

Professor Brin Grenyer
Chair of the Psychology Board of Australia
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10th September, 2010

Dear Professor Grenyer,

RE: Consultation Paper 5 - Proposed revisions to the Guidelines on Area of Practice Endorsements

We are writing on behalf of students currently enrolled in the Combined PhD/Masters of Clinical Neuropsychology degree at Macquarie University, to provide comment on “Consultation Paper 5 - Proposed revisions to the Guidelines on Area of Practice Endorsements”. Firstly, we would like to thank the Psychology Board of Australia (PBA) for inviting us to comment on this consultation paper. As we are studying in NSW, the comments we have made include examples of how these guidelines would impact students within the NSW health system.

In reviewing the proposed guidelines we noted the following issues:

- **While the guidelines allow Doctoral or Combined Masters/PhD candidates to enter the registrar program after completion of two years of postgraduate study (including completion of all coursework and placements), the guidelines do not allow Doctorate or Combined Masters/PhD candidates to apply for general registration.**

The board itself acknowledges that Doctoral students “often share the same type of training with Masters students during the first two years of training” (Page 2, Consultation Paper 5 August 2010). Given that Doctorate or Combined Masters/PhD students share the same training as Masters students, we question why the board would not allow Doctorate or Combined Masters/PhD students to apply for general registration following completion of the clinical training components of the degree. Under the state based registration scheme the NSW Psychologists Registration Board recognised this, and allowed Doctorate students to become fully registered if they had completed all coursework, supervised placements and two years of provisional registration. We have included as an attachment the relevant pages from the NSW Psychologists Registration Board October 2008 newsletter, which outlines this policy.

The ineligibility of Doctorate or Combined Masters/PhD candidates for general registration prior to completion of all degree components has the following implications:

- **Candidates would be ineligible for many jobs which provide the clinical experience required by the registrar training program.**
Currently, eligibility for registration as a General Psychologist is a minimum requirement for any person employed or applying for a position as a psychologist in the NSW health system. As these psychologist positions form the majority of roles in which registrars would obtain the experience required by the Registrar Training Program, this would significantly reduce the number of positions that Doctoral or Combined Masters/PhD candidates are eligible for. This would have a significant negative impact on their ability to commence a Registrar Training Program and maintain their clinical skills while completing the research component of their degrees.
- **Doctorate or Combined Masters/PhD candidates would only be able to commence work when an appropriate supervisor is found and the Registrar Training Program is approved by the PBA, which may make them less desirable candidates for a job.**
Candidates may be competing against those who have completed a Masters qualification and are therefore eligible for general registration. As the applicants who are generally registered would be able to commence work immediately, these candidates may be employed instead of a Doctorate or Combined Masters/PhD candidate, further reducing the opportunity for these students to commence a registrar training program and maintain their clinical skills while completing the research component of their degrees.
- **Description of clinical neuropsychologist area of practice in point 3.1.3 is incomplete.**
We would like to propose that this description also makes reference to cognitive disorders. For example, the description could read “Clinical Neuropsychologists specialise in the assessment, diagnosis and treatment of cognitive and psychological disorders associated with conditions affecting the brain”.

Finally, we would like to take this opportunity to highlight to the PBA that there are currently Doctorate and Combined Masters/PhD candidates who have completed, or are nearing completion of, the placement and coursework components of their degree. Under the state based registration scheme that was in place when these students commenced their candidature, these students were eligible for general registration following completion of these components. As the current guidelines do not allow these students register as a General Psychologist, and eligibility for registrar training is under consultation, these candidates have limited opportunity to maintain and develop their clinical skills while they complete the research component of their degree. In this interim period, while the Registrar Training Program is implemented and the profession adapts to the new Registrar Training Program, ***we strongly request that the PBA introduce a grace period to enable those students who were enrolled in a Doctoral degree or Combined Masters/PhD on 30 June 2010 to apply for general registration following completion of all coursework, placements, and two years of postgraduate study.*** This would ensure that during the transition to the

national registration scheme, these students are able to maintain and develop their clinical skills while completing the research component of their degrees.

We wish to thank you again for the opportunity to provide feedback on this consultation paper.

Kind Regards,

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Attachment 1:

Relevant pages from the NSW Psychologists Registration Board October 2008 newsletter, which outlines the policy for intern psychologists completing registration via an approved higher degree. The policy is outlined under point nine on the following page.

NSW PSYCHOLOGISTS REGISTRATION BOARD

NEWSLETTER

October 2008

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1. President's Message

"Objectivity, science and professional behaviours"

The Registration Board is charged with protecting the public and ensuring the psychologists are fit to practice, and an important aspect of this is ensuring the public does not lose the confidence of psychologists. If a member of the public has a negative experience with a psychologist, then they are unlikely to seek this help in the future. For vulnerable people in the community, we need to find ways to promote psychological assistance and make these services as non-threatening and accessible as possible. From time to time the Board has become aware of psychologists providing services to the public in a manner which have been experienced by the client as upsetting, insensitive or rude. Examples have included: the psychologist interviewing a client in a way that feels more like an interrogation; leaving a client in a busy waiting room to complete a lengthy personal questionnaire with no opportunity to debrief; sitting behind a large desk in a way experienced as intimidating; talking on the phone during consultations; typing into a computer while interviewing a client; and using language that conveys an attitude of cynical distrust. Psychologists, in their defence, have claimed that they were seeking to be 'objective', 'unbiased' and 'neutral'. However, the fundamentals of good practice include building rapport, and treating a client humanely with respect and dignity will go a long way towards ensuring that both the science and practice of psychology continue to be valued by the public.

