



**The Australian College of Specialist Psychologists**

PO Box 447, South Fremantle WA 6162

Telephone: 08 9487 1859

[www.acsp.net.au](http://www.acsp.net.au)

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## **Consultation Paper 10: Proposed amendment to the provisional registration standard for the 5+1 internship**

The Australian College of Specialist Psychologists welcomes the opportunity to provide a response to the Boards Consultation Paper regarding the introduction of a new pathway to generalist registration.

The Board has indicated in the current consultation paper that the registration standard on provisional registration, which includes provision for both 4 plus 2 and 5 plus 1 internship programs leading to general registration, was approved by the Workforce Ministerial Council on 31<sup>st</sup> March 2010. The concept of the 5 plus 1 pathway (Graduate Diploma of Professional Psychology) however, was first openly discussed by the APS in a special report in their InPsych Magazine (2009, pgs 14-16) where they stated:

*“Although the 5 plus 1 training program does not meet the ultimate goal of producing a single pathway to registration for psychologists, it offers a transitional arrangement that does raise the training standards closer to the international standard of a professional Masters degree. This would represent a significant step towards uniform nationally consistent high standards for practising Australian Psychologists.”* (pg q16)

They also state that:

*“This is proposed as a transitional step towards the ultimate goal of a minimum requirement of a professional Masters degree for registration”.* (pg. 16)

The APS review also examined the training pathways to full registration currently in Australia (up until 2009) and summarised them in a table in their article. What they did not include in their summary table however, was one of the main training routes in WA being, 6 years of university training (Masters degree) plus 2 years of professional supervision. WA has had this pathway for over 30 years and which, prior to National Registration, supported our specialist title registration. This oversight was communicated with the APS along with a concern about creating a new pathway or step towards registration (the Graduate Diploma).

A major concern is that the WA 6 plus 2 pathway, which already meets the international training standards of our major trading partners (US, UK, NZ), appears to have been ignored by the APS and the PsychBoard of Australia. Although this pathway was originally acknowledged by the Board in 2008, when it produced some of the early consultation papers on pathways to registration, since this time it has not been considered as a possible minimum standard for registration in Australia. We would like to understand why this has occurred.



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The ACSP has submitted on many occasions that the 4 plus 2 pathway is insufficient as a training model for registration and as a pathway to professional practice in psychology. This view is supported in an Australian article by Helmes and Pachana (2006) when they examined and compared the Australian training pathways with those found overseas. They explained that the “apprenticeship model” (4 plus 2 pathway) was used in the UK up to the 1970s and in NZ until 2003, after which it was closed as a route to professional practice. This pathway to professional practice was never permitted in the US. Helmes and Pachana state that the apprenticeship model suffers from inadequate training in the empirical bases for assessment and psychological interventions and further:

*“There is no guarantee of a common core of knowledge, a minimal level of skills, exposure to a minimum breath of patients with a range of diagnoses, ages or problem severity, or that the supervision provides training in current evidence-based practice. In addition ethics training for the 4 year trained practitioners is frequently inadequate” (pg 105).*

It also often appears that the decision-makers within the profession of Psychology are more concerned with assisting the Government with workforce issues, than maintaining the high ethical and training standards for the profession. Training standards should not be used to address workforce shortage issues, other ways need to be found and promoted, as suggested in the ACSP recent submission to the Senate Inquiry.

There has been a lack of good leadership in the profession on the training issue, resulting in Australia lagging significantly behind international training standards, and continuing to add less than ideal steps to registration. The primary aim of these international standards is to protect the public, as poorly implemented therapy or inappropriate therapy can be harmful, as it is in any other health care area.

