

Comments to Psychology Board of Australia on Consultation Paper on Codes and Guidelines

A. COMMENTS ON GUIDELINES ON INTERNSHIP

A1. Use of title (s. 2.2)

Only one title ('provisional psychologist') is specified. Although this title might be understood by the public to mean that the person is undergoing training (e.g. a provisional driving license), it could also be understood to mean that the person has had limits placed on their practice due to problematic behaviour. The latter meaning could undermine confidence in the person and negatively impact on the therapeutic alliance.

The guidelines introduce another possible title ('intern') by using the term 'internship' to refer to the overall supervised practice program. Given that members of the public are familiar with the title 'intern' in the health system (referring to a doctor in training), the title 'intern psychologist' is likely to be understood more accurately than 'provisional psychologist'.

Recommendation A1:

That the PBA allows the option for a person registered as a provisional psychologist pursuant to s.62 of the National Law to use the title of either 'provisional psychologist' or 'intern psychologist'.

A2. 40 per cent client contact throughout Internship (s. 3.2, s. 4.3)

The requirement that a provisional psychologist must be involved in direct client contact for 40% of all placement hours has ethical and legal implications. The ethical responsibility for the provisional psychologist is not to practice outside of their skill and knowledge. The ethical and legal issue for the supervisor is not to instruct the provisional psychologist to act outside of their skill and knowledge (to do so is termed 'negligent entrustment' in North America). Given that the undergraduate four year degree in psychology focuses on the theoretical and experimental bases of psychology, but not on practical skills and knowledge, the majority of new provisional psychologists have little or no practical skills or knowledge for working in an applied psychology setting, that is, it is arguably neither ethically nor legally viable for them to provide direct client contact.

The proposed 5+1 training process should resolve these ethical and legal issues because the provisional psychologist will acquire applied knowledge and skills in an educational setting during a transitional year between undergraduate psychology education and work in an applied psychology setting. However, the proposed 4+2 program makes the ethically and legally questionable requirement that a provisional psychologist commences 40% direct client work immediately after graduation from an undergraduate program. Alternatively, the implication is that new graduates should gain the necessary skills and knowledge somewhere else so that they can ethically embark on a 4+2 supervision program.

If the proposed requirement is not changed, then the Guidelines should

- a) highlight the ethical and legal implications for provisional psychologists and supervisors of 40% direct client contact outside of areas of demonstrated competence, and
- b) acknowledge that, in the majority of cases, the 4+2 program (with 40% client contact from the start) can only be embarked upon after considerable transitional skills and knowledge training.

The NSW Psychologists Registration Board has addressed the above issues by allowing a transitional placement year as a 'limited placement'.

“s. 3.5 Face-to-face client contact. The placement should provide eight hours per week of face-to-face client contact. Interns in the early part of their internships may not have the competency to meet this requirement and may be required to shadow their principal supervisor or other appropriate training staff as the intern’s competencies develop. By the second year of the internship interns should be completing at least eight hours per week of face-to-face client contact. If this is not achieved, the placement will be deemed limited (see Section 3.7).

s. 3.7 What constitutes psychology work? Applications for provisional registration or changes in supervision plans containing placements that the Board consider lack the necessary breath of psychological content but do contain significant psychological work may be approved. However, such placement can only be used to comprise a maximum of 12 of the 24 months of supervised placement requirement for full registration.” (*Supervision Guidelines*, NSW Psychologists Registration Board, August 2009)

In the NSW supervision training workshops the metaphor of a driving license is used to highlight the training/supervision needs of provisional psychologists.

- When they first graduate, most provisional psychologists are qualified only for an L plate; they need thorough skills and knowledge training and must not operate the car without a supervisor sitting beside them (no direct work alone). L plates are generally applicable for a period of up to 6 months.
- Once they achieve basic competency the provisional psychologist is given a Red P plate. They are permitted to operate the car alone, but with considerable limitations and need very close supervision. Red P plates are generally applicable for a period of up to 6 months.
- Once they have gained some experience with limited practice, they are given a Green P plate. A Green P plate provisional psychologist should have sufficient competence to carry a 40% direct contact caseload, that is, to meet the requirements of a ‘full’ placement.

If the 4+2 guidelines were modified to allow up to one year of ‘limited’ placement, they would be congruent with the proposed 5+1 program; that is, both would have a one year period of supervised skills and knowledge training before embarking on a year of full time psychology work that includes 40% direct client contact.

