



9th September, 2010

Dear Psychology Board members,

Thank you for Consultation Paper 5: **Proposed revisions to the Guidelines on Area of Practice Endorsements**. The Australian College of Specialist Psychologists (ACSP) would like to respond to several points and ask for feedback from the Board to clarify some issues for our members.

- ***That the PBA allows Doctoral students to begin their registrar program after completing coursework and practicum Degree requirements but before completion of their thesis.*** The ACSP agrees with this change with some caution. The change would allow students to become fully qualified more quickly, and perhaps in a similar time frame to Masters students, which from a workforce perspective is attractive. This would only be acceptable however if there is equivalent practical placement work and supervision in the different university post-graduate training programs, to ensure that a Registrar of any program has equivalent skill base when they go out into the workforce with this “title”.
- ***To allow Doctoral candidates in the Registrar program to use the title “registrar” prior to completion of their qualification and therefore prior to general registration.*** The ACSP agrees with this provision as it follows from the previous understanding, however it does make the definition of “registrar” then vary, which could be problematic. That is, the term “registrar” would mean in some instances that some have completed their post-graduate training requirements and have been awarded their Degree, and others have not. This is potentially problematic to deal with industrially, because some post-graduate Registrars would be practicing without their Degrees having been awarded. Perhaps there will need to be some understanding negotiated with employing bodies that Doctoral candidates are equivalently competent to practice, to those who have already been awarded with a post-graduate Masters Degree?
- ***To set a minimum number of hours of client contact at 176 hours per annum in the Registrar program.*** The ACSP is concerned that this is a very low number of hours in a section of the training program which aims to consolidate and enhance practical skills in the workplace. One could assume that if a person has gone through such an onerous program of study in Psychology through to Masters or Doctoral level that they want to practice in the profession. We are concerned that accommodating too many other interests of a Registrar by reducing this aspect of the training program is not ideal. We support the number of hours of registrar training in the WA model (in the Masters training program) as a good balance between obtaining sufficient



exposure to client contact and sufficient supervision support to consolidate skills. Therefore we cannot support this proposal.

We also have the same concern regarding the differences in the number of hours/years required to undertake supervised work in the Registrar program between the Masters and other training programs. We feel, as stated previously, these differences would only be justified if there is an undertaking by the university training programs that supervised and assessed practical work completed within all post-graduate programs are equivalent. Otherwise the core component of practical supervised work may be unequal across the different post-graduate programs.

- ***That the PBA adopts the Australian Health Practitioner Agency definition of practice.*** The ACSP accepts this definition being adopted as it assists to better include our speciality areas that are not health related (e.g. organisational psychologists).

Additional comments

- The ACSP has ongoing and major concern about undergraduate trained psychologists being allowed to fully practice in any field of psychology. We firmly believe that the minimum training standard, before a person can practice in any specialist field of psychology, should be at post-graduate level plus supervised practice. This is in keeping with international training standards, and also acknowledges that the essential structured and university assessed practical training in our profession does not occur in undergraduate training programs, but in the post-graduate training levels. We understand that the PBA is aiming towards aligning our training standards to international levels, and that there are workforce issues (and hence government concerns) involved. However the future development of our profession may be made more difficult to argue with governments, if statements such as the following are made “*Generally registered Psychologists have unrestricted rights to use the title Psychologist and may undertake any work using that title as long as they are generally registered*” (page 7, paragraph 2), without some statement or caveat about the continuation of this level of training for registration for full practice being still under consideration or investigation.
- We have concerns that the extra PD requirements for supervisors may lead to experienced supervisors choosing to not continue to provide supervision. This is especially true for private practitioners, where PD is undertaken at a significant cost – not only the cost of the PD event but additionally the cost of losing income whilst at the PD event. We would ask that the PBA at least allow supervisors to include their supervision PD requirements in their general PD requirements for maintaining endorsement. This way there is at least no additional burden of doing PD, beyond the normal requirements.



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- The ACSP is also concerned about the wording of some of the definitions offered for area of practice endorsements. In general, the Psychology Board of Australia must be mindful of the fact that in the process of defining each specialty area, there is the potential to redefine the scope of practice for each specialist domain. Historically, each of the specialist areas have been defined by the profession itself, but with the advent of the National Registration and Accreditation Scheme, this responsibility has been handed onto an external regulatory body. For the most part, the definitions that have been offered by the PBA have been non-controversial. In the case of 'Counselling Psychology' however, the PBA have offered a definition that is not consistent with the basic specialist entry-level standards that have been regulated by the profession for several decades. We are aware that the definition offered by the PBA for Counselling Psychology is controversial within that specialty group and we support the efforts of Counselling Psychologists to maintain the high standards that have been in place for quite some time now. The ACSP takes the position that specialist-level training in mental health care for the Australian community remains an important priority and therefore we support the efforts of Counselling Psychologists to maintain their existing definition in that domain under the new registration system.

The ACSP would like ask the following questions of the PBA:

- Will the register of endorsed professionals held by the PBA be readily accessible to the public and organisations? Will the register clearly list the qualifications and supervision of people who are endorsed? We ask this because membership of the ACSP is only open to people who have an undergraduate Degree in Psychology, plus a post graduate Degree in Psychology, from accredited training programs, and have completed the supervision requirements for endorsement. We would therefore like to be able to check applicants to our college for all these requirements from the PBA register. We are not, and do not aim to be, an accrediting body and therefore would rely on the PBA to have this clearly stated on the registrar. We also feel it would be important for community members and organisations to be able to easily check the qualifications and training of endorsed Psychologists.
- Will the PD requirements for ongoing registration cover the PD requirements for ongoing Medicare registration, or will private practitioners have to have two sets of PD requirements?



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The Australian College of Specialist Psychologists, as a newly formed National body open for membership from all “endorsed” specialists in our profession, welcomes further communication with the Board on its plans and proposals for our profession. Whilst our professional body is mostly focused on responding to and influencing Government policy affecting our specialists, and engaging in media discussions relevant to our specialists, we will actively participate in consultations and debates about the definitions and standards of our profession.

Yours sincerely,

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