

A. Prof. Brin Grenyer,
Chair, Psychology Board of Australia.

05.11.2009.

Dear Prof Grenyer,

Re: Consultation paper on registration standards and related matters. 27 October, 2009

On behalf of the Australian and New Zealand Psychology Training Clinics (ANZPTC) group that consists of those running university-based, post-graduate psychology training clinics, I would like to congratulate the Board on an inspired, broad and carefully thought out blueprint for the future of the profession of psychology. This vision enables upgrading the profession to international standards while addressing workforce requirements, improving the quality of services offered, and providing greater clarity, security and protection for the public. It provides an opportunity for the profession to provide better services to the community through improved training standards, ongoing professional development and supervision, and greater accountability with enhanced transparency regarding expertise.

The ANZPTC group supports the proposals contained in this paper. In particular, we very strongly support the proposal that registration standards be raised to six years of Australian Psychology Accreditation Council (APAC) accredited training (consisting of a 5 + 1 accredited program or a Masters program in professional psychology), with a phasing out of the 4 years of accredited training plus two years of unaccredited supervised practice (4 + 2). We have deep concerns that the current 4 + 2 model of training is the lowest standard within the Western world. Raising these standards will, as stated, increase the protection of the public and the profession via increased training in professional responsibilities and practice for the psychology workforce. We are pleased that this will bring the Australian standard up to that of the European EuroPsy, enabling free trade of professional skills based on similar qualifications.

We also very strongly agree that specialist registration provides far greater protection for the public than non-specialist registration. We support the recognition of specialist registration based on a doctoral degree in individual specialities. As pointed out, this equates with standards for basic registration in the United States and the United Kingdom. We agree that this will enhance clarity for the public in choosing a psychologist to meet their specific needs and thereby provide stronger protection. The preferred model, we believe, provides the best foundation for specialisation as it endorses those with substantial (doctoral level) expertise in a range of specialities sought by the public. We do, however, recommend that a method of restricting specialities to those that are clearly differentiated and have general acceptance and recognition is preferable to utilising a system based on one in which doctoral training is currently offered in a range of areas, many of which are sub-specialities of other core speciality areas.

While the Western Australian Model is sound at this point in time, to bring the qualifications of Australian psychologists truly up to international standards, specialist accreditation at Masters level is obsolete in comparison with all other Western countries. In particular, in comparison with the United States and United Kingdom, both of which rely on doctoral qualifications for basic registration. It is essential we offer some form of recognition of equivalent training to those countries that accept only doctoral level training for basic registration. We believe the current APS model of College

membership as a method of determining specialist qualifications is fraught with flaws and inconsistencies, as outlined, and does not provide clarity for either the public or the profession.

We also strongly support the proposal that the area of supervision of psychologists be upgraded to an endorsed area of practice in the manner described. We agree that this will ensure that those in supervisory roles have the requisite knowledge, skills and competencies to oversight the profession to provide safe and effective practice and to develop and maintain standards.

The proposal for the Board to manage professional development in the manner proposed enhances and broadens the quality of services provided by the profession, while strong professional indemnity insurance, we agree, will protect both the public and professionals themselves. There needs to be greater clarity, however, in regard to the required specialist points. Other proposals have self-evidentiary value.

In summary, we believe the proposals contained in the consultation document provide a framework for the development of the profession through clear pathways to generalist and specialist registration that enhance services, protect the public, provide a skilled and knowledgeable workforce, and reach with clarity to international parity. We believe it enables the Board to meet its obligations to both the profession and the public.

Yours sincerely,

A handwritten signature in black ink that reads "Judy Hyde".

Judy Hyde M. Clin Psych. PhD
ANZPTC