



To:  
Cc:  
Bcc:  
Subject: Fw: Attention: Chair, Psychology Board of Australia

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Dear Associate Professor Grenyer,

Thank you for the invitation to comment on the Psychology Board of Australia's "Consultation paper on registration standards and related matters"

I hold the Chair and Headship of Psychology at Southern Cross University (SCU). I started in May 2009 after 26 years away from Australia. This time away means I am essentially ignorant of Psychology in Australia; I'll leave you to judge whether this gives me a good perspective or not.

I should clarify that SCU does not currently offer any programs in professional psychology. I read the document closely to acquaint myself with what seems like a major development in the profession.

I came back to Australia from University of Otago in New Zealand, where I spent the last 20 years. The Department of Psychology there runs a Program in Clinical Psychology. It takes in 10 students per year (from at least 40 applicants) after their third year of study. The large number of applicants means the directors of the program can choose the cream of the crop academically. Successful applicants usually have already been involved in the helping professions in some way, and also need to pass an interview designed to weed out those with problems that might interfere with the practice of Clinical Psychology. The program graduates about 9 prospective clinical psychologists per year after a minimum of another three years, for a total of at least six years of education. All students do a fourth year including a research thesis, then all do a Diploma of Clinical Psychology taking at least another two years. As well, about half the students do PhDs; they usually study for another two years again, for a total of at least eight. The remainder do concurrent, research, Master's degrees; this often adds another year for a total of seven. The Diploma includes classroom training as well as two years of supervised practice organized by the department. I think that students then do one or two more years of supervised training, organized by employers, before they are ready to fly solo.

I believe other clinical programs in New Zealand are similar.

The level of education and training received by students of Clinical Psychology from University of Otago means they have no trouble finding jobs. More importantly, it puts them on an approximately equal footing with general medical practitioners and psychiatrists, meaning they can participate in mental-health teams as equal partners.

This level of training makes Australia's 4+2 and 5+1 look rather modest. I am not convinced we serve the profession by turning out psychologists who seem undereducated and undertrained compared to medical practitioners.

Anyway, I read through the document and give the thoughts that occurred to me using the following key:

Page  
>Change this  
to this {comment}

The most important issues I noticed include:

The prospect that State and Territory Registration Boards could continue to operate in parallel with the National Board. This seems to defeat the whole purpose of a National Board and seems unbelievably inefficient.

Lack of clarity as to what constitutes an alleged criminal offence.

The prospect that CPD could discourage psychologists and provisional psychologists who take parental leave.

Lack of clarity about who assesses students for personal suitability for the practice of psychology.

Lack of clarity and consistency in some of the language of the document.

I hope you find my detailed comments helpful:

1

>There are over 25 000 psychologists in Australia,  
There are over 25,000 psychologists in Australia, {comma; I'm sorry for the picky start!}

2

>With respect to the proposal for an endorsement as a psychology supervisor, while all State and Territory registration boards authorise supervisors and accord them special scope of practice privileges based on additional training and experience, this proposed endorsement would provide for psychology supervision to be regulated, and would recognise endorsed registrants as having special responsibilities for the safety of practice and the competence of their intern psychologists.  
The proposal for endorsement as a psychology supervisor would regulate psychology supervision and would recognise endorsed registrants as having special responsibilities for the safety of practice and the competence of their intern psychologists.  
{Simplify prose and clarify whether State and Territory registration boards would continue to authorise supervisors in parallel with the National Board.--I hope not.}

4

>In deciding whether a health practitioner's criminal history is relevant to the practice of their profession  
In deciding whether a health practitioner's criminal history is relevant to the practice of the profession {or "his or her profession"}

7

>In deciding whether a health practitioner's criminal history is relevant to the practice of their profession  
In deciding whether a health practitioner's criminal history is relevant to the practice of the profession {second time}

4-5

>The nature and gravity of the offence or alleged offence and its relevance to health practice.  
{Including alleged offences seems to go beyond the provisions of the national legislation as summarized at the end of this section. It seems to me that some clarification of what constitutes an allegation needs to be provided. Does it mean that the applicant or registrant has been arrested, has been denied bail, and is awaiting trial, or does it mean that someone posted an anonymous story on a web page claiming that the applicant or registrant committed an offence?}

7

>An international student is a person who completed their secondary education

An international student is a person who completed his or her secondary education

8

>To be eligible for registration an applicant for registration must declare that there is or will be in force professional indemnity insurance (PII) arrangements to adequately cover

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8

>A registered psychologist may be covered by either an individual insurance arrangement or an employer's or university's insurance arrangement.

