

Heads of Departments and Schools of Psychology Association (HODSPA)

Comments on:

Psychology Board of Australia: Consultation paper on registration standards and related matters

Thank you for the opportunity to provide feedback on the proposed changes to registration. The comments below relate to how these changes would impact University departments and schools of psychology, and psychology students.

1. Criminal History

HODSPA members support a single, national standard for criminal history screening. We would also support a standard which also meets the requirements of all agencies providing fieldwork placements. This would hopefully allow students to have only one Criminal Screen as currently two may be required to meet State and National Health Service requirements.

2. English Language Skills

HODSPA supports a national English language standard for psychology. This would enable courses to communicate a consistent message to potential overseas students who are applying for courses which will require them to be provisionally registered during their degree (eg postgraduate professional programs).

HODSPA would recommend the use of the ESOS definition of an international student in applying the English language standard to international students.

The proposed date of introduction is problematic as there are students currently enrolled in courses who will require provisional registration and who may not meet this standard (for example international students who have English GCSE or A level qualifications). There are also students who have been offered places and been entered into courses for 2010 who may not meet the proposed standard. It is suggested that current students, and students already offered places in courses, be exempted from the requirement during their enrolment as a student.

3 Proposed qualification requirements for general registration

Overall, HODSPA supports the move to a six-year APAC accredited sequence of study as the standard for registration as a psychologist to bring the profession in Australia into line with overseas standards. However, this is not without the recognition that it may impact on viability of psychology department and schools if students choose to seek alternate, shorter degrees leading to professional qualifications. Such an impact on student numbers may reduce the viability of courses and the ability of undergraduate courses to cross-subsidize postgraduate courses. A move to 6 years of education for registration would also require changes to funding models for psychology so that an increased number for psychologists can be educated through to six years. If increased

funding did not eventuate, and numbers of students completing six years of education remained at current levels, it could impact on the total number of potential psychologists flowing into the workforce. The proposal to accept accredited internship programs for the final one or two years of the six years (with an exam) may be problematic for those areas of the country with lower population densities in which the requirements for accredited internship programs may be impossible to achieve.

4 Proposal for specialist registration

HODSPA supports the introduction of specialist registration titles. Aligning specialist registration titles to the areas reflected by current accredited specialist postgraduate programs is supported.

If the registration standards change six years of education is the sole route to generalist registration, it would be appropriate for a doctoral level qualification to provide the additional knowledge and skills required to demonstrate specialist capabilities. There are concerns from some members that this may result in the demise of specialist Masters qualifications in some Universities. If alternate routes to registration remain (such as 4 or 5 years plus an internship), then allowing for a specialist masters qualification, plus an additional two years of supervision and professional development would be reasonable. HODSPA member have varying views on the necessity or appropriateness for a Doctoral qualification for specialist title membership, indicating the lack of consensus within the group on this matter.

5 Proposals for endorsements

HODSPA members support the proposal that the supervision of psychologists be upgraded to an endorsed area of practice as outlined in the consultation paper. We agree that this will ensure that those in supervisory roles have the requisite knowledge, skills and competencies to provide oversight of the profession, ensure safe and effective practice and to develop and maintain standards.

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