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Response to the

Psychology Board of Australia (PBA) Consultation Paper Registration and Standards and Related Matters

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Contact: Terry Bowles, Chair of the Educational and Developmental College.

Preamble

While there are many issues presented in the Consultation Paper (CP) deserving of comment, only those most salient will be addressed in this reply.

Comments have been made by various Educational and Developmental College members and APS Staff in formulating this response to the CP.

Summary of Recommendations

At the end of each statement about the PBA's Consultation Paper, we have offered comments for the PBA to consider.

Preamble and Guiding Principles

While we applaud the general aim of consultation we note that there are some key stakeholders, in particular the Colleges of the APS and APAC who are central in professional psychology and defining the standards of practice. It was considered that greater care could have been taken to consult with these groups specifically in matters related to specialization and standards.

The Westminster system of government and governance is based on the principle of separation of powers. Hence it is expected that the body defining standards and the body assessing standards should be independent. This does not seem to be the case in reference to the establishment of the PBA.

The PBA will have a responsibility to protect the public and as members of the public, show due care for the members of the Profession.

Our court system privileges proof and evidence as does the scientist-practitioner model, and evidence based practice. (Thus in its deliberations and decision making, wherever possible it would be of assistance if the PBA fully informed itself and justified its conclusions based on valid evidence and not preference and conjecture).

Educational and Developmental Psychologists (EDPs) perform a range of specialized and general psychological roles in a range of settings, most notably school and other settings related to developmental progress in educational, medical and clinical settings.

Psychology is a very diverse profession. All Colleges of psychology have a relevant role in the mental health and well-being of the community(ies) they serve.

In schools, EDPs perform a front-line role equivalent to no other psychological specialty in involvement in testing, assessment, identification, diagnosis, intervention, and case management of students across every state, education system, and level of education system. This is a central role for the profession.

The community needs to know that people of good character with appropriate qualifications and experience are practicing.

Issues Arising from the CP

Role

The CP indicates that the PBA is taking a central role defining the profession of psychology in Australia. Importantly, both regulation and accreditation will be performed under government regulation and legislation through the PBA.

Comment: the PBA is responsible for setting minimal standards for entry into the register and for practice. Other and more than minimal standards should not be the domain of the PBA and should be the domain of the professional society to define. The PBA should be at-arms-length from the role of investigating and accrediting if it has a primary function of informing and administering legislation.

Criminal History Checks

While protecting the community from criminals the PBA has a responsibility to involve itself in the criminal background of psychologists when the criminal behavior is related to practice or where one's character.

Comment: future legislation should be more balanced in providing protections for those who have legitimately paid their debt to society, especially where the criminality was not relevant to psychological knowledge, competence, or practice. An appeal process to correct errors is necessary.

Continuing Professional Development

Again, it needs to be stressed, the PBA is responsible for minimal standards. There is little compelling evidence to suggest that supervision has a large impact on practice. Further, other supervision methods may be more effective than individual supervision, e.g. group supervision. Care should also be given to define professional supervision from workplace supervision as in some organizations these are one and the same role and can cause a conflict of interest.

Comment: evidence-based assertions are necessary regarding supervision and training. Various forms of supervision should be encouraged. Definition of the role and function of the professional supervisor is necessary.

Recency of Practice and Practice

The PBA will be determining the standards for recency of practice and practice. It is necessary that the PBA provide a definition of practice that is appropriate to general and specialist practice. Following from this is the need for respect for the range and breadth of practice of psychologists.

Comment: the PBA should regulate minimal standards on recency of practice but recognizing the variability of practice of psychology even within a specialization. The pathways for moving from one specialization to another and one field of practice to another (within a specialization or general practice) needs to be better defined. The PBA will need to use relevant and appropriate criteria and personnel with specific expertise in making decisions about practice matters. Occupational title should be used and should be a relevant indicator of specialization that informs members of the profession and guides the public through its appropriate professional psychological services. Whether these should be college specialties will be discussed below.

Qualification for General Registration

The CP suggests that there are no immediate plans to change the minimum standards but indicates that an examination is a likely route of entry for general registration, in future. The CP also states that the 4+ 2 route to general practice will be phased out in preference for a six year minimal requirement for entry.

