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## **1. Introduction**

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The Psychology Board of Queensland ('the Board') welcomes the opportunity to respond to the Consultation Paper issued by the Psychology Board of Australia ('PBA') on 27 October 2009. The Board, with the assistance of the Office of Health Practitioner Registration Boards, has reviewed the PBA proposals together with those made by the other national boards.

That review has identified specific issues with the standard proposed by the PBA and general issues with the standards as proposed by all of the national boards. Both specific and general issues will be addressed in the following sections of this submission.

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## **2. Criminal History Standard**

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The standard is endorsed as documented. While the Board does not resile from the comments it made in response to the initial draft of the criminal history standard, the Board recognizes why the inclusion of weightings has been necessary.

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## **3. English Language Standard**

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The Board wishes to raise a number of matters in regard to the proposed English Language Standard.

First, the definition of 'international student' is problematic. The standard as proposed does not provide adequate guidance to an applicant, or a registration officer, as to the requirements for international students to provide evidence of secondary education in English with their application. In this regard, it relies on self identification by the applicant in relation to their secondary education, and if they do not identify as an international student, they are automatically exempt from the requirements of the standard. However, the registration officer assessing the application will not be able to determine if documentation was not provided because they did not fall within the definition of 'international student', or because they failed to comply with the application requirements. This will mean follow up will be required in every instance resulting in additional costs and delays to the registration process.

There are two options available to address this issue as follows:

1. Define an 'international student' as 'a person who completed their secondary education outside of Australia' while concurrently requiring all applicants to state in the application form where they undertook secondary education; or
2. require every applicant to provide evidence of their secondary education as a component of the application.

Option 1 is preferred as it is more cost effective and the Board will be able to rely on the false and misleading information provisions rather than seek evidence from every applicant.

Second, the inclusion of countries under exemption 1(a) of the standard is supported. However, the exemption could be strengthened by clarifying that the listed countries apply to

both the secondary education and the tertiary qualification components and by deleting the following text at the end of the paragraph: ‘...where English is the native or first language.’

These amendments will make it clear which applicants are required to undertake an assessment and will remove any room for argument from persons educated in a country where English is one of the first languages.

Third, the English language requirements specify applicants must ‘submit evidence or arrange for evidence to be provided’. However, under note 7 the applicant is then obliged to make arrangements for test results to be provided directly to the Board by the testing authority. This internal inconsistency needs to be addressed and it is submitted that applicants be enabled to submit evidence on the basis that the Boards can directly confirm these results with the testing authority.

Fourth, the standard as documented by the PBA has removed reference to the countries accepted as English speaking while still referencing those countries in the definition of international student. It is submitted that the reference to countries accepted as English speaking is necessary to ensure applicants and registration staff make informed decisions about when evidence of competence in English language skills is necessary.

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#### **4. Professional Indemnity Insurance Standard**

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The Board has identified a number of matters in relation to this standard, and after reviewing the standards of the other professions, being as follows:

- Applicants are required to be in compliance with the professional indemnity arrangements when the *Health Practitioner Regulation National Law Act 2009* (‘the Act’) does not enable this.
- The standard references information to be included in the guideline. It is the Board’s advice that any material in the guideline cannot be utilized in decision-making about compliance with the standard. In this regard, the standard must ‘stand alone’ and any guidelines must only be general in nature. This is an important distinction as there is no provision in the Act to require compliance with a guideline as opposed to a standard. Registration standards require approval by the Ministerial Council after recommendation by the national board. Upon renewal a registrant must make a declaration as to their compliance with standards (s. 109) and failure to comply may lead to the registrant’s renewal application being refused or approved with conditions (s.112 of the Act). In contrast, under s. 39 of the Act guidelines merely provide guidance to registrants and are not in themselves enforceable. While guidelines may be developed to help explain how to comply with a standard, the guideline: (a) does not itself form part of the standard; and (b) is not enforceable. Given these matters, all operative divisions that must be complied with must be contained within the standard itself and not delegated to a guideline.
- There are significant inconsistencies between the standards prepared by each of the national boards in relation to their legal enforceability and the information provided about compliance with the standard and the consequences of non-compliance. In this

regard it is the Board's view that the standards should be consistent and should clearly communicate the requirements to all those who must comply.

- There is no reference within the standard to the head of power in the Act.
- Definitions are either inconsistent between the national boards or they are absent when necessary. For example, under the professional indemnity standard, a definition of practice would be worthwhile given the requirement relates to holding insurance during all periods of practice. Such a definition then would have to be consistent with any definition included in the recency of practice standard.
- Requiring applicants to provide details of professional indemnity insurance if held at the time of applying for registration is not warranted as no decision can be made in relation to the application on the basis of the details of that insurance policy. Requiring the details will merely add to the cost of preparing the application and of scanning the application for electronic records.

