

The Chair

Psychology Board of Australia

22nd December, 2010

Dear Professor Grenyer,

Re: Submission in response to Exposure Draft: Guidelines on area of practice endorsements

Thank you for this opportunity to comment upon the Psychology Board of Australia's draft guidelines on areas of practice endorsements. Our national office has already provided a response to your office on 14th December. This response is generated following further discussion with Specialist Clinical Psychologists in WA who are now emerging as the most disadvantaged and negatively impacted professional group of psychologists in Australia following the transition to the National Scheme.

ACPA nationally fully supports the qualifications required for endorsement as laid out in the Exposure Draft and are encouraging the PBA to continue to move towards standards that are internationally competitive in the areas of endorsement/specialty. ACPA-WA has some further comments in support of improvement in standards.

We contend that with regard to clinical psychology, we were the only state within which the whole clinical psychology workforce met the full PBA training standards for endorsement in clinical psychology on the day of transition to the National Scheme. We held our WA legislation in high regard for its capacity to set clear professional mandates for training that ensured the levels of scrutiny and accountability at an administrative level that guaranteed critical review of Clinical Psychology Registrars during their post graduation training phase. The path toward attainment of Specialist Title mandated in law, demonstrated an unwavering commitment to the maintenance of standards that were focused on the training of the workforce to a high level of competence. Public safety could be assured in the standards of service delivery and they knew they would receive a service on par with what might be expected in the international arena. With the shift to PBA endorsement, our WA workforce has now suffered an immediate drop in standard of training as endorsed clinical psychologists (without appropriate training in accord with PBA stated standards) move to WA, or our recent graduates seek to more rapidly attain their endorsed status without completing the standard level of postgraduate supervision. This does not bode well for the quality of mental health care that will be provided to our WA public.

Our WA membership strongly supports the Specialist Title registration system as

previously administered by the Psychologists Board of WA. The standards were set in legislation, unable to be changed without due debate and process. These provided a clear set of minimum expectations for standards of training and base competency. Therefore, whilst ACPA-WA supports the full training guidelines described for endorsement, we object to the affording of endorsements to those who have not met the full training requirements (i.e. through APS Individual Bridging Plans), and those newly graduating students who will transition to full endorsement without supervision or with reduced supervision hours. (The clinical and supervision hours proposed by the PBA are also significantly less than those required by the Psychologists Board of WA). We do not believe that this provides any scope for WA to maintain the high standard of clinical psychology service delivery to our public and places them at greater risk.

Furthermore, the matter of Specialist Title retention has not been adequately addressed. There has been much focus on retaining entitlements and not disadvantaging those who sought an alternate means to attaining an endorsement in clinical psychology (i.e. APS Individual Bridging Plans and now, transition arrangements for new graduates) but there has been no recognition of the need to not disadvantage the WA Specialist Clinical Psychologists and those Registrars who had already lodged their Specialist Title supervision plans prior to transition into the National Scheme. To take the Clinical Psychology Registrars as example, this group of dedicated postgraduate-qualified supervisees, entered the WA scheme with the belief that on completion of their supervision period, they would be granted Specialist Title in Clinical Psychology. The PBA must demonstrate a similar level of due recognition of 'held belief' on entering their supervision period and also afford them the use of the title Specialist Clinical Psychologist on completion of their entire supervision program. To do less would be to disadvantage a group of clinical psychologists who are merely holding up the minimum international training standard – a matter that we understand the PBA is striving to achieve. We contend that during their supervision period they use the title 'Specialist Clinical Psychologist Registrar' to set them apart from those who have not completed the minimum training expectations.

We do not support the transition arrangements for students enrolled in a program as at June 30th 2010 (and now also those who had recently graduated) whereby they can progress to full endorsement without a mandatory or with a significantly reduced supervision period. This is creating tensions where they did not previously exist and presenting as a clear distinction within WA as 'Specialist Clinical Psychologists Registrars' continue their training through their supervision plans, whilst their newly graduated colleagues step straight into endorsement. This is inequitable and further supports why the WA registrars should be afforded their Specialist Clinical Psychologist titles upon completion of their full, Board approved, supervision.

