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COP's Response to PsyBA's CP 10:

The Consultation Paper regarding *The Development of the "5+1" Pathway to General Registration for Psychologists*

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This is a public document on behalf of the APS College of Organisational Psychologists, prepared by the College's National Regulatory Developments Working Party (NRD WP)

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SUMMARY

The College of Organisational Psychologists (hereafter COP) acknowledges that this pathway has been flagged for some time (including an enabling provision being made for multiple pathways in the National Law Act 2009), and that courses have been planned by some Universities and in one case at least approved by APAC. We also acknowledge the role of the Australian Psychological Society (APS) in promoting and supporting the concept of a “5+1” pathway, but note that this was in the context of the upgrading of minimum academic qualifications to Masters level and the removal of the “4+2” pathway. In light of the lack of support from the Australian Health Workforce Ministerial Council (AHWMC) for that upgrading and its decision not to remove the “4+2” pathway, COP (among others) sees significant difficulty with key features of this pathway in the changed context in which it must now be provided.

Regrettably our previous submissions on other Consultation Papers seem to have made little impact on AHWMC’s or PsyBA’s thinking about these features or about the general strategic purpose and value of now having three pathways, their interrelationships including in career terms for students (especially when a student may begin to specialise), the intended role of the professional doctorate, and the demanding and often competing resource requirements of the various pathways, especially during-course placements and the later supervised practice periods.

More specifically, COP considers that the proposals outlined in CP10 do not recognise adequately the grave concerns already expressed by at least this College in regard to matters such as:

- the inappropriate classification of students as “provisional” and the associated charging of registration fees,
- the inappropriate and dysfunctional clinically-biased guidelines for placements and post-graduation supervised practice,
- the too-wide-ranging and unrealistic requirements of supervised practice including the dysfunctional “whole of lifespan” prescription, and
- the undesirable impact of a general examination on the syllabuses of the fifth year (and other years of academic training, for all three pathways).

It is, we strongly suggest, time for all Psychology stakeholders as well as PsyBA to stop and take stock collectively of the major revisions being imposed by PsyBA on the higher education bodies in course development and delivery terms, on the profession in terms of providing placements and supervisors, on employers in terms of the relevance and “fit” of the competencies of graduates available to them, and on the public in terms of the quality of services that graduates may provide. Transparency of and accountability for the impacts of regulatory policies including those made by AHWMC (guaranteed by COAG when implementing the NRAS) in our view require such a collective review.

Relevant “stocktaking” questions include:

- What concepts and expectations about the desired or anticipated future shape and characteristics of the psychology workforce underlie the development of the “5+1” pathway as now described in CP10 with its emphasis on “general” practice, c.f. the rationales for the other two pathways?

- Is there good theory and empirical evidence for, and any research data about the conceptual validity and acceptability of, the contentious concept of “general practice” and “general psychologist” (both with “clinical” overtones) to students and employers? (The Society’s views about the desirability and role of a “5+1” pathway were not, we understand, founded on such a concept, which appears to have been promoted by PsyBA including via CP10.)
- Is the relative employability of graduates from a “5+1” pathway (compared to the other pathways) now sufficient to allow the confident offering and regulatory endorsement of such courses to students *in a socially responsible and ethical way*? (Students must not be guinea pigs in an experiment with a new pathway that may not succeed, *especially in the context of the retention of the “4+2” pathway!*)
- What impacts is the “5+1” pathway likely to have on the sustainability (government funding and University priorities, student choices, availability of supervised placements, etc.) of the 6 year (accredited Masters programs) pathway, *especially given AHWMC’s lack of support for the Masters as the minimum qualification?*
- Will it draw resources away from those Masters programs, already struggling in a climate of reduced government funding and of excessive pressure on academic staff to secure research funding and supervise better-funded PhD students rather than teach poorly-funded professional programs.
- How does the reference to European degree/diploma structures apply in the Australian context, beyond the brief allusion given in CP10? Is an extension of the (still contentious) Bologna model intended? Is PsyBA aware, for example, of the very different stances and approaches to course design taken by even such geographically close institutions as the University of Melbourne and Monash University?
- How does the “5+1” pathway fit in with the quite different US system of credentials for psychologists (the already-signed Free Trade Agreement with the USA appearing to be of greater relevance and immediacy than European developments and credentialing processes at this time). (This is not to denigrate the European developments, which have many attractive features.)
- Is there any basis for concerns that the “5+1” pathway with PsyBA’s emphasis on “general” psychology (that can presumably be taught by any type of academic staff member) will constitute a sub-standard qualification and cheap substitute for the 6-year pathway?