Comment: an examination is an efficient mechanism for assessing knowledge but a broader structure of the examination needs to be carefully considered and should be trialed by the PBA before implementation by the PBA. The phrasing out of the 4+2 route of entry for general practice and practitioners of school psychology will have detrimental effects. The nexus between length of qualifications and remuneration is strongly linked. As salaries for school psychologists are relatively poor in comparison with other psychology professionals expecting applications for courses that require more time and cost may jeopardize ongoing psychological services in schools. Payment for education of psychologists to work in educational, developmental, and school settings should be met by government. Whether such costs are made by government or individuals they are onerous and a

disincentive to course entry, entry to the profession and psychological practice in schools. The standards of supervision after four years of training may be better defined and therefore may improve standards of supervision and practice. Further, increasing the psychological content of undergraduate degrees may provide an alternative solution to increasing the postgraduate qualifications.

Specialist Registration

While respecting that practice of psychology is inextricably linked to improving the mental health of individuals and the public consequently training for a specialization should have the rudiments of appropriate knowledge and competence related to mental health. While appropriate knowledge and competence related to mental health may be central to specialties such as clinical and health psychology they may only form one major component of other specialties, such as organizational and sport psychology. The pathway to specialist registration via a doctorate is already threatening the existence of the current specialties as so few graduates emerge each year in other than clinical psychology via this pathway. The assumption that graduates with Doctorates remain significantly better performing than those graduating with the Masters degree is to be tested. Further, Doctorates have impoverished many Schools of Psychology by drawing resources away for far too few students.

Comment: the status quo should be maintained while national registration is established and further discussion is held about the structure of programs towards general and specialist registration. The PRB may also consider limiting the practice of specialties to specific Colleges, e.g. the Clinical College members ought to work only with those who meet clinical diagnoses and no other – otherwise they are practicing under general practice regulations.

Specialist Titles

The existing college titles as well as clinical geropsychology have been proposed in the CP. Clinical gerontology is not a specialization it is a sub categorization and a hybrid of two existing colleges -- clinical and (educational and) developmental. The names of the current Colleges are problematic, as some specialties refer to practice, e.g. counseling, some have reference to specific client groups defined by maladaptive behavior, e.g. clinical, some are domain specific, e.g. sports, others are setting

specific, e.g. organizational, and others are hybrids of setting and domain, e.g. educational and developmental. These are not all equivalent categories, and while they have historical relevance they may not fully capture the subdivision of the breadth of psychological practice in a meaningful, comparable way. That said, these categories have served psychology well and have formed the basis for specialties in the past. A major issue is the capacity to move from one specialty to another and providing an upper limit on the number of specialties an individual psychologist might hold.

Comment: as Educational and Developmental College members who represent developmental psychologists encompassing gerontologists it is strongly recommended that clinical gerontology be removed from the specialist list and that the status quo regarding specialist titles be endorsed, in the current form, until a thorough review of specialties of psychology is completed. It may well be better for the PBA to limit its registration capabilities to minimal standards for general practice and not refer to specialties within its purview at all, or leave specialist recognition for the society and other professional groups.

Psychology Supervisors

The CP suggests that supervision is an area of practice requiring endorsement.

Supervision is not a psychological practice. It is generic skill regarding management and transfer of information. The suggested definition implies that supervision is relevant across specialties. Whereas, supervision can really only occur about a specific domain of knowledge and set of competencies. Therefore, supervisors need identifiable knowledge, skills, competencies, and experiences but these should be specific to the domain knowledge (college).

Comment: While specific training may be required to supervise psychologists generally or in the specialist area, it may only require the PBA to administer a register of supervisors who have met the minimum standards for entry to the register. Defining the minimum standards should be undertaken in a manner that scientifically demonstrates the validity of the claims. Supervision towards that end should also be shown to make a significant difference otherwise it is an error and a waste.

Final Comment

We appreciate the opportunity to comment on the proposals and look forward to a

strong working relationship with the PBA, especially in matters related to specialty. Please let us know if the College or the National Committee Members can be of any assistance to the PBA in its deliberations.

Thank you,

Terry Bowles,

College Chair, on behalf of the College of Educational and Developmental Psychologists.