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**ATTENTION: CHAIR, PSYCHOLOGY BOARD OF AUSTRALIA**

SUBMISSION TO THE CONSULTATION PAPER

OF THE PSYCHOLOGY BOARD OF AUSTRALIA

The writer thanks the Board for this opportunity to offer suggestions about the regulation of the profession of psychology in Australia.

The standards of qualifications proposed are supported, given the current position in Australia and around the world. The international disparity for basic registration is a further reason for defining Specialist titles here. The reintroduction of a period of supervised practice following a specialist doctoral training is also supported. .

This submission addresses a few select points referenced to the relevant section of the paper or its Attachments.

2.4 – Continuing Professional Development

The concept of mandatory continuing professional development is supported.

However, it is not clear what the precedent of rationale has been for proposing a distinction between a specialist who maintains generalist registration and one who does not. Clarification is sought on this point.

The requirement that a psychologist should develop a “learning plan” for their CPD is firmly opposed as this is counter-productive to some functions of CPD.

Firstly CPD is generally taken from what it on offer, and this cannot be predicted by the psychologist consumer. The psychologist needs to feel free to respond to activities without being at risk of failing to carry out some pre-set plan. Secondly, the moment that one's CPD is pre-planned it no longer fulfils the function of keeping one up to date with unforeseen developments in the professional discipline. One will always be lagging behind, the most attractive offerings would cause psychologists a conflict – whether to miss the new presentation in order to adhere to their plan, or whether to discard their plan in favour of the new presentation. CPD needs to be responsive to what is new and what is available. The practice of reflecting on one's work is recognized as desirable but this would be covered in the supervision requirement without interfering with the spontaneity of other CPD. Individual learning in a trained professional can and should be continuously evolving and changing, in contrast to class and curriculum based learning. The requirement of developing of a learning plan is a misapplication of an educational concept borrowed from another form of education. The Board is therefore asked to withdraw this requirement.

The concept of an approved program is also concerning and unclear. It may be cumbersome, restricting and delaying what is offered. The form developed by the Australian Psychological Society "Record of Professional Relevance" has proved to be an excellent concept and it is recommended that the Psychology Registration Board adopt a similar tool. It allows psychologists to choose their own activities which may not have been pre-approved, but the psychologist has to substantiate its relevance. This brief task actually serves to consolidate the learning that has been undertaken. Upon audit, if there were too many activities of questionable relevance, the psychologist may not pass and would have to catch up with extra CPD. The Board is asked to make sure it does not restrict diversity in CPD by requiring approval.

Group supervision is an excellent form of CPD. It is appreciated that its use in lieu of individual supervision has to be controlled in the manner proposed – that the number of hours is divided by the number of participants, but surely the additional hours could count as general or specialist CPD points.

Alternatively, group supervision could be run as a workshop where all the hours would count, although not as individual supervision. Further consideration of the place of group supervision is requested.

With regard to specialist registration, the requirements for those with a Masters degree in the specialization are to obtain two years of supervised experience plus “120 hours of CPD in the specialty”. This may be an unworkable demand if all the CPD is to be specialist – four times the amount a registered specialist is required to do. There may not be as much CPD as this on offer in some specializations with small numbers. This requirement needs some revision.

#### Attachment A – CPD standard

The proposal of a structured program of CPD is not given any detail other than to include the use of supervision, but seems to imply that the Board intends to devise further specifications. There are arguments for and against making supervision a specific requirement, but any further structure seems quite unwarranted. The rationale that psychologists might need this to help them meet the new legislative requirement is regarded as somewhat condescending. The very nature of CPD should be that it is self-directed learning carried out by a professional person competent to evaluate what they should do. While the Board needs to audit that genuinely professional activities have been undertaken, and can indicate in broad terms what is likely to be approved, particularizing CPD any further is likely to be counter-productive. The individual psychologist should determine their own CPD.

The Board also need not approve offerings for CPD. This can be left to professional organizations to endorse and ultimately to the individual to justify other activities they seek to include in their professional development. The only time that the Board would assess CPD activities would be in auditing that psychologists had met the standard.

None of the comparison organizations or regulatory bodies referred to in this Attachment have been prescriptive or have a structured program and the British Health Professions Council emphasizes the autonomy of the individual practitioner in this. Far from being an up-grading to structure CPD, to do so would be a backward step, lowering the status of the psychology profession. The Board's role is to regulate the profession of psychology with necessary but not undue stipulation of requirements.

#### Attachment B – internship

The number of hours worked in a year is something which is often miscalculated. When setting requirements it seems sensible to make necessary allowances so that it is not the case that 100% of interns have to go over the two year period to complete their internships. The Board has made a sensible allowance in hours of supervision to be taken per year being 35 and a sensible approach to the number of hours in a working week being 35. However, the idea that a person works 48 weeks a year is erroneous. This does not take account of public holidays which in some States amount to ten days or two weeks of the year. No allowance has been made for minor sick leave of up to two weeks in a year. Additionally, it will be necessary for the Board to decide whether the supervision hour itself is to be regarded as work or not, and whether CPD is to count as work or not, and if not, these times need to be deducted from the total hours to be worked to complete one's internship within two years. It should be noted that where psychologists work in secure settings they may not be permitted to work overtime or out of hours to satisfy the Board's requirements. The Board is urged to take these matters into consideration in calculating the number of hours the intern must do to complete their internship.

#### Attachment C: Specialist Registration

The Board's aim to stop psychologists from self-styling themselves as specialist without appropriate expertise is supported. However, a brief glance at the work of the Medicare Assessment Team at the Australian Psychological

Society's office will demonstrate that making this distinction is no easy task. This is because the specialties of psychological practice in Australia are quite recently established and contain still practicing foundation members who may not have had qualifications directed specifically to that specialization but who have contributed to the evolution of the specialization. It is not so easy to distinguish these psychologists from the ones who really are under-qualified. While the standard of a Doctoral qualification in the particular specialization of psychology is supported for the future, the difficult task is how not to penalize some of our most senior specialists for whom that qualification was not offered when they trained but who none-the-less acquired specialist knowledge and skills.

There may be some justified consternation if the Board's transition proposal is adopted and all those who have not been members of the relevant Australian Psychological Society's College have to go through a time-consuming process of being judged on their merits.

In order to streamline this process it is suggested that as a transitional measure only, applicants for specialist registration who can demonstrate one of the following in their curriculum vitae could be admitted –

- Membership of the relevant APS College
- Is a registered psychologist and has been approved by the relevant APS College as a supervisor for candidates applying for membership of the College
- Held an appointment at Grade III or above in public service for three years or more which they acquired due to their knowledge and skill in the relevant specialization
- Have taught on a specialist Masters or Doctoral psychology degree (I.e. delivered a unit of study in the specialist field, not simply a guest lecture or administration of placements).

This information should be substantiated with certified documentations or a Statutory Declaration. Those who cannot demonstrate such overt evidence of

their specialist knowledge and skills having been officially recognized within the profession would need to have their case evaluated more individually and could not use the specialist title until this was done.

It is hoped that these ideas are of assistance.

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