To assist the national board in finalizing the development of this standard, a draft has been prepared for its consideration. The draft is placed at attachment (A). It is the Board's view that the draft standard is: legally enforceable; consistent with the requirements of the Act; and clearly communicates the requirements and consequences to those who must comply with the standard.

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## **5. Continuing Professional Development Standard**

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The Board has identified a number of matters in relation to this standard, and after reviewing the standards of the other professions, as follows:

- The Boards have inconsistent provisions as to which classes of registrant the standard applies to. In this regard, there is a clear intention in s. 128 of the Act that all registered health professionals are to be subject to CPD requirements, with the exception of non-practising registrants and students.
- The standard references information to be included in the guideline. It is the Board's advice that any material in the guideline cannot be utilized in decision-making about compliance with the standard. In this regard, the standard must 'stand alone' and any guidelines must only be general in nature. This is an important distinction as there is no provision in the Act to require compliance with a guideline as opposed to a standard. Registration standards require approval by the Ministerial Council after recommendation by the national board. Upon renewal a registrant must make a declaration as to their compliance with standards (s. 109) and failure to comply may lead to the registrant's renewal application being refused or approved with conditions (s.112 of the Act). In contrast, under s. 39 of the Act guidelines merely provide guidance to registrants and are not in themselves enforceable. While guidelines may be developed to help explain how to comply with a standard, the guideline: (a) does not itself form part of the standard; and (b) is not enforceable. Given these matters, all operative divisions that must be complied with must be contained within the standard itself and not delegated to a guideline.

- There are significant inconsistencies between the standards prepared by each of the national boards in relation to their legal enforceability, exemptions available and the information provided about compliance with the standard and the consequences of non-compliance. In this regard it is the Board's view that the standards should be consistent and should clearly communicate the requirements to all those who must comply.
- There is no reference within the standard to the head of power in the Act.
- Definitions are either inconsistent between the national boards or they are absent when necessary.
- The standard is to commence on 1 July 2010 and, as such, any registrant renewing registration in the period 1 July 2010 to 30 June 2011 will have less than 12 months' notice of the CPD requirements. This could be overcome by applying a pro rata requirement or by commencing the standard from 1 July 2011.
- The standard being set focuses on CPD for the purposes of maintaining a category of registration rather than CPD for the purposes of maintaining competence for practice. As such, it is restrictive in nature and will establish a barrier to maintaining registration. In addition, the time involved in undertaking CPD should an individual hold general and multiple specialist registrations would be excessive. Given these factors, the Board recommends that specific CPD requirements be set but such requirements be linked to the individual's practice.
- The proposal for a minimum of 30 hours of CPD each year relevant to each registrant's area of practice is supported. However, it is recommended that the PBA make the requirement for 10 hours of individual supervision each year optional from commencement of the standard. This will enable the PBA to take a more considered approach to the cost benefit impact of requiring such supervision. In this regard, demands of suitably trained supervisors are ever increasing and the Board is concerned that there is no capacity for the provision of 10 hours' supervision for every registrant in Australia. The Board accepts that peer supervision is part of good professional practice and occurs in many contexts formally and informally. It is to be encouraged. However, the proposed prescriptive nature of supervision as part of the CPD context will place further, possibly unsustainable, demands on supervisors.

To assist the national board in finalizing the development of this standard, a draft has been prepared for its consideration. The draft is placed at attachment (B). It is the Board's view that the draft standard is: legally enforceable, consistent with the requirements of the Act and clearly communicates the requirements and consequences to those who must comply with the standard.

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## **6. Recency of Practice Standard**

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The Board has identified a number of matters in relation to this standard, and after reviewing the standards of the other professions, as follows:

- The recency of practice standard documented by each Board appears to be inconsistent with s.38 which limits recency of practice requirements to ...*requirements in relation to*

*the nature, extent, period and recency of any previous practice of the profession by applicants for registration in the profession.* Matters outside of these requirements such as CPD and the gaining of additional qualifications cannot inform the standard unless directly related to practice.