A registered psychologist may be covered either by an individual insurance arrangement or by an employer's or university's insurance arrangement. {make parallel}

8

>An individual may be covered by either an individual insurance arrangement or an employer's or university's insurance arrangement.

An individual may be covered either by an individual insurance arrangement or by an employer's or university's insurance arrangement. {ditto}

8

>Therefore, any person practising as a registered psychologist, including those working as an independent practitioner, in part-time practice, or undertaking voluntary work,

Therefore, any person practising as a registered psychologist, including those working as an independent practitioner, those working in part-time practice, or those undertaking voluntary work,

8

>Random audits of registered psychologists will be conducted on an annual basis

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9

>Professional indemnity insurance protects professionals against claims of negligence made against them by a client.

Professional indemnity insurance protects a professional against claims of negligence made against him or her by a client. {Or "Professional indemnity insurance protects professionals against claims of negligence made against them by clients."}

9

>If others suffer a loss that can be attributed to a specialist's failure to uphold professional standards, they risk being sued for a breach of professional duty.

If others suffer a loss that can be attributed to a professional's failure to uphold professional standards, the professional risks being sued for a breach of professional duty. {Otherwise it is ambiguous, both as to who will be sued and in the use of the term "specialist", which is defined elsewhere as only a subset of registrants.}

10

>The following draft continuing professional development registration standard puts forward the proposed requirements of the Psychology Board of Australia.

The Psychology Board of Australia proposes the following draft registration standard for continuing professional development. {Otherwise there is a too-many-element compound word!}

10

>Once the standard is finalised and approved, the Board proposes to issue guidelines to assist registrants in understanding how the Board will apply

the CPD standard, for example, the  
Once the standard is finalised and approved, the Board proposes to issue  
guidelines to assist registrants in understanding how the Board will apply  
the CPD standard, for example, to the

10

>An individual who is registered in two registration categories must  
complete the minimum CPD hours required annually for 'general' registration  
(30 hours), plus the minimum number of 'specialist' CPD hours (15 hours)  
required for each 'specialist' category in which the psychologist is  
registered. For example, a 'generalist' psychologist who is also registered  
under one 'specialist' category must accumulate a minimum of 30  
'generalist' CPD hours per year (including a minimum of 10 hours individual  
supervision), plus an additional 15 'specialist' CPD hours, comprising a  
total of 45 CPD hours annually; a 'generalist' psychologist who is  
registered under two 'specialist' categories must accumulate a minimum of  
60 CPD hours per year 3.  
{Delete all single quotation marks. These terms are already defined and do  
not need to be quoted.}

10

>3 Note that proposed CPD requirements for specialist registration are  
contingent on the Ministerial Council approval for specialist registration  
to operate under the proposed national law for the psychology profession  
(see Proposal on specialist registration in this paper).  
{This footnote is essentially the same as footnote 1. The two footnotes  
should be reconciled and one deleted.}

11

>seek to ensure activities have contributed to the quality of a  
psychologist's practice, which results in the maintenance of high quality  
client services.  
seek to ensure activities have contributed to the quality of a  
psychologist's practice, maintaining high-quality client services.  
{various}

11

>however, participation in alternate programs  
however, participation in alternative programs

11

>including the mandatory individual supervision requirement  
including the requirement for mandatory individual supervision {or  
"including the mandatory individual-supervision requirement"}

11

>impose a condition on registration requiring the registered psychologist  
to successfully complete  
impose a condition on registration requiring the registered psychologist to  
complete successfully

12

>Generalist activities are 'professional development activities that are  
psychological in nature and would be appropriate for all psychologists  
{This sentence needs a closing quotation mark somewhere.}

12

>a minimum of 10 hours is devoted to the practitioners  
a minimum of 10 hours is devoted to each practitioner's {This is not the  
closing quotation mark required above!}

13

>An applicant for registration or endorsement or renewal of registration or  
endorsement must demonstrate satisfactory evidence of recent practice as a  
registered psychologist within the three years prior to the date of  
application for registration or endorsement or renewal of registration or

endorsement.

