



The Australian College of Specialist Psychologists Inc.
PO Box 447, South Fremantle WA 6162
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12th May 2011

Dear National Psychology Board of Australia

Thank you for your consultation paper on “The guidelines for the national psychology examinations”. The ACSP wishes to outline some concerns with this process and the significance it may have for psychology as a profession.

The ACSP was of the understanding that the PBA, when it first established the registration and endorsement process for our profession, was going to examine over the next three years the validity of the four year undergraduate degree (plus 2 years of supervision) as a pathway to full professional practice in our profession. We understood that the Board was not very favourable towards this level of training for professional practice, but due to workforce issues, the Ministers would not agree to increase the minimum standard of training for registration at this point. An evaluation of the undergraduate degree as having sufficient training content to practice in any area of professional psychology, has not been undertaken as yet, therefore it is very concerning that the Board is considering an option of an exam to further legitimise this low level of training as acceptable, rather than looking to other options to improve and increase the level of training to meet international training standards of countries which we will relate to professionally, such as the UK, US or NZ.

As the Board is aware, Australia is the only English speaking country in the OECD which allows someone with an undergraduate degree to fully practice within the profession of psychology – making Australia the country with the lowest standards for professional practice, and being out of step with the rest of the world. The Board is also aware that Western Australia had specialist title registration until 2010, when it was lost through the introduction of the National Registration Scheme. The then WA registration board required **eight years** of specialist training in order to obtain this level of registration i.e. 6 years of university training plus two years of supervision. This equates to two more years of training than the current 4 plus 2 pathway. This difference is being highlighted again here as the difference in WA standards appears to have been lost in the models held in other States where only 6 years of training is the highest level of training registered – either via the 4 plus 2 pathway or six years of university. WA was extremely upset when our registration standards were reduced during the introduction of the National Registration Scheme. Therefore to further legitimise the undergraduate training level via an exam process is very disturbing.

A Board regulated exam being offered to undergraduates to allow their entrance into full professional practice in Psychology is not offered in any other country. Such a process would further entrench the undergraduate training as being legitimate in the eyes of the Ministers and State public service departments, and further maintain Australian standards not meeting international training standards. We do not feel that an exam held by the Board, no matter how well intentioned and rigorous, equates to or can replace, two extra years of university training, examinations, tutorials, essay writing and university examined supervised practice.



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We would prefer the Board to firstly have a discussion within the profession, especially with university teachers of undergraduate and postgraduate programs, about whether the undergraduate Degree is adequate to train a person to professionally practice in the nine speciality areas of our profession. We believe that university teachers within these programs are in a stronger position to comment on and to assess the readiness of undergraduate degree holders to practice, than a multi-choice Board exam. We would be very surprised if it were found that the specialist skills for any of the nine specialist areas are taught in undergraduate Degrees. We would also be very surprised if in the supervision process after the undergraduate Degree, the specialist skills are taught and examined sufficiently to equate with two years in a Masters program. This is not in any case the role of supervision and not in the capacity of any one supervisor. We feel these issues need to firstly be examined, discussed and debated within our profession, before the Board starts to set administrative standards for our profession. We are very alarmed that these debates are not being had first, and that the Board is possibly being influenced, either directly or indirectly, by Government bodies concerned about workforce shortages.

These issues also dovetail into the debate about the endorsement process, which makes post-graduate training not compulsory for practice, but an optional extra, because we only have generalist registration level requirements in order to practice. The more the Board goes down the path of establishing ways to examine the generalist, the more it is building an argument for this pathway to stay. We do not feel this is in the best interests of the professions standards, which are the backbone of the service quality we provide to people in the community. We sincerely hope the Board will reconsider its proposal to establish exams for generalists with undergraduate degrees and have the much needed serious debate about this level of training first.

Below are the names of specialist psychologists who support the content of this letter and wish for their concerns to be heard. I also have permission to include several quotes from concerned colleagues for your information.

“The examination is political and will serve to entrench the (government’s) agenda to lower standards and increase regulation. The domains to be tested may well be at the basic level as they point out, but you cannot practice psychology only having some basic or fleeting level of familiarity with these topic areas. There is no way an undergraduate person can get to grips with these content areas through a reading list which itself is quite impoverished and limited. They will certainly not cover these domains during the limited supervision over two years.”

Clinical Psychologist

“They are forcing the 6yrs of training into mental health with NO consideration for any other specialty. The 2yrs provisional training (whether it be on the job or a masters) will have to focus on developing the competencies you will need to pass the test. This will effectively KILL interest and/or motivation for other specialties given some people go into other areas and later go get the masters. Org Psych will effectively die. People will do a Masters in HR. Sports Psych will probably look to Human Movement. This is an outrage.”

Organisational Psychologist



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"The PBA have begun to use the terminology of Medicare, namely 'focused psychological strategies'. It is important to understand that this term was invented from scratch and is utterly meaningless in the context of psychological theory and research. It is a bureaucratic piece of jargon. It is also important to realise the history of this term. Originally it did not apply to psychologists at all, but rather, to GPs who wished to bill patients (and the government) for psychological interventions as a part of a medical consultation. When psychologists objected to this, circa 2001, we were reassured that 'focused psychological strategies' were not intended to be bona fide psychological therapies, yet at the same time they were meant to treat mental health disorders. With the advent of the Better Access initiative in 2006, the 'focused psychological strategies' term was then applied back to psychologists. This was quite rightly an outrageous proposition to specialists who are trained in psychological therapies for mental health disorders. That is, if 'focused psychological strategies' are not intended to mean psychological therapy, then what exactly are they saying about specialists in Counselling Psychology, Forensic Psychology, Clinical Neuropsychology, etc, who routinely do complex work in mental health care?"

The use of this terminology is bureaucratic and politicised language that has been imposed upon the profession. Put simply, people who genuinely have training in psychological therapy should be able to do it (this means specialists). People who don't, should not be able to do it. We do not need an in-between made-up name like Focused Psychological Strategies. "
Counselling Psychologist

We all sincerely wish for the Board to carefully think through the concerns raised in this submission, as a faulty step forward in matters so important as this, as we believe an exam for undergraduates will be, will have ramifications for a very long time. We will look forward to hearing a response from the Board of these vital issues.

Yours sincerely,

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