



18 November 2009

Associate Professor Brin Grenyer  
Chair, Psychology Board of Australia

Dear Associate Professor Brin Grenyer,

**Re: Consultation paper on registration standards and related matters**

This letter is the response of the Australian College of Applied Psychology to the "Consultation paper on registration standards and related matters".

The Australian College of Applied Psychology (ACAP) has been running the Psychologists Registration Supervision Program for 12 years. In that time, over 1,000 interns have enrolled in the program across New South Wales, Victoria, Queensland, and the Australian Capital Territory. Of this number more than 130 interns are currently enrolled in the NSW program and more than 40 in the Queensland program. Given this level of experience in training psychologists, we believe the College is in a strong position to contribute to discussions regarding national guidelines.

The College recognises the difficulty of finding the appropriate balance between providing high quality comprehensive training for psychologists and workforce supply, especially given the expected increase in demand for psychological services. We also understand the importance of providing the optimal mix of coursework, research training, supervision and placement experience that best facilitates competence in the core capabilities and attributes, including discipline knowledge, assessment, intervention, communication, research and ethics as outlined on page 36 of the consultation paper.

The College commends the Psychology Board of Australia for addressing these key issues and setting directions for training in the longer term that will improve psychological services generally, raise the standards to bring these in line with international benchmarks, and increase the protection of the public. Within this general context, this response focuses on areas of concern where the impact of proposed changes may have adverse effects. Sections of the consultation paper which are not addressed in this report are ones in which the College is in broad agreement and supports the proposals within those sections.

**Section 2.4 Continuing professional development**

The College is of the view that registered psychologists should engage in professional development and strongly endorses this proposed development by the Psychology Board of Australia. It also views the total number of hours as acceptable. The main concern is that the proposed model is different to the existing one developed by the Australian Psychological Society (APS) which follows a points system that runs according to a two-year cycle. This is an effective and proven model that assigns differing weights to activities. Introducing a different system will overly complicate professional development requirements. In addition the one year cycle will be too restrictive forcing psychologists into engaging in less relevant and lower standard activities in order to meet the annual deadline for reporting. A further concern is the immediate introduction of a minimum of 10 hours of individual supervision each year. It is our view that psychologists may find it difficult to obtain this amount of supervision, especially in the short term. This may expected to lead to a reduction in the number of registered psychologists if it is to be implemented immediately.

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**The College recommends that the Board adopts the APS model of continuing professional development. Should any specific aspect of this model not meet requirements for the National Board then APAC or an equivalent body should modify the current model so that it serves both registration and APS membership. The College also recommends that the immediate requirement of 10 hours of individual supervision be reviewed.**

### **Section 3: Proposed qualification requirements for general registration**

As noted in our introductory comments, the College strongly supports the move towards raising the standards for the training of all psychologists to internationally recognised levels. Consequently we support a gradual phasing out of the two year internship (4+2) model. We do so even though we believe that within the 4+2 option the College has provided a high standard of training for psychologists, many of whom have progressed to making substantial contributions to the psychology workforce. We recognise however that one of the major difficulties arising from this model is ensuring appropriately high standards are met across all trainee psychologists taking this route to registration.

Our concern with the proposal regarding the 4+2 route centres on the changes proposed in the interim period until it is phased out. Given registration is to be at the national level we recognise the importance of having a nationally adopted set of requirements rather than the somewhat disparate set that currently exists across states and territories and are summarised on page 37 of the consultation paper. But in moving towards this goal, the College is particularly concerned about the impact of the large increase in hours that will be required for the training of psychologists in NSW, QLD, NT and ACT and the immediate impact this will have on the numbers of probationary psychologists. We predict from our analyses of availability of workplace placements and costs of training that there will be a substantial reduction in the number of probationary psychologists should the proposed requirements be introduced in July 2010 with a flow on effect of reducing the number of psychologists in the workforce.

We already experience difficulty obtaining placements for all our students even though we have established excellent relationships with external organisations over the 12 year period we have been placing intern psychologists. Thus even considering only New South Wales and Queensland, where we are aware that the system is already working at, or very close to full capacity, the impact of the increase of placement hours by well over 50% will inevitably reduce the number of psychologists being trained. It will also place pressure on individuals to accept substandard or restricted placement experiences, despite the best efforts of the Board to ensure otherwise, especially if they are not completing their training through an institution such as ours that closely monitors standards.

In addition, many organisations do not provide any payment to their psychology interns. Currently 88% of ACAP intern psychologists in the NSW program are in voluntary placements<sup>1</sup>. Many subsidise their training through taking on other work while in training. Thus the increase in the overall hours to full-time is expected to lead to a reduction in the number of trainee psychologists through some opting not to pursue a career in psychology and others having to stretch out their training over an increased number of years while they work part-time to support themselves. We recognise that intern psychologists are expected to undertake a higher workload in other states currently but we would still argue that the sudden increases to be introduced in July 2010, at least in New South Wales and Queensland where we have direct experience and where the majority of placements are voluntary will have this impact.

