



8 September 2010

Professor Brin Grenyer  
Chair, Psychology Board of Australia  
PO Box 16085  
Collins Street West  
Melbourne VIC 8007

Dear Professor Grenyer

**Re: *Response to Consultation Paper 5: Revisions to the Guidelines on Area of Practice Endorsements***

#### Introduction

After significant consideration, the Institute of Private Practising Psychologists (IPPP) provides the following response to *Consultation 5: Revisions to the Guidelines in Area of Practice Endorsements*. We have elected to comment only on the Equivalence Guidelines from the Consultation Paper and to provide other related contextual information regarding transition and grandparenting arrangements for area of practice endorsement.

#### Response

In previous correspondence to the Psychology Board of Australia (PBA) dated 19 June 2010, the IPPP raised a serious concern regarding the process of applying for recognition as a Clinical Psychologist through the Australian Psychological Society (APS).

We note that the PBA has extended a grace period for psychologists applying for College membership with the APS, however we believe the fundamental flaws in the application and assessment process have not been addressed. This has continued to disadvantage a group of psychologists who have been practitioners of many years' experience, mostly operating within private practice, and who have traditionally provided the bulk of psychological health services to the community. The IPPP states that we do not hold confidence in the criteria or process being used by the APS to assess the merits of these long-standing psychologists.



In addition, the IPPP notes that the PBA has granted a grace period for students enrolled in a higher degree program on 30 June 2010. We cite the communication from the PBA, dated 4 August 2010, that recorded the Board had consulted *"with stakeholders about the transition and grandparenting arrangements for area of practice endorsement. The consultation has aimed to ensure that the grace periods applied are fair and reasonable."* We applaud the PBA in recognising the group of higher degree students who *"were outside the scope of the previously proposed transition arrangements"* and providing a mechanism to address this oversight.

However, the IPPP asserts that the PBA has also overlooked another group of psychologists who are *"outside the scope of the previously proposed transition arrangements"*; that being those psychologists who have an extensive history of practice, but who do not have current APS Clinical College membership. This group are generally unable to meet the criteria for membership imposed by the APS Clinical College, as the criteria are unreasonable when applied to these practitioners. These psychologists are also unfairly excluded from the grandfathering and transition provisions thus far elaborated by the PBA, as these provisions have not followed principles that have been traditionally associated with the concept of grandfathering. The IPPP contends that grandfathering has been widely practised during the introductory changes to grading of qualifications in other health disciplines, affording opportunities for the recognition of the skills and experience of long established practitioners who do not hold all of the specific qualifications required in the introduction of new standards, or providing reasonable pathways for those practitioners to remedy any evident deficiencies.

Further, the *Consultation Paper 5: Proposed Revisions to the Guidelines on Areas of Practice Endorsements*, released by the PBA in August 2010, does not address this oversight in its proposed "Equivalence Guidelines". The PBA continues to perpetuate the same inequities in the criteria it proposes will guide its judgement in considering equivalence in the granting of endorsement in approved areas of practice. There continues to be no mechanisms for recognition of prior learning, application of skills and knowledge gained from many years of practice, achievement of other standards of excellence (e.g., the IPPP Competency Program), and continued commitment to maintaining and upgrading of skills by any means other than undertaking APAC accredited qualifications, or other post-graduate qualifications.

As in our earlier correspondence to the PBA, the IPPP again urges the PBA to establish an evaluation process that is open and transparent and perceived to be so by the majority of the psychology profession. We recommend the establishment of a small, impartial, eminent group of experienced senior practitioners, who are independent of any interest group. This group should be empowered to examine all of the circumstances of psychologists who have an extensive history of practice, who wish to apply for practice area endorsement. This group would reach a binding decision regarding eligibility



for grandfathering, including determining how a practitioner may address any assessed deficiencies in knowledge and/or skills ("bridging plan"). This group would have a sunset clause, in that there should be a reasonable time limit imposed for experienced psychologists to make an application via this process. As in the grace periods applied to other groups that have been recognised as disadvantaged by the introduction of the new system, these psychologists would also have a specific time frame in which to complete their bridging plans.

The IPPP asserts that this process may be utilised as a model Australia-wide, to treat with this group of psychologists who thus far have been unfairly overlooked and we are confident our national body will support it.

Once again, as noted in our earlier correspondence, the IPPP states that this recommendation is fully consistent with the intent of the PBA to protect the interests of the public. The IPPP applauds this intent and is committed to protecting and serving the general community, and more specifically, those who seek access to psychological services. Our dedication in this respect does not conflict with our desire to have addressed the inequitable and unreasonable treatment afforded to experienced psychologists in the introduction of the new health regulation system.

Meeting request

We seek the opportunity to have an audience to discuss the detail of this correspondence with the PBA at your earliest convenience. We look forward to a response to this correspondence facilitating an appointment to meet.

Yours sincerely

**Denise Keenan, PhD**  
**President, IPPP**

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