

COMMENTS ON CONSULTATION PAPER 5:

**“PROPOSED REVISIONS TO THE
GUIDELINES ON AREA OF PRACTICE
ENDORSEMENTS (AUGUST 2010)”**

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This a public document on behalf of the APS College of Organisational Psychologists,
prepared by the College’s National Regulatory Developments Working Party (NRD WP)

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PREAMBLE AND SUMMARY:

The College of Organisational Psychologists (COP) appreciates the opportunity to comment on this Consultation Paper (hereafter CP5). We also applaud the PBA's efforts to build greater flexibility into the Guidelines on Area of Practice Endorsements (hereafter "Guidelines"). In particular we note that the PBA has recognised and made some useful concessions to the demands placed upon students and others wishing to gain specialist practice area endorsements in psychology.

However there are still a number of issues which we believe need to be addressed if significant problems are to be avoided in the application of the Guidelines. These include: ambiguities in terms, titles and associated requirements, with potential anomalies; our objection to the use of the quasi-medical title "registrar"; desired limits on use of multiple endorsements; CPD requirements not to be weakened where a registrant is granted more than one endorsement; insufficient qualified supervisors to meet new and at times excessive supervision demands; the need for greater flexibility about core competencies for specialisations; and issues to do with the proposed duration of the "registrar program".

In summary, COP is very concerned that the Guidelines for endorsements even as amended will prove to be so confusing, demanding and unsuited to the "real life" of professional practice (especially beyond the health sector) that:

- (a) many and serious errors may well be made accidentally by registrants and supervisors in trying to follow the Guidelines, requiring time and effort to identify and correct, and placing them in the invidious position of being seen to have breached the Guidelines; and/or
- (b) many psychologists will not bother to seek endorsement (if indeed they even choose to register), or to offer themselves as supervisors for endorsement qualification purposes. This would mean insufficient supply of qualified endorsement-level supervisors to meet demand, and potentially lead to degraded standards of qualification for supervisors. Systemically, lack of clear identification of staffing levels and trends in the various practice areas would seriously hamper future workforce planning.

KEY ISSUES:

1. Review and clarification of terms, titles and associated requirements is needed:

The Guidelines use various inter-connected terms (including titles) such as "general registration", "provisional psychologist", "internship" (although not "intern psychologist"), "coursework practicum", "registrar", "registrar program", "supervision", "approved supervised practice", and "endorsements" (with specific practice area endorsements giving rise to titles such as "organisational psychologist", "forensic psychologist" and so forth).

These various terms and associated requirements are in our view not clearly enough defined and described or coherently interrelated: the reader must make sense of them for her/himself. For the public and new registrants in particular, but even for more experienced psychologists, this may be a difficult task. We appreciate that the Guidelines contain a Definitions section that provides a clear description of some of the key terms, but it appears too late, after section 6 “Application for Endorsement”, and may not be read in a timely way for full comprehension of the earlier parts of the Guidelines (if indeed it is read closely at all).

For example, it is implied (especially in 3.1 as revised) rather than clearly stated that the supervised practice that occurs during a Masters or doctoral program, through specialist “placements”, or that qualifies APS members for College status, precedes and does not constitute part or the whole of the “Registrar program” that leads to “endorsement”. Clause 3.1 refers to “a period of supervised practice (the registrar program)”, alluding to practicums and the other types of supervised experience as if they were not “a period of supervised experience”.

In both cases (Masters and 4+2) there appears to be a lack of direct reference to “recognition of prior learning” (RPL), a principle that underpins modern educational progression policies (such as universities recognising some TAFE programs as partially satisfying their subject requirements and granting the student advanced standing, as is well known to PBA members). Is it the PBA’s intention to reject RPL concepts¹, to simply accept that duplication is unavoidable, or to require of such a registrant more advanced professional experience for endorsement purposes?

We do note that the PBA is willing to adopt RPL-style provisions relating to equivalence (2.3). Given assurance about the maintenance of COP’s standards in the consideration of university bridging programs, we would likely support such provisions (subject to seeing the detail). But we re-state that there are substantial differences in knowledge and core competencies between Organisational Psychology and the other practice areas which would make the bridging program a relatively long one.

