

10 November 2009

To The Chair, Psychology Board of Australia,

Please find attached my submission in response to the “Consultation Paper on Registration Standards and Related Matters” dated 27 October 2009.

Although I support the concept of national registration and regulation of specialist titles, as someone working in the organizational psychology area, I believe there are some issues and concerns with some of the preferred models advocated in this document for this area of psychological practice.

### **1. Requiring supervision as a component of ongoing professional development to meet registration requirements**

I support the argument that psychologists should continue their professional development after they leave formal training. Making improvements to how you might go about your work adds to your professionalism, client outcomes and personal job satisfaction. In principle requiring a certain amount of professional development to be completed annually is desirable. However I have concerns regarding the prescription of supervision and what alternative PD options may be approved to keep this a cost effective exercise.

Section 2.4, “Continuing Professional Development” proposes a model that combines one-on-one supervision with another professional and attendance at PD activities. For those working within organizational psychology this raises a BIG issue of competitive advantage and competition for clients. I personally am uncomfortable talking to another psychologist (or talking within a group) about my consulting process and how I might go about a project as this might reveal aspects of my work or intellectual property that could be misappropriated. In addition, it may provide the ‘supervising’ psychologist or other attendees with intelligence about a client that they then use to approach the client and poach the client from you or undermine you with the client. I feel the requirement for supervision is a very difficult area for organizational psychologists and it is likely to be a unique concern when compared to other types of psychologists such as clinical psychologists in private practice who may not face this commercial pressure.

Related to the issue of annual PD requirements is the practicality of doing the PD. For most this will involve time (from business and family) and financial costs to business (yourself or your employer). In terms of the annual cost of PD, I think there needs to be some consideration of what types of PD will be considered suitable. If there is reliance on supervision (where you tend to pay hourly rates to the supervisor) and formal conference/training/workshop programs then the financial costs of PD to psychologists may become prohibitive (see Annex A where I have modeled the costs using these as the core PD options). I haven’t attempted to model the indirect costs to family or business of this PD for obvious reasons. In summary, I believe the annual costs in terms of time and money need to be carefully considered.

An alternative to requiring supervision may be the HPC standards from the UK described in the document: an individual can decide what would be a good learning option for themselves and their practice based on their development needs, preferred learning style and resources available. Various development options could therefore be used without supervision being the core of the PD. If the Board is concerned about ‘keeping an eye’ on the PD and ensuring its suitable, a psychologist could be required to submit their development needs analysis and PD plan annually as part of their registration and payment process for the coming year.

## **2. Requirement for supervisors of psychologists and interns to complete annual supervision PD**

I support the argument that supervisors should meet specific competency requirements as supervisors. Ensuring quality and competency in the assessment of, giving of feedback to and coaching of interns and psychologists is certainly desirable. However I have concerns about the requirement for annual supervision PD and how this may impact on the supply of supervisors (and therefore availability of psychologists) and cost to supervisees.

My understanding of the model proposed is that to be a supervisor of other psychologists, the model proposed requires 35 hours of PD if you supervise at the generalist level (30 general hours plus 5 supervision hours), and 50 hours of PD if you supervise at the specialist title level (30 general hours, plus 15 specialist hours, plus 5 supervision hours) per year. The ongoing time and cost of PD (paying hourly rates to supervisors, loss of income as you attend supervision rather than work on paying client work, time from your business and family, and other potential imposts) may mean some psychologists do not go ahead and do the extra 5 hours a year to be a supervisor. You may end up with demand for supervision exceeding supply of supervisors – and therefore unreasonable fees being asked by those with this supervision accreditation. This will have implications for universities in placing masters students in placements, and for psychologists in practice seeking supervision to meet their annual PD requirements which facilitates their registration renewal. People may miss out on being able to register each year if they cannot access a supervisor or afford one at the rates charged. I am not sure of the equity or practicalities of this. Attachment D to the consultation paper argues that in QLD and NSW there has been no negative impact on the number of supervisors when there is mandatory supervision training. HOWEVER, as described in the document it would appear that neither of these states require ongoing PD requirements to be a supervisor or have those additional time requirements of supervision PD in addition to your other general and specialist PD requirements. They only have initial training requirements. Therefore we do not know if this new model with ongoing annual requirements will result in more or less supervisors.

Also raised by this proposed requirement is a potential concern about conflict of interest and financial gain. Potential training providers for this supervision training are likely to be the Board itself, universities or the APS. All key stakeholders who have been consulted about this requirement for this standard.