- The recency of practice standard under the legislation applies to applicants for registration and for the renewal of registration. For clarity, the Board recommends that two separate standards be established.
- The standard references information to be included in the guideline. It is the Board's advice that any material in the guideline cannot be utilized in decision-making about compliance with the standard. In this regard, the standard must 'stand alone' and any guidelines must only be general in nature. This is an important distinction as there is no provision in the Act to require compliance with a guideline as opposed to a standard. Registration standards require approval by the Ministerial Council after recommendation by the national board. Upon renewal a registrant must make a declaration as to their compliance with standards (s. 109) and failure to comply may lead to the registrant's renewal application being refused or approved with conditions (s.112 of the Act). In contrast, under s. 39 of the Act guidelines merely provide guidance to registrants and are not in themselves enforceable. While guidelines may be developed to help explain how to comply with a standard, the guideline: (a) does not itself form part of the standard; and (b) is not enforceable. Given these matters, all operative divisions that must be complied with must be contained within the standard itself and not delegated to a guideline.
- There are significant inconsistencies between the standards prepared by each of the national boards in relation to their legal enforceability, exemptions available and the information provided about compliance with the standard and the consequences of non-compliance. In this regard it is the Board's view that the standards should be consistent and should clearly communicate the requirements to all those who must comply.
- There is no reference within the standard to the head of power in the Act.
- Definitions are either inconsistent between the national boards or they are absent when necessary.
- The standard is to commence on 1 July 2010 and, as such, any registrant renewing registration in the period 1 July 2010 to 30 June 2011 will have less than 12 months' notice of the recency of practice requirements. This could be overcome by applying a pro rata requirement or by commencing the standard from 1 July 2011.

To assist the national board in finalizing the development of the separate recency of practice standards, drafts have been prepared for its consideration. These drafts are placed at attachments (C) and (D). It is the Board's view that the draft standards are legally enforceable; consistent with the requirements of the Act; and clearly communicate the requirements and consequences to those who must comply with the standards.

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## **7. Proposed Qualification Requirements for General Registration**

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When considered in conjunction with the Act (enacted by Queensland Parliament on 30 October 2009, this section of the Consultation paper is confusing. Although the Consultation paper does provide information on the qualification or qualifications plus internship the PBA proposes to accept for the purposes of eligibility for general registration, it does not directly state the requirements of an 'approved qualification' for the profession which will meet the requirements of section 53(a) of the Bill, Qualifications for general registration.

It is necessary, particularly for the benefit of prospective applicants for provisional registration who need to meet the requirements of section 62(1)(a) of the Act (which depends on section 53(a)), for the PBA to clearly state the proposed minimum requirements of an 'approved qualification' for the profession from commencement of the National Registration and Accreditation Scheme on 1 July 2010; eg 'an APAC accredited four-year sequence of study'.

A clearer explanation is required from the PBA about the proposed qualification requirements for general registration and for provisional registration including: Models; APAC requirements for approved courses; clarification of what will be included in 'an APAC accredited five-year sequence of study' and how and why this differs from a coursework Masters program. These major issues should be presented unambiguously.

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## **8. Proposal for Specialist Registration**

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The Board supports the PBA's proposal to seek approval for psychology to be a health profession for which specialist recognition operates. However, it has a number of comments in relation to this matter as follows:

Concerns are raised by the PBA's proposal that, if specialist registration is to operate under the national scheme for the psychology profession, 'the minimum qualification for specialist registration be an accredited professional doctorate in psychology in the specialty'. This may be viewed as unduly restricting competition as, for some specialty areas in the profession (eg Organisational Psychology), an accredited professional doctorate qualification has only been introduced in recent years and may only be provided by a small number of universities in the country.

The Board considers that a coursework masters qualification and a coursework PhD in psychology, where all specialist coursework and placements at master's level have been met, should be taken to provide equivalence in training for a practice specialisation. Any additional supervision and/or CPD requirements for specialist registration should be equivalent following both of these qualifications.

The PBA would need to provide evidence to support its proposal to treat these two qualifications differently for the purposes of conferring eligibility for specialist registration. For example, such evidence would need to show that completion of a PhD level thesis in a specialist area conferred on a registrant a greater likelihood of competent and ethical practice in that specialty area than completion of a masters level thesis in the speciality area; and therefore provided a greater level of protection for the public.

The Board acknowledges that an accredited professional doctorate in psychology in a specialty provides a graduand with more specialist coursework, more placement hours and a larger thesis than an accredited coursework master's program in the same speciality.

Therefore any additional supervision and/or CPD requirements for specialist registration following completion of an accredited professional doctorate in psychology should be less than that required following completion of an accredited coursework masters or coursework PhD qualification in the same speciality.

