

Submission to the Psychologist Board of Australia .

Subject: National Registration Discussion Paper 2009

Date: 23rd November 2009

Overall, I wish to support the proposals regarding standards, made in the discussion paper. I believe it is beneficial to the profession of psychology and it upgrades the standards and scope of the profession and ensures further accountability. However, there are some concerns which are outlined below.

Criminal History.

A minor comment re pg 4. '*The Board may place less weight on offences committed when the applicant is younger, and particularly under 18 years of age.*' Are any applicants for psychologists' registration, under 18?

Pg. 5 Under definition of criminal history. In my view it is reasonable if a psychologist has been formally charged with a criminal offence in the past and **convicted**, however if there has been no conviction then disclosure impinges on our civil liberties and privacy. It also goes against the principle of presumption of innocence until proven guilty. It is highly alarming to think that psychologists will now have to additionally worry about possible deregistration if wrongly accused of an offence.

English language requirement.

This requirement shows a lack of understanding of English proficiency in tertiary educated professionals in countries where English is not a native or first language, but is spoken fluently. Countries in the Indian Subcontinent, such as Pakistan and Bangladesh; Malaysia, Singapore and some African countries like Nigeria and Kenya have English as the medium of instruction in Universities.

Although English proficiency is essential to good psychological practice, in my view, the addition of the words *where English is a native or first language* (pg 9, requirement 4, and exemption 1), is unfair and places further unnecessary impediments to registration on applicants who are overseas trained but **have had all their secondary and tertiary education in English and have been using English in their practice**. To my knowledge, only 4 countries in the world have English as a native or first language, Australia, Canada, UK and USA. All other countries have two or more languages. In several countries, English is taught and spoken widely as a second language with equal if not better proficiency than English speaking countries.

Hence, my suggestion is that the proviso, *where English is a native or first language* should be omitted.

Professional Development

This is generally supported except that the inclusion of 10 hrs of 1-1 supervision can be problematic, in terms of finding a suitable supervisor plus the cost. Many

psychologists have been working competently without 1-1 supervision and hence the rationale for this requirement is unclear. It would make sense to include it if there was evidence that it improved the practice of psychology more than other forms of CPD.

Although CPD is essential for keeping up to date with the latest knowledge and skill base for every psychologist, penalties for failure to meet CPD requirements are too severe and punitive, in my view, especially penalty (a) and (e).

Moreover, if penalty (a) applies, that is, refusal to renew registration for failure to comply with CPD standards then, does it not make the rest redundant? In my opinion, it should be refusal to renew registration OR the other penalties. I also believe penalties (c) and (d) are problematic in terms of the relevance of the performance assessment or examination. My concerns are about who would be responsible for compiling these assessments. The Board would have to ensure that these assessments are fair and set at the skill and knowledge level of each applicant.

Recency of Practice.

Overall this standard is supported with some queries. Does practice of psychology count outside Australia? Many psychologists get jobs overseas and return. Secondly, there is no provision for the minimum hours per week required for a psychologist to be engaged in practice. So, would this standard be fulfilled if a psychologist only practiced 2 hours per week ?

Qualification Requirements for General Registration.

There appears to be some inconsistency here. It appears that the Board is supporting 6 years minimum study for general registration, but also recognizing alternative pathways of 5+1 and 4+2. The 4+2 pathway is as things are now so what has changed? My view is that if there is to be an uplifting of professional standards of psychology in Australia, in keeping with international standards as the paper outlines, then the minimum study period should be ideally 6 years or at least 5 years, not 4 years. I have been a Clinical psychologist for over 22 years and have been supervising interns and other psychologists for over 14 years. My observation is that the 4+2 pathway does not adequately provide a good knowledge, skill and professional base for registration. In my view the 2 year internship is too varied and does not give high quality training to the intern as a Masters programme does.

Specialist Registration.

This proposal is wholeheartedly supported in principle. One query however. For those of us who are practicing in a specialist area now, such as clinical psychology, with a Masters in clinical psychology, the additional supervision and CPD requirements seem fair however, what would be the nature of the additional *sequence of study acceptable to the Board*? Would that mean that one would have to do a DPsych with credits being given for the masters so it can be completed in 12 months?

This is certainly a cause for anxiety in those of us who have been senior specialists for many years.

Endorsement of Supervisors.

Supported fully.

General comments.

I feel that the new changes are going to be quite positive in upgrading the profession of psychology in Australia and in standardizing how it is practiced in the entire country. This has been a long time coming. I feel it will go a long way in informing both the public and employers, especially the Health Department of the value of our profession in many different fields.

Although the proposed standards are excellent, I would like to request that consideration be given to the extra time, effort and money it will require from psychologists to comply with them. Hence, the Board might consider subsidizing CPD and supervision and making access to them easier.

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