need for health practitioners to be flexible and responsive internationally."*

69.a. *“Embedded in the past”* might be another way of saying, “well grounded in the real world.” But it is a disparaging way of evoking a trendy, post-modernist and ageist concept of out with the old and in with the new, but if dramatics and poetics are allowed here, we might just as well say, “We are all standing on the shoulders of giants from the past and it is important to preserve, not white-ant our foundations.” It is time the PBA got with the times and applied post-post-modernist methods to understand the value of restorative and restitutive revaluing of traditional methodologies alongside new methodologies.

There is no argument given by the PBA for the glib statement that 4+2 is *“not fit for purpose in the current and future labour training market.”* Who says? Do they have a crystal ball to see the future.? This is a highly arrogant statement by the Board based on prejudice and alignment with the goals of academic clinical psychologists.

In social sciences as with all sciences, the best predictor of the future is the past. There is no compelling evidence that the 4+2 pathway is not viable moving forward.

The 4+2 pathway works well and is very flexible and responsive and should be retained as one of several pathways to registration to ensure diverse workforce and to future proof the profession against academic funding reduction and other unforeseen contingencies... 4+2 is an intensive program of one to one supervision with several supervisors across several domains of competency and it's stringency is a strength, not a weakness. If regulatory bodies are complaining that it is administratively burdensome, are they lazy or just serving some other agenda such as promoting universities?

It is also elitist to remove the only option for full registration available to people on low incomes with families and mortgages who need to enter the workforce, sooner rather than later. It is also depriving the workforce of provisionally registered, competent psychologists.

Quality of training is just a Furphy. There is absolutely no evidence to support the PBA's desire to relegate 4+2 seasoned psychologists to the lower quality scrap heap.

d. We should be concerned with the Australian situation, not with selling degrees overseas. If the 4+2 trained workforce is competent there is no need to remove that training pathway, and they are.

69. c is a baseless assertion fear mongering about risk. Diverse pathways reduce risk of monopoly or tyranny or dogmatic hegemony, which are far greater risks to the public than highly trained, supervised, mentored, competency based and examined psychologists. Multiple pathways reduce risk to the public of warped methodology applied incorrectly, even if they increase the workload of regulators, whose job it is to discern competency amidst the broad experience of the real world, not to force the real world to simplify itself to make their job simpler.

94. *“The 4+2 internship pathway continues to present numerous challenges for the Board as the national regulator.”*

Yes, as it should. A diverse and reflexive workforce for a diverse and challenging population should present a challenge to a board that wants to reduce that diversity to a uniform simplification for the sake of their own ease and comfort.

Perhaps the biggest challenge for the board of the 4+2 pathway is being called upon to put their biases and self-interest to one side and admit that it is a very good pathway that enriches the experience of the practitioner immensely, creating very versatile psychologists with a large array of real world skills. Perhaps it is a big challenge for the Board to admit that hanging out at University perpetually, hasn't made them superior psychologists to those psychologists who have chosen the way of the real world and are quite at home there amidst the chaotic cut and thrust of real life with its “slings and arrows of outrageous fortune.”

There is apparent here, a strong desire of academics to control and reduce and tame and diminish the sea of uncertainty that is the real world. This has become very counterproductive when let go too far. There are many very intelligent, educated and insightful 4+2 psychologists with far greater practical capabilities than the overeducated overprivileged elitists who want to simplify processes, and remove challenges to make their own lives even easier for themselves when called upon to regulate others not of their bent.

95. Such a heavy emphasis on academic attainment shows where the board's mind is at... promoting academia...Which is understandable if that is their world. However, many academically challenged individuals become brilliant in their field, including psychologists. Albert Einstein is one famous example. Psychology is an applied profession, not just an academic profession. That is why we need diverse pathways to registration. So we don't preclude less academically inclined graduates from becoming practitioners in the field despite getting good grades, because their talents and inclinations lay in practice of applied psychology, not in regurgitating and cutting and pasting the status quo at university. Further academic training and 'higher' degrees are not practicable, helpful or necessary for many very good psychology graduates who want to get out there and help.