Recommendation 1:

That in light of the implications of AHWMC’s lack of support for the upgrading of minimum qualifications to Masters level, and its decision to retain the “4+2” pathway, further development and implementation of the policy regarding the “5+1” pathway be paused, awaiting a collaborative “taking stock” process that will provide satisfactory answers to fundamental questions about the directions being taken by PsyBA in regard to the structure and thrust of the three pathways (including the retained “4+2” pathway), their interrelationships, their cumulative funding and infrastructure resource demands, and like matters.

Recommendation 2:

That:

- (a) *the fifth year program already approved be treated as a trial of the “5+1” model and carefully and comprehensively evaluated before any other five-year programs are accredited,*

- (b) *this evaluation be planned and overseen by the Australian Psychology Accreditation Council, in consultation with the APS and its Colleges, and*
- (c) *contingency plans be developed regarding how to treat students in this first program if the course proves to be inadequate or ineffective in terms of costs to students, government funding adequacy, course structure, syllabus content, teaching demands, availability of placements, and recognition for employment purposes. (Such plans should consider options such as recognition of time spent on course for transfer with credit to a 6-year program, and/or recognition of completed course time as partial completion of the 2 year practice component of the 4+2 pathway.)*

MORE SPECIFIC COMMENTARY

1. Terminology: qualifications:

On page 2 of CP 10, it is stated that “*Section 53 of the National Law provides that a person is qualified for general registration if they hold an approved qualification. The Board has determined that the qualifications that lead to general registration are:*

a) *a accredited Master’s degree or”*

Although a Doctorate qualification may be considered under 53 (d), the PsyBA is encouraged to modify 53 a) to: “an accredited Master’s or Professional Doctorate degree or”.

2. National Examination:

(a) Questionable need for and design of the proposed national examination:

Section 53 of the National Law refers to the possibility of a national examination. As noted in a previous submission by COP (to CP 9), we question very strongly the requirement for, and nature of, such a national examination. Resolution needs to be gained (from the PsyBA) regarding the relevance and scope of such an examination, particularly for Masters and Doctorate students. Technically it is most unwise to try to use an assessment instrument such as a “general examination” to achieve multiple and diverse purposes. The content of the national examination is unacceptable to us, being clinically focused.

(b) Curriculum balance and implications of ethical practice:

These issues have been canvassed by COP in several previous submissions and remain just as pertinent to CP 10. Curriculum balance is essential if the diversity of the profession is to be recognised and protected (which we consider to be a “duty of care” that the Board is legally obliged to recognise and discharge), and there is not to be a forced shift towards the “clinical” bias evident in the draft General Examination.

(c) Other concerns:

We believe that the PsyBA has not addressed our concerns in two other key areas which have important implications for ethical practice as well as “best practice”:

▪ Psychological assessment and measurement:

Individuals keen to pursue psychology within the organisational and educational fields, in particular, will find themselves well behind their overseas counterparts and below the requisite Australian standard if the syllabus of the fifth year is “general” with the clinical bias outlined above, and with the undue weight being placed on clinical assessment practices by the PsyBA. This further clinical bias is at the expense of modern test theory and its modern applications. The latter are the cornerstone of key developments in organisational and educational assessment and measurement practice.

- Practice across the lifespan:

While exposure (during the undergraduate years of study) to areas such as developmental and child psychology may be justified as one requisite general foundation for all trainee psychologists, many practicing psychologists have no need to gain higher order skills and knowledge of human development across the lifespan.

For organisational psychologists, this is particularly true in relation to children. We recognise that practice across adolescence can be relevant to the world of work (for example, 18 to 21 year olds, and even prior in relation to career and vocational planning) but practice with respect to children is not undertaken. It is crucial to note here that the ethical principles under which psychologists function demands that they do not practice outside their area(s) of competence. The requirement for all psychologists to demonstrate competence in “practice across the lifespan” is unrealistic, unattainable, yet may lead to a false belief of ongoing or sustained competence across this domain, despite no practice in parts of the domain. (The same comment can also be made in relation to psychological assessment and measurement whereby individuals may make false assumptions regarding their competence in what is a very broad, and changing, field.)

