

The Australian College of Advanced Postgraduate Psychologists Inc.

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**Australian College of Advanced Postgraduate Psychologists
Response to Consultation Paper 26: Review of the Area of
Practice Endorsements Registration Standard and the
Guidelines for Area of Practice Endorsements.**

Written by:

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Thank you for Consultation Paper 26 being made available for comment. ACAPP would like to firstly indicate that it agrees with the initial position of the Board that the requirements of the registration standard and guidelines for Area of Practice Endorsements are appropriate and working well for the psychology profession. However the Board indicates on a number of occasions throughout its consultation paper that a number of factors and developments in the broader regulatory environment may influence area of practice endorsements in the future, it is very unclear why the Board does not wait until such influences are presented and then make a consultation paper.

ACAPP would like to make some general comments before focusing on the proposed changes, under the three headings below.

What is Area of Practice Endorsement? (page 5)

Firstly we would like to highlight again a major flaw in Area of Practice Endorsement, and indeed in the regulation of practice in psychology in general, being that an undergraduate generalist (currently 4 plus 2 and 5 plus 1) have no restrictions on practicing in any areas of the profession which people who have areas of practice endorsement work in. The only restriction is in the use of title, meaning that non-endorsed psychologists are working beyond their training base at the expense of the safety of the public. Given that endorsement to practice in any of the nine expert areas of psychology require postgraduate training and supervision, and is “not based on experience derived during the course of a professional career” (pg 5), the Board has yet to deal with this major regulatory flaw, one which is not seen in any other profession.

Criteria for Specialist Registration (page 7-8)

On page 7 of the consultation paper the Board indicates that they presented a proposal to establish specialist registration and refers to Consultation Paper 1 in 2009. This was a consultation paper only to which many stakeholders replied, including the AHMAC Governance Committee for NRAS (comprising all the CEOs of all State, Territory and Commonwealth Health Departments). This was NOT a proposal for specialist registration put to Ministerial Council. However it appears that the single response to consultation paper 1 from the Governance Committee, which indicated it did not agree with specialist registration for psychology, stopped the Board from attempting a submission to Ministerial Council (communication to ACAPP received from the Board 15th February, 2016), even though there was significant support for specialist registration from the profession. The Governance Committees response against specialist registration was never challenged by the Board, although it had considerable errors. For example it claimed that there was no national standard for the accreditation of programs that lead to qualifications as a specialist – although APAC had been accrediting and regulating postgraduate specialist courses for many years. They also claimed there would be a significant burden of statutory regulation if there was specialist registration, however their response did not appear to take into



account that Western Australia had specialist title registration for over 20 years and the statutory regulation burden was not significant, in fact the then WA Registration Board managed to oversee this process very efficiently and effectively. The Board also indicated that it sought Ministerial approval for a separate specialist register for Psychology in 2009, which is curious as one would think there would have to be specialist registration before a specialist register could be granted? This is most confusing. Since the criteria for specialist registration was released over 18 months ago, the Board has unilaterally made the decision not to apply. There has been no consultation paper on this, nor national forums. It has been left to individual professional groups to lobby the Board, including ACAPP, APS, ACPA, and possibly others, requesting the Board apply for specialist registration, but with no avail. We would like to publically request again, that the Board at the very least, have a consultation paper on this significant issue for the profession and for the safety of the public.

Legislation and Regulatory principle (page 9)

Paragraph 35. “facilitating high quality education and training of health practitioners while ensuring that the standards are not **set unrealistically high** so as to inhibit the continuous development of the workforce to meet public demand for psychology services.” (emphasis added).

It is very unclear what is meant by “unrealistically high” for the profession of psychology in Australia. Currently we have the lowest standard for full registration in the OECD, and to increase the minimum standard of training for full registration to postgraduate masters (2 years plus supervision), would only bring us into line with our main trading partners of the UK and the US. We sincerely hope that the Board recognises that one of the main blocks to meeting workforce demand is the lack of government supported (HECS) places in postgraduate university courses and the lack of endorsed psychologist places employed in the public sector to provide registrar supervision, not the length of training per se.

REGISTRATION STANDARD: AREA OF PRACTICE ENDORSEMENTS: Proposed changes under Option 2

Paragraph 62/64: ACAPP does not agree to the reduction in the number of hours of the registrar program for the sake of convenience. These hours are vital for the protection of the public, to ensure that newly trained psychologists have sufficient time and supervision to understand their competency and skills and to fine tune professional skills with essential professional support.



Paragraph 65/66: It is unclear what the purpose of the “bridging program” is and when it can be undertaken. If this means that a person who has already met requirements to be endorsed in one area of practice can do an additional year to bridge into another area of practice, then ACAPP supports this. If it however means that a person with undergraduate qualifications (non endorsed) can for some reason do a one year bridging program to become endorsed into an area of practice, then ACAPP does not agree.

All other changes in this section ACAPP supports

REVIEW OF THE GUIDELINES ON AREA OF PRACTICE ENDORCEMENTS: Proposed changes under option 2

Paragraph 83/84: The Board states “It is understood that some jurisdictions still have awards in place that allow protected titles to be used by individuals who do not hold the relevant endorsement” and “the Board confirms that psychologists who use titles permitted under an award in their work role but do not hold the relevant endorsement are **NOT** in breach of the national law” (emphasis added). This is a very surprising situation given the stringent requirements on all psychologists not to use title without endorsement. ACAPP would like to ask why the Board has not insisted that the various Health Departments (and/or others) bring use of titles into line with the national law. It is unacceptable at this point in our regulation that the Board tolerates this breach.

Paragraph 89: Again the role of bridging programs and when they can be undertaken is unclear (see above comments).

Paragraph 97 (Hours of practice): As above, ACAPP does not agree with reducing the hours of supervision, even if it aligns with hours of supervision elsewhere. These reductions are equivalent to dropping 40, 60 and 80 weeks of supervision support which are significant changes.

Paragraph 101 (Supervision): Reducing the frequency and the length of individual supervision time is not in the best interests of the registrar or the supervision process. Supervision should be seen as essential support and carry the depth of contact and support as found in a therapeutic session. This change could make supervision a very superficial process, not allowing the registrar to have time to explore their skills, concerns and areas of uncertainty.

All other changes in this section are acceptable to ACAPP.

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Thank you for the opportunity to comment on these changes and we will look forward to future consultation papers regarding any other more significant changes to our regulation, and hopefully to a consultation paper about specialist registration.