More generally, some employers of psychologists may see so many problems in the endorsement supervision process that they opt not to participate in a “registrar program”. We observe that some of these problems may be solved simply, e.g. altering the requirement in 3.3 from “at least fortnightly” to “every 10 days of practice” (which accommodates absences, holidays, etc.), and we urge the PBA to do all that it can to find such solutions as soon as possible. Other requirements, restrictions and caveats such as dot point one at the top of p.13 (supervision “provided at least fortnightly ... regardless of how many hours have been provided previously and regardless of the number of hours per week of psychological practice completed..”) appear more problematic and complex. Just how such a restriction or caveat would intersect with other restrictions and

¹ The adoption of a standard percentage (75%) of supervised hours for multiple endorsements is not RPL, but is an arbitrary percentage of dubious origin and validity which would not be appropriate for the Organisational Psychologist practice area endorsement.

requirements is not self-evident. Expert modelling of the various requirements and restrictions and mapping of their interactions seem necessary.

More generally we urge the PBA to re-examine and where necessary modify these terms, titles and requirements to achieve greater coherence and clarity (especially for readers inexperienced in regulatory issues and language), avoid inconsistencies and anomalies, and reduce the stresses that some requirements are likely to place on supervisors and supervisees.

2. Multiple Areas of Practice Endorsement:

COP does not support the notion of individuals holding more than two practice endorsements. Multiple endorsements devalue the notion of “specialisation” and would put at risk any further attempts to allow psychologists to use specialist titles rather than practice area endorsements. The more detailed arguments in support of this position are, in the context of responding to CP5, probably best left for the moment but should the PBA wish, we are ready to supply them.

3 Use of the term “Registrar”:

We do not consider that this term is appropriate or helpful:

- (a) Does the “psychologist” with “general registration” who is undertaking this approved program of supervision even need an additional title (especially one that confuses rather than clarifies)? A registrant could be undertaking an accredited higher degree but that does not attract a special title.
- (b) The perceived need for some such title seems to derive wholly from the PBA decision to add two years of supervised experience post-Masters/doctorate as a requirement for practice area endorsements, and to distinguish that experience arrangement from placement experience at Masters/doctoral level and the experience requirement in the “4+2” pathway. Thus a title for the program seems to be the real requirement, not an additional title for the registrant. Presumably a more self-explanatory and a less medical title such as “Endorsement Preparation Program” could be substituted for the “Registrar Program”.
- (c) As CP5 indicates, the “registrar” title is not required by (indeed is not mentioned in) the legislation under which the PBA must act (whereas the term “provisional psychologist” appears to be required) and is not protected by the National Law (as CP5 also recognises). We note (judging from CP5) that the PBA discarded the term “intern psychologist” partly because of similar lack of legal protection of that title.
- (d) It is not entirely clear at what stage of the psychologist’s life the title “registrar” is to be used and how it relates to the titles “provisional psychologist”, “psychologist” and “registered psychologist”. It appears from the rather convoluted explanation on p.7 of the Guidelines and elsewhere (especially the Definitions section) to be a post-“provisional” title uniquely associated with

being approved to undertake the requisite supervised experience for specialist practice area endorsement. But the “registrar” has concurrently the more formal (legally protected) title of “psychologist” or “registered psychologist” (with “general registration”) and may engage in any area of psychological practice whether or not s/he is a “registrar” in a practice area.

- (e) It unnecessarily invites the criticism that psychology is mimicking the medical profession for status reasons. The psychology profession should use its own independent terms, suited to its own diverse applications and settings.
- (f) “Registrar” has the sense of “in training” only in the medical/health field (and usually in hospital settings). In other fields it has other, very different meanings and standing. There are registrars in schools and universities, administrative authorities, government departments, business/commerce and even registration boards and other regulatory authorities. They typically undertake high-level administrative and perhaps quasi-legal work (e.g. the Registrars of family and bankruptcy courts, and other courts’ administrative units), usually at very senior levels, and certainly not as junior trainees. It is difficult to imagine how a supervisor of a trainee organisational psychologist (or other “non-health” psychologist) could be expected to explain clearly to a “non-health” client or to University academic and administrative staff the real status of a psychology “registrar” viz-a-viz other kinds of registrars.

The need for the “registrar” title should (we commend) be reviewed; and (if persisted with) the complexly nuanced explanations outlined above do need to be more clearly explained for the public, employers, supervisors and registrants likely to be bemused by the plethora of unfamiliar concepts and terms.

