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Cc:
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Subject: Fw: Attention: Chair Psychology Board of Australia

Dear Chair Psychology Board of Australia,

Please find below my comments and questions in relation to the consultation paper on registration standards and related matters dated 27 October 2009:

- 1) With regard to recency of practice – my comment is that I have concerns the standards appear not to be taking into consideration leave from the profession for reasons of parenting (which quite feasibly for those parents wishing to remain at home until their child/ren commence their schooling education could quite easily extend beyond 5 years). From my interpretation of this paper, there are no clear guidelines as to what is required to regain registration for a person who takes leave from the profession for more than 5 years for these reasons/ or for other reasons equally as legitimate. I think clear guidelines as to what is required for people in these circumstances is important and that opportunity to comment on such requirements be provided to the profession before such matters are legislated is essential. My question on this matter is therefore – what will be required of persons who have leave from the profession for more than 5 years for such reasons as parenting?
- 2) In relation to the above I also have concerns regarding the cost of professional development being placed upon these individuals during the time they are on leave – presumably much of which is without pay if reasons for leave is parenting tasks. I wonder if more consideration is not required on such registration requirements – which are likely to place undue pressure on individuals who are then not necessarily even guaranteed to be able to regain registration – if I am to read the consultation paper correctly. I presume there has actually been consideration of this matter, but that it is simply not clear in the consultation paper.
- 3) I have some concerns regarding the potential increase in cost in order to maintain registration, costs which already on an annual basis far exceed many of our allied health and medical colleagues. To provide one such example – for those of us already enrolled in Doctoral programs we are currently paying the fees associated without our doctoral course, the leave from work associated with completion of clinical placements, expenses associated with completion of thesis, professional indemnity insurance (in some but not all circumstances), registration fees (hinted at rising next year with national registration expected to be cost neutral), APS membership fees, attendance at other professional development activities, and an expected increased cost for those who are not fortunate enough to work in the government sector and have access to free supervision of additional supervisory expenses. While I understand and support the fact that these measures are being taken to ensure the protection of the public, I think that some overall justification of the cost vs benefit to the profession also needs consideration. Given the weight placed in the consultation paper on international standards, I am wondering where the evidence is to support these measures. My question being, will we be given access and evidence-based justification that these new measures do in fact result (e.g., is there robust evidence from the US that this is in fact the case) in a better service to the public, more protection to the public, and a higher standard of professional practice for the field of Psychology?
- 4) I think the matters in relation to criminal history and English standards appear fair and in line with other fields and current status for psychologists. We are currently subjected to criminal history checks there appears to be no changes in this regard.
- 5) CPD – It is unclear in the section pertaining to CPD whether current standards in place

by the APS as to what constitutes general and specialist CPD will apply as it currently stands to the national registration CPD requirement? More clearly – if I have accrued 80 generalist points in a year via APS means, will that equate to 80 generalist points for national registration CPD requirement? Obviously with the exception being 10 hours of 1:1 supervision required.

6) CPD appears to me to be fairly consistent with the APS requirements and therefore reasonable and likely to be very valuable to individual psychologist as well as profession as a whole. I have some concerns for those people in regional areas that the cost of CPD is generally significantly higher than for those location in metropolitan areas – I wonder if more opportunities to be involved via teleconference will be considered as advisable by bodies such as APS in order to enable more cost effective participation.

7) CPD is said to be in line with international standards however, on the table provided on p.30 of the consultation paper, the proposed standards required is higher than all countries except Canada, with no data provided for any US state except California (I question why we have not been provided with all US evidence given the models proposed on specialist qualifications are US based).

8) I have a question in relation to PII, but this is perhaps a question more for my professional supervisor in the workplace, as it pertains to what evidence government departments will provide in relation to whether PII does meet these four criteria. As I understand it those already in possession of a AON PII policy do meet those four requirements.

9) Specialist titles – I am seeking clarification on ability to be registered in two specialist areas for those of us who are undertaking effectively joint doctoral programs where we will meet requirement for both College of Clinical Psychology and the College of Clinical Geropsychology by completing the Doctorate Clinical Psychology (Clinical Geropsychology) – a) will this joint specializing be able to occur? B) if not will the individual be able to choose which specialization to remain in given the one most applicable to their current workplace? C) if able to remain in both specializations will the person then be required to complete three separate lots of PD – e.g., Clinical Psychology specialist PD points, Clinical Geropsychology specialist PD points, and General points?

10) Two year programs of supervised practice – the proposal for supervised practice makes this path all but impossible for any person wishing to join our profession who currently has parenting or carer responsibilities and therefore previously could have still gained registration in ½ of our states by completing part-time work. I think the new requirement is quite prejudicial against people whose circumstances quite legitimately prohibit them from completing 35 hours of work a week over 2 years to meet the new requirements. Could an alternative be added that with special permission granted by the board for reasons such as parental/carer responsibilities/health that an individual would be permitted to complete the 3080 hours over either 3 or 4 year period?

Thank you for the opportunity to comment on this consultation paper. I apologise that the wording of my thoughts were a little rushed in the writing due to time constraints, however I thought it more important to make comment than miss the opportunity because of less than ideal wording. I look forward to further consultation in the future, and further information on the evidence-base to support the new directions.

Sincerely
Natasha Bartlett
(Registered Psychologist – QLD)