If there are concerns about the 4-year degree lacking practical focus, then fix that! But it is clear that the academic mindset hasn't even entertained the possibility of increasing the practicability of the 4-year university pathway here, because it would not necessitate longer stays at university, which seems to be their primary goal and focus in promoting the 5+1 pathway.

Social workers and Occupational Therapists, Nurses and others do not have to go further than a four-year degree, yet we are having to fight our own board to retain a 4 + 2 training because they are hellbent on increasing attendance at university programs with no demonstrated benefit to the public or the practitioners other than financial incentives for clinical psychology graduates of masters programs due to sustained lobbying by ACPA and their allies in the APS and PBA.

There is no proven benefit to the public of holding psychology graduates back at University for another year or more. The university programs gain benefit. Society loses skilled and skilling workforces. More research is required by independent parties.

99. Supports the argument that 4+2 is viable... 85% pass rate for an exam that has a pass mark of 80%! the 15 percent who did not score higher than 80% (the pass mark I believe, that the PBA conveniently left out of their discussion paper) might had still have had a reasonably high score, only less than 80%. And consider that they are not academically inclined, what is being operationalised here? academic

proWess? regurgitability? comfortability with exams? plenty of confounding variables. Again the PBA is using academic gauges gages for applied behaviours.

101. *“There is also some concern that the 4+2 internship pathway places a considerable burden on industry. Training and supervision of interns rests solely with employers, many of whom are small organisations or private practices. This means that the cost of training these provisional psychologists is shifted, in part, from the individual and the tertiary education sector onto employers.”*

The employers get a worker! It is a choice of the provisional registrant and should not be controlled by elitists. More choice is a good thing. Less choice is not a good thing.

103 *“Interns commencing their supervised practice program have never seen a client before. They have no practical experiences, and are not expected to possess the competencies for independent practice. This is inconsistent with the expectations of an employer wanting to recruit staff that are ready to work. Interns require a specific training program embedded within a risk-management framework. The burden of this falls on the individual supervisor or employer. In the 5+1 internship pathway and higher degree pathway, the provisional psychologist’s first interactions with clients are provided safely within a structured training environment with both simulations and real-world client experiences.”*

A 4 plus 2 registered psychologist says, “Point 103 is a blatant falsehood. When I did my internship I had already been working for several years in mental health and community health as a clinical case manager and counsellor.”

If a 4 plus 2 intern has no client experience they start with assistant tasks etc and work their way up via close supervision to more and more autonomy. And Honours counselling courses provide simulated and volunteer counselling learning experiences prior to entry into the workforce as a provisional registrant. Many also bring prior experience with them, especially mature age registrants who would probably favor the 4 plus 2 due to the imperative of workforce participation due to mortgage and family etc. Many provisional registrants have backgrounds in other professions such as nursing and social work that make them seasoned people

workers before they started their psychology degrees. Others had long supervised trainings and experience in voluntary organisations like Life-line telephone counselling which help establish a good foundation for working with people.

Once again the solution to there being low emphasis in the academic years at uni, on client work is to fix the 4 year degree to make this part of the requirement. Or to expect provisional registrants to have some recognised prior learning before working with clients. A mandatory extra year at university is not the solution to providing a versatile and competent psychology workforce.

Many workplaces find provisional registrants to be a great asset.

Undergraduates will have to find supervised placements anyway unless intake to programs is severely limited.

104. *"The fact that employers and supervisors are willing to undertake this resource intensive task is a testimony to their commitment to the future of the profession and dedication to mentoring new staff. While it does allow senior staff to 'train up the new generation' of professionals to their specifications relevant to the needs of the job site, it does cost-shift the training from the university to the workplace. "*

A 4 plus 2 registered psychologist says, *"I did my internships in NGOs and my employers benefitted from the structured approach and even used my practice standards and competencies and evidences as evidence in their own funding audits with external auditors needing solid evidence. I was a benefit to them and it brought a level of rigour to their service that was needed to maintain their funding. I had an external supervisor whom I paid from my own pocket. The employers benefitted greatly from my internship as I brought a lot of experience to the roles. And I gained immensely from the experience. It really was a win-win-win scenario all around. The supervisor loved it and we are firm friends and colleagues now 10 years on."*

The 4+2 pathway is the best way for a life-experienced psychologist to gain registration while continuing to provide value to employer, clients and society rather than being a financial burden on the community and/or family and self as a fulltime university student.

