

Psychology Board of Australia
natboards@dhs.vic.gov.au

Dear Board

SUBMISSION REGARDING THE CONSULTATION PAPER ON CODES AND GUIDELINES

Thank you for the opportunity to read and provide comment on the Consultation Paper on Codes and Guidelines. The comments I provide are from my position as the Manager, School Psychology Service in the Department of Education Western Australia. The School Psychology Service employs over 200 FTE and with a total over 280 School Psychologists, it is the largest employer of psychologists in the state. There is a requirement that School Psychologists hold a recognised four year tertiary qualification in psychology and also a teaching qualification. Psychologists who are provisionally registered are provided with supervision towards registration as part of their employment conditions. The service provides direct services to public schools across the entire state of Western Australia. This involves servicing primary, secondary and Education Support schools in the metropolitan, regional, rural and remote areas.

The intent of the consultation paper is highly commendable. There is an obvious desire by the Board to ensure the highest possible professional practice standards and that client safety is protected. Further, the intent of instilling in all psychologists a sense of belonging to the profession in the broader sense rather than to any one aspect of the domain of psychology is apparent. This is built on a premise that ultimately psychologists might change work focus and primary client type over their career.

There are many aspects of the guidelines, especially in relation to the internship program, that are excellent and will undoubtedly improve the quality of and learning from supervision. The principal objectives are positive as are the internship training objectives. Similarly creating potential for secondary supervisors and the focus on targeted records of experience are good strategies to assist the learning process.

I request the Board further consider changes to some aspects of the draft document to improve clarity, create appropriate flexibility and avoid imposition of measures that will introduce inequity, especially for psychologists working in rural and remote settings. The paragraphs below outline specific areas of concern I have identified.

School Psychologists are employed to provide both direct (e.g. assessment and intervention) and indirect psychological services (e.g. consultation) to schools. Both services are recognised and supported by the psychological literature as valuable and legitimate. However, this is not recognised within the guidelines. I believe the guidelines completely devalue indirect services

and the positive impact these can have on multiple clients. The guidelines take a narrow and conservative approach built on a model that may suit clinical work settings but does not capture the richness and diversity in work settings and approaches required in the practice.

On pages two and three of section 3.1 the statement is made that, "For example a provisional psychologist who secures a position working only with children (e.g. in a school setting) will be required to secure another position and in another setting working with adult clients (e.g. in a mental health setting) to achieve all of the core capabilities". This sentence is of great significance. This has potentially colossal impact on the future of school psychology services. From a practical perspective such a requirement will in all likelihood extend the period of internship, especially for rural and remote settings where there may be no such alternative setting available. In turn, this will further deter people from wanting to work in those settings, exacerbate the existing issue of attracting psychologists to the country and ultimately create inequity of access by clients. Surely this is the last outcome anybody wants.

Schools may perceive this requirement to be an unnecessary and conflicting imposition that could reduce their access to the school psychology services they seek. The requirement may make employment by schools of a School Psychologist less appealing than available alternative service providers, such as school chaplains or youth workers. Thus, employment of School Psychologists and community access to their services could be detrimentally affected.

The details of requirements of the other position are not defined. For what duration is another position to be occupied? Further, who will provide supervision in the new work setting and at whose cost?

I request that the Board take into consideration that the Department of Education has a long history of providing quality supervision towards registration for psychologists. At the end of their period of internship School Psychologists have developed extensive knowledge and skills. The supervision enables provisional psychologists to cover the Board's core subject areas. Further, in the course of their work and supervision they provide services for adults (e.g. parents and school personnel) using skills including, rapport building, active listening, empathic responding, reflection, questioning, summarising and negotiation. The extent of this experience provides sufficient grounding for these skills to be readily generalised into and successfully applied with adult clients in other settings. There are numerous examples in Western Australia of School Psychologists who have successfully transferred their skills into working effectively with adult clients in subsequent employment in areas such as Employee Assistance Program provision.

This one sentence requirement has the potential to quickly dismantle a service such as the School Psychology Service in Western Australia, especially the rural and remote aspect. Surely if such a proposal was to be seriously considered an appropriate process of thorough consultation and risk assessment is required before implementation.

The Board's statements on page 11 of the internship guidelines regarding case-by-case handling of matters related to alternative methods of supervision demonstrates a realisation of the complexities and need for tailoring of programs for individual circumstances. This is exceptionally relevant in Western Australia where large physical distances are involved, where provisional psychologists are sometimes located in geographically different places but where customisation has been and will need to be allowed into the future. I request that the Board maintain cognisance of the realities faced by the School Psychology Service and supports the professional judgements made by supervisors and provisional psychologists. Processes of negotiation and flexibility will be required. In this way School Psychologists will not lose employment and schools in rural and remote areas will not be further disadvantaged by a loss of access to the School Psychology Service, a service they value highly.

There will be a need for transition arrangements to be announced once the new internship processes are agreed upon. This will assist provisional psychologists, supervisors and organisations, such as the Department of Education, to make the necessary adjustments without disadvantaging individuals providing psychological services or the clients of these services.

I would like to once again commend the Board on the draft consultation paper on codes and guidelines and express a desire to work with the Board in the finalisation of the matters I have raised above.

Yours sincerely

Chris Gostelow
Manager, School Psychology Service

14 April 2010