A potential alternative to ongoing/annual supervision PD, that would still provide assurance about the quality of supervision, might be the adoption of the QLD and NSW model which are reported in the consultation paper as being successful: provide supervisors with an initial training program and examination process, time limit the accreditation, and require update training and assessment on a schedule. This may be less onerous to psychologists, less costly and ensure adequate numbers of supervisors to meet the annual intern, masters and psychologist demand for supervision.

## **3. Relevance of standard (h) in the Internship Model outlined in Attachment B**

There are 8 standards proposed in attachment B of the consultation document that need to be met during internship. Standard “(h) practice across the lifespan” does not necessarily apply/seem practical/seem relevant for organizational psychological practice. At times you work at the organizational level (eg. A project at the system design level), or at the team or individual level (eg. Whatever employees there are within that organisation) and there is no way you can engineer a cross-section of people based on age for things such as safety training, or applicants for recruitment or selection campaigns, or when conducting succession planning activities. These activities should be based around specific criteria which meet the business need, the requirements of the position and should be inherently equitable, without discrimination, and ultimately based on the merit principle.

#### **4. Driving psychologists from the profession and losing quality control on professional practice, thereby defeating the purpose and intent of this national registration process**

Outside of this consultation document it is also important to consider the context in which this one branch of psychology operates – it could be argued that the market in which organizational psychologists work is unique compared to other branches of psychology, and as such makes the need for you to be allowed to call yourself a ‘psychologist’ less critical.

Whether you are an external consultant or internal consultant to an organisation, competitors for jobs and work within the organizational psychology area are usually not other psychologists but people with business and HR backgrounds (and others who move into areas in which we work with variable competencies and backgrounds). So the question is - What is in this for organizational psychologists? If the registration requirements are onerous, or PERCEIVED to be, people may stop bothering to register. There is not a lot of competitive advantage in calling yourself a psychologist when you can use “management consultant” or “HR consultant” or “OHS Advisor” or “Learning and Development Advisor” (and many other title options). Clients seem to look for competent consultants rather than specific professional titles. Might an onerous registration process result in people like those with organizational psychology backgrounds opting out as it creates no obvious advantage to be able to call yourself a psychologist? The consequences therefore could be that these people effectively move out of any professional management processes where there would be no quality control, complaints or disciplinary mechanisms that apply to them. A complaint we often hear (and make as a profession) about others where there is no professional body ensuring standards or competency requirements (ie. those who call themselves “counselors” and “coaches”). Wouldn’t it be better to make the processes of registration and supervision practical and user friendly so you keep these people within the professional boundaries of a Board and have quality control, complaints and disciplinary processes you can apply to them.

I raise this as a point of discussion and as a question to consider at a wider strategic level.

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In summary, I believe the intent of the new national registration process and management of specialist title admirable and I support it. I just hope we can get right the mechanisms for ‘how’ it will work so we support and enhance the quality and professionalism of psychologists across all branches of the profession, across Australia and facilitate easy transitions to other states for work.

Please feel free to contact me if you have questions or require any clarification on the points raised in this submission.

Kind regards,

*(original signed)*

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HR and OD Consultant/Psychologist

## Annex A: Modeling the Cost of doing Annual Professional Development as a Requirement for Registration

Requirement	Approx Cost
<b>Generalist PD Requirement (30 hours)</b>	
10 hours of supervision at \$200 per hour	\$2,000.00
2 day conference – registration & workshops often approx	\$2,000.00
- travel and accommodation (if interstate)	\$2,000.00
- assume 10hour days	
<b>Sub-total</b>	<b>\$6,000.00</b>
<b>Specialist Title PD Requirement (15 hours)</b>	
10 hours of supervision at \$200 per hour	\$2,000.00
½ day workshop – lets assume \$300 and 5 hours	\$300.00
<b>Sub-total</b>	<b>\$2,300.00</b>
<b>Supervision PD Requirement (5 hours)</b>	
½ day workshop – lets assume \$500 and 5 hours	\$500.00
<b>Sub-total</b>	<b>\$500.00</b>
<b>Annual Registration Renewal Fee</b>	
Assume its similar to what we pay now in WA	\$300.00
<b>Sub-total</b>	<b>\$300.00</b>
<b>Total Annual Cost to Keep your Registration</b>	
Generalist Psychologist	<b>\$6,300.00</b>
Generalist with Supervision Accreditation	<b>\$6,800.00</b>
Specialist Psychologist	<b>\$8,600.00</b>
Specialist with Supervision Accreditation	<b>\$9,100.00</b>

In addition to this will be costs such as:

- Professional Indemnity Insurance (for me in 2009 that was \$1,400.00)
- Membership of other bodies such as APS, etc