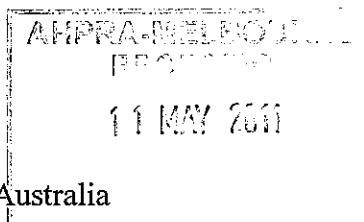


2011



9th May

Dear National Psychology Board of Australia

I am writing with regard to your consultation paper on "The guidelines for the national psychology examinations". I was made aware of the consultation paper by the Australian College of Specialist Psychologists (ACSP) and I agree with them that the process outlined in the guidelines is concerning for a number of reasons.

Specialist psychologists were of the understanding that the PBA, when it first established the registration and endorsement process for our profession, was going to examine over the next three years the validity of the four year undergraduate degree (plus 2 years of supervision) as a pathway to full professional practice in our profession. We understood that the Board was not very favourable towards this level of training for professional practice, but due to workforce issues, the Ministers would not agree to increase the minimum standard of training for registration at this point. An evaluation of the undergraduate degree as having sufficient training content to practice in any area of professional psychology, has not been undertaken as yet, therefore it is very concerning that the Board is considering an option of an exam to further legitimise this low level of training as acceptable, rather than looking to other options to improve and increase the level of training to meet international training standards of countries which we will relate to professionally, such as the UK, US or NZ.

As the Board is aware, Australia is the only English speaking country in the OECD which allows someone with an undergraduate degree to fully practice within the profession of psychology – making Australia the country with the lowest standards for professional practice, and being out of step with the rest of the world. The Board is also aware that Western Australia had specialist title registration until 2010, when it was lost through the introduction of the National Registration Scheme. The then WA registration board required **eight years** of specialist training in order to obtain this level of registration i.e. 6 years of university training plus two years of supervision. This equates to two more years of training than the current 4 plus 2 pathway. This difference is being highlighted again here as the difference in WA standards appears to have been lost in the models held in other States where only 6 years of training is the highest level of training registered – either via the 4 plus 2 pathway or six years of university. WA was extremely upset when our registration standards were reduced during the introduction of the National Registration Scheme. Therefore to further legitimise the undergraduate training level via an exam process is very disturbing.

A Board regulated exam being offered to undergraduates to allow their entrance into full professional practice in Psychology is not offered in any other country. Such a process would further entrench the undergraduate training as being legitimate in the eyes of the Ministers and State public service departments, and further maintain Australian standards not meeting international training standards. We do not feel that an exam held by the Board, no matter how well intentioned and rigorous, equates to or can replace, two extra years of university training, examinations, tutorials, essay writing and university examined supervised practice.

We would prefer the Board to firstly have a discussion within the profession, especially with university teachers of undergraduate and postgraduate programs, about whether the undergraduate Degree is adequate to train a person to professionally practice in the nine speciality areas of our profession. We believe that university teachers within these programs are in a stronger position to comment on and to assess the readiness of undergraduate degree holders to practice, than a multi-choice Board exam. We would be very surprised if it were found that the specialist skills for any of the nine specialist areas are taught in undergraduate Degrees. We would also be very surprised if in the supervision process after the undergraduate Degree, the specialist skills are taught and examined sufficiently to equate with two years in a Masters program. This is not in any case the role of supervision and not in the capacity of any one supervisor. We feel these issues need to firstly be examined, discussed and debated within our profession, before the Board starts to set administrative standards for our profession. We are very alarmed that these debates are not being had first, and that the Board is possibly being influenced, either directly or indirectly, by Government bodies concerned about workforce shortages.

These issues also dovetail into the debate about the endorsement process, which makes post-graduate training not compulsory for practice, but an optional extra, because we only have generalist registration level requirements in order to practice. The more the Board goes down the path of establishing ways to examine the generalist, the more it is building an argument for this pathway to stay. We do not feel this is in the best interests of the professions standards, which are the backbone of the service quality we provide to people in the community. We sincerely hope the Board will reconsider its proposal to establish exams for generalists with undergraduate degrees and have the much needed serious debate about this level of training first.

I look forward to hearing a response from the Board about these vital issues.

Yours sincerely,



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