4 Insufficient supervisors to meet new supervision demands:

It must be borne in mind that the supervised practice of “4+2” provisional psychologists, and the practicums that form part of Masters and doctoral programs, already place a heavy load on Australian university staff and professional practices, to the point where students and university staff experience great difficulty securing suitable placements and provisional psychologists are finding a scarcity of appropriate entry-level jobs.²

It must also be borne in mind that professional practices (whether they be private clinics, consultancy firms, government units, NGO service agencies or other) are not quasi-training units tasked and staffed for, or necessarily experienced in, placement supervision. In particular they must not be treated as quasi-university departments able to remedy any content deficiencies in registrants’ university

² The latter trend has multiple causes, one of which appears to be that some employers of psychologists see provisional psychologists as too much trouble in terms of supervision, and prefer fully-qualified psychologists who can be immediately employed as independent professionals. In this regard, we note that in public sector staffing structures, the number of P1 positions seems to have been very much reduced over recent years, as has the number of senior psychologist positions - a “topping and tailing” process of much concern to us because it erodes not only the provision of trainee positions and in-house professional supervision capacity but also internal professional workforce planning, service integration, and professional headship/leadership/representation roles.

training. They do what they were established and are funded to do – provide *their* set of professional services to their clients. The profession owes them its gratitude for allowing new graduates to share in their service delivery, and for providing appropriately-focused supervision.

The new two-year supervision requirement for endorsement purposes adds very substantially to the overall supervision load across the registration system for psychologists. On our calculations there are already insufficient qualified supervisors to meet the need, and some of them will predictably be put off by the PBA's expectations of endorsement supervisors. Expectations such as keeping "weekly documentation" are in our view unreasonable. Certainly some record of supervision is appropriate, but would be better framed around ongoing professional work cycles than on a calendar or other formulaic basis. There seems to be some lack of balance in the Guidelines of (a) the placement agency's legitimate needs regarding and desired benefits from such supervision with (b) the requirements of the regulatory body. For instance, the quantum of supervision can be very simply recorded for regulatory purposes (e.g. trainee's and supervisor's work diaries), but the more important goal is surely the encouragement of meaningful involvement by the trainee *in the professional work of the agency*, and learning (and recording) the "lessons learned"?

Another unrealistic requirement of supervisors – at least as stated in 4.3.5 – is that supervisors are expected to observe the trainee's work directly. This is often not possible, at least fully, especially where the supervisor is external to the trainee's employing organisation (as may be appropriate where the trainee is the only psychologist employed in that organisation).

Some clearer guidance should be given by the PBA as to how such arrangements may be set up to the Board's satisfaction while acknowledging and nurturing the placement agency's needs and desired outcomes from the provision of supervised practice.

5 The CPD requirement for individuals to maintain their area of practice endorsement (2.4).

In the case of an individual endeavouring to maintain two practice endorsements, we believe that more than 15 hours of CPD should be gained within each area of practice. We do not support the position that individuals with more than one endorsement can spread their CPD equally while still maintaining just 30 hours of CPD in total per year. The underlying notion of "double-crediting" CPD deserves clearer explication, as do the criteria to be observed for doing so.

COP believes that generally there is sufficient differentiation between the various areas of practice for the PBA to require more than the general CPD standard of 30 hours in total per year for individuals intending to maintain more than one endorsement. A crucial element is the degree of overlap between the two areas of practice endorsement. In particular regard to Organisational Psychology, there is insufficient overlap conceptually and in practice-related competencies between it and the other areas of practice to warrant any such "double-crediting" of CPD. Thirty hours annually of CPD *specific to our specialisation* should be the requirement.

Other APS Colleges may share this view, or may accept some “double-crediting”, depending on the degree of overlap that they recognise between their practice area’s knowledge and practice competencies and those of other practice areas.

6. Core competencies:

It is pleasing to see that the PBA has made some concession to area of practice differences when defining the core competencies (3.1.3). In particular we note with appreciation the adoption of a “practice-tailored” approach in “(c) *psychological assessment and measurement relevant to the area of practice*”. (Our underlining.) We look forward to further details of these competencies and how the “practice-tailored” approach may also flow on to the requirements for general registration.

However, there are still some core competencies in the Guidelines where the tailoring to “area of practice” is not adequate, and differences in very important associated “cognate knowledge” are not fully or consistently recognised for CPD purposes. A particular instance is competency requirement (h), which is significant for organisational psychologists, but not as stated. The PBA formulation has unnecessarily limited relevance for organisational psychologists (especially in terms of its focus on childhood and even adolescence and late adulthood).

A better formulation and more flexibility are desirable for our field. In Organisational Psychology human development ideas and knowledge are certainly used, but in a very different context and in quite different ways from those underlying the PBA’s outline of competency (h). They also have linkages with quite different fields of cognate knowledge from those implicit in the PBA description (especially with the “human factors” and “human resource management” fields rather than with education and child and adolescent development).

