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Associate Professor Brin Grenyer
Chair, Psychology Board of Australia

Dear Associate Professor Grenyer

Thank you for the opportunity to respond to the consultation paper on registration standards and related matters. I have considered the contents of the paper carefully and sought feedback from staff and colleagues in preparing my comments. In responding I have followed the sequence of headings as per your document.

Sincerely

Dr Mark S Edwards
Head & Chair of Psychology
Bond University
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Mandatory Registration Standards

I support the proposed standards for registration as they relate to criminal history, English language, professional indemnity insurance, continuing professional development, and recency of practice.

Proposed Qualification Requirements for General Registration

I support, in principle, phasing out of the 4 years university training plus two years internship (4+2) pathway to registration. I believe enforcement of a 6-year training model for psychology is necessary to bring Australia in line with international standards. However, for the reasons outlined below, I believe that some caution should be exercised before a final determination on closing the 4+2 route to registration is made.

Most, if not all, Australian universities rely on their undergraduate cohorts and associated revenue to support the costs of postgraduate training. Under the present training model, graduates of fourth year programs are able to commence work as probationary registered psychologists. Despite an additional two years of supervised practice under this framework, the fact that graduates can begin earning an income after four years of university education makes psychology an attractive career option for many school leavers. The proposed model eliminates the fourth year exit point as a pathway to registration and requires those considering a career in psychology to commit to five, six or more years of university training for general registration, and doctoral qualifications for specialist registration. My concern is that the proposed training model may be perceived as an overly onerous sequence of study for psychology to be considered as a viable career option for many school leavers, who in turn may enrol in alternative disciplines of university study. Any reduction in undergraduate student numbers will result in less revenue being available to channel into postgraduate programs, with the real net effect being that universities will be able to offer fewer postgraduate (5th and 6th year) places, rather than additional places. Such an outcome of course would be problematic given that the Board is seeking other means to backfill the void that would be left by closing the 4+2 pathway to registration. I believe that psychology must continue to attract large numbers of undergraduate students to off-set the cost associated with postgraduate training – perhaps retention of the 4+2 pathway is one method that could assist in achieving that aim. The 4+2 option still remains a six-year training model and is therefore in line with international standards.

Proposal for Specialist Registration

I support the use of specialist titles for registered practitioners and the list of specialties. I support that the Board, rather than the APS Colleges, regulate the use of these titles.

I support the criteria for graduates of Professional Doctorates (+ one year of supervised practice and 35 hours of supervision) and the professional PhD (+ 2 years of supervised practice and 70 hours of supervision) to use specialist titles.

I do NOT support the exclusion of Specialist Masters Graduates (e.g., Master of Clinical Psychology) from obtaining specialist titles. Graduates of Specialist Masters Programs must undertake the same specialist coursework and placement activity as graduates from professional Specialist PhD programs; the single difference between the Specialist Masters and PhD programs being the size/nature of the research component. I cannot see equity in a decision that differentiates Masters and PhD graduates from using specialist titles on these grounds. Also, for the reasons stated above, I am very concerned that overly onerous education and training requirements for specialist registration might force potential students of the discipline and profession into alternative career paths.

My view is that graduates of Specialist Masters programs be eligible to obtain specialist titles following completion of their Degrees, two years of supervised practice, and 70 hours of specialist supervision (as per the professional PhD route). From the perspective of public users of psychological services graduates of Masters and PhD programs are clearly differentiated – PhD Graduates are eligible to

use the title Doctor; Masters Graduates are not. If the option of specialist registration is not available to Masters Graduates then there would be no professional benefit in completing a Masters Degree specialisation over the proposed 5+1 pathway. There would also be point in offering Specialist Masters programs.

I support the proposal that graduates of Generalist Masters programs (i.e., those programs without specialisation and APS College Approval) are not eligible to use specialist titles.

Proposals for Endorsements

I support the proposal that supervision should be an endorsed area of practice and the associated CPD requirements.

Attachment B

Proposed Internship Model under a Board Approved Supervised Practice Program

Core competencies of the supervised practice program

In principle I support the proposed model for Internships. I note however, that in addition to the core capabilities and attributes adopted from the APAC Standards, that the Board is proposing the following two additional attributes

- (g) working within a cross-cultural context
- (h) practice across the lifespan

I seek clarification from the Board as to whether the additional (g) and (h) attributes are likely be adopted in the APAC Standards for Accreditation as competencies for Masters and Doctoral programs; if so, the Board and/or APAC should specify the demonstrated knowledge requirements for each.

Hours of supervised practice

The Board is proposing that for the Supervised Practice Program two-thirds of the supervision component must be individual (as opposed to group supervision). The ratio of individual to group supervision for the Internship program therefore differs from that ratio specified in APAC Standard 5.3.26 as it relates to postgraduate programs. APAC Standard 5.3.26 states that where supervision comprises a mix of individual and small group formats, no less than 50% can be individual supervision. If the ratio of individual to group supervision remains distinct for Postgraduate Programs compared to the Supervised Practice Program then I support the Board's proposal. Should the Board determine that the requirement of two-thirds individual supervision be applied to postgraduate programs then I do NOT support the Board's position. At Bond University, we have carefully planned procedures in place to ensure that students receive a minimum of 50% individual supervision. The minimum requirement of 50% individual supervision in our postgraduate programs works well for us and produces high quality graduates. Specifying that a minimum of two-thirds supervision be individually based in postgraduate programs would detract from the training experience our students currently receive. If adopted, this requirement would again add significant costs to postgraduate education and possibly result in fewer postgraduate places being offered.