Response to the Consultation paper on registration standards and related matters

Issued by the Psychology Board of Australia under the authority of Associate Professor Brin Grenyer, Chair on 27 October 2009

With regard to the above mentioned consultation paper. I wish to respond from a Guidance Counsellor (GC) or School Psychologists point of view. I am currently the Senior Education Officer Guidance and Counselling for Brisbane Catholic Education (BCE) and a member of the Queensland College of Educational and Developmental Psychologists. I will however be putting forward views that are mine alone and not necessarily the views of either BCE or the College.

Context

Currently BCE is moving the skill set for Guidance Counsellors (GCs) from a requirement that the role holder be either a registered teacher with post graduate qualifications in guidance and counselling, or a registered psychologist preferably with qualifications in educational psychology, to a requirement that the role holder be both a registered teacher and a registered psychologist with qualifications in counselling.

BCE is seeking to move to this new skill set for GCs in order to ensure that:

- 1. GCs have a sufficient knowledge of schools and of curriculum to be effective in promoting the integration of personal and social development and social emotional learning programs into the curriculum. Our system believes that schools have an important role to play in the promotion and development of student wellbeing and that programs such as Kids Matter, Mind Matters and School Wider Positive Behaviour Support are most effective if integrated into the curriculum and processes of the school. For these reasons we believe that a GC will be most effective if they have the knowledge base and understanding of curriculum of a registered teacher.
- GCs have a sufficient knowledge of psychological and educational theory and practice to be able to do the following:
 - a. To be able to support students using a range of interventions strategies including personal counselling.
 - To have sufficient knowledge of the discipline of education and psychology to be able to recognise and support students with personal, social, developmental, learning, and mental health issues.
 - c. To be able to communicate effectively with students, parents and staff and to be able to design reports and programs that are useful in the school context.
 - d. To be able to research implement and evaluated programs so that their practice is founded on a sound evidence based approach.
 - e. To be able to accurately administer interpret and report on Psychoeducational Assessments in a way that will lead to interventions that are both evidence based and useful in the school context.
 - f. To have knowledge of policy, legislation, ethics, and professional matters and to apply that knowledge in schools to support the best interests of students in compliance with the organisations policies and requirements.

BCE had implemented the move to this new skill set because it believes that the currently available qualifications for Guidance Counsellors (such as the Masters in Educational and Developmental Psychology, or teaching, plus the Masters in Guidance and Counselling) do not completely meet the above requirements

You may appreciate then, that the provisions stated in this consultation paper will have a significant impact on BCE's current staffing policy for Guidance Counsellors, since the majority of our registered teachers seeking to qualify as psychologists will be using the 4+2 pathway to registration. I believe that the BCE staffing plan is highly congruent with the Psychology Board of Australia's objective to ensure "A viable, high-quality and safe

psychology workforce ... for the Australian community". Schools have been recognised by both state and federal governments as being in the front line for prevention and early intervention programs. Our objective to integrate the complex set of skills held by teachers and psychologists will provide schools with GCs who are equipped to support schools at all levels of intervention (universal, selective and targeted).

Response:

Mandatory Registration Standards

The board has put forward the following standards:	
	Criminal history
	English language
	Professional indemnity insurance
	Continuing professional development
	Recency of practice

I do not intend to comment on the requirements for Criminal History or English Language proficiency Professional Indemnity Insurance or Recency of Practice.

Continuing Professional Development;

With regard to the requirement for continuing professional development I would like first of all to query the **Boards definition of continuing professional development**:

"Continuing professional development refers to activities that result in the improvement and broadening of psychological knowledge and skill and the personal and professional qualities needed throughout a psychologist's working life (Australian Psychological Society (APS) definition of 'appropriate PD activities'). "

In accepting the APS definition of "appropriate PD activities" the Board is in effect discounting a range of professional learning that is relevant to psychologists working in schools. In its definition of "appropriate PD activities the APS requires presenter to meet the following criteria:

"The presenter should normally be a member of the Society or eligible for membership and demonstrate current knowledge and expertise in the area of presentation. If the presenter is from overseas the basic requirement would be that he/she is a registered psychologist and/or a member of the psychological association in his/her country. Clear specification of presenter qualifications and experience must be included in an application for endorsement. When specialist point endorsement is sought the presenter must be a member or eligible for membership of the relevant APS College.

