

# **PSYCHOLOGISTS REGISTRATION BOARD OF VICTORIA**

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This submission is made by the Psychologists Registration Board of Victoria ('PRBV') in relation to the Consultation Paper on Proposed Guidelines under the National Registration and Accreditation Scheme for the Health Professions.

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## **GUIDELINES ON ADVERTISING**

### **4. What is acceptable advertising?**

h) Advertising language skills by the health practitioner or someone in their office: It is of concern to the Board that the health practitioner or their staff will be their own arbiter in regards to fluency of language skills. In addition, are the language skills of their staff at all relevant? Is it proposed that staff will be used as interpreters in treatment, and if so, should they not be required to have interpreter qualifications?

### **6.4 Advertising of qualifications and titles**

As the Guidelines point out, the National Law does not prohibit a practitioner from using the title "Dr". Therefore, the Board does not believe that the National Law gives the PBA the power to prohibit the use of the title "Dr" without including words to indicate that they are not a medical practitioner. The law is clear that the onus of proof would be on the PBA to prove that the use of the title was misleading, not for the practitioner to prove that it was not.

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## **GUIDELINES FOR MANDATORY NOTIFICATIONS**

### **Decision guide - notifying sexual misconduct (page 3)**

If a practitioner does not form the belief that another practitioner may have engaged in sexual misconduct - so answer “No” according to the flowchart - then what would a practitioner be making a voluntary notification about?

### **Placing the public at risk of substantial harm because of an impairment (s.140(c))**

Is the intent of this section that safeguards by an employer negate the requirement to report that exists pursuant to s.140? It would appear the legislation does not contemplate this exemption from reporting, so either this guideline must provide the practitioner with this exemption (and therefore protection from breaching s.140 by not reporting) or practitioners must meet their requirements pursuant to s.140. In this case the Agency may determine that no further action will be required because the public is protected by the actions of the employer.

## **PROPOSAL FOR CODE OF ETHICS FOR THE PSYCHOLOGY PROFESSION**

The Board supports the proposal of the PBA.

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## **GUIDELINES ON CONTINUING PROFESSIONAL DEVELOPMENT**

### **Scope of application**

The Board believes that the inclusion of a requirement to demonstrate 2.5 hours CPD for every month of registration for registrants who have been registered for less than 12 months will be administratively time consuming and ultimately more costly for the Agency to administer. As an applicant for registration will have satisfied the requirements for recent practice to obtain registration, the Board believes there would be minimal risk in exempting practitioners from this requirement until their first full renewal of registration cycle.

### **Requirements**

The Board believes that the requirement for all psychologists to develop and maintain a learning plan is onerous, and is unnecessary for registered health practitioners.

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## **GUIDELINES ON AREA OF PRACTICE ENDORSEMENTS**

### **5. Transition arrangements for all Board-approved supervisors**

The PBA does not distinguish between supervisors of the higher degree and 4+2 pathways as discussed in the guideline. In Victoria, the Board has removed the requirement that supervisors within a higher degree program that leads to registration to be done by a Board approved supervisor. The Board believes that if this requirement is reintroduced in Victoria, there may be a shortage of the PBA approved supervisors for both the tertiary and 4+2 training programs.

Further, the impact of the additional requirement for a Board approved supervisor for supervision which leads to endorsement may be problematic in terms of the availability of the PBA approved supervisors at the commencement of the scheme.

#### **Endorsement and use of title**

As the PBA notes earlier in this guideline, the title of Registrar is not a protected title under the National Law. Therefore, the PBA cannot in this section of the Guidelines determine that a psychologist cannot use the title Registrar except in the situations outlined in this section, when as the PBA itself notes, it is a widely used term, often linked to employment.

#### **Approved supervised practice program (registrar program)**

##### **3.1 General**

The Board believes that the PBA is creating a significant administrative burden on the Agency with the requirement that a supervision plan be lodged with the Agency prior to commencing supervised practice which leads to endorsement. Is it intended that the applicant applies for the endorsement at the commencement of the supervised practice program and that the application is complete at the end of the supervision? If not, does the legislation give the PBA the power to compel someone to comply with these requirements outside of the application pathway?

#### **Area of practice endorsement**

##### **1. Endorsement and use of title**

Although the PBA has noted that only psychologists with the appropriate endorsement may use the relevant title, there is nothing articulated about the

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scopes of practice for each of the areas of endorsement. The PBA will also need to address what the scope of practice will be for psychologists who do not hold an endorsement.

