



Associate Professor Caroline Hunt
Director of Clinical Training

6th November, 2009.

Associate Professor Brin Grenyer,
Chair,
Psychology Board of Australia.

Dear Professor Grenyer,

Re: Consultation paper on registration standards and related matters.

Thank you for providing the opportunity to comment on the “Consultation paper on registration standards and related matters” that was released on the 27th October. The School of Psychology at the University of Sydney offers doctoral level training in clinical psychology and is therefore concerned with the range of issues that this paper considers, including training standards, supervision practice, workforce issues and the quality of psychology services offered to the public.

Overall, the School of Psychology strongly supports the range of proposals that are outlined in the consultation paper. We strongly support the Psychology Board of Australia’s proposed Mandatory registration standards are endorsed. There are a number of other issues that we would like to particularly highlight in our response.

3 Proposed qualification requirements for general registration

The School of Psychology supports the proposal that registration standards be raised to six years of Australian Psychology Accreditation Council (APAC) accredited training. We agree that the current four university years plus two-year internship should be phased out in six years, as it does not provide sufficiently rigorous preparation for clinical practice, and sits well below international standards for the profession of psychology. Raising the standards for general registration will, as stated, increase the protection of the public.

4 Proposal for specialist registration

The School of Psychology is in agreement with the Psychology Board of Australia that specialist registration provides greater protection for the public than non-specialist registration. We also support the recognition of specialist registration based on a doctoral degree in individual specialities as this equates with standards for general psychology registration in the United States and the United Kingdom. Our University has chosen to offer only doctoral level professional training in clinical psychology because we believe that Australian practice should not fall below international standards.

In line with the Psychology Board of Australia, we believe that specialist registration will enhance clarity for the public in choosing a psychologist to meet their specific needs and thereby provide stronger protection for the public interest. We strongly support the Board’s recommendation of Option 3 (requiring possession of an APAC-accredited doctorate degree) as it is recognised internationally as the required standard and also represents the attainment of advanced theoretical knowledge and practice in psychology. For example, doctoral level training is the basic requirement for practice as a licensed clinical psychologist in the USA, or a chartered clinical psychologist in the UK.

We are strongly in agreement that eligibility for APS college membership is not appropriate as an ongoing standard for specialist registration under the new scheme, primarily because of inconsistencies and variations in the pathways that have lead to APS college membership.

The School of Psychology is less convinced of the List of Specialities (Table 4.1). For example, we are unaware of any APAC-accredited postgraduate professional degrees with the specialisation clinical geropsychology, and would instead see this as a sub-speciality of clinical psychology. Even with the list restricted to accredited professional degrees, there is a risk that a proliferation of degrees leading to a proliferation of specialist titles will cause more confusion in the minds of the public. We argue instead that the Psychology Board of Australia, through its procedures for developing standards, determine a limited and finite list of specialist titles that best represent the main streams of professional practice of psychology both in Australia and internationally. For example, we would support five core specialist titles: Clinical Psychology (subsuming the more focused clinical areas of geropsychology, community and health psychology); Neuropsychology; Educational and Developmental Psychology; Industrial and Organisation Psychology; and Forensic Psychology. Counselling psychology is not a specialist area of practice, and best sits within the title of general registration.

5 Proposals for endorsements

The School of Psychology strongly supports 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.

In conclusion, we commend the Psychology Board of Australia for presenting proposals that, in our opinion, will ensure a viable, high-quality and safe psychology workforce for Australia. In particular, the mandatory registration standards, proposed specialist registration and endorsement of supervisors will reinforce high standards in the profession of psychology that are consistent with international practice.

Yours sincerely,

Associate Professor Caroline Hunt,
Director of Clinical Training,
On behalf of the School of Psychology, The University of Sydney.