

**Psychology Department**

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**Re: Psychology Board of Australia Consultation Paper on Registration Standards and Related Matters**

The Psychology Department at the Children's Hospital at Westmead thank the Board for the proposals contained within this document, aimed at maintaining a viable, high-quality and safe psychology workforce. Please accept this submission which aims to represent the viewpoint of the majority of Department members.

**Section 2: Mandatory registration standards**

**2.1 – Criminal History**

Members of the Department support this proposal

**2.2 – English Language Skills**

Members of the Department support this proposal

**2.3 – Professional Indemnity Insurance**

Members of the Department support this proposal. However it is unclear to us at this stage whether the insurance cover currently provided by our public health employer includes all of the specified requirements. If not members would be required to seek additional cover.

**2.4 – Continuing Professional Development**

Members of the Department generally support the requirement for ongoing professional development, and the total number of hours proposed for each registration category.

However there were a number of concerns related to the practical aspects of working within the public health system. Principally, under the 2009 Health and Community Employees Psychologists' (State) Award there is no provision for professional development and supervision requirements, with very limited learning and development leave allowed, and similarly limited financial support. There is serious concern that unless registration requirements are supported by the award, as per medical professionals, psychologists in public health will have to pursue learning and supervision requirements in their own time and at considerable expense.

Many members of the Psychology Department also have a significant role in supporting rural and remote psychologists via videoconferencing and thus have an insight into the unique practice issues facing these clinicians. Psychologists in these areas already struggle to access professional supervision, even on a privately funded basis, due to the lack of appropriately qualified and skilled local clinicians. They would find it practically impossible to meet the proposed requirements of 10 hours per year. Many rely on monthly group supervision via videoconferencing, but even so the proposed proportional recognition of supervision time for group participation would make it impossible to meet the required 10 hours. In addition to the difficulties rural and remote clinicians have in accessing supervision, they also face difficulties in accessing appropriate professional development activities, with restrictions on learning and development leave, course funding and travel support.

The Psychology Department therefore suggests that the 10 hours of supervision be encouraged but not made mandatory. Alternatively, that group supervision allows credit for the whole period of participation rather than just a proportion based on the number of group members. Further, it is suggested that professional development requirements follow the 2 year cycle currently used by the APS, to allow for natural variation in the availability of appropriate learning opportunities. Finally, that professional development support needs to be specified in the public health award covering psychologists.

## **2.5 – Recency of Practice**

Members of the Department support this proposal

### **Section 3: Proposed qualification requirements for general registration**

Members of the Department support this proposal, although request clarity in regards to what qualification sequences will be recognised leading up to and after 2016, particularly in regards to the 4+2 interns. It is also unclear who will provide the proposed 5+1 program and whether it is likely to be widely adopted.

Members of the Department with overseas general and specialist registration currently recognised as equivalent (e.g. New Zealand qualifications) request clarification regarding whether their qualifications will continue to be recognised under APAC accreditation.

Members of the Department currently under a board-approved supervised practice program expressed concern that the proposed requirements for supervised practice and professional development will be difficult to meet for those employed in the public health system. The new minimum hours for supervised practice equates to full-time employment and the requirements for three hours per week of formal workshops or training programs equates to 16 days per year. Currently psychologists in the full time employ of NSW Health would be unlikely to be granted any more than five days learning and development leave per annum, and often less than this. It is difficult to see how these interns could meet the requirement for this formal training within the hours of their practice.

#### **Section 4: Proposal for specialist registration**

Members of the Department strongly support this proposal and the adoption of option 3 as outlined in Attachment C (page 42).

#### **Section 5: Proposals for endorsements**

Members of the Department strongly support the requirement for supervision as an endorsed area of practice, with some reservations:

The proposal appears to extend the standard from psychologists providing supervision for provisionally registered psychologists to those providing supervision for specialty training, including university internship and placement programs. Psychologists within our organisation currently carry a significant load providing supervision to university interns completing masters and doctorate qualifications, with no financial recompense to the individual clinicians, departments or the organisation. If endorsement would be required to supervise these interns it would be difficult for clinicians to meet the specific training and CPD requirements without support from our employer and/or the universities for the time and cost involved. This support would be crucial for ongoing workforce development.

Current Registration Board approved training in supervision is focussed on the needs of provisionally registered psychologists. Extending the standard to interns in specialty training would require revision and extension of approved supervision training programs.

There is concern that the requirement for a minimum of 5 hours of CPD per annum specific to psychology supervision for renewal of endorsement may decrease the number of psychologists willing and able to be supervisors. This is likely to be particularly the case for rural and remote clinicians who find it difficult to access appropriate learning opportunities, especially on an ongoing basis. Even for metropolitan clinicians there do not currently appear to be sufficient supervision-specific training courses to allow them to meet CPD requirements.

Finally, members of the Department support the Board's thinking that endorsement not apply to psychologists providing supervision to generalist or specialist registered psychologists within a CPD program, as this would be likely to have negative workforce implications.

Thank you for your consideration of our comments and suggestions.

Yours sincerely



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