### **3.2 Psychological practice**

The Board has concerns about the parameters articulated for practice within an endorsement.

Firstly, the requirement that a psychologist must meet a minimum of 80% of their practice within the area of their endorsement. This will have significant ramifications for many practitioners who work within a variety of settings within their professional practice. For example, a psychologist who has an endorsement in neuropsychology, but works for the Board for four days per week would not be able to maintain that endorsement, or would need to reduce their work at the Board. How will a psychologist who currently holds membership of more than one college, therefore automatically getting more than one endorsement, maintain these if they are to practice at least 80% in an area of endorsement? Is there a research basis for the assumption that 80% of work must be in the area of practice to support this requirement?

The Board does not support that a psychologist must work at least 17.5 hours per week to maintain an endorsement. Is the PBA saying that a psychologist who works two days per week in their area of endorsement (15 hours) is not eligible to maintain that endorsement? This could create equity issues for women returning to part time work following maternity leave. And is there any research basis to suggest that you must work at least 17.5 hours to maintain competency in the area of endorsement?

### **3.3 Supervision**

As discussed previously the Board believes that there may not be enough PBA approved supervisors to provide fortnightly supervision to every psychologist seeking an endorsement.

## **5. Examination**

As the psychologist seeking endorsement will have already completed masters or doctoral studies, and these qualifications have formed the basis of them obtaining general registration, what would be examined following the successful completion of their degree.

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## **GUIDELINES FOR 4+2 INTERNSHIP PROGRAM: PROVISIONAL PSYCHOLOGISTS AND SUPERVISORS**

As this program is based on the supervised practice program developed by the Board, the Board supports the program in principle, however notes that there are some areas that require comment.

### **Definitions**

**Incomplete application** - the definition needs to be broadened to include that “the information provided is not of a standard acceptable to the Board.”

**Principal Supervisor and Supervisor** – the Board believes including both definitions may create confusion, and there needs to be uniformity in the use of one of these terms throughout the document.

**Secondary Supervisor** - by adding the requirement that the secondary supervisor must have completed a Board approved program, the Board believes that this may create a shortage of suitably qualified people to fill this role. In Victoria, there is currently no requirement for secondary supervisors to complete a training course, or for secondary supervisors to be Board approved. This will have a significant impact in Victoria.

**Supervised practice program** - is a training and supervision program, not a “plan”.

### **The Internship program: scope and provisions**

#### **3.1 Objectives**

In the first paragraph of p.3 “The Board has an obligation to the community that all psychologists are safe and competent to practice psychology, including delivering psychotherapy for mental health problems using focused psychological strategies”. This statement does not reflect the broad range of practice areas of psychology such as organisational psychology.

#### **3.2 Requirements of the internship program**

It should be a minimum of 17.5 hours per week of “psychological practice”, not the general term “internship”.

It is more practical to round the 117.33 hours to 117 - this will assist the provisional psychologist, the principal supervisor and the Agency staff who administer the program.

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As stated previously, clarification of terms when referring to the principal supervisor, rather than the generic supervisor term.

### **5.4 Frequency of supervision**

The Board believes that the way that the frequency of supervision has been described in the Guidelines is confusing and needs to be rewritten in a way that is easily understood. It is also described differently in the body of the document and the summary of requirements.

### **5.7 Direct observation**

Remove the paragraph commencing with “When direct observation of telephone counselling...” as telephone counselling is not regarded as direct client contact (refer p 9.)

### **6.3 The core capabilities**

#### **Ethical, legal and professional matters**

Sexual propriety and boundary issues are not a subset of consent issues and boundary issues should be expanded to reflect the many ways that boundaries can be breached including physical breaches which are not necessarily sexual breaches.

#### **Working within a cross-cultural context + across the lifespan competencies**

The Board believes that the two additional core capabilities would benefit from better definitions and training objectives

### **9.5 Maintaining approved supervisor status**

The Board believes that for supervisors to maintain their ‘S’ status supervision of their own practice must be provided by a registered psychologist.

### **Appendix C**

Note previous comments in regards to hours of supervision and at Section 7, it should read Supervised practice plan, not program, at 8.2 change the last line to “28 days from the due date”, not “28 days of falling due”.