

17<sup>th</sup> May, 2014

To Psychology Board of Australia,

Below are my submissions to the current consultations. I have made submissions to two areas;

- 1) General Registration Standard Consultation
- 2) Continuing Professional Development

Thank you for considering the submissions.

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Psychologist

## **General Registration Standard Consultation**

### **Policy Review Timeframes**

The proposal to change the timeframe for reviews to 5 years is not appropriate as the current three years it not itself being met. Poor policies can impact upon careers and 5 years is too long for changes.

Further clarification of the timeframe for reviews is needed in regards to whether the review will be completed “within” the timeframe, or whether it will “begin” in that timeframe, or whether the review will occur “after” the set timeframe.

It has also previously been told to me by the Chair of PsyBA that failure to meet the deadlines for reviews is without consequence. This seems to be a poor governance system. I would therefore encourage the PsyBA to publicly provide a list of all codes, policies and guidelines in a table where the review date is listed. Also in this table should be the date the review actually started and completed so members and the public can see when timeframes (set by the PsyBA themselves) are being met. I would also believe that this table should also be included in all communiques sent from the PSyBA with explanation of why review dates were not met when this occurs.

I would also encourage that AHPRA as the overarching body to implement performance management systems to ensure that review dates are met and communicate with the public what these systems are to instil faith in AHPRA and the PsyBA.

## **Continuing Professional Development**

### **Active CPD**

I am fully supportive of the removal of the 'active' requirement for CPD. It has never been defined appropriately and as indicated in the discussion paper, not effective in learning as compared to other methods.

### **CPD Minimum Hours**

It is unfortunate that the board is not looking at the minimum requirements for CPD. As compared to other professions, psychologists require significant more annual CPD hours than other professions. For example:

Chiropractors= 25 hours

Dental Practitioners= 60 over 3 years (20 per year)

Physiotherapists= 20 hours

Podiatry= 20 hours

ATSI= 60 hours over 3 years (20 per year).

From the professions that included an hour system only one other had the same level of hours required which was OTs. The other professions seem to use a point system or were managed by other professional bodies/colleges.

The rationale behind 30 hours seems to be missing from the CPD documents and seems more a historical burden as the APS had that requirement before AHPRA, and it seems to be adopted because that is the way it has always been. The argument that significant CPD hours protects the public also has the flip side with the misnomer that psychologists knowledge and skills expire every 12 months even if in full time practice. I would like to see AHPRA show trust in psychologists and support a recommendation to reduce the hours required annually to 15 hours on average with a move to a triennium system.

### **Annual versus Triennium**

The suggestion to move to a triennium model is significantly important. Often CPD opportunities can fluctuate and if a psychologist completes over 30 hours in a year, the extra hours are discounted and are not considered as useful or relevant. Budgets also fluctuate meaning that opportunities to attend CPD events change as well, so remaining in an annual system depends on budgets remaining constant year to year. It does seem that PsyBA looks in a different direction to this as the guidelines look at what is required monthly (2.5 hours it states) rather than looking more broadly.

### **CPD Subcategories**

I would recommend removal of all subcategories of CPD required, that being, active CPD, and peer consultation. There is no evidence to suggest that these categories improve learning outcomes or improve practice by psychologists. It would seem strange that after so many hours of CPD in one

area, that any further hours are considered not valid or are considered as less than another particular type of activity. For example, someone who has completed their 20<sup>th</sup> hour in workshop training is being told that any further hours are best spent in peer consultation and are actually discouraged from further professional development even if their learning plan highlights that need.

### **Learning Plans**

In relation to learning plans, I would recommend the removal of them. The learning plan seems to be very city-centric as access to training (both location and variety) is increased in metropolitan areas, while those in regional and rural areas have a significant disadvantage in accessing a variety of training. For example, a rural psychologist identifying training in DBT may never get access to such training, while their city cousin is more likely to. Continuing on from the regional-rural and city divide, the cost of workshops/conferences for regional and rural psychologists is often to least expensive item as travel, accommodation and other associated costs are often higher, thus reducing access even further and is only overcome by increasing the financial burden on psychologists and their employers. A learning plan is irrelevant to those who can only attend CPD events based on their availability but still required to get CPD hours.

### **Peer Consultation**

The other aspect worth changing is the notion that only the hours spent in peer consultation in which you are speaking about your practice is eligible to be counted. This is absurd. This requirement is stating that learning from other colleagues, their experience, challenges, mistakes etc cannot occur unless specifically discussing your own work. I would recommend immediately removing this requirement.

### **Professional Development and Peer Consultation Journals**

The professional development and peer consultation journals should also be removed from requirements. The fact sheet on these journals state they are required because

“Written reflection in the journals demonstrates that you have actively engaged in the professional development activities you have undertaken and helps to reinforce learning through integrating theory and practice”

This is flawed reasoning. Firstly, active engagement in professional development can occur in a number of ways.

Secondly, you are recommending the removal of active CPD requirements. How does this differ from the journal requiring psychologists to show active engagement in all CPD activities?

Thirdly, successfully meeting this requirement is extremely subjective.

This requirement also favours those with higher written skills than others and does not represent whether someone has adopted the new skills/knowledge or has reflected upon them or has critically analysed them.