Those activities which have limited psychological content or input (in terms of presenter credentials) but otherwise meet the endorsement criteria may also accrue points if a professional need can be demonstrated. If the presenter is not a psychologist, they should have advanced expertise in the topic being addressed."

In requiring that the professional learning be largely presented by professionals eligible for membership of the APS, the Board is not considering a wide range of professionally qualified presenters who have knowledge and skills relevant to practitioners. It would be preferable for the Board to broaden its view of suitable professional learning so as to include any professionally qualified person who presents knowledge and skills relevant to the

psychologist. For example Guidance Counsellors in our system will be required to meet the Continuing Professional Development (CPD) requirements of two professions psychology and teaching. It is clear that professional learning relevant to the GC's teaching qualification will be relevant to their psychology practice in schools even if the presenter is not a psychologist. Such content might be presented by registered teachers with expertise in behaviour management or curriculum, social workers with expertise in student protection legislation or speech pathologists with relevant expertise in phonemic awareness. To limit the range of qualified presenters to psychologists will not only discount a range of professional learning relevant to school psychologists but could also constitute an undue burden on GCs or school psychologists required to meet CPD requirements for a range of professions and professionals associations. (For example GCs in Brisbane Catholic Education could potentially need to meet the requirements of the College of Teachers, the Psychologists Board of Australia, APS, the Queensland Guidance and Counselling Association, Entitlement to Teach in Catholic Schools and the requirements of the Career Industry Council of Australia.)

I therefore propose:

- That the Board accept any professional learning that is relevant to the psychologist's domain of practice.
- That the Board accept professional learning presented by any suitably qualified professional provided it is of a high standard and relevant to the domain of practice.

With regard to continuing professional development I would also like to query the Boards requirement that all registered psychologists must complete **10 hours of individual supervision per year provided by an endorsed supervisor.**

Currently those states who provide an accreditation scheme for psychological supervision relate that supervision to **psychologists in training**. Thus students on the 4+2 partway or those following pathway two must be supervised during practicum by a psychologist who is an accredited supervisor. This is not a requirement for continuing professional development for those who are fully registered so this is a considerable additional impost.

By requiring all psychologists (not just those in training) to be supervised by endorsed psychologist supervisors the Board is placing a considerable burden of cost on psychologists, particularly those who do not work in settings where other psychologists are employed on site. At Brisbane Catholic Education we supervise all of our Guidance Counsellors (GCs) both individually and in groups for three sessions (of approx 2 hours) in each school term. That totals approximately 24 hours of professional supervision a year. However for some of our GCs none of that formal supervision will be acceptable to the Board since the person providing the supervision may be a trained supervisor who is an accredited counsellor but not a psychologist.

I would therefore like to propose the following:

- That only "psychologists in training" be required to be supervised by a psychologist who is a Board endorsed supervisor.
- For fully registered psychologists:
 - Either remove the requirement that they be professionally supervised for 10 hours a year by an endorsed psychologist supervisor.
 - Or, accept supervision by a suitably trained and qualified professional in a cognate profession (e.g. counselling, psychiatry, or social work) as meeting the CPD requirements.
- That the Board's training program for supervisory endorsement be open to related professions like counselling, social work, and psychiatry. (Such a change would align well with the move by mental health professionals to a more multidisciplinary team based approach.)