3. Supervised Practice (Year 6 equivalent):

The requirement of 40% client contact is onerous. This requirement is consistent with the view of psychology as a ‘treatment’ profession or discipline with predominantly one-on-one practitioner-client sessions. It fails to address the needs of those who work in many of the beyond health areas of psychology engaging in client service delivery of very different forms (e.g. to groups, with teams or companies, and so on). They may well be working in areas of survey design, job analysis, job redesign, selection validation research, the management of organisation-wide change processes, public policy development, program evaluation, applied research (e.g. road, marine and aviation accident analysis), report writing and the like. Such activities, often multidisciplinary even though within a supervised practice program, are very likely to constitute (say) a 20% rather than a 40% “direct” client contact requirement. A clinical notion of “direct client contact” does not transfer to those activities in a meaningful way.

Furthermore, the 1540 hours of supervised practice, plus 88 hours of supervision (including at least 58 hours of one-to-one supervision) are likely to limit severely the number of suitable supervised practice opportunities for ‘intern’ psychologists not wishing to work in hospital or clinical settings.

The expected outcomes from this one year period of supervised practice, as outlined in CP10, are quite unrealistic. As we have repeatedly said in our previous submissions, placement agencies are not there to act as quasi-university departments training students on behalf of the registration authority. They are small businesses or public sector units whose prime role and responsibility is to provide a “niche” set of psychological services to various bodies and types of clients.

The profession must count itself fortunate that employers including public sector heads allow the placements, and that professional staff agree to provide supervision of places.

In its treatment of placement agencies PsyBA should beware "killing the goose that lays the golden eggs".

4. Clarification of Maximum Time for Completion Urgently Required:

The CP 10 document states on page 4, item 5:

"The 5+1 program must be completed within a maximum five years from commencement." Presumably this is an error, being self-evidently unachievable.

Reference to time for completion should specify whether it applies to the whole pathway or the university degree components. Given that the 5+1 program would take a minimum of six years for a full-time student, this particular statement needs to be modified so that there is a sensible maximum that allows for part-time completion, and for delays that may legitimately occur in the student's course progress (e.g. illness, child rearing and parental leave) over this extended period.

More fundamentally, PsyBA appears to expect the student to enter and enroll for the "5+1" pathway *from the first day of her/his first year of University study, or at least the commencement of Psychology 1*. Career indecision, subject choice match with subject availability, differences in degree structures, "major" subject transfers, mature age entry and the like are all ignored in the setting of such a prescription.

5. Fundamental concerns about the underpinnings of this intended registration standard:

The Board's role in setting standards for entry into the profession is not challenged here (provided that the Board works in close collaboration with the profession through the APS as well as with the higher education providers).

However we note that PsyBA is explicitly and solely an arm of government, not a quasi-professional body representing the interests of the profession or registrants. Also we do have concerns about whether the Board is acting within its (and governments') legal remit where it sets requirements that go beyond the entry level, are not required in order to protect the public interest, and interfere with the independence of the profession and the discipline and their natural (and intertwined) evolution.

More specifically, there are a number of elements within the proposed standard in CP10 which seem to be an attempt to create a future profession in the image of the Board's clinical composition and collective professional experience, rather than appreciating, reflecting and protecting the diversity and integrity of the profession as a dynamic whole. The notion of "general practice" seems to have been drawn from a "medical model" and (applied inappropriately to Psychology) to deny the diversity of the profession and the need for many syllabuses and sets of competencies, not just one.

In the view of the College of Organisational Psychologists this 5+1 practice orientated pathway as apparently planned by PsyBA in CP10 has the clear potential to be too lopsided if clinically-oriented, too vague and dysfunctionally broad if it tries to be "all things to all people", and too shallow if seen as an alternative to the 6-year specialist pathway. Certainly some public discussion of this vitally important issue is warranted, but so far has been sadly lacking.

We very strongly support the highly relevant analysis of trends in higher education in Psychology, and in the (un)availability of supervised placements, reported by Voudouris and Mrowinski in the Australian Psychological Society's journal *InPsych* April 2010. (This report should be immediately available to those members of PsyBA who are also members of the APS.) With APS approval we cite the "Conclusions" section of that paper in the Attachment.

