### **NSW DEPARTMENT OF EDUCATION RESPONSE**

# Psychology Board of Australia Public Consultation Reducing regulatory burden: Retiring the 4+2 internship pathway to general registration

## **Introduction and Context**

The NSW Department of Education (the department) is pleased to provide a submission to the Psychology Board of Australia (the Board) as part of the public consultation on the proposal to retire the 4+2 internship pathway to general registration.

The department is one of the largest employers of psychologists in Australia through its school counselling service. The school counselling service contributes significantly to student wellbeing in NSW public schools by providing psychological counselling, assessment and intervention services.

Results from the Second Australian Child and Adolescent Survey of Mental Health and Wellbeing (Lawrence et al., 2015), which surveyed over 6,300 families with children aged 4-17 years, indicated that approximately one in seven children and young people experienced a mental disorder in the past year. It is important that students have access to accredited psychological services in schools when they need them.

The NSW Government has allocated an increased investment of \$167.2 million through the Supported Students, Successful Students initiative to support the wellbeing of students in NSW public schools. This package includes \$80.7 million to employ 236 additional school counselling positions, increasing the total from 790 to 1026 positions in July 2016. The package also includes \$8 million for graduate scholarships to boost the recruitment of the school counselling service.

The department also invests significant resources to support the ongoing development of the school counselling service. This includes a strong supervision structure. Dedicated time within school counselling resources is allocated to individual and group supervision. School counselling staff are supervised by 133 senior psychologists education. Ten leaders psychology practice across the state supervise the clinical practice of the senior psychologists and support them in their supervision and management of their counselling teams. Systemic support for the school counselling service is provided by the state office Psychology and Wellbeing Team. This facilitates consistency of training, processes, service delivery and systemic support for the registration requirements of the Board.

The department has a strong history of supporting provisional psychologists to achieve general registration. The department funds experienced staff to become Board approved supervisors and also funds supervisors to maintain their supervisor status through master classes. The department values the commitment and dedication of these supervisors in developing the future of the profession.

Provision of quality professional learning to support psychological practice is facilitated at a state-wide and local level. Examples of state-wide professional learning for all school counselling staff in 2018 include training in a tailored adaptation of the Black Dog Institute's existing accredited advanced training in suicide prevention course for the high school context. The department has also partnered with the University of Wollongong to provide training for the workforce as part of the Project Air Strategy for Schools.

The department provides scholarships to support psychology students to enter the school counselling service through a number of pathways. This includes the training of teachers through a Graduate Diploma in Psychology at the University of Wollongong; the Master of Teaching (School Counselling) program at Sydney University which provides psychology graduates with the teaching qualification required to become school counsellors, and the Master of Professional Psychology pathway that supports graduates through an internship to become school psychologists.

#### Questions for consideration

1. Do you agree with the Board's proposal to consider education and training reform, including focusing on reducing regulatory burden, as an important next step in the development of the regulatory environment for psychology?

The NSW Department of Education acknowledges the importance of considering education and training reform and undertaking a public consultation to reduce regulatory burden. Public discourse about education and training for the profession allows the Board to take into account research, international standards and the views of stakeholders to inform future system improvements.

- 2. Which do you consider is the best option for reducing regulatory burden? Please provide reasons for your stated preference:
  - a. option one status quo
  - b. option two retirement of the 4+2 pathway to general registration
  - c. none of these options, or another option.

The NSW Department of Education considers that retaining the status quo provides the greatest opportunity for large employers such as the department to have access to accredited psychologists. The retirement of the 4+2 pathway at this time would place pressure on the workforce supply of psychologists in NSW.

The department has a strong history of sponsoring psychology graduates to achieve general registration through the 4+2 pathway and more recently, the 5+1 registration pathway. These psychologists have provided a high quality psychological service to students in NSW public schools statewide.

The department is implementing a range of strategies to increase the supply of school counselling staff. These strategies include the creation of an additional pathway to employ qualified school psychologists without teaching qualifications, retraining existing teachers as school counsellors, and offering rural and metropolitan scholarships to support psychology graduates to complete the Master of Psychology pathway to be employed in the school counselling service.