For example, concepts about human development and maturation generally (which should be taught holistically as part of accredited undergraduate programs) lead very neatly into the more specialised notions of life and career stages and their social and cultural contexts that are important in Organisational Psychology but which are not part and parcel of the “standard” developmental psychology curriculum - for example issues such as occupational choice and career development, personnel selection, succession planning, mentoring, readiness for leadership roles, and so on. Also of considerable and increasing importance in Organisational Psychology are concepts about the physiological and social aspects of human ageing and related issues such as employability, adjustment of work tasks and contexts to suit older workers (e.g. increasing workplace illumination for visual work), and individually, organisationally, socially and culturally meaningful life-styles, patterns of work-life balance, and disengagement and retirement processes.

We urge the PBA to modify (especially broaden and allow more area-specific choice about) the content of this element, to allow the inclusion of “human

development” notions of most relevance to the area of practice, rather than insist on a “one size fits all” specification (as appears to be the case).

In addition, we find 3.1.3 quite vague with respect to “... *a level of depth and expertise appropriate to the approved area of practice endorsement ...*” If this is an attempt at flexibility, it is to be applauded but nonetheless needs greater specificity to illustrate what is intended. A previous submission from COP, in relation to the 4+2 guidelines, has commented on the limited nature of these competencies and their inappropriate health flavour and focus when it comes to individuals working beyond health psychology, such as in OP.

We trust that the final competency requirements for both general registration and endorsed areas of practice take these concerns into account.

7 Duration of the “Registrar program” (RP):

We applaud the flexibility provided for part-time trainee psychologists to complete the RP requirements, and the associated removal of the 17.5 hpw requirement. But the rationale for the new requirement of a minimum of 176 hours of “direct client contact” per annum is unclear, especially in relation to the acceptance of a maximum 5-year period for part-time registrants to complete the RP. This lack of clarity is accentuated by the removal of the specification in 3.2 regarding the number of annual hours that constitute full-time work.³

The new specification regarding “direct client contact” (whether supervised or not) is a minimum of 352 hours over two full-time years (176 x 2). This would equate to 4 hours per week (minimum) in a working week of 44 hours. In 3.3 the minimum supervision rate is 40 hours per full-time year, equating to just under 1 hour a week (40/44). It is not clear how these specifications translate to part-time practice over 3, 4 and 5 years. As they stand, they are not readily comprehensible. A table showing specifications by duration (2,3,4 and 5 years) would be very helpful.

8 Language re “direct client contact” and “direct clinical care”:

The language used in the revised Guidelines is likely to sponsor the implication that “direct client contact” equates to “direct clinical care”, despite the CP5 authors’ efforts to indicate otherwise elsewhere in CP5. The two phrases are too alike for such equating not to occur in at least some instances. Such potential confusion could well lead to the unacceptable view that trainee organisational psychologists are expected to undertake “direct clinical care” work!

The term “direct client contact” must be kept broad and non-clinical if it is to apply appropriately to organisational psychologists. Our clients may include senior executives of organisations, and/or their staff, and/or their customers (as in customer satisfaction surveys). There may indeed be “faceless clients” (the

³ The deleted specification led to a number of 1540 hours per year, multiplied by 2 to reach a figure of 3080 hours for the full-time supervised placement experience over *two* years. It is not clear why this useful benchmark was deleted.

organisation as a whole – an “artificial person” - rather than an identified “natural person”). Interviewing staff, or observing work undertaken by them, or being involved in their training, are as much “direct client contact” as individual clinical work. In particular we consider that there should be no implication that the client must be a distressed person seeking psychotherapeutic help (or other clinical intervention). Nor should there be any implication that designing valuable organisational processes (such as a new performance management system) is not “direct client contact”, so long as there is some face-to-face contact with the “client” (who could be the CEO or another senior executive in the organisation or other employees or indeed union representatives). Nor should there be an expectation that supervision be solely or primarily one-on-one. Group interaction among supervisees with leadership from the supervisor has clear benefits in terms of learning about and understanding the breadth and depth of professional issues, and in professional team-building (an important issue in professional work in Organisational Psychology and other fields that may not be fully recognised in clinical settings where one-on-one client contact appears to be considered the norm). Such group interaction is instantiated where a team of psychologists involved in a project meet after completion of the project to evaluate performance collectively and individually. Feedback from fellow trainees as well as from the supervisor should be considered a very valuable “adult learning” feature of good supervision in such contexts.

IN CONCLUSION

We support the PBA's efforts to improve the Guidelines, a complex process bearing in mind the novel requirements and circumstances that our very diverse profession is facing with the introduction of the rather health-preoccupied NRAS. We hope that our feedback will be helpful to the PBA in that activity, and look forward to seeing further revisions.