We echo the ACPA national office regarding deep concern about the definition of practice as applied to clinical areas of endorsement such as clinical psychology, clinical neuropsychology and forensic psychology. In these areas "management,

administration, education, research, advisory, regulatory or policy development roles” may not involve direct client contact or allow maintenance of clinical skills. Clinical areas of endorsement need to include work directly involved with clinical populations to meet recency of practice requirements. Anything less places the public at risk from clinicians who are de-skilled, and with outdated knowledge, returning to work with clinical populations.

ACPA-WA also firmly believes that differentiation in core clinical competencies within the registrar program sets the foundation for clinical practice that allows the public to make informed choices. It is an unfortunate consequence of the Medicare system that those psychologists who once proudly and strongly held an identity separate to that of clinical psychology, now strive to be ‘as same as possible’ in order to enter Medicare as clinical psychology service providers. This is likely to result in a loss of diversity in psychology. Those psychologists who have taken alternate, non-degree routes to attaining endorsement in clinical psychology need to be identified as such on the register. This provides the public with greater assurances in terms of their expectations about basic internationally similar standards of training.

Furthermore, we contend that whilst the PBA has sought to safeguard the benefits of many ‘groups’ of psychologists within their transition and grandparenting arrangements, it is the WA based Specialists that are experiencing the greatest impact on their trade. A recent submission made to the PBA by the Institute of Clinical Psychologists (ICP) sought further clarification about the legal basis for not keeping our Specialist Titles and having them clearly recorded within the Specialty area of the register. ACPA-WA contend that not allowing us to maintain after 2013 the title that we attained via a duly recognized state legislative and administrative process may be unconstitutional and amounts to a restriction of trade. The PBA have not sufficiently supported our WA group of Specialist Clinical Psychologists and our basic contention is that we should not ever lose our titles and that they should be duly noted within the appropriate specialist title section of the AHPRA register. We contend that for the PBA to not advocate for us at this level represents unfair treatment when considered against the benefits that have been afforded other groups (e.g. APS Individual Bridging Plan psychologists and newly graduating students).

We appreciate that there are many IT teething problems with PBA website register and that AHPRA has stipulated its format. However, we ask that the PBA kindly consider presenting the following issues to AHPRA. We note that the WA Board’s Psychologists and Specialist Psychologists website register included considerably more information than the PBA register. This information was useful for the profession, other professionals and the public. We urge the PBA to consult the former WA register example and refine its website register of psychologists. For example, the PBA register is inconsistent and does not provide important qualification details such as the area of psychology in which the degree was completed, the university, or the degree award date. The PBA website also does not allow group searches in areas and states (e.g. all clinical psychologists in WA), nor

does it provide professional contact details for psychologists.

In summary, our key points are:

- Award 'specialist title' notation to Clinical Psychologist Registrars who fully complete their Psychologists Board of WA supervision program.
- Encourage all Clinical Psychologist Registrars to continue to pursue full completion of their Psychologists Board of WA supervision program and not expedite their path to endorsement via the PBA transition arrangements.
- Address the restriction of trade issues that arise as a result of WA Clinical Psychologists not being fully afforded their Specialist Title on the register (the notation is inadequate). We contend that as a matter of law we are entitled to continue to hold the title once it is attained.
- Place a notation on the website that identifies those psychologists who are endorsed and have acquired endorsement through non-standard routes.
- Request that AHPRA refine the website and include group search facilities and crucial information for the public and professionals about types of psychology degrees; names of universities and graduation dates; and professional contact details.

We look forward to being able to represent these concerns to you again in the New Year as we embark on a process of becoming better informed about our legal entitlements regarding Specialist Title. We appreciate your consideration of our concerns relating to registrars and the issues we have raised in terms of recency of practice. We thank you for the ongoing efforts of the Board members and wish you well in managing this time of transition and change.

Yours sincerely,

Dr Thelma Pitcher

Acting Chair, WA Section of the Australian Clinical Psychology Association