The PBA consultation paper states the following:"The Board has determined that the qualification that leads to registration as a general psychologist is a six-year Australian Psychology Accreditation Council (APAC) accredited sequence of study, comprising a master's degree minimum qualification or equivalent. The Board will also recognise the following six-year sequences as equivalent for the purposes of eligibility for general registration:

- a five-year APAC-approved sequence of study followed by a one-year Board-approved internship (5+1).
- a four-year APAC-approved sequence of study followed by a two-year Board-approved internship (4+2).

'Internship' means a Board approved supervised practice program."

"To ensure quality and standards, the Board may require the passing of an examination prior to accepting an application for full general registration."

"The current four university years plus two-year internship (4+2) is set below all current international standards, and therefore is proposed to be phased out in six years, depending on workforce needs and provision of university places."

As was indicated earlier, BCE is currently moving the skill set for Guidance Counsellor (School Psychologists) to the requirement that they be both registered teachers and psychologists with skills in counselling. You will appreciate that this involves a significant commitment to study for our personnel. Currently APAC guidelines allow little or no credit for studies in education despite their potential relevance to the GC role. In consequence the planned addition of a further full time year to the current 4 + 2 pathway will add to the burden of study already being faced by our teachers who wish to upgrade their skills.

I believe our staffing plan for the GC role is very much in line with the Board's objective of ensuring "public safety and confidence in the profession" while taking into account "work force needs" in that it seeks to move toward a set of qualifications for GCs that is congruent with the needs of schools and the more complex demands apparent in the student population. The Melbourne Declaration of Educational Goals for Young Australians (Dec 2008) confirmed the role of schools in promoting the personal and social development of students in its goal to ensure that all young people become "confident and creative individuals" who "have a sense of self-worth, self-awareness and personal identity that enables them to manage their emotional, mental, spiritual and physical wellbeing." Schools play a central role in prevention and early intervention for mental health issues among children and adolescents as is acknowledged by the development of the Australian Department of Health and Ageing programs "Mind Matters" and "KidsMatter." It is clearly in the public interest that school employ GCs with the requisite skills to effectively intervene to support students with mental health issues. However this will be more difficult to achieve if our teaching work force finds it impossible to complete the study required to reach our objective.

I would therefore suggest the following:

- That universities and APAC be encouraged to recognise the relevance of studies in education, particularly special education, to the role of school psychologist and allow some credit for studies in this area for those seeking registration as psychologists in schools.
- 2. That the move to a 5 +1 sequence be delayed to allow employers in the education sector to complete the up skilling of their school psychologist workforce.
- That undergraduate and fourth year psychology programs place a greater emphasis on psychological practice and not delay practitioner training until the fifth year of study.
- 4. That the role of schools and school psychologists in health promotion and prevention, and in developing student's social and emotional skills be acknowledged and supported by the Board.

¹ The Melbourne Declaration of Educational Goals for Young Australians (Ministerial Council on Education Employment Training and Youth Affairs, Dec 2008, pg 9)

5. That the Board consider a system of Recognition of Prior Learning to confirm expertise for both Australian Citizens as well as for those qualified overseas, in addition to considering a National Psychology Examination. Many GCs in schools have a range of high quality professional skills that have been acquired through in service training rather than at a University. At present there is limited recognition of these skills by professional bodies or universities.

Proposal for Specialist Registration

In the consultation paper the Board makes a case for specialist registration for psychologists. I do not intend to dispute the need to recognise those psychologists who have expertise of a kind suitable to meet the needs of clients. However I would like to comment on the means by which such expertise is acquired.

Approved Program of Education

The Board proposes that the relevant specialist qualification should be a "professional doctorate in psychology in the specialty plus one year of approved supervised full-time equivalent practice comprising 35 hours of individual supervision with a psychology supervisor who has the relevant specialty and is endorsed by the Board, or equivalent. Equivalence will be grandparented for accredited professional master's programs in the specialty plus a two-year program of approved supervised practice (comprising 70 hours of supervision with an endorsed supervisor, of which 45 hours must be individual supervision, with the rest being individual or group supervision) and 120 CPD hours in the specialty; another sequence of study acceptable to the Board; and/or passing an examination in the specialist area."

