

Dear Psychology Board of Australia,

I wish to provide comment on one aspect of the recent PBA Consultation Paper from the perspective of a Provisional Psychologist.

Let me start by acknowledging that I am excited at the prospect of a national governing body for the profession and believe it is real progress to be able to practice as a Psychologist nationally without having to secure / maintain multiple different state-based registrations. It also creates a benchmark nationally, which in turn provides further certainty for clients (and employers) in the competence of the Psychologist with whom they will be interacting (or hiring).

I wish to focus my feedback specifically on the *Guidelines for 4 + 2 internship* program section, and more specifically, to successful achievement of the Psychological Assessment competency. To that end, I offer the following anecdote.

Challenges securing supervised practice outside of the primary workplace

I am in somewhat of a unique position to comment on the 4 + 2 internship program. I am currently in my second year of the Masters of Organisational Psychology at Monash University, however prior to embarking on the Masters, I completed all the preparations (and formal Supervision Planning) that would enable me to pursue the '4 + 2' route. Indeed, I was granted status as a Provisional Psychologist in early 2008. However, it was not smooth sailing to secure registration or approval by the VIC Psychology Registration Board of my supervision plan. The primary objection that the VIC PRB raised to my submitted supervision plan was the lack of clarity on how I was going to gain competence in the administration/interpretation/reporting of the mandatory intelligence and memory assessments. It was requested that I research options and document specific steps on how I would go about gaining experience and competence in this, before the VIC PRB would officially endorse my application.

From memory, I was granted a sort of '*provisional*' Provisional Psychologist status. That is, the VIC PRB allowed me to commence supervised practice (so I would not lose out on placement days that could be counted immediately in my current work), but was urged to make arrangements for supervised practice in a clinical or neuropsychological setting, specifically administering (and interpreting/reporting on) the required intelligence and memory assessments. I was asked to provide a 'revised plan' to the VIC PRB that included details of these arrangements as soon as possible.

I began a journey of enquiry, contacting multiple recognised supervisors in neuropsychological practice. I would like to share the details of one encounter I had. This individual was moderately supportive of my interest in gaining experience with neuropsychological assessments, and understood that it was a formal requirement of the 4 + 2 program. While this individual was comfortable supervising me in how to administer and write reports, they were **not at all keen for me to administer assessments to their client population**. They highlighted the unique

nature of this client population, stating that the subtleties in how, for example, brain-damaged clients respond to / approach the assessments are just as important (if not more so) than mere interpretation of the test results. As such, this individual simply did not feel comfortable with a provisional Psychologist with no neuropsychological education / training, and for whom Organisational Psychology was their primary focus, entering their practice and liaising with their clients. This meant that, while they would expose me to the mandatory IQ and memory assessments (by observation, discussion of the test manuals etc), I would not be able to fulfil the VIC PRB, and indeed the proposed national guidelines, for psychological assessment of actual clients.

Discussion with other practitioners in both neuropsychology and educational psychology proved equally discouraging. This was proving to be a serious stumbling-block for me, and failure to secure this assessment experience would prevent me from successfully securing full registration. Enquiries with various professional colleges (e.g., Aus College of Applied Psych and Swinburne Clinic, from memory) revealed that I could pay high fees to be trained in the IQ and memory assessments, but again, would not be given exposure to genuine clients, hence not meeting the registration requirements.

Roughly four months into my 4 + 2 Internship, I informed the VIC PRB that I was discontinuing the supervision pathway and I instead commenced the Masters of Organisational Psychology the following year, in February 2009. It's important to note that other factors also played a part in my decision to discontinue with the 4 + 2 route. For example, the status that a Masters accreditation holds within the industry, coupled with the networks and contacts to be established through Monash's placement opportunities, were strong influencers for me at the time. However, I recall being truly drained at this point trying to secure neuropsychological assessment experience.

Current postgraduate offerings of Organisational Psychology

I make the assumption that the Psychology Board of Australia is aware of recent closures and suspensions of Postgraduate Organisational Psychology programs across Australia. Monash University has closed its Postgraduate Organisational Psychology program. UNSW has temporarily suspended their program. I may be wrong, but I am under the impression that Curtin University used to have a program and now no longer does. Similarly, Melbourne University closed its program several years ago. The options for Postgraduate Organisational Psychology study are rapidly declining.

The result of these closures is that far fewer course positions will be available for aspiring Organisational Psychology students. In Melbourne, for example, Deakin University will be the sole institution providing post-graduate Organisational Psychology training. They only offer full fee-paying positions - there are no HECS / government subsidised options. This may serve as a significant financial barrier for those wishing to pursue postgraduate study. The overreliance on single institutions in major capital cities is also a risk to the volume of Graduate Organisational Psychologists (especially at a time where industry demand for them is growing). However, the

Psychology Board of Australia can positively impact upon this situation by encouraging more aspiring Organisational Psychologists to embark on the 4 + 2 supervised route. It can do so by making registration requirements such as the memory and intelligence assessment requirements more achievable for those working in organisational psychology contexts.

Recommendations

I agree with the recommendations put forth in the 'COP Response to PBA Consultation Paper' regarding compulsory intelligence and memory assessments. I believe such assessments should not be mandatory requirements for individuals working in organisational psychology settings, with client groups for whom such tests are inappropriate, impractical and are simply not used.

Should the PBA require all candidates for 4 + 2 provisional registration to gain competence in a set list of mandatory memory and IQ assessments, then I would suggest that experienced Clinical, Educational, or Neuropsychological Supervising Psychologists provide training to provisional psychologists (e.g., those who are working in organisational or sports psychology) in the tests, and formally assess their competence via 'mock' or 'role-play' assessments using these tests. Supervising Psychologists could then make judgements as to whether such Provisional Psychologists are competent or not, and could provide their 'endorsement' to the Psychology Board of Australia. This may overcome such practitioners' reluctance to expose provisional psychologists to their real clients.

To conclude, I refer to a section of the *COP Response to PBS Consultation Paper* with which I wholeheartedly agree:

"It would be more realistic to expect that, on entry to the profession, 4+2 trained psychologists are able to recognise features of serious mental disorders and make an appropriate referral to a more experienced and qualified practitioner."

Thank you for encouraging the Psychological community to provide feedback on your Consultation Paper. I look forward to learning what is decided.

Kind regards,

Daniel Osher