

Professor Brin Grenyer
Chair
Psychology Board of Australia

9 September, 2010

Re: Consultation Paper 5, Proposed Revisions to the Guidelines on Area of Practice Endorsements

Dear Professor Grenyer,

On behalf of the Postgraduate Clinical Psychology Students we would like to thank the Psychology Board of Australia for the prompt and decisive action taken regarding grandparenting arrangements for currently enrolled students. As Student Representatives we were aware that many postgraduate students were concerned about this matter. The Board's decision to extend the transition and grandparenting arrangements is welcomed.

As Student Representatives we would like to thank the Board for the opportunity to comment on the proposed revisions to the Guidelines on Area of Practice Endorsement. The Board is right to acknowledge that the guidelines, in their current form, do indeed create disincentives for Doctorate and PhD candidates. As indicated in Consultation Paper 5, Doctorate level qualified psychologists are needed in positions of leadership and supervision, and disincentives for students considering, or currently undertaking these pathways should be minimised.

As such, we endorse the proposal provided by the College of Clinical Psychologists (30 August, 2010) in which it is recommended that Doctorate and PhD students be eligible for general registration on completion of a 2-year period of enrollment in their degree, the completion of all coursework and practicum requirements, and completion of research deemed equivalent to requirements of a Clinical Masters degree. We support the proposal that this be attested to by the Head of School of the concerned university.

There is broad based support for this proposed change from the student population and a number of reasons are cited. It is commonplace that students complete their coursework and practicum requirements prior to the submission of their thesis. Prior to National Registration, while State Registration Boards differed in their requirements for general registration of Doctoral and PhD students, it is understood that it was policy of at least one State Registration Board to grant Doctoral and PhD students' general registration prior to the submission of their thesis where they had achieved Master's level equivalency in coursework and practicum. This policy enabled higher degree students to gain work for which they were rightly qualified, given their skills were at minimum equivalent to those of a Masters level graduate.

Another concern relates to the possible erosion of skills in the interim period between completion of practicum requirements and being granted general registration. The possibility of becoming de-skilled within this time is of concern. The period after completion of practicum reflects a critical phase in which skill consolidation and ongoing supervision are essential for the professional development of beginning practitioners. As such, the maintenance of clinical skills is dependent on ongoing clinical practice. Granting general registration in this phase would enable higher degree students to undertake clinical work on a part-time basis, thus ensuring skill consolidation whilst research requirements are being fulfilled.

We appreciate your consideration in this matter, and we thank you for the opportunity to make comment.

Sincerely,

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College of Clinical Psychologists
Australian Psychological Society
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