

Attention: Chair
Psychology Board of Australia

Dear Sir

Thank you for the opportunity to respond to the *Consultation Paper on Registration Standards and Related Matters* for the Psychology Board of Australia.

The Australian Guidance and Counselling Association Ltd is the national professional body that represents psychologists working in the education sector, particularly in schools. We provide professional support and regular professional development activities for school psychologists and for school counsellors. In South Australia the AGCA represents psychologists working in both government and private schools, as well as a small number of school counsellors who are not registered psychologists.

Please find our response to the Consultation Paper attached.

Sincerely

A handwritten signature in black ink that reads "Kate Prescott". The signature is written in a cursive, slightly slanted style.

Kate Prescott
President
AGCA (SA)

Consultation Paper on Registration Standards and Related Matters for the Psychology Board of Australia

Response from the Australian Guidance and Counselling Association, South Australia

The Australian Guidance and Counselling Association is the national body that represents psychologists working in schools. There are branches and affiliates in all states and territories. This response has been prepared by AGCA (SA).

We would like to stress that we are not practitioners in health, and are keen that the Board incorporate the views of the wide range of psychologists who work in non-health settings.

In principle we agree with the mandatory registration standards, but do have some concerns, comments and questions.

We are concerned that the requirements for maintenance of registration should not lead to an increase in the cost of registration to psychologists.

2.1 Criminal History

How will this be undertaken?

Currently in SA psychologists sign a declaration when renewing their registration. Will the national board use a similar process?

As most organisations employing psychologists require criminal history checks for prospective employees will the Psychology Board of Australia accept the checks undertaken for other purposes? For example, many school psychologists are also registered teachers. In the government schooling sector that means that a number of the school psychologists have had a criminal check for both their teacher registration and for employment in the Department of Education and Children's Services (DECS).

If the PBA does not accept other checks as adequate this will necessitate extra cost to the registrant, which is not acceptable.

2.2 English Language Skills

We accept and agree with this requirement for registration.

2.3 Professional Indemnity Insurance

A significant number of our membership is employed by DECS, what proof of insurance will they be required to provide? Will individuals be required to provide the evidence or will the employer be asked to provide a statement that covers all of its employed psychologists?

2.4 Continuing Professional Development

We recognize the importance of CPD, and are keen that our members are able to maintain their registration.

We have concern that this requirement, if not flexible, is likely to impose significant extra costs (in time and money) on the individual psychologist and / or their employer. Currently the funding available to DECS psychologists to pay for attendance at professional development activities does not cover the cost of one day at present rates.

What constitutes CPD? Currently professional organisations which require CPD for continued membership use a range of options. Will the CPD for the Board include a wide range of potential activities such as reading, working parties and study groups, being on executives of professional bodies, preparation of training, and online learning?

What will be the process for logging CPD hours? We would support a simple online entry system.

What criteria will the Board use to determine what delivered PD is appropriate for CPD hours? Will there be a requirement for organisations which provide PD for psychologists to register with the Board, or have their PD approved for hours?

Will there be a difference of criteria for generalist and specialist hours?

Apart from the professional development provided through DECS, the AGCA is the primary provider of professional development for school psychologists in South Australia. Our professional development is always well attended. As we are a small state with a small number of educational psychologists (and therefore a relatively small membership) it would be prohibitive for the AGCA (SA) to have to register its PD with the Board if there was a cost associated with this process.

We have a number of country based members, most of whom are sole practitioners in their town and region. Their ability to access 30 hours of face – to - face professional learning and professional supervision is extremely limited, and the cost associated with that would be prohibitive.

In South Australia we have a number of members who work part time as psychologists. The blanket 30 hours irrespective of whether you work part time or full time will be difficult for the part timers to fulfill. There should not be an expectation that a significant amount of the PD is undertaken in one's own time. We believe some consideration should be given to a prorata number of hours depending on employment situation.

We would support the concept of CPD point accrual over a two year rotation, as it is sometimes not possible to accrue hours in one calendar year, but is possible across two years by attending eg. a conference.

Peer supervision

What constitutes psychology supervision? What does "actual hours" mean? What will the recording and accounting requirements be?

How is it envisaged for a psychologist in a senior position could meet the requirements for peer supervision? What is the definition of peer?

The use of the term supervision for both the supervision of interns and for CPD is confusing. Could there be a differentiation with a change of term for the peer supervision (perhaps peer consultation?)

2.5 Recency of Practice

What are we required to provide in order to demonstrate satisfactory evidence of recent practice as a 'registered psychologist'? Will it just be an honesty system tick-a-box like the Chiropractic Board of SA are currently using?

We have a number of members who are not employed as psychologists per se, but who use their psychological skills and expertise to be effective in their roles. We would argue that they are continuing to practice as psychologists.

Supervision for registration

The proposal for the need for intern supervisors to be endorsed by the board is supported.

While initial training makes sense, 5 hours of training every year for supervisors is excessive, particularly if they are active supervisors. We would support refresher training every three years. Who will provide the training for the supervisors? The training needs to be consistent across states. We think the trainers need to be experienced in both practice and supervision? How often and where will the courses be provided? What are the likely costs of this training (if any)?

The transition arrangements for supervisors currently on registers are not clear in the paper. Are they to be required to do the 2 day training, or will it be acceptable for them to undertake the 5 hour updates?

The use of the term supervision for both the supervision of interns and for CPD is confusing. Could there be a differentiation with a change of term for the peer supervision (perhaps peer consultation?)

Internships

Core capabilities and attributes are consistent with current requirements in SA, although we are not sure what “across the lifespan” requires.

Clarification of what the 120 hours of PD means is required. Is this formal PD or does it include eg. reading or study groups, or supervision discussions? If it is formal PD this is likely to be a difficult criteria to fulfill for the 4 plus 2 and 5 plus 1 entrants to the profession.

The role and requirements of a secondary supervisor need clarification. What does “outside the scope of practice of the principal supervisor” mean? This would be very difficult for many interns to meet. In South Australia it is already extremely difficult to get even short term minor placements for the 4 plus 2 interns as the psychology profession is stretched in providing placements associated with Masters programs. If an intern has to nominate a secondary supervisor outside their department there is likely to be a cost payable to the secondary supervisor, which is not an acceptable expectation.

Specialty areas

We feel that should be an avenue into specialty that takes into consideration experience and expertise in practice.

In SA we do not have access to either a Master program or a PhD program in educational and developmental psychology.