The Good

Simulated client work

Simulated client work can be counted (90 hours in the first year, 60 in the second).

Supervision ratios

Total supervision ratio is now set at 1 hour to every 17.5 hours of the internship. Previously the 1:17.5 was required regardless of how much supervision had previously been provided. This now means that there is flexibility as a Prov. Psychs progresses, recognition is given for high levels of supervision at the beginning that would previously not be able to be counted.

Psychological Testing

Psychological testing can be done on simulated clients. This is the simplest and biggest change that has been proposed that helps many agencies and organisations help Prov. Psychs progress through their internship without looking for another placement if psych testing is not a major part of that service.

Expansion of client contact

Client contact is widened to include contact with associated parties of the client such as parents and teachers.

Asynchronous supervision

10 hours of asynchronous supervision can be claimed (written feedback etc), though this should be at least doubled. The reason for this is that recognition should be provided on aspects of feedback on assessments and other written material. It also helps reduce the tyranny of distance in regional and rural areas.
The Bad

Supervision ratio still too high

The ratio of supervision remains of 1:17.5 hours. This is a 400% increase on pre-2010 internship requirements in NSW. This should change immediately namely for the cost to the Prov. Psych or the organisation is enormous and therefore reduces incentives for hiring Prov. Psychs. It also disadvantages regional and rural Prov. Psychs who have to travel for supervision.

Professional development requirements

Prov. Psychs still need 120 hours professional development. This is twice as much as a registered psych and comes at a huge cost to organisations and the Prov. Psych. It is also an extra two weeks that the Prov. Psych is not completing the work of the organisation. Organisations who support hiring Prov. Psychs should not be excessively burdened.

Also, for Prov. Psychs that are not doing paid placement have considerable expense for supervision that can restrict them from entering into an internship.

Logbooks

Logbooks still require reflection for every activity logged. Every Prov. Psych and Supervisor I have spoken too thinks poorly of the log books. It is an onerous and meaningless form. It is added paperwork on top of their job, extra study, case studies, supervisor tasks requested, exam prep and extra professional development. To reflect on every client is not feasible and the practice of reflection is also diminished. Two solid reflections on client work per week would be more beneficial.

Case reports

Eight case reports of 2500 words in length. The PBA claim Prov. Psychs have been asking for an increase in this word length but this is not what is reported to me in my experience. This should be a phased increase to a max 2500 words, as someone 6 months in won't write the same as someone who is 18 months into their internship.

Exam focus for supervisors

Supervisors are being asked to focus more on the exam with the Prov. Psych. This is probably the most significant change for supervisors and actually falls outside the scope of the definition of supervision that AHPRA provide (ie: The purpose of supervision is to guide and provide feedback on the provisional psychologist’s practice, and to assess personal, professional and educational development in the context of their experience of providing safe, appropriate and high quality care to clients. Guidelines for the 4+2 internship program, pg 24). Supervision is not about tutoring for an exam.

Implied preference for multiple placements
The documents state that "single placement may be permitted" which indicates a preference for multiple placements which leads to organisations being unwilling to take Prov. Psychs if they know they will leave after 12 months. This is exacerbated by the enormous investment organisations make via providing supervision, access to professional development, and other support.

**Phone supervision hours decreased**

Supervision by phone hours has decreased. This is devastating for regional and rural psychologists. The lack of acceptance for phones or other telecommunication methods is extremely disappointing and highlights a metropolitan-centric view of the world.

**Audio recordings disallowed**

Direct observation no longer includes audio recordings. This again disadvantages regional and rural services, and those who provide telephone counselling services. To further elaborate on this we need to look at the consequence of this decision. The expectation is that once again organisations or Prov. Psychs who face vast distances require supervisors to travel as great expense. Other methods of filming are welcome but should not be at the restriction of audio recordings.

**Self-care rhetoric**

The PBA should be applauded at continuing to highlight the importance of self-care, unfortunately though the rhetoric is not supported by the rest of the requirements. It should be recognised that while onerous forms (eg: log book reflections), increase workload with exam preparation, twice as much professional development required, tasks required by supervisors, on top of other tasks outside of direct client work that the organisation requires and increased general reading as they are new to the profession means that increased stress and burn-out will occur. It also has the potential to lead to low performance in the workplace which then has to be managed by the organisation. If self-care was important significant changes would be made to reduce paperwork and other requirements to actually support Prov. Psychs instead of putting up many barriers.

**Improving managing performance issues of Prov. Psychs**

The PBA should also create a better process in which performance issues within an organisation of a Prov. Psych can be addressed in conjunction with the internship requirements. For example, failure to hand in work on time has an impact on the Prov. Psych’s job and on their internship, but there is no simple provision to pause internships to support performance management by an organisation.

**Off-site placement requirements**

In reference to off-site supervision the PBA require “If the supervisor is not on-site, there must be someone else on-site (such as another psychologist, line manager and/or other health professional) who can oversee the provisional psychologist and provide professional guidance if required”. There are a number of problems with this and this should be removed immediately:
- The PBA should not tell organisations what their structure needs to be. Requirements for internships are not the driving force behind decisions of employee placements.
- It is unreasonable to expect a staff member to be placed at a location for the sole purpose of supporting a Prov. Psych.
- In regional and rural areas psychologists often work in a range of workplace and different towns. It is unreasonable to expect that someone travels with them.
- This requirement completely dismisses the ability for Prov. Psychs to use a phone.
- This requirement is poorly defined and is incongruent with real world practice.

5 year review cycle

The proposal for a five year review cycle is also a significant problematic change. The changes to the 4+2 model continues to impede the growth of psychologist. Four and a half years on provisional psychologists numbers are still below November 2010 numbers. While the PBA’s owns stats show that there is a 5% decline (13% decline at its lowest) on those numbers, it does not include expected annual growth of psychologists therefore the decline is significantly higher. A formal and thorough review on the 4+2 Guidelines was not conducted by June 2013 as required by AHPRA but instead it was lumped into a 5+1 review. There is no consequence of the board not meeting this requirement for the PBA. Due to the importance of the 4+2 pathway being a significant pathway for regional and rural psychologists, estimated to be 50% of the registration pathway for those areas, continued implementation of poor processes has a large impact on workforce issues in these areas. Therefore the three year review cycle should remain with increased penalties for board members for failing to meet this target.

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