CONCLUSION

Even though the 5+1 pathway proposed in Consultation Paper 10 appears to be consistent with previous pronouncements from PsyBA and with the National Law Act 2009, we consider the immediate development of a suite of “5+1” courses now to be problematic in light of the AHWMC decisions to retain the “4+2” pathway and not upgrade minimum academic qualifications to Masters level. The serious implications of these decisions must (we consider) be carefully reviewed before committing to a “5+1” pathway *that has a different role from that originally envisaged and supported*. Also important resource issues must be considered.

We urge a collegiate “pause and take stock” process (overseen by PsyBA but involving the APS, its Colleges, APAC, and the Heads of Departments and Schools of Psychology). There is time for such a process.

We also urge taking advantage of the opportunity (unlikely to recur) of carrying out a well-designed trial of the first approved “5+1” course, before any further approvals of such courses are made. Such a trial would be consistent with the value placed in the profession on evidence-based policies. Safeguards for students should be put in place.

Thank you for the opportunity to submit our views to the Psychology Board of Australia. We look forward to your considered response not only to this submission, but also to our prior submissions which have raised many apposite points.

ATTACHMENT:

Alarming drop in availability of postgraduate psychology training

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Conclusions

The preliminary data reviewed here suggest the psychology profession's postgraduate professional training system is confronted by a number of very concerning problems. It is clear that the current level of funding for Commonwealth supported places in postgraduate professional courses is highly inadequate. In the face of this there has been a sustained period of course closures and an associated loss of training places, despite the fact that there is considerable unmet demand for places in these courses. Should this process continue unabated, the danger is that there will be further decline in the number of places and the losses are likely to occur first in the most vulnerable specialisations, such as sport, community and health psychology. At the time of writing, there is only one university maintaining a sport psychology professional postgraduate program and two universities maintaining community psychology programs, and neither the discipline nor the Australian community can afford the loss of specialist expertise which will inevitably follow. There may be important opportunities to address funding issues provided by the upcoming higher education reforms, regarding which the APS has already begun the process of consultation with Government.

Other constraints must also be addressed if courses are to remain viable. The most pressing of these is the availability of fieldwork placements. Most fieldwork placements in Australia are unfunded and only happen because of the good will of the staff in (mostly public) agencies, who often receive little if any recognition for their role as a placement supervisor. Increasingly, health agencies discourage or forbid their psychologists from offering placements to trainees. Such a system of training is no longer sustainable. The federally funded APS Clinical Supervision Scheme for Postgraduate Psychology Student Trainees program, which has created over 50 additional fieldwork placements in clinical, counselling, health, neuropsychology and forensic psychology for trainees around Australia since its introduction in 2008 (see www.psychology.org.au/academic/scholarships/clinical), has clearly demonstrated that funding is the critical ingredient needed to increase the availability of placements for psychology trainees. The National Health Workforce Taskforce is currently undertaking consultation regarding the creation of a national placement funding subsidy scheme as part of a \$56 million Council of Australian Governments allocation to build supervision capacity in the health sector, however it is not yet clear how much funding will be available for psychology fieldwork placements or whether this funding might extend to the many student psychologists who undertake fieldwork training outside the health sector.

The related issue of availability of appropriately qualified supervisors will also need to be addressed if the decline in viability of professional postgraduate training is to be arrested. At present, the profession is not in possession of comprehensive data regarding supervision supply and demand which could inform a process of planning, although it is clear from the survey data provided by the

educational institutions and reported here that specialist supervision is in short supply. Federal fieldwork placement funding may alleviate this shortage to some extent but is unlikely to make a substantial impact in specialisations which operate outside of the health sector.

The next three to five years will be a crucially important period of change in professional postgraduate training in Australia. Now that we have a clearer picture of the state of our professional training programs, the first task is to assist the Government and other planners to understand how urgent it is to address the funding shortfall in professional postgraduate training if decline is to be arrested. Second, it is crucial that we do not sacrifice the quality, depth and breadth of training of psychologists in order to meet cost and workforce imperatives if we are to fulfil our obligation to the public to ensure that psychologists are skilled practitioners who can deliver the full range of high quality psychological services to the community.

Finally, the results of this data analysis highlight the significant challenges for the profession if the goal to raise Australian psychology training standards to those of other developed countries is to be realised. With a more detailed understanding of the constraints to increasing postgraduate training places, all stakeholders within the psychology profession must join together in strenuous advocacy to enable Australian training standards to match those of our international colleagues.