

The Institute of
**PRIVATE PRACTISING
PSYCHOLOGISTS**
INCORPORATED



**IPPP Response to the
Psychology Board of Australia's
Consultation Paper on Registration
Standards and Related Matters
(27 October 2009)**

Recommendations Summary

Consultation period

Given the importance of the matters under consideration and the impact on the psychology profession nation-wide, the IPPP deems that a one-month consultation did not allow adequate consultation. We note that at the consultation forum held in Melbourne on 19 November 2009 the PBA indicated, "almost 70% of affected psychologists were essentially under represented here today".

Recommendation 1: The Psychology Board of Australia should not implement the more complex and contentious issues as from July 1, 2010 but consult further and resolve these matters within the nominated 3-year transition period.

Proposed standards the IPPP can endorse now

Recommendation 2: The Psychology Board of Australia implement the proposed standards relating to: Criminal History, English Language, Recency of Practice, Qualification Requirements for General Registration and Endorsement as a Psychology Supervisor, as from July 1, 2010.

Proposed standard for which the IPPP recommends minor modifications

1. Continuing Professional Development

Recommendation 3: The definition of individual supervision should make explicit that the registered psychologist does not need to be an endorsed supervisor, thereby removing any potential for ambiguity.

Recommendation 4: Further information is required in relation to what the Board envisions in relation to the conduct of supervision.

Recommendation 5: Individuals in the supervision arrangement should be free to determine the nature and weighting of these activities they engaged in according to the professional maturity and needs of each person.

2. Specialist registration

Recommendation 6: As it is inappropriate to make a specific requirement for CPD within a specialist registration category further consultation is requested.

3. Psychology supervisor

Recommendation 7: Supervisors undertake a minimum of 7 hours (equivalent to a 1-day workshop) CPD specific to psychology supervision every 5 years.

If an endorsed supervisor does not undertake any supervision duties within a 2-year period, then the requirement for 5 hours of CPD specific to psychology supervision could be enacted prior to the person commencing the endorsed supervision role with another psychologist.

4. General comments

Recommendation 8: The PBA should give due consideration to like professions within Australia, such as the medical profession, and in particular, general practice, when setting standards for CPD.

Proposed standard for which the IPPP recommends further consultation

Specialist registration

1. Avoid denigrate the generalist psychologist

Recommendation 9: The Psychology Board of Australia should guard against a decrease in numbers of generalist registrants in the future and also against the establishment of a perception that generalist psychologists lack skills to perform the work they undertake.

2. Specialist registration across all psychology disciplines

Recommendation 10: A decision regarding the introduction of specialty titles should not be made by 1 July 2010, rather further consultation should occur post this date.

Recommendation 11: Should specialty titles be introduced, consultation should occur to agree an independent process to assess and accredit the competence of psychologists with extensive practice experience and recognition of their prior learning with a view to grandfathering according to merit. This process must not be that currently undertaken by the APS College system, as this is not considered independent.

Recommendation 12: Should specialty titles be introduced, consultation should occur to determine reasonable processes by which any such practitioner may achieve required standards, should they not meet the grandfathering criteria.

Recommendation 13: Should specialty titles be introduced, the Psychology Board of Australia should convene an advisory committee consisting of representatives from organisations that currently have stakeholders in this matter and who have made substantial efforts already to progress solutions in this matter.

Recommendation 14: Existing programs should be reviewed for their applicability to assist in addressing the issue of experienced psychologists meeting equivalence criteria - refer to The IPPP Competencies Program.

Recommendation 15: If specialist areas are to be considered, then we suggest there should be relatively few. The IPPP recommends that an independent study of components of practice be undertaken and attempts made to meaningfully discriminate between areas of practice prior to considering the adoption of specialty titles.

Recommendation 16: If an application for equivalence be submitted by experienced psychologists, the six-year time frame for completion of transition arrangements should be applied from the date upon which the psychologist receives notification of outcome, if the outcome is a recommendation for additional training or supervision. (This recommendation assumes the psychologist makes an application for equivalence in a timely manner.)

Recommendation 17: The Psychology Board of Australia must bring to the attention of the Ministerial Council the likely additional funding requirements that will be necessary to support the proposed transition process for experienced psychologists.

Recommendation 18: The Psychology Board of Australia must bring to the attention of the Ministerial Council the additional funding requirements that will be necessary to support the proposed minimum qualifications for specialist registration.

Proposed additional area of endorsement in relation to area of practice

Recommendation 19: Psychology supervision should be accepted as an endorsed scope of practice.

Recommendation 20: Independent practice (private practice) should be an additional scope of practice considered for endorsement.

Recommendation 21: The IPPP wishes to discuss their established 12 Unit Competency Program with the Psychology Board of Australia, and proposes this Program as a model for what might be developed, with further consultation with our profession over the next 3 years, in order to reach agreement regarding endorsement of independent practice of psychology.