

Mail Box 98, Trades Hall, 54 Victoria Street Carlton South VIC 3053 3rd floor Rear Building, Trades Hall

> www.vicpsych.org.au email: enquiry@msav.org.au

> > tel: 03 9623 9625 fax: 03 9663 8109

> > > ABN 30 345 343 541

Submission of the Victorian Psychologists Association Inc

24 November 2009

to

Consultation Paper on Registration Standards and Related Matters

Issued by the Psychology Board of Australia 27 October 2009

The Victorian Psychologists Association of Victoria Inc (VPA) is an organization which looks after the industrial interests of psychologists employed in health services and community services in Victoria in the public, private and not for profit sectors.

The VPA submission to the *Consultation Paper on Registration Standards and Related Matters* issued by the Psychology Board of Australia 27 October 2009 is as follows:

2.3 Professional Indemnity Insurance

The VPA supports the requirement for all registered psychologists except non-practising registrants to have appropriate PII arrangements in force.

The VPA Inc currently provides professional indemnity insurance to its members under a group scheme with Vero Insurance Ltd.

The VPA Inc and other associations and Unions should be able to continue to offer professional indemnity insurance to their members. Group policies offered by Unions or associations of psychologists should be accepted by the Board along with an employer or university arrangements, provided the level of cover and other requirements are met.

In this context it is noted that the draft PII arrangements standard put forward by the Physiotherapy Board of Australia provides for the provision of PII cover by a registered physiotherapists' union.

The VPA Inc proposes that the PII arrangements include group schemes which registered psychologists are covered by, by virtue of their membership of their union or other association.

2.4 Continuing Professional Development (CPD)

Support the Board's proposal

2.5 Recency of Practice

a. Support proposal for psychologists who have not practiced for 3 – 5 years to provide evidence of CPD (excluding supervision)

- b. Support the proposal that psychologists who have not practiced for 5 plus years will not get automatic registration but *may* be required to undertake supervised practice and additional CPD. We do not support this being termed 'remedial action'.
- c. Psychologists who have not practiced in Australia for more than 3 years but who have practiced and/or been registered in an equivalent jurisdiction overseas within the last three years should be granted registration, subject to adequate evidence of the same.

3 Proposed qualification requirements for general registration of psychologists

- Support the phasing-out of the 4 year university degree plus 2 year internship over 6 years. That is, students enrolled in 4 year undergraduate courses as at 1 July 2010 or enrolled in a 4th year equivalent diploma as a 1 July 2010 may continue with a 2 year Board approved internship, but this is to cease for new enrolments from 1 January 2011
- Current '5 + 1' arrangements be phased out immediately, except for students enrolled as at 1 July 2010
- The base qualification for general registration to be a six year APAC accredited sequence of study with a minimum qualification of a Master's degree
- A person with a PhD (as opposed to a professional doctorate) may be registered having completed a 1 year internship and/or placements at Masters level plus CPD

4 Proposal for specialist registration – The VPA supports option 3

- Support specialist registration by the Board, subject to the proviso that any changes which are
 proposed to the criteria for specialist registration are subject to a process of consultation with all
 stakeholders, including industrial organisations/unions representing psychologists
- Support legislative protection of specialist titles
- Support the minimum qualification for a specialist title being a professional doctorate in the speciality plus one year's approved supervised full-time equivalent practice as proposed
- Support the proposal re equivalence of a PhD with the caveat that all specialist coursework and placement at Master's level have been completed, together with CPD and additional 2 year's supervision
- Psychologists who are currently members of a specialist college of the APS will be registered as specialists under the national Board ('grandfathering')

5 Proposal for endorsement Registered supervisors

- Support the supervision being an endorsed area of practice
- Psychologists who hold state endorsement or registration as supervisors as at 1 July 2010 to be deemed to be endorsed by the national Board
- The minimum number of years of practice to be endorsed as a supervisor needs to be increased from 3 to 5 for psychologists holding general registration
- The minimum number of years of unconditional practice as a specialist to be endorsed as a supervisor needs to be increased from 2 to 4 years

Scope of practice

No-one other than a registered psychologist should be permitted to administer or interpret psychological tests