

**Attention: Chair
Psychology Board of Australia**

**Comment on:
Consultation paper on registration standards and related
matters, dated 27 October 2009.**

Context:

I am a Psychologist registered in NSW since 1996 (provisionally registered 1994-96). I am forwarding this as a comment from myself as an individual psychologist rather than on behalf of a government agency, although it is influenced by my experience. I am working at a senior level in the youth justice area and have been employed for over 20 years in the public service correctional and youth justice fields.

The Board is to be commended for the standards being proposed for the registration of psychologists. It moves us forward as a profession in many ways. My comments below indicate areas that my experience indicates may need further clarification and/or consideration by the Board.

Thank you for the opportunity to comment on the consultation paper.

2.4 Continuing Professional Development

Ensuring ongoing professional development and clinical supervision for all psychologists is a great improvement on past practices. I strongly support the proposed standard for continuing professional development activities for all.

**Issue: Some ambiguity regarding what properly constitutes a
“group” for the purposes of clinical supervision.**

However, there is a possible ambiguity in regard to the definition of “group supervision”.

The definition refers to “a group of no more than six registered psychologists”. There needs to be clarification about the total number of participants in a group and whether there is a maximum number of provisionally registered psychologists within the group.

Not all employees providing services of a similar nature are registered psychologists. For example, some may have qualifications in Social Work. Nevertheless, they may participate in group clinical supervision.

Therefore, the question arises as to whether a group of supervisees need to consist only of psychologists? If non-psychologists can be included, is there a maximum number?

I would suggest that the maximum number for a supervision group be stipulated as six participants in total, with a minimum number of 3 psychologists/intern psychologists.

In my experience, some employers have provided group supervision that does not comply with the limited numbers due to the ambiguity. Non-psychologists have been included *in addition to* the six psychologists for that group.

Issue: Low frequency of clinical supervision for fully registered psychologists.

The importance of clinical supervision and the emphasis placed on it in the proposed standards are most welcome. I support the proposed frequency of supervision for intern psychologists.

However, the minimum standard for frequency of clinical supervision for fully-registered generalist and specialist psychologists is set at about one hour per month in all cases. Whilst monthly supervision is an accepted standard for senior clinicians, this will all too easily become “the” standard supported by employers.

I would suggest that those psychologists with minimal post-internship experience still need increased levels of support from their supervisor. Perhaps two hours per month would be a more suitable minimum standard for those with less than ten years experience.

A more suitable benchmark was given by the NSW Psychologists Registration Board (Newsletter, October 2008):

Some professional associations have suggested one hour of clinical supervision is required for every eight hours of face-to-face psychological work. Others suggest a ratio of one-to-ten. However, monthly supervision is generally accepted as a minimum requirement for even the most senior clinicians.

A standard ratio such as the above would better enhance the profession and the public’s confidence in it.

2.5 Recency of practice

Issue: Defining “psychological work” or “practice”, especially in a situation where a psychological registration is *not* a requirement.

The Board refers to “practice involving activities of a psychological nature”. There is also a definition of “practice” stated which includes “using the knowledge, skills and attitudes of the profession, and regardless of job title and generally in roles where registration as a psychologist is a requirement”.

However, in some work locations employees are involved in such practice but without the requirement for a psychological qualification or registration. Job titles would include such things as “counsellor” or “program officer”. (Alternative qualifications may include social work degrees, etc.).

Therefore, in order to protect the community and ensure practice is better understood, national registration needs to stipulate that where a psychologist is engaged in “psychological work”, then there must be adherence to the national registration standards *by the employer*. That is, the employer must recognise that the work is of a psychological nature and therefore registration *does apply to that employee*.

This would ensure that employers cannot ignore the standards set which is currently the case where the position holder is not required to hold psychologist registration. It is not always the case that an individual psychologist is able to attend for supervision and other professional development opportunities without the support of the employer. Whilst it is possible for such an individual psychologist to source professional supervision independently, this then raises confidentiality issues for the psychologist, supervisor and the employer. The employer can respond by limiting any case discussion.

Whilst this has been considered to be an industrial issue, it is also part of the responsibility of a national standards board to do all it can to ensure the public is properly informed and protected.

I recognise that this particular issue may appear to be beyond the scope of the current paper, however, I would encourage the Board to give it fuller consideration.

