



## Consultation Paper on Registration Standards

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Bcc: NatBoards

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To Whom It May Concern:

I wish to make a submission to this consultation process.

I do not agree that 10 hours of individual supervision are necessary or reasonable for ongoing registration. Individual supervision has not been proven to be superior or necessary, is time consuming, and very costly. No other allied health specialist is required to engage in this form of supervision after registration. It would be near impossible in a remote area and even in an urban area the quality of supervision may be limited to only that which is affordable not necessarily the supervisor with the most appropriate skill set.

I do not believe that the 4+2 pathway or the 5+1 pathway should be recognised at all for registration purposes. It is inadequate by all international standards. Although I cannot back up my belief with research, I am of the impression that the general public believes a practicing psychologist will have been trained in the assessment, diagnosis and therapy procedures applicable to clinical work. I do not believe they understand about the different types of psychologists. They would equate a psychologist with someone who has training in helping people with their mental health problems. The minimum accepted standard of clinical training is a masters degree (clinical, counselling, neuropsych etc). To register someone with a lesser degree of training is to continue to mislead the public and place them at risk.

I do not believe a specialist level of registration is then necessary because all registered psychologists will have the appropriate training.

If the two tiered system is to be continued (and it was only introduced in WA to distinguish between the 4+2s and the 6 years), a Masters degree is appropriate protection for the public for the Specialist title and is as highly qualified as necessary for the provision of clinical work. A doctoral degree confers no clinical advantage – it is primarily an extension of the research component.

If such a specialist level was to be recognised, then all other psychologists should be given a title that indicates to the general public that their training is not of the minimum standard for general clinical work (Non-Specialist Psychologist).

However, I believe it is easier to have one level of registration, available only to those who have 6 years of formal training and above. The others can be unregistered psychologists or psychological counsellors. Registration should be reserved for the people with adequate training because this is the only way to protect the public. I consider any other decision to be political.

Yours sincerely  
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