Again, the PBA is bemoaning the fact that funding priorities might shift to workplace traineeships rather than academic programs. Workplace based traineeships are far

more economically sound than university programs, because the trainee is providing considerable value to the employer.

It's basic economics that increasing the number of transactions and parties involved in an economy benefits the entire community by stimulating the economy to largely self-fund, but a little economic stimulation from government to assist employers with traineeships should make it even better.

105. "For supervisors, the time commitment to train, observe and supervise an intern is considerable. While there is no evidence to suggest that the required hours of supervision are not being achieved, the reality of maintaining a professional practice while supervising trainees means that priorities may shift over the course of an internship. This raises questions about consistency of training across the course of a two-year internship."

At 105. The board admits there is no evidence to suggest the required hours of supervision are not being achieved, but sets out to cure a problem that doesn't exist, by recommending limiting options and forcing people to stay at university under academic control for at least another year. This is very irrational and controlling to the point of looking like an anxiety disorder.

We are all grown ups and can deal with shifting demands and priorities and there are alternate supervisors allowed for and encouraged within the 4+2 pathway. Grappling with shifting priorities is part of the training. Most supervisors love their role as much or more than many university academics, untrained in the art of teaching, training or supervising, forced to teach to keep their research programs and higher degree pursuits viable. There are multiple reasons for the Board et. al to be advocating for longer stays at universities before registration, but relieving workplace supervisors of their roles for altruistic reasons or for reasons of ensuring adequate supervision hours occur, are not valid reasons. The PBA admit at 105, "*there is no evidence to suggest that the required hours of supervision are not being achieved...*"

107. "For a higher education provider, several staff teach in their area of expertise to cover all these competencies and therefore the responsibility for training is shared across multiple staff. A higher education provider is responsible for the provision of

training, and delegates this role to the relevant training program. However, in an internship training model, the quality of training is dependent on the knowledge and skills of the individual supervisor.”

Here is clear example of how ignorant or disinterested the Board is about matters of training other than training pathways relating to ‘a higher education provider’. The reality of supervision by internship is that the provisional registrant usually has more than one alternate supervisor as well as the primary supervisor, plus many learning experiences with other practitioners. Particular assistance with training can be sought from other fully registered and practicing psychologists with particular strengths in particular areas.

One Psychologist says, “During my internship I was supervised and/or trained by 4 senior psychologists externally for various respective skill sets and knowledges and my manager at work was a psychologist who imparted many useful experiences to me. On top of this I attended regular multidisciplinary meetings and trainings with psychologists, social workers, counsellors and other human service professionals within the organisations I worked for and out of the workplace at seminars and workshops run by human service professionals including some psychologists. It was a highly enriching set of experiences for which I was paid fairly for my contribution to the work of the organisation and we paid my supervisors for my supervision fairly. The public and my clients benefitted greatly too.”

What the Board needs to recognise is that registered psychologists practicing in the field are highly professional, conscientious, capable, adaptive and ethical scientist practitioners with a wealth of experience. It is offensive to insinuate that they are not and that it is preferable to have an expensive and highly regulated, one size fits all, at university, approach to keeping a stranglehold on the professional development of provisional registrants. This is unnecessary overkill. We don’t need to force people to stay at university for more than 4 years.

While it is somewhat heart-warming to think that the board is so concerned about the ‘burden’ on supervisors and interns and altruistically offering to shift the burden to the university sector, it doesn’t really make sense to see it as a burden in the first place because it is a benefit to all concerned for example it provides novelty and refreshment to supervisors and secondly, why does shifting this imagined ‘burden’ to

the university sector make any sense when that sector is in funding crisis for places for students and the employing sector could benefit from provisional registrants in the workforce. If there is concern for graduates lacking areas of knowledge and practice not covered in the 4 years at uni, now is the time to start including some of these core practices in the basic training, as other professions like nursing, occupational therapy, social work do. Making psychology training even more academic and university bound for longer is nonsensical if practical skills are the issue.