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## 9. Proposals for Endorsement

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The Board wishes to raise a number of matters in relation to the PBA statement that ... *the Psychology Board of Australia is of the view that supervision intended to meet the requirements of registration and continuing professional development should be an endorsed area of practice.*

The Board supports the view of the PBA that supervision intended to meet the requirements of registration should be an endorsed area of practice. A training program accepted by the PBA for endorsement of a registrant as a supervisor should include a competency based assessment of the registrant's skills as a supervisor.

The Board does not support the view that 'supervision intended to meet the requirements of ... *continuing professional development should be an endorsed area of practice.* Attachment D, the background paper for endorsement of psychology supervisors, states on page 46 in the final paragraph:

*The current thinking is that it (endorsement) is not intended to apply to psychologists providing supervision within a continuous development program, although endorsement in these situations is encouraged.*

Therefore 'continuing professional development' should not be included in the statement of the Board regarding supervision as an endorsed area of practice.

- The proposed standard for CPD is that 10 hours of individual supervision each year will be mandatory for all psychologists in order to be eligible for renewal of registration. It is preferable that all supervisors should have completed training in supervision and assessment of their skills as a supervisor. However, if endorsement as a supervisor is required in order to supervise registrants to meet their CPD requirements, this may make it quite difficult for registrants practising in some areas of the profession (and the country) to access an appropriate supervisor and meet the CPD requirements of their registration.
- As previously mentioned, demands of supervisors are ever increasing and the pool of 'endorsed' supervisors may not be sufficient to cover all the areas of supervision required by the Board. Endorsed supervisors would be required to supervise postgraduate students in university clinics and in externships, and to supervise provisional registrants during internships. If a registrant can only meet their CPD requirements with an 'endorsed supervisor' it may be very difficult for all registrants to meet the CDP requirements for renewal of their registration.
- Practise in the profession includes work in clinical, administration, research and education fields, using the knowledge, skills and attitudes of the profession, whether remunerated or not, regardless of job title. The most appropriate supervisor for a registrant may be a registered senior colleague who provides experienced supervision

with an understanding of aspects peculiar to the psychologist's employing organisation or workplace.

- For example, the most appropriate supervisor for CPD for a registered academic psychologist whose practice of the profession involves teaching and research only may be a registered or retired senior colleague whose practice of the profession also involves teaching and research. The supervision for CPD may be provided pro bono. As the senior colleague does not supervise provisional registrants for registration (and receive fees) and/or such supervision of provisional registrants is not a requirement of the senior colleague's work, what incentive does the senior colleague have to complete and pay for a supervisor training program to gain endorsement as a supervisor? The example may also apply to psychologists working at a senior level where their role is largely management and administration.

Given the issues as documented above, the Board recommends that the PBA statement on this matter be amended to read: *...supervision intended to meet the requirements of registration should be an endorsed area of practice.*

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## **10. The Proposed Internship Model**

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This proposal is supported. The requirement can be met within two years by a provisional registrant working 35 hours a week (assuming all of these hours are approved psychological practice), allowing eight weeks leave per year. The requirement can also be met within the maximum allowed period of five years by a provisional registrant working the minimum allowed 15 hours per week of psychological practice for 44 weeks per year.

Minimum hours of supervision: Two hours of supervision per week of supervised practice

For consultation purposes it would be useful for the PBA to provide a comparison table for the minimum required supervision hours of the current two-year programs of supervised practice in the States and Territories of Australia, (as has been provided for the minimum hours of psychological practice). The PBA has not provided background information supporting the proposed requirement for two hours per week of supervision.

Currently in Queensland, probationary registrants must undertake one hour of supervision per week if practising the profession for more than 20 hours per week or one hour per fortnight if practising the profession for 20 hours per week or less. The proposed change to two hours per week of supervision will significantly increase the cost of the supervised practice program / internship for provisional registrants from Queensland (who currently can pay \$150 or more per hour of supervision) and may therefore restrict the number of suitably qualified persons who are able to gain general registration through completion of the proposed internship. This has implications for the psychology workforce.

The requirement for two hours of supervision per week for provisional registrants doubles the hours an approved workplace supervisor must allocate each week to each intern under his or her supervision. This may restrict the availability of supervisors to interns and therefore restrict number of suitably qualified persons who are able to gain general registration through completion of the proposed internship. This has implications for the psychology workforce.

The risks to the workforce posed by (2) and (3) above may be outweighed by improved professional standards of psychologists who meet the eligibility requirements for general registration by completion of an approved qualification plus an internship which requires two hours of supervision per week. However, the PBA has not provided evidence that this is the case.

Clarification is required regarding the minimum hours of supervision required for a provisional registrant who is completing the internship part-time over five years. For example, does a provisional registrant who practises the profession for the minimum required 15 hours per week need to undertake two hours of supervision per week?