{There needs to be some mechanism not to discourage psychologists and provisional psychologists who take parental leave. Requirement 6, on the next page, seems particularly discouraging. One can imagine a woman who has a week to run on her internship program who, on medical advice, has to stop work to safeguard her pregnancy, and who then goes on parental leave for three years (e.g., to have other children) who would be discouraged at having to repeat all of her internship program. It does not seem fair.}

13

>The following draft recency of practice registration standard puts forward the proposed requirements of the Psychology Board of Australia. The Psychology Board of Australia proposes the following draft registration standard for recency of practice.

14

>If a provisional psychologist, on application for renewal of registration has a leave of absence of three or more years within their  
If a provisional psychologist, on application for renewal of registration has a leave of absence of three or more years within his or her

14

>require the applicant to successfully complete further education aimed at remedying shortfalls in their professional knowledge or skills resulting from their recent lack of practice  
require the applicant successfully to complete further education aimed at remedying shortfalls in his or her professional knowledge or skills resulting from the recent lack of practice {two changes}

15

>The Board has set a timeframe to review the proposed standards to ensure that the standards remain effective and relevant whilst  
The Board has set a timeframe to review the proposed standards to ensure that the standards remain effective and relevant while {otherwise archaic}

16

>The decision to recognise a six-year Australian Psychology Accreditation Council (APAC) accredited sequence of study, at a master's degree minimum qualification  
{Is it proposed that the Master's degree be a specific clinical-psychology degree? This would presumably allow assessment of applicants for personal characteristics that might make them ineffective as psychologists (such as a personality disorder). Is there some mechanism for this assessment? If a prospective psychologist can go through a qualifying master's degree without such assessment, this throws the assessment onto whoever does the supervised training. This is not fair to the prospective psychologist in that he or she has wasted six years of study.  
{The same concern applies to the proposed five-year sequence.}

16

>Data collected in October 2008 indicated that there were approximately 4500  
Data collected in October 2008 indicated that there were approximately 4,500 {for consistency}

16

>which importantly highlights the need to continue to provide equivalent alternate  
which importantly highlights the need to continue to provide equivalent alternative {unless provisional psychologists are supposed to alternate between two programs}

16

>The Board will also recognise the following six-year sequences as equivalent for the purposes of eligibility for general registration:  
{This creates two tiers of qualifications for registration. This is

potentially a Bad Thing. And it is not clear to me whether those who complete an APAC-accredited six-year sequence of study do supervised practice during that sequence.}

17

>It also believes it important that the public  
It also believes it important that members of the public

17

>It is widely recognised that mental health problems  
{This is in the context of specialist registration. What does an IO  
Psychologist have to do with mental health problems?}

18

>this proposal is not expected to impact  
this proposal is not expected to have an impact

21

>Supervision is a critical mechanism in the training of psychologists and  
in the ongoing professional development of psychologists throughout their  
career.  
Supervision is a critical mechanism in the training of psychologists and in  
the ongoing professional development of psychologists throughout their  
careers.

21

>The Board considers endorsement essential to ensure that those in  
supervisory roles have the requisite knowledge, skills and competencies to  
adequately prepare supervisees for professional practice.  
The Board considers endorsement essential to ensure that those in  
supervisory roles have the requisite knowledge, skills and competencies to  
prepare supervisees adequately for professional practice.

22

>This endorsement scheme should not impact  
This endorsement scheme should not have an impact

22

>The following draft endorsement in relation to area of practice puts  
forward the proposed requirements of the Psychology Board of Australia.  
The Psychology Board of Australia proposes the following draft requirements  
for endorsement of practice.

22

>not been subject to conditions on their registration  
not been subject to conditions on his or her registration

22

>those in line supervisor roles  
those in-line supervisor roles

22

>6 As for footnote 5  
{This makes it unnecessary to use 6 as the footnote number.}

Cheers,  
Robert.

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School of Health and Human Sciences,  
Southern Cross University,