

Trevor Rule -Clinical Psychologist (WA), MAPS

24 November 2009

**Chair
Psychology Board of Australia**

Re: Comment on the “Consultation paper on registration standards and related matters” issued by the National Psychology Board

I would like to express my general support and approval of the proposals put forward by the National Psychology Board in this consultation paper. I would like to comment particularly on the areas of Registration, Specialist Title Registration, Transition and Continuing Professional Development.

Registration

I support the 4 + 2 model in the present and for the near future for general registration. The eventual raising of the standard to a 6 year training model for general registration must occur in tandem with a lifting of the requirements for the academic training of specialist psychologists to be at a DPsych or PhD level with a subsequent year of supervised practice. I note the Board’s identification of the relatively low standard of training that is required of Australian psychologists when compared with that of psychologists in the UK, Europe, Canada, and the USA. Reaching for international standards of psychological training and practice will serve to ensure that a high standard of psychological care is available to the Australian public. It will also enable Australian psychologists to be more easily recognised as standing shoulder to shoulder with the psychologists of other developed nations.

As noted in the consultation paper the WA Psychology Board has a well established process of mandatory supervision for those who, after completing their undergraduate degree in Psychology, apply for registration as a Psychologist. There is also a well established process for those who have completed a postgraduate Psychology training programme and wish to apply for Specialist Title registration. In both cases a two year post academic qualification process of structured supervision is required (unless the applicant has completed a DPsych or PhD in which case the supervision period may be reduced to 18 months). These processes are working well and have long been accepted by the public, employers, and the profession in WA.

The viability of the internship (5 + 1) model of training in WA is very uncertain without additional support for the placement of students (perhaps this could be assisted through a “Workforce agency” sponsorship).

Specialist Title

I also recommend the application of regulation for specialist title. Registration for specialist title has been regulated by the WA Psychology Board for 30 years (not 15 years

as stated in the consultation document). The WA model of regulation for specialist title has served the public and the profession well with defined areas of specialised practice for Counselling, Clinical, Educational & Developmental, Forensic, Clinical Neuropsychology, Organisational and Sport Psychology. The public are protected by the use of these specialist titles through current legislation as these titles are only permitted to be used by those that have demonstrated attainment of skills in these areas of psychology through the registration process. These titles also give a clear level of accountability for the quality of service that the public may expect from these specialists.

The areas of specialist title have also enabled the development of clear pathways of professional development for all psychologists. The areas of competence that have been defined for these specialist titles have enabled psychologists to promote their skills as a group to employers and develop a career structure. Information about these areas of competence is available to the public and the profession from the WA Psychology Registration Board.

Transition

Generally the transition arrangements for general registration and specialist title seem adequate however an anomaly is likely to occur where, for example, under the transition arrangements, those that have been deemed eligible for membership of the Clinical College of the APS and thus eligible for specialist rebates of Medicare will be eligible for specialist title. There are possibly some registrants that will be eligible for specialist title through this process that may possibly not have any post graduate psychology qualification. Whilst this may be acceptable as a part of the transition nationally I ask the National Psychology Board to consider a more time-limited transition for those that have attained APS College membership to make application to be considered for specialist title before the National Board moves to a more qualification based standard for specialist title. However I also understand that alternative pathways to registration for specialist title should be in place for extraordinary circumstances.

Continuing Professional Development (CPD)

I strongly support the plan for continuing mandatory CPD however the mandating of individual supervision seems to be over regulating this area of professional development. It is unclear what evidence exists to support the notion that lack of individual supervision will result in a reduction in professional standards.

I would like to thank the National Psychology Board for the opportunity to comment on the proposed registration standards,

Yours truly

Trevor Rule
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