



Professor Brin Grenyer
Chair
Psychology Board of Australia
G.P.O. Box 9958
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10 September 2010

Dear Professor Grenyer,

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

Thank you for the opportunity to comment on the above Consultation Paper. We note that incorporates several of the suggestions made in our previous correspondence. Thank you for your consideration of the concerns we raised in that letter.

On the whole, we view the suggestions put forward in Consultation Paper 5 as being a significant improvement on the previous guidelines, and believe they are consistent with a scientist-practitioner model of training.

There are, however, certain aspects of the proposed new guidelines that require further clarification or could present difficulties. Below, we have provided comment on each of the first four specific proposals in relation to their implications for DPsych candidates.

1. The PBA proposes to allow Doctorate students to enter the Registrar program after completing coursework and placement requirements, but before submitting their thesis.

This will have the benefit of allowing DPsych candidates the opportunity to consolidate and develop their clinical skills in the workplace immediately after finishing the practical aspects of their training, thereby reducing the de-skilling that would have occurred with the previous guidelines. It also reduces the disadvantage that DPsych students had under the previous guidelines in comparison with 4+2 trained psychologists.

One issue about which we seek clarification is whether or not DPsych students would be able to enter a registrar program after completing all their coursework components and the first 1000 hours of placements (i.e., the equivalent number of placement hours to a Masters student), or whether or not they would be required to wait until they complete their final advanced internship in their third year (which is an additional placement unique to the DPsych program as compared with an MPsych/PhD program). We would recommend that the latter scenario is implemented, as we do not

think it is practical for DPsych students to be undertaking paid clinical work at the same time as completing a demanding internship.

2. The PBA proposes to allow Doctorate candidates in the Registrar program to use the title “registrar” prior to completion of their qualification and therefore before gaining general registration.

We can see both advantages and disadvantages to the proposal that Doctorate students remain provisionally registered psychologists during the period after commencing the registrar program but before their thesis has been passed. The positive benefits of this model are:

- Preventing registrars from having full registration before their thesis is passed also prevents them from practicing without supervision (e.g., if they were to practice as a general psychologist as opposed to being a registrar).
- Importantly, it provides an incentive for Doctorate students to complete their thesis.

Potential disadvantages are that:

- It creates a complicated three-tiered system of:
 - Doctorate students working as provisional psychologists before entering a registrar program (i.e., before completing their coursework and placements)
 - Doctorate students working as registrars with provisional registration
 - Recent graduates working as registrars with full registration

We believe this will create confusion among students, employers and the public regarding the differing level of training and qualification among these three options. We would suggest that Doctorate students have the opportunity to undertake paid clinical work only after completing all coursework and placements (i.e., remove the first tier above).

- These three levels do not map directly onto Victoria’s current grading system as specified in the Victorian Psychologists’ Association’s Enterprise Bargaining Agreement. Currently, most clinical positions require the employee to have full registration. We would suggest that the PBA undertakes direct and clear communication with the Victorian Psychologists’ Association so the EBA can be updated to be consistent with the PBA’s guidelines.
- The two levels of registrars (i.e., provisionally and fully registered) will receive different levels of pay, but the costs involved with maintaining their registration will remain the same (i.e., insurance, attending CPD events, potentially private supervision, and PBA registration fees). From our understanding, there is no difference in the registration fees payable by provisional psychologists who are enrolled in higher degree programs as compared with registrars and fully registered/endorsed psychologists (i.e., \$410 initial fee, \$390 ongoing). We do not believe this to be fair, particularly consider students’ usually minimal income, and instead would suggest a sliding scale of registration fees for provisionally registered psychologists, registrars, and fully endorsed psychologists that reflects the different income levels of these groups.

If the suggestions contained in the three points above are adopted, we support the PBA's proposal as expressed in point 2.

3. There is a proposed minimum 176 patient contact hours per year as part of the Registrar program, irrespective of EFT. The requirement for a minimum 17.5 hrs per week of clinical work has been removed. In line with guidelines of recency of practice, there is a maximum 5-year limit for a candidate to be part of the Registrar program.

This removal of the minimum 0.5EFT requirement will have the benefit of allowing DPsych students to continue to dedicate the majority of their time to completing their thesis requirements while in a registrar program, hence promoting the completion of their higher degrees. It also allows registrars who are recent graduates the opportunity to work in research positions which are more than 0.5EFT while still doing clinical work as part of a registrar program, or simply to work part-time while juggling other (e.g., family) commitments. We also agree with the maximum 5-year limit on the registrar program, as this will encourage DPsych students to complete their theses within a reasonable time frame.

One issue about which we seek clarification is whether a registrar who is working, say, 1-2 days per week only in clinical practice, is still required to complete 40 hours of active CPD and 40 hours of supervision per calendar year. Many students feel that this would be difficult given the costs of participating in active CPD on a limited salary and also the limited number of cases they would be seeing to discuss in supervision. More detail and clarity in the guidelines about this issue is suggested. We would recommend:

- pro-rating the supervision and CPD requirements according to the EFT, but with a minimum of 20 hours CPD and 10 hours supervision (totalling 30 hours, equivalent to the minimum requirements for registered psychologists) per calendar year. Part-time registrars would still need to meet the overall minimum requirement of 40 hours supervision + 40 hours CPD.

4. The PBA propose to adopt, for the purpose of the endorsement program, the Australian Health Practitioner Agency definition of practice.

We like this definition and believe it will be more inclusive of a variety of clinically relevant roles (including clinical research) that could be performed by registrars.

Timing of full registration

Although the Consultation Paper has firmly stated that it does not propose any change to the requirement that full registration or endorsement is only available after Doctoral theses have been passed, we remain convinced that this is not in the best interests of the profession. In particular, it disadvantages currently enrolled DPsych students who are not and will not be required to participate in a registrar program, who will continue to be forced to wait until their thesis is passed before being able to commence work as registered psychologists, which will mean de-skilling is likely. At minimum, we would request that a transition period be offered for these currently enrolled DPsych students, such that full registration could be gained after their thesis was submitted, and this registration could be suspended if the thesis was not passed after one year.

Thank you again for the opportunity to comment on these guidelines. We look forward to seeing the outcome.

Yours sincerely,



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