Minimum hours of professional development: 120 hours per year

The proposal states that the requirement for 120 hours of professional development each year is required to meet equivalence standards. It would be helpful if the PBA provided further information regarding these equivalence standards eg equivalent to the coursework requirements for an APAC accredited six year course of study etc.

The proposal states that the hours of professional development must occur within the hours of professional practice completed each year. Does this mean that, of the minimum 15 hours per week of required practice of the profession, three of those hours may be professional development?

Clarification is required regarding the minimum hours of professional development required in total for completion of an internship. For example, a provisional registrant who finishes the internship program within the minimum two year period will be required to complete 240 hours of professional development. Does a provisional registrant who practises the profession for the minimum 15 hours per week over five years need to complete 120 hours of professional development in each of the five years, ie a total of 600 hours?

Currently, probationary registrants who meet the requirements of the Supervised Practice Program in Queensland through completion of an APAC-accredited coursework program (at the fifth and sixth (or seventh) year level) may complete this program part-time. The coursework hours (lectures / seminars / workshops etc) completed by a probationary registrant as part of their accredited course is the same whether the probationary registrant takes the minimum two years or the maximum five years to complete their course and the Supervised Practice Program. It is therefore recommended that the PBA set a total minimum number of hours of professional development for the internship; eg 240 hours of which a minimum of 48 hours must be completed each year of supervised practice.

Currently in Queensland, probationary registrants must complete 60 hours of professional development over the course of their Supervised Practice Program. The proposed change to 120 hours per year of professional development will significantly increase the cost of the supervised practice program for provisional registrants from Queensland and may therefore restrict the number of suitably qualified persons who are able to gain general registration through completion of the proposed internship. This has implications for the psychology workforce.

The risk posed by the increased cost may be outweighed by the value this professional development will add to the professional standards of psychologists who meet the eligibility

requirements for general registration by completion of an approved qualification plus an internship. However, the PBA needs to provide evidence that this is the case.

### Proposed eight competencies

The Board is unable to comment on the two new competencies for the proposed internship, 'working within a cross-cultural context' and 'practice across the lifespan', as insufficient information has been provided by the Board.

These competencies are additional to those which currently have to be met by probationary registrants under the Queensland supervised practice program. The addition of these competency requirements may increase the cost of the supervised practice program for provisional registrants from Queensland and may therefore restrict the number of suitably qualified persons who are able to gain general registration through completion of the proposed internship. This has implications for the psychology workforce.

It is therefore recommended that the PBA provide detailed information on the proposed requirements for interns to meet the competencies, 'working within a cross-cultural context' and 'practice across the lifespan'. The PBA also provide background information to support the requirement for these additional competencies as part of the proposed internship.

### Work roles

The Board supports the proposed work roles.

### Supervisors

In order to maximise the availability of appropriate supervision for probationary registrants in Queensland (particularly those practising in rural and remote locations or with a particular client base) assistant (secondary) supervisors may be appointed for a probationary registrant under one of the following three categories:

- An accredited supervisor (similar to the proposed 'supervisor endorsed by the PBA').
- A general registrant who is not an accredited supervisor. The Board may approve this assistant supervisor if the Board is satisfied that the probationary registrant would not be able to meet the requirements for supervision unless this registrant is approved as an assistant supervisor.
- A person who is not a psychologist (in general, an experienced professional from a cognate discipline). The Board may, at its discretion and in special circumstances, approve this person to be an assistant supervisor for a probationary registrant if the Board is satisfied that the probationary registrant would not be able to meet the requirements for supervision unless this person is approved to assist the probationary registrant's supervisor, provided that the person has experience, knowledge and qualifications that will enable the person to meet the probationary registrant's professional development needs.

Probationary registrants must undertake 75% of their required supervision hours with an accredited supervisor.

Given the above, clarification is requested as to whether a secondary supervisor for a provisional registrant under the PBA's proposed internship is required to be a supervisor endorsed by the PBA? What are the proposed eligibility requirements for a secondary supervisor?

### Transition arrangements

Supported subject to the following request for clarification.

Currently, under section 88(c) of the *Psychologists Registration Act 2001*, the Board must cancel the registration of a probationary registrant who does not complete the requirements of the Supervised Practice Program within the maximum period allowed under the legislation, five years from date of registration. The person may make a fresh application for registration and, if this application is approved, may be permitted to complete the requirements of the Supervised Practice Program under a Partial program within a time frame set by the Board.

