

Dear Chair,

RE: Psychology Board of Australia Consultation Paper

I am writing on behalf of the Department of Health (Western Australia) Clinical Psychology Reference Group. This is the peak body for clinical psychologists employed by the Department of Health (WA), and aims to represent clinical psychologists in matters of professional relevance.

We would like first to express our appreciation to the Psychology Board of Australia for the preparation of the proposals presented in the Consultation Paper on registration standards and related matters (27 October 2009). We believe this offers increased rigour to the practice of our profession.

We would like to recognise the unique position of the National Board and believe this is a step forward. Previously the APS has been the only National body in a position to provide advice to Government at a National level. The APS has a valuable role in representing members. It is important however to recognise that the advice given by the APS will represent the composition and views of constituent members of the APS, and the balance of these views. Members can choose to join a professional body for many different reasons, and we understand membership, both generalist and specialist, to vary considerably across states, with the overwhelming weight of membership being towards the generalist area.

By contrast the National Board makes regulatory decisions which pertain to all psychologists.

We would like to make a number of comments with regard to the recommendations.

2. Mandatory registration requirements.

We support the proposals relating to Criminal History, English Language Skills, Professional Indemnity Insurance and Recency of Practice.

We are also broadly in support of the proposal for Continuing Professional Development, and of the requirements regarding number of hours of professional development for psychologists in the different registration categories. We would like, however, to raise the following questions:

Is there good empirical evidence to support the value of individual supervision/peer consultation over other professional development activities? We would foresee an invaluable role for the APS Colleges, in providing opportunities for high standard ongoing professional development activities.

We would also like to acknowledge that for many services within the public sector (including the WA Department of Health), there are substantial and well-established professional development, professional review, and supervision processes that are

available to psychologists; some of these are requirements of employment. These are entirely independent of the APS.

We would query the requirement of 10 hours per year of individual supervision/peer consultation. This is on the grounds that for many psychologists (eg those in rural or small communities) such supervision may be of limited availability. We also think that for psychologists practising part-time, the required 10 hours of supervision would be disproportionate to their professional caseload.

3. Proposed qualification requirements for general registration

We wish to raise the following question:

Will those psychologists who have gained their qualification via 5 years of university training plus one year of supervision be eligible for general registration, following the introduction of the new “six year requirement”? We would be in support of the proposal of a “grandparent” clause permitting those registered before 2016 to continue to practise as registered psychologists.

4. Proposal for specialist registration

We support the proposal to introduce specialist registration, which we believe has been of value here in Western Australia. We also support “Option 3” proposed by the Board, - that eligibility for specialist registration requires “possession of an APAC-accredited doctorate degree and one year of supervised practice, or equivalent”. We note, however, that the APS Colleges have stringent requirements for specialisation, so the proposed requirement could be modified to include “APAC-accredited and College-approved doctoral degrees”.

We would also ask for clarification regarding the grandparenting clause, with regard to the additional supervision in order to maintain specialist clinical psychology status under Medicare.

5. Proposal for endorsement of supervisor training

We offer strong support for this proposal. We would see a very positive ongoing role for the APS Colleges in providing suitable training programmes and relevant continuing professional development.

We are appreciative of this chance to respond to the proposals of the new Psychology Board of Australia, and thank you for consideration of our feedback.

Yours truly,

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Western Australia