4 Proposed qualification requirements for specialist registration

The Board has specifically requested comments to assist in developing its views on specialist registration in the psychology profession. Whilst the improvement in the required standard for specialist registration is supported, the standard provided by Masters programs plus supervised practice deserves some status.

Issue: Transition for currently registered psychologists working in specialist areas.

Current practice has assisted many psychologists to develop specialist expertise and their recognition under the proposed standards needs further clarification.

Currently NSW does not have any provision for specialist registration of psychologists. Some clarification is needed regarding how a registered

psychologist can attain specialist registration. For instance, will a psychologist of many years supervised practice be required to prove that length of supervised practice in a specialist area?

Issue: Value of Masters programs.

The proposed standards do not appear to recognise the value of the current Masters programs plus supervised practice. Is the intention to phase out these in favour of Doctorates? Even if so, there should be some recognition that a Masters level qualification is better than a four year-only qualification.

Issue: Clarification of the impact on the NSW Crown Employees (Psychologists) Award (2006)

Currently in NSW, those psychologists employed under the *Crown Employees (Psychologists) Award (2006)*, are able to progress to classifications such as “Specialist Psychologist” and “Senior Specialist Psychologist”. This privilege was a hard-won battle by public service psychologists employed by Police, Corrective Services, Ageing Disability & Home Care, Community Services and Juvenile Justice. It recognised the specialist nature of the work and improvements in the psychological practice consistent with empirical evidence in these areas. In order to progress to such classifications, the psychologists must pass stringent standards assessed by a suitable panel.

The standards proposed by the Board appear to overturn this recognition and use of the title “specialist”. In addition, without such protection as provided by this Award, employers prefer not to comply with standards for registration, clinical supervision and professional development.

What would be the effect on this Award with the passing of Commonwealth legislation relating to national registration?

Approved program of education / Proposed list of specialities

The equivalence to be given to current Masters programs plus supervised practice is welcomed. Please note that the Award referred to above recognises those with Masters level qualifications as specialists.

Issue: Some clarification is needed regarding transition under the “grandparent clause” for those with qualifications that appear to differ from their area of specialty.

In some instances, psychologists have gained a Masters level qualification in one specialist area but have gained supervised work practice in a related specialist area. For instance, those currently specialising in work in a “Forensic specialty” often have a Masters level qualification in “Clinical Psychology”.

The transition arrangements should allow for a psychologist to gain specialist registration in the area of supervised work practice following a Masters qualification. It is the supervised work practice that is the area of speciality. This may be the intention of the Board but the paper does not specify it as a possibility and outline the requirements.

Issue: Two areas of specialist practice may be appropriate in some instances.

In addition to the above, as the Board has alluded to in the paper, it is possible that such a psychologist would have expertise in two areas of speciality. It is fairly common for a psychologist working in corrections or youth justice to develop expertise in both clinical and forensic psychology. These specialist areas have a large degree of overlap. Research has shown that adolescent offenders, for instance, have a high prevalence of mental health illness and other mental health issues (Kenny, D. T. & Nelson, P. K. (2008). *Young Offenders on Community Orders: Health, Welfare and Criminogenic Needs*. Sydney, Australia: Sydney University Press). The Psychologist must be able to provide psychological services in the area of mental health as well as assessment and intervention for criminogenic needs.

Where this is the case, the psychologist should be able to “grandparent” into two specialist areas of “Clinical Psychologist” and “Forensic Psychologist”.

Summary of issues for further consideration by the Board:

- Some ambiguity regarding what properly constitutes a “group” for the purposes of clinical supervision.
- Low frequency of clinical supervision for fully registered psychologists.
- Defining “psychological work” or “practice”, especially in a situation where a psychological registration is *not* a requirement.
- Transition for currently registered psychologists working in specialist areas.
- Value of Masters programs.
- Clarification of the impact on the *NSW Crown Employees (Psychologists) Award (2006)*
- Some clarification is needed regarding transition under the “grandparent clause” for those with qualifications that appear to differ from their area of speciality.
- Two areas of specialist practice may be appropriate in some instances.

Thank you again for the opportunity to comment on the consultation paper. I commend the Board for the thought and work that has gone into improving the practice of psychology at a national level.

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24 November 2009.