Can the PBA clarify the proposed action to be taken if a provisional registrant who is completing the requirements of the Queensland Supervised Practice Program as part of the transitional arrangements proposed by the PBA does not complete the requirements of the Queensland program within five years from the date of his or her probationary registration in Queensland.

## **Registration Standard: Professional Indemnity Insurance**

### **Legislative basis**

The Board has established this standard in compliance with section 38(1)(a) of the Act.

### **Scope**

This standard is applicable to all persons who are registered by the Psychology Board of Australia with the exception of those registered in the non-practising and student registration categories.

### **Requirements**

1. Registrants must not practise unless they have appropriate Professional Indemnity Insurance ('PII') in force for all aspects of practice, in each context and location of practice, whether practising full or part-time, paid or unpaid [s. 129(1)]. If for any reason the policy is amended (e.g. conditions or restrictions placed on the policy) or contains exclusions, the registrant must not practise outside the scope of the policy.
2. The insurance policy must include:
  - Unlimited retroactivity of cover.
  - 'Run off' cover following any period of practice including for retirement or death.
  - Two automatic reinstatements during the period of cover.
3. Registrants may be covered by their employer's insurance. However, it must satisfy the minimum standard specified above. If any practice is undertaken outside of an employment relationship the registrant must have individual PII in place (including when undertaking practical/clinical components of professional development activities).
4. Registrants may be covered by their professional association's insurance. However, it must satisfy the minimum standard specified above.
5. Registrants who choose an individual insurance policy must seek the advice of a professional indemnity insurer on their risk exposure and on the suitable level of insurance for their practice circumstances. Registrants must keep evidence of having sought this advice and provide it to the Board on request.

### **Exemptions**

The only exemption to the requirement to have PII is for periods of non-practice. The Board may require a registrant to provide evidence that they were not practising during any period where they were not covered by PII.

## **Compliance assessment**

### At initial registration

Applicants will be required at application for registration to make a declaration that they will not practise the profession unless they have appropriate professional indemnity insurance arrangements in place consistent with this standard.

### Renewal requirements

A registrant will be required to make a declaration at renewal that:

1. they have not practised the profession during the preceding period of registration without having professional indemnity insurance arrangements in place consistent with this standard (s. 109(1)(2)(iv)); and
2. if their registration is renewed they will not practise the profession unless they have professional indemnity insurance arrangements in place consistent with this standard (s. 109(1)(2)(v)).

### During registration period

The Board may, at any time, require a registrant to provide evidence that they have appropriate PII in force (s. 129(2)).

### Audit

The Board will conduct random audits to determine compliance with this standard.

## **Consequences of non-compliance**

Practising without insurance cover in accordance with this standard is a breach of the legal requirements for registration and will be viewed as professional misconduct, and may result in disciplinary action. If a registrant is unable to make the declarations required on renewal, the Board will refuse to renew registration and any endorsements.

Knowingly making a false declaration may be considered by the Board to be unprofessional conduct or professional misconduct and, as such, may be dealt with by the Board through the disciplinary mechanisms available under the Act. These mechanisms include sanctions ranging from cautioning or reprimanding the registrant to cancellation of registration.

## **Definitions**

Act means the *Health Practitioner Regulation National Law Act 2009* as amended.

Run-off cover means insurance that protects a practitioner who has ceased a particular practice or business against claims that arise out of activities which occurred when they were conducting that practice or business. This type of cover may be included in a PII policy or may need to be purchased separately.

Practice means working in clinical, administrative, research or education fields using the knowledge, skills and attitudes of the Psychology profession.

### **Commencement**

This standard will commence on 1 July 2010.

### **Review**

The Board will review this standard within three years of operation.

## **Registration Standard: Continuing Professional Development**

### **Legislative basis**

The Board has established this standard in compliance with section 38(1)(c) of the Act.

### **Scope**

This standard is applicable to all persons who are registered by the Psychology Board of Australia with the exception of those registered in the non-practising and student registration categories.

This standard does not apply to:

- a registrant who graduated from the course required to qualify for registration if the graduation date was within X years of the date of renewal; and
- to a registrant who has been registered for less than three months.

Practitioners who have been registered for more than three months but less than one year will need to show compliance with the requirements for CPD on a pro-rata basis proportionate to the fraction of the year they have been registered.

### **Requirements**

1. Registrants must complete a minimum of 30 hours of CPD activities annually of which 10 hours may include individual supervision.
2. Registrants must maintain an up to date CPD portfolio detailing:
  - (a) a self-assessment of their personal CPD needs and desired outcomes;
  - (b) how the CPD relates to the practice of the profession;
  - (c) all CPD activities undertaken; and
  - (d) an evaluation of the CPD activities undertaken to determine whether the desired outcomes have been achieved.