Clearly this is a push to stave up the university sector. Alternatively, we could stave up the traineeship/internship sector in order to provide far more practical practitioners than staying longer at university will afford.

The Board at 109 to 116 outlines exactly how intensive 4 plus 2 can be and alternatives to university for support in that process. Let it be! Let it continue to be an option among many for the one third large minority who choose the 4+2 pathway.

At 116. The Board presents a very small, biased, skewed sample of 4+2 experiences, which may well be statistical outliers. These are obviously cherry picked. Where is the scientific rigour? Where is the balance in this 'confidential' 'public consultation' discussion paper? It is likely that no rigorous scientific studies have been done on these questions because the findings are obviously going to highlight the benefits of not going down the 'higher education' pathway, post graduate. So instead the captains of our industry cherry pick results that favour the University sector.

An alternative experience not favourable to the PBA's thesis is the following comment from another psychologist : Psychologist's Comment: "During +2 I started my own private practice from my supervisors practice, paid to rent a room even. I learnt everything while I was working in the field. It was the best experience & the best mentor I have ever had when dealing with study bureaucracy. We are also firm friends."

Comment: 117. 'not all... are equal' could be applied across the board in any profession despite training pathways. Self-directed learning is highly effective when applied by graduates with critical thinking, analysis and reflection skills, which should have been developed in undergraduate degrees. If the ability to self-direct learning using competencies is lacking in a graduate, the undergraduate program is lacking. In which case it is imperative to enhance undergraduate programs, not drag them out another year. How tedious and regurgative do we want our psychologists to be?

Comment: The Board says at 117. "... *other interns develop required competencies despite (not because of) the training experiences provided by the workplace,*" But this comment is equally applicable to any training pathway, and shows the competency of those who have completed the 4 years of university training to manage their own learning and not have to be spoon fed. Many 4 plus 2 are extremely resilient and independent before and (more-so) after the training. They make excellent psychologists who can cope with a wide range of challenges, unlike many university cloistered individuals spoon fed a narrow dogma and rigid formulaic approach to service provision not best befitting real-world situations.

Comment: The Board's point at 118. is just too extremely biased and one eyed to be taken seriously at all. It serves as a clear example of how unprofessional this 'confidential' 'public consultation' by the PBA is. There must be a moratorium on this decision until a properly functioning review can be done by a professional firm or agency with neutrality. There is too much at stake not to.

Comment: The Board's assertion at 119. that "*4+2 interns are less work ready at the beginning of their internship than trainees from any other pathway.*" Is a complete fabrication without any statistical basis.

Psychologist's Comment: "During +2 I started my own private practice from my supervisors practice, paid to rent a room even. I learnt everything while I was working in the field. It was the best experience & the best mentor I have ever had when dealing with study bureaucracy. We are also firm friends."

Comment: the section of the Board's 'confidential' 'public consultation' on managing risk is conjectural, not scientific. What research and analysis has been done on the issue of risk management? And by whom? The Board is not expert in surmising these matters based on conjecture. A professional consultation by a qualified neutral

party is required given the high stakes of this decision and the clearly biased and almost flippant, cursory attitude of the PBA in this matter.

Comment: 132. "The eight core competencies are listed in the Board's Provisional registration standard and are consistent with the International declaration of core competencies in professional psychology (the declaration). A board-approved internship program must be designed to meet these competencies and assessment of each competency is mandatory. Competencies are primarily assessed by the Board- approved supervisor in the course of monitoring and observation of the intern, including six-month reports of progress, and assessment and feedback of case reports. Some oversight assessment is conducted by the Board and AHPRA through review of case reports and progress reports, and the requirement to pass the national psychology examination."