Whilst the regulatory and administrative burden of the 4+2 pathway is acknowledged, the department has demonstrated its capacity to successfully support the 4+2 pathway and the 5+1 registration pathways to produce high quality psychologists.

3. Are there any specific impacts (positive or negative) or advantages/disadvantages for each of the two options that have not been outlined in the paper?

The Board has stated that there is no current workforce shortage. Whilst the psychology workforce is growing across Australia, the department has found that it is not growing at the rate required in NSW. Given the increased demands for psychology services in the community and the expansion of the school counselling service in recent years, the department has found the supply of psychologists is not sufficient across all geographic locations.

For many years the Department has sponsored teachers to become school counsellors through bespoke courses of study developed with universities. Between 2012 and 2017 a total of 201 teachers completed the Graduate Diploma of Psychology (4+2 pathway) through the University of Wollongong. This tailored training pathway enables teachers to upgrade their psychology qualifications and work as school counsellors. Graduates then undertake their psychology registration through the two year internship while working in NSW public schools.

The Graduate Diploma of Psychology at the University of Wollongong provides a tailored fourth year program for school counsellors. Unlike other fourth year programs described by the Board, this tailored pathway provides the professional training and development of practical skills through

supervised placements in schools. These interactions with students are provided safely within a structured environment with both simulations and real-world client experiences.

Whilst the 5+1 registration pathways are growing and an increasing number of psychology graduates are taking up this option, the numbers in the 5+1 pathway in NSW (15.2%) remain comparatively small, compared to the 4+2 pathway (47.6%) at this time. There are currently six providers of Master of Professional Psychology programs in NSW. Entry into these courses is highly competitive. Until the number of providers or places increase, there may be insufficient places in these courses for psychology graduates to sustain the workforce needs. This impact on workforce supply is likely to lead to a shortage, particularly in rural and remote locations.

Should the Board decide to retire the 4+2 pathway, extended time is needed to transition currently sponsored students to complete their psychology qualifications and internships and ensure an ongoing supply into the school counselling workforce to meet the growing demand for school counselling services

# 4. Are there any specific risks (for each of the two options) that have not been outlined in the paper?

Sponsored teachers undertaking psychology studies have provided a steady workforce supply into the school counselling service.

It is anticipated that there will be 70 teachers entering the school counselling workforce between 2019 and 2021 through this training pathway. An additional 39 teachers are currently sponsored to complete a psychology major and will undertake the school counsellor training program from 2019. These teachers will be due to begin their two year internship in 2019, 2020, 2021 or 2022.

There is a risk that these psychology students may not complete studies in time to commence internships unless the transition time to retire the 4+2 pathway is extended, should the Board decide to retire the 4+2 pathway.

5. If you prefer option two, do you support the Board making the changes (update/delete) to the standards, guidelines, fact sheets and forms as outlined in <a href="Attachment G-J">Attachment G-J</a> to retire the 4+2 internship pathway?

It will be important to update documentation regarding the registration pathways to enable guidelines to be clear and transparent.

- 6. If you prefer option two, which transition option do you prefer and why?
  - option a): last enrolment in the 4+2 internship is 30 June 2019
  - option b): last enrolment in the 4+2 internship is 30 June 2020
  - option c): last enrolment in the 4+2 internship is 30 June 2021
  - none of these options or another option (please specify)

Should the Board decide to retire the 4+2 pathway an extended time-frame will be needed, beyond the options outlined above.

7. From your perspective, can you identify any practical issues in retiring the 4+2 internship pathway?

As stated above, the key issues from the department's perspective are workforce supply, reviewing current retraining pathways to align with the Board's decisions and allowing time for existing sponsored psychology students to complete their studies and begin internships.

8. Is the content and structure of the consultation paper helpful, clear, relevant and understandable? If not, what needs to change?

The paper is comprehensive and clearly articulates the view of the Board.

9. Is there anything else the National Board should take into account in its proposal, such as impacts on workforce or access to health services that have not been outlined in the paper?