The portfolio must include supporting documentation as follows:

- (a) receipts from formal courses undertaken or conferences attended;
- (b) certificates issued upon completion of CPD activities by an approved training or educational provider; and
- (c) records of any self-directed CPD, including what activity was undertaken and for how long.

### **Exemptions**

The Board may grant an exemption from the from this standard where there are valid reasons why the registrant has not been able to complete their CPD requirements in the preceding year, such as the need to cater for family leave, long term illness, or any other good reason.

The Board, therefore, will allow eligible registrants to be exempted from the CPD requirement for one yearly registration period, provided the registrant has not been exempted for more than one year in the past three years.

Registrants seeking an exemption should contact the Board as soon as the need for an exemption is known, particularly where the Board needs to determine whether the registrant has sufficient reason for applying (illness, other good reasons). Prior notice of bona fide family leave is not required.

## **Compliance assessment**

### Renewal requirements – s109 Act

A registrant will be required to make a declaration at renewal that they have completed the CPD the registrant was required by this standard to undertake during the registrant's preceding period of registration.

### Audit

The Board will conduct random audits of professional portfolios to determine compliance with this standard.

## **Consequences of non compliance**

If a registrant is unable to make the declarations required on renewal, the Board may refuse to renew registration and any endorsements or approve renewal of registration and any endorsements subject to conditions.

Knowingly making a false declaration may be considered by the Board to be unprofessional conduct or professional misconduct and, as such, may be dealt with by the Board through the disciplinary mechanisms available under the Act. These mechanisms include sanctions ranging from cautioning or reprimanding the registrant to cancellation of registration.

## **Definitions**

Act means the *Health Practitioner Regulation National Law Act 2009* as amended.

Continuing professional development or CPD means study, training, courses, seminars, reading and other learning activities that could reasonably be expected to advance the registrant's professional development and contribute to safe and competent practice.

Generalist activities are professional development activities that are psychological in nature and would be appropriate for all psychologists.

Group supervision means consultation with a group of no more than six registered psychologists for the purpose of professional development and support in the practice of psychology and includes a critically reflective focus on the practitioner's own practice. Where group supervision is undertaken in satisfaction of this standard, the psychologist must ensure a minimum of 10 hours is devoted to the practitioner's own practice. For instance, in a supervision group of three, a minimum of 30 hours in any one year would be required, to allow each practitioner to meet minimum standards of reflective practice.

Individual supervision means one on one consultation with a registered psychologist for the purposes of professional development and support in the practice of psychologist and includes a critically reflective focus on the practitioner's own practice. Supervision hours must be actual hours.

One on one includes provision for teleconference or alternative modes of delivery other than face to face.

Portfolio means:

- (a) a private collection of evidence which demonstrates the continuing acquisition of skills, knowledge, attitudes, understanding and achievement (it is both retrospective and prospective, as well as reflecting the current stage of development of the individual);
- (b) something that describes learning experiences and provides evidence that concepts and principles from these experiences are being applied in practice; and
- (c) a means of recording personal career progress and to show that a person is demonstrating professional knowledge and competence.

Practice includes work in clinical, administration, research and education fields, using the knowledge, skills and attitudes of the Psychology profession, whether remunerated or not, and regardless of job title.

Specialist activities are professional development activities that are psychological in content within the specialist area of practice.

## **Commencement**

This standard will commence on 1 July 2011.

## **Review**

The Board will review this standard within three years of operation.

## **Registration Standard: Previous Practice of the Profession**

### **Legislative basis**

The Board has established this standard in compliance with sections 52(1)(e) and 55(1)(f) of the Act.

### **Scope**

This standard is applicable to all persons who apply for registration with the Psychology Board of Australia with the exception of those applying in the non-practising and student registration categories.

This standard does not apply to an applicant who graduated from the course required to qualify for registration if the graduation date was within three years of the date of application.

### **Requirements**

1. Those seeking registration must have practised psychology within the three years preceding the date of the application.
2. Those seeking registration who have not practised for more than three years will be required to undertake one or more of the following:
  - (a) approved course of study or retraining;
  - (b) approved mentoring/supervised practice arrangement;
  - (c) approved assessment or examination;
  - (d) approved CPD activities; and/or
  - (e) condition on practice.
3. To inform its assessment decision for those who have not practised for more than three years the following matters will be considered by the Board:
  - (a) the person's registration and practice history;
  - (b) the period the person has not been practising;
  - (c) when the person's primary qualification was awarded;
  - (d) the activities related to the practice of psychology the person has undertaken in the last five years;
  - (e) the person's continuing professional development history; and
  - (f) any additional qualifications obtained during the period the person was not practising.