A 4+2 Psychologist's Comment: "I also did a research thesis that I designed collected data analysed & wrote up - just like a masters. It took 6 months."

So if the 4 plus 2 pathway meets these 8 competencies, and it does, the trainees have met the competencies. End of story.

Comment: 135 etc. Psychologists, Dr. Clive Jones and Dr. Alexander James Caution against following this international situation of requiring higher and higher degrees for registration and the impact it has on the diversity of the workforce. Party because it prices psychologist out of the workforce in places like the United states where the public opt to see counsellors and therapists from other disciplines with lesser burdens of academic training years.

Comment: 139. A masters degree in one country is not necessarily at the same standard as a masters degree in another country, or at a different university, or discipline or subspecialisation. Point 139. may be more about export marketing and fees for degrees than about safety standards in Australia. This is Australia, not South Africa. We don't require such strict control, nor do Australians thrive under hyperregulation. On the contrary, Autonomy, Self-determination and Innovation are core elements of our national psyche.

Comment: 140. Australian regulations should primarily concern themselves with registration in Australia, not other countries. The PBA should work with overseas

regulatory bodies to develop amelioration of this problem if they feel the need to, not restrict training pathways in Australia.

144-145. "*A viable alternative: the 5 plus 1 internship pathway...*"

Comment: That is fine... have an alternative...but it is not a viable replacement to those who are better suited to the 4+2 pathway. Don't get rid of 4 plus 2 because there is no need to and let people make their own choices rather than excessive oversight and restriction of choice.

Given the current trends, if the 5+1 replaces the 4+2, it is only a matter of time that they will phase it out too when they get university and APS control of all training... and require Masters and PHD training from thenceforth. The ACPA have expressed a desire to make PHD a mandatory entrance requirement for clinical psychology. This will price out many excellent candidates and will also make the profession of psychology unaffordable to the general public. It will necessitate greater expenditure on University places. This is the purpose of this push for restriction of credentialing to 'higher education'.

The Board in their 'confidential' 'public consultation' at 148. Highlights the importance of "... *acquisition of psychological knowledge and skills under clearly defined competency requirements...*" which it says occurs during the 5 +1 path. It also occurs thoroughly during the 4 plus 2 internship training pathway. More thoroughly.

5 plus 1 offers nothing more than 4 plus 2, but limits the experiences available to the registrant. 5+1 limits the earning capacity of financially struggling graduates.

If there is a natural growth towards 5 plus 1, why bother to kibosh the 4 plus 2. Why not allow market and other forces to do the work. For many 4 plus 2 is still viable and versatile.

At 159. the PBA indicates their priorities are closely aligned with the education sectors priorities by pointing out that the universities are waiting for assurance that the 4+2 is retired so they can open up more 5+1 programs. Instead of concerning themselves with the public and psychologists, their focus is on the needs of the university sector.

At point 162 the "advantages over 4 plus 2" are all advantages for the academics. It shifts the regulatory burden to the universities. Creates more regulation, assessment, oversight, control, administration, academia - not less. It is power shifting and concentrating regulation more in the hands of academics, rather than in the hands of AHPRA and a neutral Board where it should be.

There is an old saying, "if it aint broke don't fix it."

Comment: 164 The Board is happy to promote "*f. a primary focus on education and training (whereas a workplace is necessarily focused on service delivery, with education and training as secondary).*" This shows complete bias towards education sector control and blindness to the actual priority of workplace focus in ensuring a competent and safe practicing psychology work-force.

As does 170. "*For the Board, administering only a one-year internship program effectively reduces the administrative burden. Additional accreditation gives the Board confidence in academic entry standards, and the quality of training for the fifth year. It means that the diversity in internship experiences (number of employers, the variety of work sectors and any jurisdictional differences) has a lessened effect on provision of quality education and training of psychologists than it has in the 4+2 internship pathway.*"

The Board is mainly academics who lack confidence in the very grounded competencies of alternative pathways from the academic. It is understandable that they feel comfortable with what is familiar to them, but it is not necessarily what is best for Australia to shift the burden of responsibility for regulation away from AHPRA to the PBA's cronies at University, ostensibly to make the board's life easier for themselves. The PBA has one of the highest registration fees for members and about 30,000 registrants. They can manage.

