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7 April 2010

Dr. Brin Grenyer
Chair, Psychology Board of Australia

Re: Consultation paper on codes and guidelines

Thank you for the opportunity to comment on the proposed guidelines. Once again, I note that these are my personal comments and do not reflect the views of my colleagues, the Department, or of the University. The following comments follow the structure of the Consultation paper.

First, I feel it is worth noting that the decision guides that are provided re mandatory reporting and continuing professional development are quite helpful and should be maintained in the final Board documents. I would also suggest that planning take place to evaluate the efficacy of the mandatory reporting program, as the record of mandatory reporting in other areas is quite mixed in terms of its actual effectiveness in accomplishing the stated goals. This will be difficult given the current lack of good data on the actual frequency of impaired practice outside of the cases brought to the attention of the State Boards.

The proposal for 10 hours of peer consultation out of the 30 hours of required annual continuing professional development is an interesting suggestion. There are likely to be practical barriers for registrants who practice in rural and remote areas to successfully complete this requirement unless telephone and video link arrangements are fully accepted. I would also suggest that the Board give some consideration as to how registrants holding managerial and academic positions can best meet the proposed requirement. Once again, consulting one's peers when there are relatively few of them locally can be a challenge, particularly over time when the requirement is an ongoing annual one.

In general, I support the current position of the Board on practice endorsements. I understand that this is a matter of continuing negotiation with the Ministerial Council, but would suggest that consideration be given to permitting more specialized endorsements, such as "rehabilitation psychologist", "clinical child psychologist" or "clinical geropsychologist" in addition to the titles associated with the Colleges of the APS.

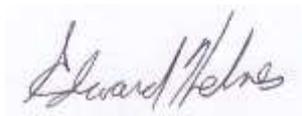
With regard to the requirement for continuing professional development, what is the Board's policy going to be for those registrants who have overlapping areas of practice and maintain membership in two (or sometimes more) APS Colleges? Under the current system for members of more than one College, the accumulation of professional development credits is a blend, with full requirements for College-related points and somewhat proportionately less for general points. One resolution that I can see is that the Board recommend to registrants that they primarily obtain Board-related continuing development points for a single, primary area of practice, and maintain College membership on a separate basis.

I strongly support the Board's position on the two-year internship for four-year graduates. The system by which the internship covers both core capabilities and includes specifications for both the supervised practice and the supervisors will certainly help improve the standard of training for these individuals. I do hope, however, that the Board continues to press for full six-year minimum level for entry to professional practice. The current figures by which Australia has one of the most favourable ratio of psychologists to members of the public in the developed world would argue against the position that there is a shortage of psychologists in the healthcare workforce.

Once again, the guidelines that are provided on individual and group supervision, and the nature of approved supervision methods are very helpful. I hope that Appendix C.: Summary of requirements will make its way into the final documentation, as it provides a very useful reference.

Please accept my congratulations on the work that you and the members of the Board have put in to date under the tight deadlines for implementation.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "Edward Helms". The signature is written in dark ink on a light-colored background.