Compounding the problem of lack of remuneration for intern psychologists, in conjunction with increased hours, is the increase in the total cost for supervision fees putting the training out of reach of many who currently train as psychologists in the states where the number of hours

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<sup>1</sup> The College recognises that the matter of remuneration for placements does not fall directly within the Board's brief. However the implications of the high number of unpaid placements are such that it will be necessary for those in the profession to lobby the appropriate government and non-government organisations to ensure that intern probationary psychologists receive remuneration for their work and that workplace supervisors are recognised by their employers with their position descriptions including supervision as part of their employment.

required is lower. We strongly support the requirement that supervisors undertake training and believe this leads to higher quality supervision. In addition, supervisors are frequently external to the organisation providing intern psychologists with greater flexibility and avoiding issues related to dual roles in the workplace. However, in this general context we believe the number of hours of individual supervision is too high and that group supervision can be just as effective for many supervision activities.

We also note that the proposed changes to the 4+2 model are not in keeping with the view expressed in the Paper that the 5<sup>th</sup> and 6<sup>th</sup> year Masters is the preferred model of training. According to APAC guidelines (Section 5.3.7) the practical placement for Masters programs accounts for 25 to 30% of the course and a minimum of 1000 hours. This is substantially less than the number of hours proposed for the 4+2 at the national level. It is unclear what the rationale is for opting for such a high number of placement hours in setting national guidelines. We are not aware of any research evidence that indicates how many placement hours are optimal or of any research supporting the assumption that more placement hours lead to better trained interns.

Our experience over the past 12 years suggests that the number of days that an intern works is not the key factor in training outcomes. Rather, it is a combination of the *quality* of work placement, the *quality* of supervision which directly relates to that placement experience, and the *relevance* of the professional development to practice. In the absence of any evidence directly addressing the number of placement hours it is our view that a move towards the number in Masters courses for which we do have evidence and which is the favoured model by the Psychology Board Australia be the preferred approach.

**The College recommends that the Board reduces the placement and individual supervision requirements for the internship program to bring them in line with the preferred model of training (Masters and Doctoral degrees), to maintain access to quality placements and supervision, and to avoid any reduction in the number of psychologists that will be trained.**

The College is concerned regarding the frequent reference to universities in the consultation paper. This first occurs in Section 2.3 on professional indemnity insurance (an employer's or university's insurance arrangement) where we are not clear why universities need to be singled out from employers generally. More central to this point is that the consultation paper makes specific reference to universities in the context of training. For example with reference to the current 4+2 model it states this route should be ".....phased out in six years, depending on workforce needs and *provision of university places*." (p16 emphasis added). Similarly in defining an intern psychologist it refers to a "..... provisionally registered psychologist who has completed an APAC accredited four-year sequence of study and who is undertaking further years of *university training* or a supervised practice program for the purpose of applying for general registration as a psychologist." (p38 emphasis added). In order to meet the increasing demand for psychologists in the workplace it is essential all higher education providers that develop programs meeting stringent government and professional accreditation standards be recognised as providing training for psychologists.

**The College recommends the Board recognises future developments by all higher education providers that may develop and offer fully accredited undergraduate and postgraduate degree programs in psychology.**

With regard to the proposal to introduce a 5+1 model, the College sees certain benefits. The inclusion of an APAC accredited fifth year provides an additional qualification, the Graduate Diploma of Professional Psychology that will require minimum standards to be met and will also provide students with access to FEE-HELP for one of the two years of their training. However there are two issues that may impact negatively on the number of psychologists in future years.

It will take some time for institutions to develop these programs. The guidelines were only released by APAC in August this year. Institutions must now cost the program, make decisions about its viability and then go through fairly extensive internal and external accreditation processes prior to student intake. It is likely that many of these programs will not be introduced for another two years and it is also not clear how many higher education providers intend to offer this program.

In addition, there appears to be no control over the numbers of students taken into these programs (beyond institutional requirements of maintaining acceptable student:staff ratios) and no requirement for institutions who train the students to ensure internships are available in the sixth year of training. This raises the possibility of psychology students completing 5 years of training but not being able to complete their sixth year as an intern or being forced to do so in placements that do not provide adequate ranges of workplace experience. For those who do obtain places, many will be expected to undertake a full-year of work without remuneration if the current situation with regard to placements continues. The combination of these factors is likely to lead to future cohorts opting not to continue with their training in psychology.

**The College recommends that the Board takes account of the time it will take to establish and accredit Graduate Diploma of Professional Psychology programs and the impact of this on the number of psychologists being trained in the context of the proposed changes to the +2 program discussed above.**

**The College also recommends that the Board consults with APAC (as the accrediting body) regarding the impact on students who may opt for the 5+1 route, but are not able to secure the final intern year after five years of training.**

The College appreciates the opportunity to provide feedback to the Board and confirms its support for the move to national registration. It requests that the Board takes account of the specific concerns raised in this paper. Staff at the College would be willing to meet with the Board for further discussion of the points raised should this assist. We look forward to considering revised guidelines that take account of feedback from the profession and from other sources.

Chris Pratt  
Foundation Professor and Head of School of Psychology