The Board states at 171. "*The Board's confidence that registrants in the 5+1 pathway are consistently more likely to meet the competencies, than those in the 4+2 pathway is evidenced in the comparative pass rates of each group on the national psychology examination.*"

Comment: But this just shows that the board has more confidence in academic methods than in anything else, because they are academics. It is about ability to perform on an academic exam not practice competence.

Comment: 172 is about small differences in pass rates on the academic exam. This is obviously where the Board is most at home, but still fail to apply proper academic standards to their own evidence. Where are the tests for statistical significance? Are confounding variables and error factors accounted for and controlled?

This is further evidence of biased cherry-picking data to support an apriori conclusion.

A moratorium and independent commission of inquiry is required now.

Comment: The pass rate in the first year of the exam was 86% for the 5 plus 1s. It was 86% in 2017 for the 4 plus 2s.

Maybe more support for the 4 plus 2s would increase their pass rate? How about more support not less? It is clear that universities can better coach people to pass exams than workplaces can. What is not clear is that passing exams at 85% or higher indicates better readiness for the workforce. I would say that 86% is a great score for an academic test for a non-academic role.

The time is not right to retire the 4+2 pathway.

Comment: 177 reducing regulatory burden is a red herring. they are shifting regulatory burden to universities. To themselves and their mates as they rotate.

Comment: 178 The national law is fully served already under current registration practices. If it aint broke don't fix it.

Comment: 179 Regulatory principle for national scheme...

Comment: a. The risk factors are not significantly different.

Comment: b. Community confidence is fine, but it is being eroded by the PBA ACPA and APS raising spurious aspersions on 4 plus 2 when there is no valid evidence that 4 plus 2 is less competent or ethical. None! Not one iota. Just pontification of academics.

Comment: c. Ministerial council has to approve the Boards standards of practice.

Comment: Who are the 'stakeholders' referred to by this paper. An independent review is required now. The PBA has lost its validity due to a lack of independence.

Comment: 180. COAG principles for best practice regulation should not be prohibitive of 4plus2.

Comment: 185 status quo advantages are far greater than what they say but the 'disadvantages' are also 'advantages' depending on how they are applied.

Comment: 186 a. The challenges are opportunities. Challenges create growth and resilience.

Comment: 186 b. Moving the regulatory burden to universities is not advantages for the public or the profession, but for the university sector employees only. Regulatory burden brings about excellence in workforces. It smartens up their competence and standards. It is a good thing.

Comment: 186 c. there are other ways to reduce cost of red tape. e.g. better fund regulatory authorities. There is no saving by changing to 5 plus 1. The cost would be shifted to the university sector as would the power.

Comment: 186 d. variety is the spice of life. Psychology is not a monoculture and strengths in some areas and focci are a strength for the profession, community and workforce sector.

Comment: 186 e. International standards are not comparable due to lower standards of degrees in some countries... a masters in the US is not comparabe to a Masters in Australia. Australian regulation should concern itself with Australian practice not overseas... see Dr. Clive Jones on this.

Comment: f. Not true.

Comment: 187 Ministerial council approval is necessary condition to retire the 4 plus 2 pathway.

Comment: 189. There it is ... More support for development of 5 plus 1 pathways... More funding for Universities and training organisations etc. This is the agenda. Pure and simple.

Comment: 190 APAC and HODSPA to reduce regulatory burden and red tape of 5 plus 1 = moving more power and oversight to the HODSPA education sector, Which is closely aligned with the PBA, which is why we need an independent inquiry.

Comment: 192 Is about fighting phantoms and manufactured fears.

Comment: 194 is an example of the marketing tool of being repetitive. Saying something again and again doesnt make it any more true. This is a deceptive technique to influence decision makers. We need an independent review for this and other reasons.

Comment: 195. a. What is good about simplifying a complex area such as psychology? How would this simplify it anyway.