Recommendation A2:

That the PBA
either

a. highlights the ethical and legal implications for provisional psychologists and supervisors of 40% direct client contact without outside of areas of demonstrated competence, acknowledging that, in the majority of cases, the 4+2 program can only be embarked upon after considerable transitional skills and knowledge training.

or

b. allows a ‘limited’ placement period of up to one year, that is, a placement that has significant psychological content, with the opportunity to develop applied skills and knowledge under supervision, but has limited ‘direct client contact’ (ranging from no direct contact at the start through to several hours per week towards the end of the limited placement period), and highlights the ethical and legal importance of ensuring sufficient competence before the provisional psychologist undertakes direct client work.

Some points in relation to these recommendations:

- The proposed guidelines specify a minimum of 1232 hours of face-to-face client contact; that is, 14 per week. If Recommendation A2 (b) is adopted, this needs to be

reduced to 616 hours during the 'full' placement year (it would not be reasonable to expect a provisional psychologist to carry more than 14 hours per week direct case load). An additional figure could be specified for the 'limited' placement year (perhaps 100 hours during the equivalent of the Red P plate period?).

- Perhaps a hurdle from the 'limited' to 'full' placement could be identified, that is, that the provisional psychologist must be deemed by their supervisor to be sufficiently competent to move to 40% direct client contact. This could occur at the start of the placement program (for those who have gained sufficient competence before starting the 4+2 program), or at any time up to one year after starting the 4+2 program. Those who need more than one year to gain sufficient competence could be required to undertake further 'limited' placement time before starting one year of 'full' placement.
- Structured telephone counselling (e.g. on a gambling line) is excellent experience for a provisional psychologist, especially when they are on L or Red P plates. Instead of restricting phone counselling to 194 hours of client-related activities (s 4.3), phone counselling could be permitted without limits as a training/experience activity during the 'limited' placement period.

A3. Non-client-related activities (s. 3.5)

A small proportion of any psychologists' time is taken up with tasks such as "clerical duties, marketing and promotion, management duties and driving between client appointments" (pp 5-6), and attending staff meetings, etc. A provisional psychologist would not be an active team member if they did not perform these tasks along with their supervisor and other staff members. The proposed guidelines exclude the tasks from the 35 hours per week, which means either that a provisional psychologist must work for more than 35 hours per week or that they must extend their period of provisional registration beyond 2 years in order to meet the total hour requirement. It also complicates the recording process. If there an evidence base for taking a position that "35 hours per week of client contact and client related activities" has a significantly improved outcome than, for example, "28 hours per week of client contact and client related activities plus 7 hours of the normal, general work of a psychology position" (travel, meetings, clerical, etc.)"

Recommendation A3:

That the PBA revises the minimum limit on the proportion of time that must be spent on "client contact plus client-related" activities (e.g. reduces the requirement from 35 of 35 hours (100%) to 28 of 35 hours (80%)).

A4. Concurrent placements (s. 3.5)

Are concurrent placements permitted? The statement "Provisional psychologists may need to undertake employment in more than one work role to meet the requirements of the internship program" (p. 6) might imply that concurrent placements are permitted or it might be intended to mean that serial range of placements. An option for concurrent placements is important for many provisional psychologists because it is much more likely that they can find two shorter placements than one placement for 35 hours. It could also be argued that it is preferable for their learning that provisional psychologists are involved full time in psychology work (even if across two placements) than spending only half time in psychology work for a longer period of time.

An explicit statement is needed as to whether or not concurrent placements are permitted. If they are, then clarification is needed regarding:

- i) The minimum times allowed. A practical arrangement would be 21 hours in one placement and 14 hours in the concurrent placement – this would mean that the provisional psychologist was present for full days in each placement and had sufficient

- time to provide depth and continuity of experience in each placement. However, the 17.5 minimum rule (s. 3.4 step 1) implies that a 21-14 split would not be permitted.
- ii) Supervision arrangements for each placement. e.g., Principal supervisor on one placement and secondary supervisor on the other?

Recommendation A4:

That the PBA permits two concurrent placements and permits a split of 21+14 or 17.5+17.5 as the allocation of total hours in each placement. Supervision requirements for the concurrent placements need to be clarified.

A5. Group supervision (s. 5.3)

The guidelines specify a maximum of four other provisional psychologists in group supervision. Some teams mix provisional and fully registered psychologists in their group supervision. Is there a reasonable argument as to why the inclusion of a fully registered psychologist would reduce the impact of group supervision on the provisional psychologists in the group?

