

## **RESPONSE TO THE PSYCHOLOGY BOARD OF AUSTRALIA CONSULTATION PAPER ON REGISTRATION STANDARDS AND RELATED MATTERS**

### **ITEM 2 MANDATORY REGISTRATION STANDARDS (ALL BOARDS)**

#### **2.1 CRIMINAL HISTORY**

Currently in South Australia newly registered psychologists and those renewing registration are required to sign the registration document indicating that they have not been involved in any criminal activity or convicted of any criminal offence in the previous 12 month period.

Will a similar process, with relevant audits and random checks occur?

How will proof of meeting the criminal history standard be demonstrated to the Board?

Is there any intent to require individuals to independently undertake a criminal history screening or police record checks as proof?

If so what measures will be in place to have mutually recognised checks made by agencies on behalf of individuals as part of conditions of employment? (For example many agencies which employ individuals who work with children require a letter of clearance from a criminal history screening or police record check.)

If independent checks will be required, this will also incur a cost for service.

#### **2.2 ENGLISH LANGUAGE SKILLS**

Accepted and agreed with principles of requirements.

#### **2.3 PROFESSIONAL INDEMNITY INSURANCE**

Will individuals employed by agencies be required to provide proof of indemnity insurance as per requirements held by the employing agency? If so this would require some large government agencies to issue hundreds of certificates demonstrating proof.

#### **2.4 CONTINUING PROFESSIONAL DEVELOPMENT**

Re CPD:

There are significant individual and cost implications for psychologists in country regions.

What defines accredited continuing professional development (CPD)?

How will CPD accreditation determined and by whom?

Will there be any costs associated with gaining accreditation for a CPD program?

What form of recording and reporting will be required? The existing APS online process is acceptable and recommended?

What does and does not constitute peer supervision?

What will be the recording and accountability requirements for engaging in peer supervision?

What is meant by 'Supervision hours must be actual hours'? (p12)

With regard to exemptions, would working in another non-psychology role, working/travelling overseas, being on extended long service leave be considered to constitute 'special circumstances'?

What does and does not constitute 'psychology practise' for psychologists working in administrative and managerial roles? We are concerned that this is not too narrowly defined and act as a career pathway barrier for psychologists who would like to progress to managerial roles.

Potential impediments exist for a psychologist in a senior position to meet the requirement of peer supervision where a peer may not exist at their level within the organisation or elsewhere in the state. How can supervision requirements be met in these circumstances?

Re the endorsement of supervisors:

The proposal for the requirements for a psychology supervisor endorsed to be endorsed by the board are considered appropriate. It is also acknowledged that a masters level is not one of these prerequisites as is currently the requirement in SA.

The use of supervision for CPD and for intern purposes is somewhat confusing and requires differentiation. The term formal peer consultation is a suggested alternative for supervision for CPD.

In principle we agree with the requirement to have supervisors for intern purposes trained, however an annual 5 hour refresher is considered onerous and excessive. (A refresher every three years is more appropriate, which may be 2- 5 hours.)

Clarification is sought regarding transition requirements for supervisors who are already approved and registered with state boards. Will they be required to undertake the initial supervisor training as well as the additional annual 5 hours update, or will the update hours only be required?

Who will provide the initial training and update programs?

How frequently will they be provided?

Where will they occur?

What costs will be associated with accessing these programs?

Although the examples of Queensland and New South Wales requiring endorsement of supervisors leading to an increased supply of trained supervisor was provided, this may not be reflected in other states. We anticipate this will not be the experience in South Australia.

Re internships:

Core capabilities and attributes are all acceptable. Clarification is sought regarding the additional item h) 'practise across the lifespan'.

What does 120 hours of PD for internships constitute? Masters students are likely to be able to access this through their program. This may present additional access to training for interns undertaking a 4+2 or 5+1 option.

What is the role, requirement, function of the secondary supervisor from a practise outside the scope of practise of the principal supervisor? This requirement would be very difficult for many to meet and would incur considerable costs.

Re specialty areas:

Currently in SA there is no masters program for educational and developmental psychology. This considerably restricts the opportunities for individuals to obtain PhD status required for seeking specialist registration.

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