Comment: 195. b. Shifts regulatory burden to unis and leaves burden with the trainee.

Comment: 195c 'Changing to a framework of multiple pathways' **minus one very effective pathway in 4+2**, benefits only the university sector and disadvantages many other people.

Comment: 195d is a baseless assertion with no proof.

Comment: 195e is repetitive. International courses across different jurisdictions are not comparable. We need to focus on Australian conditions and needs, not the careers of university professors.

Comment: 195f. No change to number of psychologists, pricing etc. is a non-issue. Why list it as an advantage? This is neutral. Not an advantage.

195g. *“There is minimal to no impact on the labour market:*

i. there is no additional time required for psychologists in training to obtain general registration (remains at six years)

ii. there are no restrictions on education and training providers...”

Comment: 195g is absolutely false. The workforce loses the trainee during the 5th year.

Comment: 195g i. Where are the costings? If the costs are the same there is no gain.

Comment: iv. Why not fund the paid internship registration courses instead

Comment: v. Red herring / Not relevant

Comment: 196a is wrong. It would mean another year of university instead of full-time employment as an intern.

Comment: 196b. Lag in workforce entry is significant. not insignificant and it would not be for one year only as people are wooed to do 'higher degrees' like masters and phds instead of entering the workforce, because they are less workready having spent an extra year at University.

Comment: 195 f. iv. Do all 5 plus 1 trainees finish in that time, never deferring or extending time? Is it too early to compare? Where are the statistics? The 4 plus 2 are already in the workforce even, if they delay the full registration beyond the plus 2 to complete requirements, they are still already in the workforce making a contribution and earning an income.

Comment: 199 is Repetitious. Is this an attempt to bore and hypnotise the readers into acquiescent compliance with a faulty proposal?

Comment: Does the word "streamline" equate to creating a mono-culture? A multi-culture in psychology is preferable as other countries like Britain know only too well.

Comment: 201. It is cheaper and better to have mentoring arrangements in the workforce rather than educational monocultural ivory towers.

Comment: 202 This is repetition again. The Furphy of protecting the public... from what? Where is the evidence? What is the proof? There is none! The board is manufacturing fear, by repeating a lie, in order to increase control by the university sector.

Comment: 204 Costs of retiring 4 + 2? What are the costs? Where are the costings? We need an independent review.

Comment: **205** *"205. For consumers, this means receiving treatment by a work-ready intern for the same cost (consultation fee) as before, knowing that the Board facilitates consistently high-quality education and training of psychologists."*

Comment: 205. Same Same. There is nothing new here.

Comment: 207 Education providers are what this proposal is all about. It should be about the public and the profession, not about making life better for boards and educators.

Comment: 208 Please don't retire the program and don't make these people second class professionals.

Comment: 214 What is this regulatory and administrative burden of which they speak? What a Furphy. Any method will have regulatory and administrative requirement. This is a non-argument.

Comment: 218 It's all about boosting numbers at university, the comfort zone of the elitist PBA and their friends, many of whom are university professors of psychology.

Comment: 233. Or how about option d. leave it alone as it is and don't upset anybody!

Comment: 246 Questions for consideration.

246. The Psychology Board of Australia (the Board) is inviting feedback on the following questions:

"1. Do you agree with the Board's proposal to consider education and training reform, including focusing on reducing regulatory burden, as an important next step in the development of the regulatory environment for psychology?"

NO, REGULATORY BURDEN WOULD BE SHIFTED TO UNIVERSITIES AND IT SHOULD REMAIN WITH THE AHPRA.

"2. Which do you consider is the best option for reducing regulatory burden? Please provide reasons for your stated preference:

- option one - status quo OPTION ONE*
- option two - retirement of the 4+2 pathway to general registration*

- none of these options, or another option.*

3. Are there any specific impacts (positive or negative) or advantages/disadvantages for each of the two options that have not been outlined in the paper?

