Attention: Chair, Psychology Board of Australia
Thank you for the opportunity to comment on the Consultation Paper on Registration Standards and Related Matters for the Psychology Board of Australia.
Below are some comments which particularly relate to the role of school psychologists in Tasmania.
The Tasmanian branch endorses the comments made by the national AGCA body, but would like to add some comments which are particularly relevant to school psychologists working in Tasmania.

Continuing professional development
Most School Psychologists (Guidance Officers) in Tasmania are employed by the Department of Education, are on teacher conditions and have a PD budget similar to that of teachers.
Current PD budgets are not sufficient to allow School Psychologists to complete 30 hours of PD a year.
There are limited opportunities for psychology based PD in Tasmania, and it would be a challenge to find presenters for 15 hours of School Psychology PD. To meet the suggested 15 hours of activities relating to the specialist area of practice for which the psychologist is registered, ie school psychology, would necessitate bringing in speakers from interstate, and this would further increase the cost of the PD. Part time school psychologists would find that they must spend a significant amount of their work time on PD, although no time off schools is currently allocated to this.
Providing 10 hours of supervision for each school psychologist would mean that senior school psychologists would each have to provide about 70 hours of supervision in a year. The current workload of senior School psychologists does not allow for this level of supervision.

**Specialist Registration**

School Psychologists seeking specialist registration would apply for registration to become a specialist educational and developmental psychologist. The suggested minimum qualification for specialist registration is an accredited professional doctorate in psychology in the specialty plus one year of approved supervised full-time equivalent practice comprising 35 hours of individual supervision with a psychology supervisor who has the relevant specialty and is endorsed by the Board, or equivalent. At the end of this training, school psychologists with specialist registration will still be paid as base grade teachers with 4 years of tertiary training (up to band 1, level 12).

There is no tertiary institution in Tasmania which offers post graduation qualifications in educational psychology. It is not possible to be trained as an Educational Psych while living in Tasmania. The only university, the University of Tasmania, only offers Clinical Masters and there is not a distance course available in Australia.

The grandparent clause, is equally overqualified for the level of pay (that of a teacher) and would not include most school psychologists currently working in the field. (accredited professional master’s programs in the specialty plus a two-year program of approved supervised practice, comprising 70 hours of supervision with an endorsed supervisor, of which 45 hours must be individual supervision, with the rest being individual or group supervision, and 120 CPD hours in the specialty; another sequence of study acceptable to the Board; and / or passing an examination in the specialist area)

**Supervisors**

The board is proposing that a psychology supervisor must:

(a) have held general registration for at least three years before applying for endorsement

(b) successfully complete a Board approved training program in psychology supervision

(c) not be subject to conditions on their registration

(d) obtain CPD relevant to the endorsement on an annual basis to maintain the endorsement.

(e) hold specialist registration for at least two years before beginning supervision when providing supervision for the purpose of a registered psychologist undertaking a program of training for specialist registration.
Specialist registration should be in the specialist area for which supervision is sought. (This requirement is not intended to apply to academics supervising research dissertations and those in line supervisor roles that are administrative or management roles in businesses, organisations or groups.)

Any Doctorate student who wished to work as a school psychologist would be unable to find anyone working in this field with the required qualifications to provide supervision.

As can be seen from the above comments, while we are not against an increase in CPD, supervision and qualifications, these need to be determined in light of work loads, pay and work conditions. School psychologists have the same conditions as teachers, including pay, and do not have the timetable flexibility to meet these conditions.

AGCA TAs would welcome further consultation with the Board given the lack of previous consultation with the AGCA and the restricted time-line for feedback on the Consultation Paper, which was less than four weeks.

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