2. Change in Board Membership

The Board regrets to announce that Ms Jill Hennessy has resigned from the Board for personal reasons. Accordingly, the Minister for Health has appointed Mr David McGrath, filling the vacated position of 'an officer of the Department of Health' as is specified by legislation. The Board welcomes Mr McGrath.

3. National Psychology Examination – comment sought

Discussions regarding the future of psychology are current at a number levels including registration Boards, the Council of Psychologists Registration Boards, Accreditation Agencies, Professional Societies and in the context of the forthcoming National registration and accreditation scheme. A discussion paper

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iii. Recognition of Prior Learning

The Board has revised the Supervision Guidelines regarding the methods of assessing the competence of intern psychologists, specifically the use of recognition of prior learning (RPL). The Board will no longer recognise prior learning from an Intern Psychologist's four-year qualification in psychology as demonstrating competency towards any of the key standards required to successfully complete the provisional registration program. This will apply to all intern psychologists whose provisional registration was granted after 1 April 2008.

The Board has also revised the Supervision Guidelines regarding Key Standard 5D: Conduct Independent Research Project. The Board now requires Intern Psychologists to conduct an independent research activity on a professionally relevant topic (identify and define research problem, design and conduct research investigation, evaluate research findings and communicate research outcomes). The activity should emphasise the synthesis of research-based knowledge and the integration of this knowledge into professional activities. It may take the form of an evaluation of an intervention programme, a major case report which includes a review and rationale of empirically-based interventions, or a survey undertaken to identify client needs. The activity should be written up as a report and assessed by the supervisor. Again, this will apply to all intern psychologists whose provisional registration was granted after 1 April 2008.

The Board also considers RPL may form part of a certificate but cannot be used as evidence of competence for a full certificate. The competencies addressed in Certificates 1 concerning Legal Ethical And Professional Conduct and Certificate 5 concerning Professional Development are developed, maintained and demonstrated throughout the provisional registration period and are to be recorded as such on the supervision plan.

9. Intern Psychologists completing registration via an Approved Higher Degree: Change in Policy

The Board has recently changed its policy regarding the requirements for full registration for intern psychologists applying via the approved higher degree pathway.

For students who first enrolled in an approved Masters degree on or after 1 January 2009, it is necessary to complete all components of the degree including the research thesis to be eligible for full registration. Apply using Form A3 which is available from the Board or website (> Application Forms). Attach either your academic transcript or a letter on university letterhead from the course director stating that you have completed and passed all the requirements for the degree. This decision in part is to bring NSW into line with other States and Territories, and anticipates the New National Registration System.

For students who first enrolled in an approved Doctorate degree on or after 1 January 2009, it is not necessary to graduate with the degree to be eligible for full registration. You can apply for full registration after two years of provisional registration if you have completed all coursework and supervised placements required in the first two fulltime years of the course and your research thesis is progressing at a satisfactory rate. Apply using Form A3 which is available from the Board or website (> Application Forms). Attach a letter on university letterhead from the course director stating that you have completed all coursework and supervised placements for the first two fulltime years of the degree and a statement that your research thesis is progressing at a satisfactory rate.

For students who first enrolled in an approved higher degree before 1 January 2009, it is not necessary to graduate with the degree or to complete the research thesis to be eligible for full registration. You can apply for full registration after two years of provisional registration if you have completed all coursework and supervised placements. Apply using Form A3 which is available from the Board or website (> Application Forms). Attach a letter on university letterhead paper from the course director stating that you have completed all coursework and supervised placements.

10. Clinical Supervision Requirements

General Principle A(1) of the Code of Professional Conduct requires Psychologists to "demonstrate continuing competence in their practice of psychology (and) that includes adequate knowledge, skill, judgement and care." Section 4 (i) elaborates on this principle stating, "Psychologists are expected to maintain competence in their area of psychological practice through ongoing supervision and professional development". Thus, every psychologist in NSW actively engaged in clinical work with members of the public are expected to receive clinical supervision at a level that ensures his or her competence is maintained.

The amount and frequency of clinical supervision will depend on the level of experience, skill and knowledge of the supervisee and the role and nature of the psychological work partaken. For example, provisionally registered psychologists require at a minimum two hours of clinical supervision per fortnight. More experienced psychologists might require less frequent clinical supervision. Some professional associations have suggested one hour of clinical supervision is required for every eight hours of face-to-face psychological work. Others suggest a ratio of one-to-ten. However, monthly supervision is generally accepted as a minimum requirement for even the most senior clinicians. For those psychologists who do not do clinical work, competence must be maintained through relevant means such as professional development and peer review.