4. Are there any specific risks (for each of the two options) that have not been outlined in the paper?

5. *If you prefer option two, do you support the Board making the changes (update/delete) to the standards, guidelines, fact sheets and forms as outlined in Attachment G-J to retire the 4+2 internship pathway?*

6. *If you prefer option two, which transition option do you prefer and why?*

- *option a): last enrolment in the 4+2 internship is 30 June 2019*
- *option b): last enrolment in the 4+2 internship is 30 June 2020*
- *option c): last enrolment in the 4+2 internship is 30 June 2021*
- *none of these options or another option (please specify)*

7. *From your perspective, can you identify any practical issues in retiring the 4+2 internship pathway?*

8. *Is the content and structure of the consultation paper helpful, clear, relevant and understandable? If not, what needs to change?*

9. *Is there anything else the National Board should take into account in its proposal, such as impacts on workforce or access to health services that have not been outlined in the paper?"*

246. 1. NO. REGULATORY BURDEN WOULD BE SHIFTED TO UNIVERSITIES AND REGULATORY AUTHORITY WHEN IT SHOULD REMAIN WITH THE AHPRA.

Comment: 2. NO NEED TO REDUCE REGULATORY BURDEN... STATUS QUO HAS THE LEAST AMOUNT OF ADMINISTRATIVE BURDEN. THIS IS A PRETEXT TO MOVE POWER AND RESOURCES TO THE UNIVERSITY SECTOR.

Comment: 246.3. Yes as listed above.

Comment: 246.4. YES AS LISTED IN RESPONSES ABOVE. Yes. As listed in responses above. RISKS TO DIVERSITY. RISK OF MONOCULTURE. FURTHER CONCENTRATION OF POWER IN UNIVERSITIES. INCREASING MARCH OF THE CREATION OF IVORY TOWERS STRUCTURES REQUIRING COMPLIANCE TO NARROW MONOCULTURES... CREEPING EMPHHASIS ON HIGHER DEGREES WILL LEAD TO EVENTUAL AXING OF 5PLUS 2 UNDER THE SAME ARGUMENTS AS THOSE FOR THE AXING OF 4 PLUS 2.

Comment: 246.5 NO

Comment: 246.6 **OPTION D. LEAVE IT ALONE.**

Comment: 246.7 AS ABOVE... REDUCTION OF DIVERSITY, CONCENTRATION OF POWER AND RESOURCES IN UNIVERSITY IVORY ECHO CHAMBERS.

Comment: 246.8 IT IS REPETATIVE AND HEAVILY BIASED AND LACKS EVIDENTIARY DISCIPLINE AND CREDIBILITY. IT CLEARLY SEEKS TO FAVOR ACADEMIA AND BENDS THE FACTS TO MEET THAT BARELY HIDDEN AGENDA.

Comment: 246.9 I AM SURE THE BOARD HAS CONSIDERED ALL OF THIS already AND DEEMED IT PREFERABLE TO PUT UNIVERSITY PROGRAM SURVIVAL ABOVE ALL OTHER CONCERNS SUCH AS LOSS OF WORKFORCE DIVERSITY, DIFFICULTY FOR REMOTE STUDENTS AND REGISTRANTS. THE LOSS OF INCOME AND WORKFORCE PARTICIPATION . ALL OF THE ABOVE.

Comment: 248 The board will consider feedback... because they have to, but they don't have to act on the feedback. The Ministerial Council must intervene and appoint a neutral commissioner to review this.

Comment: 252 to 281 looks like a rehash of the preceding points.

Comment: 272 Is wrong... It is by definition 'restrictive' to remove a perfectly good pathway to registration.

250. *"These procedures have been developed by AHPRA in accordance with section 25 of the Health Practitioner Regulation National Law as in force in each state and territory (the National Law) which requires AHPRA to establish procedures for the purpose of ensuring that the National Registration and Accreditation Scheme (the National Scheme) operates in accordance with good regulatory practice."*

In the spirit of point 250 a proper review and consultative process is need by a neutral party without vested interests that the members of the PBA definitely have, being largely of the academic sector which stands to gain most of all from these proposed changes, that disadvantage large sections of the psychology profession, the public and the sector.

Yours sincerely

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