With the inclusion of the 5 plus 1 pathway, there will be five different training pathways, all leading to generalist registration, and allowing a person to professionally practice in psychology. This appears to represent unclear thinking about what standards are actually needed to professionally practice in our profession. To summarize in the table below:

<b>No. Years at Uni</b>	<b>Supervision required</b>	<b>Australian Registration level</b>	<b>Meeting International standards (US, UK, NZ)</b>
4 years	yes (2 years)	Generalist	No
5 years	yes (1 year)	Generalist (soon)	No
6 years	no	Generalist	No
6 years	yes (2 years)	Generalist	Yes
6 plus years	yes (one year)	Generalist	Yes

We sincerely hope that in 2013 (or preferable sooner) a complete revision of this situation will occur making our training standards less confusing and complicated.



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As stated by Helmes and Pachana in 2006:

*“Of greater concern is the continuing state of affairs wherein multiple paths to professional psychological training persist. The historical lack of coordination between APS and State legislatures may have lead to an increase in the number of poorly qualified and poorly trained people legally entitled to call themselves psychologists, who may in fact form an increasing risk to the public” (pg 110).*

An even more concerning situation is the announcement in the APS magazine InPsych (April 2011) of a pilot training program at the University of South Australia. This consists of a three year degree in Psychological Science, and has mainly “practical training” in counselling skills and will allow a person to practice in mental health. There are insufficient safeguards coupled often with poor knowledge in many workplaces, to accurately match the skills required and levels of training necessary to provide appropriate services to people in the community. This issue becomes even more pressing in mental health, when the Federal Government will be funding Medicare Locals and NGOs to contract people to provide mental health services. These agencies may have very limited understanding if the training requirements for good outcomes in mental health care and will consider spreading their capped funding further by potentially rationalising the expertise of those they contract into service delivery. The training institutions of our profession and the Registration Board need to be aware of what is happening in the workforce. This where our training is being interpreted and offering multiple training levels which are not meeting any standards, does the community, especially in mental health, a major disservice.

A concern flowing on from the lack of differentiation in the workforce of the different training levels and what they provide, is that students will potentially lose the incentive to undertake further studies in psychology, when there are quicker and cheaper ways to get open access to the profession with the current lower steps. It is also a concern that Universities will over time readily accept the 5 plus 1 pathway, because a one year Graduate Diploma program is less expensive to support than a two year Masters program. This has the potential effect of the Masters programs becoming less attractive to run and a decision to drop Masters programs would be pushed along if lower numbers of students were to enrol in these longer programs. Is there any guarantee that the Graduate Diploma will actually replace the 4 plus 2 pathway, or could it be that it will replace the Masters plus supervision pathway? Most professionals in the field have found the 2 years of post graduate training plus supervision to be a very good and thorough training base for professional practice and it is clear that by halving the post graduate training, the amount of learning, depth of experience and breath of training will be greatly reduced.

It would be considerably less confusing and more connected to international standards if the Psychology Board simply took the original standards from WA (Masters degree and 2 years supervision), as the minimum standard for registration and professional practice. It could then also argue for specialist registration for the nine specialist area in psychology in 2013.



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In conclusion, the ACSP does not support the introduction of yet another pathway to registration, even as a transitional step.

### **ACSP Recommendations**

- That the PsychBoard make a commitment to phasing out the 4 plus 2 pathway by announcing a time frame for this.
- That the PsychBoard not introduce the 5 plus 1 pathway to generalist registration.
- That the PsychBoard aim towards 2013 as the deadline for Masters plus 2 years supervision being the minimum standard for professional registration and practice.
- That the PsychBoard argue for the introduction of specialist registration for the profession of Psychology in 2013, based on the nine specialist training pathways we have within the profession.
- That the PsychBoard argue with Government that people with only 4 years of University training in psychology from for example, 2000 to 2013, have all post graduate training fees waived, to facilitate them completing postgraduate training.
- That the PsychBoard argue for the Government to utilize approaches to manage workforce shortages in psychology, especially in the mental health sections of our profession, which encourage and facilitate more post graduate training so that we can move towards international training standards.
- That the PsychBoard argue for specialist registration for the nine specialist areas in psychology in 2013.

Thank you for accepting the submission from the Australian College of Specialist Psychologists and we will look towards the Board for their leadership in these matters.

Yours sincerely,

Dr. Jillian Horton  
President of the Australian College of Psychologists