### **Exemptions**

Applicants who have successfully completed a competency evaluation required by the Board within the previous three years are exempt from the requirement.

### **Consequences of non compliance**

If an applicant cannot show sufficient practice upon application for registration to comply with the standard, the Board may refuse to grant registration and any endorsements or approve the grant of registration and any endorsements subject to conditions.

Knowingly making a false declaration that leads to registration may be considered by the Board to be unprofessional conduct or professional misconduct and, as such, may be dealt with by the Board through the disciplinary mechanisms available under the Act. These mechanisms include sanctions ranging from cautioning or reprimanding the registrant to cancellation of registration.

## **Definitions**

Act means the *Health Practitioner Regulation National Law Act 2009* as amended.

Competency evaluation means a competency assessment or supervised practice assessment or a course of study approved by the Board.

Practice includes work in clinical, administration, research and education fields, using the knowledge, skills and attitudes of the profession, whether remunerated or not, and regardless of job title, provided that if the jurisdiction the practice occurred in required registration, only practice that occurred whilst registered will be recognised by the Board as complying with this standard.

## **Commencement**

This standard will commence on 1 July 2010.

## **Review**

The Board will review this standard within three years of operation.

## Registration Standard: Recency of Practice

### Legislative basis

The Board has established this standard in compliance with section 38(1)(e) of the Act.

### Scope

This standard is applicable to all persons who are registered by the Psychology Board of Australia with the exception of those registered in the non-practising and student registration categories.

This standard does not apply to:

- a registrant who graduated from the course required to qualify for registration if the graduation date was within two years of the date of renewal; and
- to a registrant who has been registered for less than three months.

### Requirements

1. Those seeking renewal of registration must have practised psychology within the two years preceding the date of the application.
2. Those seeking renewal of registration who have not practised for more than two years will be required to undertake one or more of the following:
  - (a) approved course of study or retraining;
  - (b) approved mentoring/supervised practice arrangement;
  - (c) approved assessment or examination;
  - (d) approved CPD activities; and/or
  - (e) condition on practice.
3. To inform its assessment decision for those who have not practised for more than two years the following matters will be considered by the Board:
  - (a) the person's registration and practice history;
  - (b) the period the person has not been practising;
  - (c) when the person's primary qualification was awarded;
  - (d) the activities related to the practice of psychology the person has undertaken in the last five years;
  - (e) the person's continuing professional development history; and
  - (f) any additional qualifications obtained during the period the person was not practising.

### Exemptions

The Board may grant an exemption from the from this standard where there are valid reasons why the registrant has not been able to complete their recency requirements in the preceding year, such as the need to cater for family leave, long term illness, or any other good reason.

The Board, therefore, will allow eligible registrants to be exempted from the recency requirement for one yearly registration period, provided the registrant has not been exempted for more than one year in the past three years.

Registrants seeking an exemption should contact the Board as soon as the need for an exemption is known, particularly where the Board needs to determine whether the registrant has sufficient reason for applying (illness, other good reasons). Prior notice of bona fide family leave is not required.

Applicants who have successfully completed a competency evaluation required by the Board within the previous two years are exempt from the requirement.

## **Compliance assessment**

### Renewal requirements – s109 Act

A registrant will be required to make a declaration at renewal that they have completed the recent practice the registrant was required by this standard to undertake during the registrant's preceding period of registration.

### Audit

The Board will conduct random audits to determine compliance with this standard.

## **Consequences of non compliance**

If a registrant is unable to make the declarations required on renewal, the Board may refuse to renew registration and any endorsements or approve renewal of registration and any endorsements subject to conditions.

Knowingly making a false declaration may be considered by the Board to be unprofessional conduct or professional misconduct and, as such, may be dealt with by the Board through the disciplinary mechanisms available under the Act. These mechanisms include sanctions ranging from cautioning or reprimanding the registrant to cancellation of registration.

## **Definitions**

Act means the *Health Practitioner Regulation National Law Act 2009* as amended.

Competency evaluation means a competency assessment or supervised practice assessment or a course of study approved by the Board.

Practice includes work in clinical, administration, research and education fields, using the knowledge, skills and attitudes of the profession, whether remunerated or not, and regardless of job title, provided that if the jurisdiction the practice occurred in required registration, only practice that occurred whilst registered will be recognised by the Board as complying with this standard.

## **Commencement**

This standard will commence on 1 July 2011.

### **Review**

The Board will review this standard within three years of operation.