



THE UNIVERSITY OF  
**SYDNEY**

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Professor Brin Grenyer,  
Chair, Psychology Board of Australia.

Dear Professor Grenyer,

Thank you for providing the opportunity to comment on the "Consultation paper on codes and guidelines" that was released in March 2010. The School of Psychology at the University of Sydney offers doctoral level training in clinical psychology and is therefore concerned with the range of issues that this paper considers. Overall, the School of Psychology supports the proposals that are outlined in the consultation paper. In particular we support the importance of practice endorsements in informing the public of the level of training and practice of psychology specialities. However, there are a number of issues of concern that we would like to particularly highlight in our response.

**Guidelines for advertising of regulated health services.**

The School of Psychology is very concerned with the proposal that "If photographs of people are used in advertising, the photographs must only depict patients or clients who have actually undergone the advertised treatment and who have provided consent for publication of the photograph" (p.5). In the practice of clinical psychology, it is recognised that attention needs to be given to the unequal power within professional relationships, and the potential vulnerability of patients within such relationships. We therefore do not believe it is ethical for clinical psychologists to depict photographs of former patients, which may put them in a vulnerable position, even having sought their permission. In particular clinical psychologists must give serious consideration to the potential vulnerability of specific groups, such as children, people in a life crisis, people with impairment or disability, or individuals with specific narcissistic and related impulse control disorders that are characterized by poor decision making. For example, members of the School have had direct experience with problem gamblers who have willingly agreed to have their images and personal details portrayed in the media without foreseeing the very real and serious financial, employment and legal consequences of this action.

**Guidelines on area of practice endorsements**

The School of Psychology is in strong support of the seven areas of practice endorsement recently outlined by the Ministerial Council.

In relation to the current consultation paper, the PBA's proposal "to not recognise individualised non-accredited bridging courses" (p.6) is strongly supported as it is also our

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view that such bridging courses do not provide the sustained education, training and supervision that characterised the carefully developed integrated experience in an accredited post-graduate qualification. Using this same rationale, the School of Psychology strongly opposes the equivalence of “post-doctoral bridging courses” to the completion of an integrated post-graduate qualification in an area of practice endorsement. Such bridging courses would not provide the developmental sequence of integrated academic instruction, research development, and application in a variety of settings particular to an area of practice endorsement. Furthermore, such bridging courses would not allow for adequate evaluation of a student’s performance and have no guarantee that an individual meets the required standard of training in the area of practice endorsement. On discussion with our colleagues in the US, we have learnt that similar “respecialization” programmes have significant problems and being used less and less. For example, some of the problems that have emerged include individuals who want to respecialize who come from other disciplines such as education, the increasing requirements as clinical programmes increase their own accreditation requirements, and the problem with offering a consistent “respecialization” programme when individuals might come from very different backgrounds (for example, forensic versus educational/developmental).

**Guidelines for 4+2 internship program: provisional psychologists and supervisors**

In our previous submission the School of Psychology did not support the 4+2 internship program as it does not provide sufficiently rigorous preparation for clinical practice, and sits well below international standards for the profession of psychology. However, given the likely continuation of this pathway, we support the attempts to tighten and strengthen the requirements.

In conclusion, we commend the Psychology Board of Australia for presenting proposals that, in our opinion, will contribute to a viable, high-quality and safe psychology workforce for Australia.

Yours sincerely,

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School of Psychology.