

Dear Chair,

Re: Psychology Board of Australia Consultation Paper

Please accept this submission on the Psychology Board of Australia Consultation Paper.

I would like to acknowledge the Board for a series of excellent proposals that will serve to ensure standards of psychological care to the public.

I have worked for 27 years as a clinical psychologist in WA in senior roles in the public sector and more recently also in the private sector. I am a Fellow of the APS, have previously held a role as a Deputy member of the WA Registration Board 1994-1995 (Ministerial appointment), and as Chair of the original Specialist Titles Committee for the Board in 1993-1994. (This group was a working party which determined the program content and supervision requirements for each of the post-graduate psychology specialities- clinical psychology, neuropsychology, educational and developmental psychology, industrial and organisational psychology, sports psychology and counselling psychology- necessary for registration post six-year degree training), and as Chair of the WA APS Branch.(1996-1997) It is from this range of experiences that I respectfully offer the comments below.

I would like to make comment on three areas: the National Board position and role; continuing professional development; and specialist registration.

National Psychology Board Position and Role

The Board is in a unique position in being able to provide advice to Government on the way in which psychology should be regulated in Australia.

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 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 membership, both generalist and specialist, varies across states, with the overwhelming weight of membership being towards the generalist (4 plus 2) area. There are clear and obvious explanations for this, specialist college membership requires further education and practice, which in the past has not been undertaken by the majority of psychologists, as there was no need to do so for continuing practice and registration. The views of the APS membership will be drawn from the current experience of education and practice. I am confident the APS will represent membership well in submissions to the Board and Government.

The need to be cognisant of competing or varied interests and make independent decisions on standards and the regulation of standards for the profession for all psychologists and most particularly the public is one that only Registration boards can take and most particularly enforce in the interests of the public particularly.

Continuing Professional Development

Continuing professional development is clearly an essential part of conduct as a practicing psychologist and the number of hours specified for the various categories of registration appears appropriate.

The mandatory requirement of 10 hours of individual supervision/peer consultation per year as part of the continuing professional development requirement would be best linked to some sort of pro-rata arrangement based on working hours. For psychologists who may be in practice on a part-time basis, one day a week for example, ten hours of individual supervision would be excessive in representing their professional caseload.

There is a clear indicated role here for the APS Specialist Colleges and the APS in general, in providing opportunities for high standard ongoing professional development activities. The advice of the Specialist Colleges to the Board in this area would be a very appropriate use of some very well developed expertise.

Proposal for specialist registration

Specialist registration has been of considerable value here in Western Australia, where it has been in place for some years, and it is hard for psychologists in WA to imagine a professional environment in which it does not operate. It has provided a very efficient system of regulation in the employment environment in particular, where “who can use what title and why” provides an easily understandable system for employers and the general public.

It has been of particular advantage in the determination of who can provide Medicare rebates as a clinical psychologist, which in WA has been linked primarily directly to whether or not they had been granted specialist title by the WA Registration Board as a clinical psychologist, a system that has worked very efficiently.

It is possible that the adoption of specialist registration at a national level might impact on membership of the APS Specialist Colleges, particularly in states where there has not been previous regulation of specialist title. In WA both specialist registration regulation and membership of the APS specialist college have existed well side by side for some, with each having clear roles and responsibilities, with not all registered specialist psychologists choosing to be members of the APS. The role of the APS Specialist Colleges in professional development in WA has been particularly strong, and there is virtually no confusion about who does what. The efficiency of having separate regulatory and professional bodies at the specialist level has worked well.

It is uncertain what roles the APS Colleges will continue to have as this has been in the process of review by the APS. From this perspective it has been reassuring that the role

of regulator for specialist title has sat with the WA Registration Board during this time, providing certainty in the regulatory role with employers and the public.

“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” would be a clear move forward. It has been of benefit to the profession, particularly from an employer perspective, to have specialist psychologists in their early years of training undertake brief periods of employment overseas, with clear gains to organisations who employ them and the specialist psychologist’s skills. There have however been embarrassingly few countries in which Australian post-graduate qualifications are deemed to be at a high enough level for equivalence for specialists, with most countries regarding a masters degree as the base level qualification, resulting in these specialist psychologists either not being eligible at all in some countries, and needing to sit further exams, undertake further supervision and assignments in others. The disadvantage to Australia in not keeping pace with educational requirements elsewhere has thus operated both at the generalist and specialist levels.

Thank-you for the opportunity to comment on this very important consultation paper.

Yours sincerely,

Margaret Jones

Clinical Psychologist