The guidelines specify that “group supervision should not be confused with professional development activities” (p. 10). Much of the supervision (individual and group) of ‘L plate and Red P plate’ provisional psychologists involves professional development activities – didactic input, skills demonstration, role play, etc. These activities are also a part, to a lesser extent, of supervision of ‘Green P plate’ provisional psychologists and of consultation to fully registered psychologists. If professional development activities are to be excluded from supervision time, then the required 60 hours per year of workshops is grossly insufficient to develop the skills and knowledge required for competence practice as a psychologist.

Recommendation A5: That the PBA

- a) revises the group membership requirement to read “a maximum of four other provisional *or fully registered* psychologists” (p. 10), and
- b) either deletes the statement “group supervision should not be confused with professional development activities” (p. 10) or provides more detail regarding the activities that are permitted during group (and individual) supervision and explicates where professional development training is to take place (in addition to the 60 hours per year of workshops)

A6. “ANY” personal relationship (s. 9.8)

The statement “Supervisors must not enter into ANY personal relationship with provisional psychologists” (p. 25) is noteworthy because it is the only place where capital letters have been used to highlight a requirement. It invites reflection on what ‘ANY personal relationship’ might be. Am I having a personal relationship when I sit next to my supervisee/supervisor at morning tea and have a chat them and other colleagues about the TV show we saw last night? Am I having a personal relationship when I attend the staff Xmas party and find myself in a small group of colleagues who are having a chat and drinking a glass of wine? Am I having a personal relationship when my supervisee takes leave to give birth and I sign the congratulations card and contribute to the present that all the staff send to her?

Capitalised ‘ANY’ implies that all of these normal social interactions between staff are not permitted, but it does not explicate the ethical considerations that apply to supervisor-supervisee relationships.

Recommendation A6:

That the PBA delete “ANY” in s. 9.8 and add one or two sentences that exclude romantic and sexual relationships and note that collegial friendships are appropriate but that care must be taken not to cross the boundary to private friendships.

A7. Responsibility for submitting documentation to Board (s. 3.2, s. 9.2, s. 11.1, s.11.2)

The guidelines attribute responsibility for submitting reports to the Board to “the supervisor and provisional psychologist” (s. 3.2) or to the principal supervisor (s. 9.2, 11.1, 11.2). Given that the Intern is disadvantaged if forms are not submitted on time, and given that the purpose of the internship is to develop an autonomous, responsible professional, it seems prudent to make it the provisional psychologist’s responsibility to submit the paperwork (as is the case in the current NSW requirements).

Recommendation A7:

That the PBA specify that the supervisor is responsible for completing progress and transitional reports within a reasonable time to allow them to be submitted to the Board by the due date (28 days after end of reporting period) and that the provisional psychologist is responsible for lodging the forms with the Board by the due date.

A8. Arbiter of disputes – form of reporting – R4 (p. 26)

The guidelines specify that “The Board cannot be the arbiter of disputes about the content of any forms or reports” (p. 26). Ultimately, when there is disagreement between the supervisor and provisional psychologist, the Board must be the arbiter – either by overriding the provisional psychologists objections and accepting the supervisor’s report or by accepting the provisional psychologist’s disagreement with their supervisor and instructing the supervisor to find a process by which to resolve the disagreement (but what would that be?).

The guidelines do indicate some due process measures such as “ a supervisor must provide regular constructive feedback... and must not wait until the end” (p. 26). However, the guidelines do not highlight all the necessary components of due process and do not specify a process for dealing with issues that arise. The NSW guidelines provide helpful details on due process, including the R4 form to notify the Board of problems.

Recommendation A8

That the PBA provide more details of due process including methods for resolving disagreements between the provisional psychologist and supervisor.

B. QUESTIONS REGARDING CLARITY OF GUIDELINES

There are several places in the guidelines where the details of the requirements are not clear – clarification or further detail would be helpful.

B1. Off-site supervision (s. 3.4 step 2)

The possibility of offsite supervision is noted (p. 5) but the details are not provided of how this can be done or what the requirements are for onsite clinical management. These issues are highlighted on the NSW Psychologists Registration Board’s P2: External Supervisor Approval by Placement Agency.

