



28 July 2011

Attention: Chair, 5 + 1 consultation  
[psychconsultation@ahpra.gov.au](mailto:psychconsultation@ahpra.gov.au)

Associate Professor Brin Grenyer  
Chair, Psychology Board of Australia

Dear Associate Professor Grenyer,

**Re: Consultation Paper 10 Proposed amendment to the provisional registration standard to account for the 5+1 program**

This letter is the response of the Australian College of Applied Psychology (ACAP) to the *“Consultation Paper 10 Proposed amendment to the provisional registration standard to account for the 5+1 program”*.

We appreciate the opportunity to comment on the proposed provisional registration standards. The College has run a two year FTE Psychologists Registration Supervision Program (PRSP) for more than 12 years that has supported more than 1000 interns to gain registration in New South Wales and Queensland. Based on this experience, we believe that ACAP can make a useful contribution to the discussion of the provisional registration standards for the newly recognised 5 +1 professional training pathway in psychology, in particular the sixth year supervised practice (internship).

Since the guidelines for the Graduate Diploma of Professional Psychology were made available by APAC in June 2010 the College has eagerly anticipated the Board’s proposals concerning the requirements for the 6<sup>th</sup> year of supervised practice. In general, we commend the direction of the new 5+1 pathway that raises professional training standards in psychology to meet international benchmarks, in particular the EuroPsy. Recognising that one of the major drivers of the Bologna process in general and of the EuroPsy in particular is facilitating international recognition of qualifications, we support the development of a pathway to facilitate the international recognition of Australian psychologists. However, there are a number of specific issues about the sixth year of supervised practice that we would like to raise.

Australian College of Applied Psychology Pty Ltd

**Sydney Campus**  
Level 5, 11 York Street  
Sydney NSW 2000  
Australia  
T +61 2 9964 6300

**Brisbane Campus**  
Level 2, 99 Creek Street  
Brisbane QLD 4000  
Australia  
T +61 7 3234 4400

**Melbourne Campus**  
400 Queen Street  
Melbourne VIC 3000  
Australia  
T +61 3 8613 0600

T 1800 061 199  
F +61 2 9964 6370  
E [acap@acap.edu.au](mailto:acap@acap.edu.au)  
[www.acap.edu.au](http://www.acap.edu.au)

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Consultation Paper 10 proposes that “The sixth year mirrors the final two years of the 4 + 2 supervised practice (internship) program, except the time requirements are halved” (p.3). This means that those in the +1 program will be required to complete a minimum of 1540 hours of placement and a minimum of 60 hours of professional development to meet the eight competencies. We agree that the requirement for 1540 professional practice hours is appropriate and is consistent with the EuroPsy. However, we note that one of our concerns about the changes to the +2 program was the affordability of two full-time years of supervised practice, given that almost 90% of those completing ACAP’s (+2) PRSP program undertake unpaid placements. In the past, it was possible for provisionally registered psychologists to supplement their unpaid work with paid employment. However, with the new placement requirements provisionally registered psychologists would either have to be able to support themselves for two years with little or no income or complete the program over four years. Alternatively, they might find a full-time, Board approved, paid placement, although in our experience these are a minority of the placements available. These concerns apply to a lesser degree to the 5+1 pathway, particularly as there is no requirement for institutions who train 5<sup>th</sup> year students to ensure internships are available in the 6<sup>th</sup> year. **The lack of availability of paid supervised placements for psychology graduates is a serious issue for the profession of psychology broadly.**

The requirement for 60 hours of professional development in the +1 program does not recognise the fundamental difference between the 4+2 and 5+1 programs: that those in the +1 pathway will have completed an APAC approved Graduate Diploma of 1 year FTE comprising coursework that is focused on the core professional capabilities, in addition to supervised practice. **We urge the Board to consider reducing the professional development required in the +1 year of practice to 30 hours, in line with that required for registered psychologists.**

In terms of supervision, the ‘Guidelines for 4+2 internship program: provisional psychologists and supervisors’ note that “*The Board-approved supervisor ... should preferably be a person who works onsite with the provisional psychologist*” (p.8) and that “*It will be at the Board’s discretion as to whether it approves any offsite supervisory arrangement*” (p.8). We believe that the requirement for onsite supervision raises practical and pedagogical concerns. First, it further limits the availability of placement opportunities for +1 provisional psychologists. Second, offsite supervision avoids the possibility that the supervisor acts in a dual role with the provisional psychologist. Third, offsite supervision facilitates consistency of supervision across work placements: the requirement of onsite supervision effectively means that if the provisional psychologist changes their placement, then they may have to change principal supervisors and interrupt the continuity of their supervised practice. We have extensive experience with the offsite supervision model in the ACAP PRSP (+2) program. ACAP works with a group of excellent offsite supervisors, and this model has worked well for supervisees, providing both the opportunity for stability of supervision across changes in placements and the opportunity to change supervisors to meet the changing needs of the developing professional.

For comparison, we note that the EuroPsy guidelines for the final year of supervised practice include the following:

- *psychologist as student at university and supervised practice is part of the university education and training*
- *psychologist works as employee and supervised practice is part of the probationary training period (and supervision is formally arranged within the work setting)*
- *psychologist works as employee and supervised practice is informally arranged (and maybe provided by a psychologist outside the work setting)*
- *psychologist is self-employed and arranges own supervision (p.51)*

**We urge the Board to consider its position on offsite supervision in light of international best practice.**

As noted above and in our previous responses to the Board's requests for consultation, the College supports the move to national registration for the profession of psychology and recognises the importance of achieving national standards for the profession. We have been particularly anticipating the release of the guidelines for the +1 year of supervised practice and staff from the School of Psychological Sciences are available to meet with the Board or to provide further information if requested. We look forward to considering the response of the Board to the submissions received to Consultation Paper 10.

Lynne Harris

Associate Professor, School of Psychological Sciences, Australian College of Applied Psychology

Felicity Rea

Manager - Psychologists Registration Supervision Program, Australian College of Applied Psychology