



Department of
Education

Our Ref: [D09/0680556](#)

Associate Professor Brin Grenyer
Chair
Psychology Board of Australia

Dear Brin

Re: Consultation Paper on Registration Standards and Related Matters

Thank you for the opportunity to provide feedback on the consultation paper.

The document is comprehensive in scope and clearly driven by a desire to ensure professional practice standards in psychology are maintained. The intent of building on the existing practices and process operating under the Australian Psychological Society and the various state Boards is also evident. The desire to maintain quality practice in psychologists and simultaneously consider the need for client safety and well-being is inherent in the document.

I endorse the focus and broad statements in areas such as criminal history standards, English language proficiency, professional indemnity insurance and continuing professional development. The tables in each of these sections of the document make for easy reading and clarity of both the intent and the specific professional requirements.

In responding to this document I am considering the public sector school psychology workforce in Western Australia. In broad terms this workforce comprises approximately 250 psychologists. All of these psychologists have at least four years of formal tertiary training in psychology (some also have a Masters degree) and a tertiary level teaching qualification. The psychologists work across the entire state, from the inner city and metropolitan area through to regional and remote areas. The nature of clientele and referral related difficulties psychologists encounter varies considerably. However, the personal and organisational commitment to professionalism is extremely high. As such the Department of Education provides formal supervision for conditionally registered psychologists (to be known as interns under the new arrangements), offers access to a two-year (30 day) induction program, professional development programs for all and access to ongoing professional line management (in most cases by a fellow psychologist). In addition, performance management processes for every individual guide their work and professional growth.

I would like to provide comment in the paragraphs below on some specific matters that I believe require further consideration.

Additional statements about professional indemnity insurance for psychologists working for organisations need to be added in order to ensure that individuals know what aspects of their employer's policy they need to enquire about with regard to the level of protection and cover offered. Individuals need to be able to fully understand how an employer policy differs from a private policy in order to then make an informed decision on whether to take out their own policy or not.

Continuing professional development standards are a welcome aspect to registration requirements. The statement of a minimum number of hours is excellent. I would like to offer the following comments:

- The learning plan requirement can be met under organisational performance management protocols. It would be useful to state this.
- The record of continuing professional development process needs to be simple and effective. An electronic process, such as that used by the Australian Psychological Society, would be very helpful in this regard.
- The 10 hours of individual supervision is a useful requirement. However, the Board needs to accept that for large organisations setting up processes for all staff to meet this standard will take time and planning. Not only do geographic realities need to be planned for but also the potential impact on service provision needs organising. Lead time is needed to allow School Psychologists the required time to educate and explain to schools what this requirement is and the benefits that will flow from the supervision. Otherwise schools might see this as a loss of direct service time and an imposition.
- Further to the comments above there is a need for additional wording on the nature of individual supervision. Perhaps some statements on the need for integrity in approaching this task and/or words to outline what supervision is not intended to be. This will aim to avoid tokenistic supervision.
- The requirement for psychology supervisors to undertake specific professional learning to assist them in this task is good. However, imposition of a three year period after registration before a psychologist can apply for endorsement to become a psychology supervisor has the potential to create hardship for organisations. A two year period, as currently applies under Western Australian registration requirements, would be preferable. This issue is significant for maintaining viable rural and remote psychology supervision arrangements.

I would like to finish by acknowledging the amount of effort and thought that has been put into developing the consultation paper. The paper will support professional standards and public confidence in psychology as a profession. I trust the comments above will be considered carefully and welcome the opportunity to elaborate on these for the Board at any time.

Yours sincerely

CHRIS GOSTELOW
MANAGER
SCHOOL PSYCHOLOGY SERVICE

24 November 2009