I would like to suggest that an alternate path way be offered under the category of "another sequence of study acceptable to the Board" similar to the "Society Qualifications" offered by the British Psychological Society". (BPS) The British Psychological Society offers qualifications in a range of areas including clinical, counselling and educational psychology (Please refer to the British Psychological Society Website). I believe that there is a need for a more modular approach to the acquisition of credentials in psychology that is more flexible than is offered by the completion of a professional doctorate.

As was indicated in the Boards paper, as of October 2008 there were "approximately 4500 provisionally registered psychologists, of which approximately half were undertaking a supervised practice program." These personnel are in employment often on a full time basis. There is therefore need for a more flexible approach to achieving specialist accreditation, one more accessible to those working full time or part time and one that will allow acquisition of skills relevant to the psychologist's workplace at any given time.

Guidance Counsellors (GC) or School Psychologists deal with a range of client issues from learning difficulties to mental health issues, in addition they work within the school context as a member of a multidisciplinary team that seeks to improve both school culture (e.g. "Safe Schools"; "Health Promoting Schools") and school operational processes (e.g. School Wide Positive Behaviour Support). Thus areas of expertise of interest to a GC or school psychologist relate to a broad range of professional specialisations including clinical psychology (assessment, psychopathology) organisational psychology (selection, organisational improvement, career development) educational psychology (reading acquisition, barriers to learning) and counselling psychology (frameworks for counselling, evidence based interventions). Thus the skills needs of this professional group are neither static nor limited to what might be offered in a single Educational and Developmental program.

One of the Guiding Principles of this legislation was: "To enable the continuous development of a flexible, responsive and sustainable Australian health workforce and to enable innovation in the education of, and service delivery by, health practitioners". I believe that an approach to

psychology specialisation limited to professional doctorates does not meet this requirement. The Australian Workforce is increasingly mobile and seeks a portfolio of qualifications that is flexible and meets their needs at the time and in the setting they serve.

I would therefore suggest that in addition to endorsing a professional doctorate that the Board:

- Consider the accreditation of generic masters of psychology qualification which consistently relates theory to practice and which enables skill acquisition to occur throughout the program.
- That such a qualification have the capacity to add modules or endorsements in a flexible manner over a period of time
- That such modules be focused on practice rather than on research unless the practice is research focused
- That the Board specify how a combination of these modules could be accepted as a legitimate pathway to achieving a specialist endorsement in a range of areas of specialisation.
- And that the Board actively supports the movement of psychologists across settings so as to prevent the assumption that for examples only Clinical Psychologists can work in hospitals or Educational Psychologists work in schools. That in fact any psychologist can work in any setting with the relevant endorsements and experience of practice.

Endorsement

The Board has proposed endorsement of psychology supervisors as follows:

"Endorsement as a psychology supervisor is to apply to those with the following registration:

- (a) general
- (b) specialist.

A psychology supervisor must have:

- held general registration for at least three years before applying for endorsement successfully completed a Board approved training program in psychology supervision
- not been subject to conditions on their registration. Endorsed psychology supervisors must maintain CPD relevant to the endorsement on an annual basis to maintain the endorsement.

A psychology supervisor providing supervision for a psychologist undertaking specialist training must have held unconditional specialist registration for two years. Specialist registration should be in the specialist area for which supervision is sought"

I am fully supportive of training for supervisors but have some reservations with regard to the need for such professionals to be psychologists (see comments above on the CPD requirements).

In addition I am concerned about the availability of specialist supervisors. I would suggest that a suitably trained supervisor with experience in the relevant domain of specialisation would be sufficient to ensure the public good and would not limit available practice settings. It is clear that the availability of suitable practice settings is central to the effectiveness of this workforce legislation.

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