

SUBMISSION TO PSYCHOLOGY BOARD OF AUSTRALIA CONSULTATION

November 2009-11-24

Thank you for the opportunity to make this submission to your Consultation process.

As senior Clinical Psychologists in Victoria, we very much welcome the forthcoming national registration of our profession, and we very much welcome the proposal for specialist registration, as this is a good way to ensure adequate standards of professional service across the nation.

We particularly welcome registration of Clinical Psychologists as specialists qualified to work across the full spectrum of psychological practice in the realm of mental health, including the diagnosis and treatment of the most severe and complex cases of mental illness, regularly involving questions of life and death. We believe that the Australian public is entitled to the protection that registration can afford in this area.

We believe that the National Registration Board the appropriate body to safeguard the standards of Clinical Psychological practice in the future, as the College of Clinical Psychologists of The Australian Psychological Society has been struggling to effectively safeguard standards since the introduction of the Medicare Better Access Scheme in 2006. This Scheme, as you realise, give a higher Medicare rebate for the services of Clinical Psychologists than that for other Psychologists.

The College of Clinical Psychologists has become irrelevant to maintaining standards because in 2006, reportedly in response to pressure by its parent body, The Australian Psychological Society, the College revoked its responsibility for determining its own membership, and the associated procedures for setting the standard of criteria for membership, to a new APS unit entitled "The APS Medicare Team". The standards used by the APS Medicare Team are not transparent, despite the College Board of Censors being consulted for advice in some cases. Furthermore, the APS Website creates conflicting impressions of the criteria used to process non-standard applications, of which there are now many, as psychologists without specialist qualifications attempt to gain membership in order that their services attract a higher Medicare rebate.

In the absence of transparency, indications strongly suggest that the APS Medicare Team has been watering down the standards for membership devised and upheld pre-2006 by the College of Clinical Psychologists. At the very time that Australian Clinical Psychologists are needing to raise standards of training to reach international standards (especially those of the UK, which we have always aspired to), our standards seem to be being eroded. The APS Medicare Team is implementing a policy being pursued openly by APS to widen opportunities for Psychologists to be able to secure the higher Medicare rebate. APS has, for example, moved to lower the standard of research training in postgraduate professional training programs, and is promoting means for Psychologists to do "bridging courses" between Colleges. These are both highly contentious moves amongst the members of many Colleges, not only members of the College of Clinical Psychologists.

Many attempts by large numbers of members of Colleges, especially members of the College of Clinical Psychologists, to have APS address the obvious problems mentioned above have been met with strong opposition, even by the National Committee of the College of Clinical Psychologists itself, which appears to be beholden to the overall APS administration.

National registration presents a new chance for the area of mental health in this country. We urge the National Registration Board to consider the issues mentioned above in deliberating how to set up Specialist Registration of Clinical Psychologists. We urge the Board to consider independence from APS processes, certainly after the grandfathering period. If complete independence is not possible, then the Board must ensure that it is the Colleges themselves that have responsibility for setting standards, not the generalist APS structure. Minimum Doctor of Clinical Psychology standards should apply in the future, and criteria for non-standard applications for Clinical Psychology registration should be rigorous and transparent. Only thus will Australian communities be assured of the highest competence in psychological services.

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Clinical Psychologists