B2. Organisational Psychologists

The guidelines specify that all psychologists need to be “safe and competent to practice psychology, including delivering psychotherapy for mental health problems using focused psychological strategies” (p. 3), and the core capabilities address this requirement, but there

it is not clear how this fits with specialised groups such as organisational psychologists. Indeed, there is an implication that specialised organisational placements are possible – “the match between the job description and the applicant’s chosen area of focus for the psychology training (e.g. clinical, counselling, organisation, etc.” (p. 6), and “In the case of organisational interventions, the case studies must be of the same rigour and scope” p. 13).

Clarification of “chosen area of focus” and of the minimal requirements for organisational psychologists is needed (e.g., one period of 6 months in a counselling setting to acquire core capabilities in mental health work and 2 case studies directly on mental health interventions?).

B3. Written work

Written work is required for the core capabilities:

- Six target problems (Knowledge of the discipline assessment tasks) (p. 13)
- Reports on tests (individual test of intelligence, test of personality, test of memory; minimum 5 times per area) (pp. 14-15)
- Reports on tests (two tests from two categories; 5 times per category) (p. 15)
- Written communication (case notes, intervention plans or correspondence; 12 examples) (pp. 16-17)
- Reports written for a variety of audiences (p. 16)
- Literature review regarding a problem situation/target behaviour (p. 17)
- Report on six situations in which he or she has identified their professional limitations (p. 19)
- Report on 6 ethical dilemmas (p. 19)
- At least one case study where the client is from a different culture (p. 19)
- At least one case study where the major focus is a client either in childhood or adolescence (p. 20)
- At least one case study where the main focus is a client either in adulthood or late adulthood (p. 20)
- Six case studies – three to be submitted to Board (s. 10.2)

Can any of these items be done in the one report? For example, can the case studies with a client from a different culture and different developmental ages be part of the six case studies detailed in s. 10.2? Could the literature/review required for Research and Evaluation (p.17) be one of the six target problem reports (p. 13)? The written requirements are difficult to understand in the guidelines, especially the many different reports and multiple versions of reports required in the Psychological Assessment and Measurement section.

B4. Development stages

Four developmental stages are listed (p. 19) and it is stated that placements are needed to “provide substantial exposure to client populations within the developmental stages in which the core capabilities are being developed” (p. 20). But only two case studies are required in this section, one on either childhood or adolescence and one on either adulthood or late adulthood. Does this mean that, unless work with all developmental ages is available in the placement, two different placements are required (one in childhood or adolescence and one in adulthood or late adulthood) or are four placements required to cover each development stage? Also, what counts as working with an age group? For example, school counselors provide psychology consultation services to parents and grandparents, but don’t provide therapy for parents and grandparents. Would their role be considered to cover all developmental stages?

B5. Transitional reports

A frequent query in supervision workshops is whether a transition report must be submitted if a 6 monthly progress report has been submitted recently (eg. within previous 2 months or so). A statement could be included in the section on transitional reports (p. 22) that such a report is required if any further work or supervision (even just a week) has been completed since the last 6 monthly report.

B6. Which 3 case studies? (s. 10.2)

When selecting the 3 case studies to submit to the Board, are there any requirements on which ones to select? e.g. include one from a different culture; include one that is a different age group to the others?

B7. Fast tracking?

Can a provisional psychologist fast track (shorter than 2 calendar years) their application for full registration:

- a) if they take less than 8 weeks leave per year? and/or
- b) if they complete more than 35 hours per week?

B8. Secondary Supervisor's Role (s.9) and eligibility requirements (s. 9.4)

Section 9 is titled "Information for principal and secondary supervisor", but most of the information is directed to principal supervisors. More information is needed regarding the secondary supervisor's responsibilities, especially if they become an acting principal supervisor. And can they be off site? And can they provide support by phone?

The information in s. 9.4 regarding supervisor eligibility requirements appears to relate to principal supervisors ("must have held general registration for at least three years"). Further information is needed regarding secondary supervisor requirements.

B9. Timing of Supervision Training (s. 9.4)

When can registered psychologists complete Board-approved training? Currently, in NSW, psychologists must have already been registered for 3 years before they can attend the training. The guidelines imply that psychologists will be permitted to attend when they have been registered for 2 years – so that they can be secondary supervisors – or will there be different trainings for secondary supervisors? Clarification is needed both on 2 or 3 years registration requirement to attend and whether they can attend before the required registration period has been completed (although cannot supervise until the required registration period has been completed) or not attend until it has been completed.

B10. Typo (p. 26)

There is a typo on p.26 (in 10.3). "...requirements have been *met*" (not me).

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