

## Public consultation paper

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19 December 2014

### Consultation paper 24

Proposed amendments to the:

- Provisional registration standard, and
- Guidelines for the 4+2 internship program

#### Public consultation

The Psychology Board of Australia (the Board) is releasing the attached public consultation paper on the review of the *Provisional registration standard* and the *Guidelines for the 4+2 internship program*. You are invited to provide your comments on the documents in this consultation paper, including responses to any of the questions in the discussion paper, by **Friday 27 February 2015**. Please provide your submission in a Word document or equivalent<sup>1</sup> by email to [psychconsultation@ahpra.gov.au](mailto:psychconsultation@ahpra.gov.au).

#### How your submission will be treated

Submissions received are generally published on the Psychology Board website under [Past consultations](#) after the consultation closes.

The views expressed in the submissions are those of the individuals or organisations who submit them and their publication does not imply any acceptance of, or agreement with, these views by the Board.

The Board publishes submissions on the website to encourage discussion and inform the community and stakeholders. However, the Board retains the right not to publish submissions at its discretion, and will not place on the website, or make available to the public, submissions that contain offensive or defamatory comments or which are outside the scope of the consultation.

Before publication, the Board may remove personally-identifying information from submissions, such as contact details. The Board will also publish submissions anonymously if requested by the respondent, in which case all identifying information including name and organisation will be removed before publication.

The Board also accepts submissions made in confidence. These submissions will not be published on the website or elsewhere. Submissions may be confidential because they include personal experiences or other sensitive information. Any request for access to a confidential submission will be determined in accordance with the *Freedom of Information Act 1982* (Cwlth), which has provisions designed to protect

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<sup>1</sup> You are welcome to supply a PDF file of your feedback in addition to the Word (or equivalent) file, however we request that you do supply a text or word file. As part of an effort to meet international website accessibility guidelines, AHPRA and National Boards are striving to publish documents in accessible formats (such as Word), in addition to PDFs. More information about this is available at [www.ahpra.gov.au/About-AHPRA/Accessibility.aspx](http://www.ahpra.gov.au/About-AHPRA/Accessibility.aspx).

personal information and information given in confidence. Please let the Board know if you do not want your submission published, or want all or part of it treated as confidential.

For more information about the consultation process please refer to the document *Consultation process of National Boards* available at [www.ahpra.gov.au/Publications/Procedures.aspx](http://www.ahpra.gov.au/Publications/Procedures.aspx).

The Board does not provide individual responses to submissions. Individuals and organisations seeking a personal reply to specific policy or operational questions raised by this consultation paper are invited to write a separate letter to the Chair of the Board at [psychologychair@ahpra.gov.au](mailto:psychologychair@ahpra.gov.au).

Individuals and organisations seeking advice on making a submission to this consultation such as advice about the format and submission deadline should send their queries to [psychconsultation@ahpra.gov.au](mailto:psychconsultation@ahpra.gov.au), this inbox will be monitored regularly while the public consultation is open.

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## Overview of consultation

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Public consultation on proposed amendments to the:

- Provisional registration standard, and
- Guidelines for the 4+2 internship program

### Background

1. The Health Practitioner Regulation National Law as in force in each state and territory (the National Law) requires National Boards to develop registration standards, which may include registration standards about issues relevant to the eligibility of individuals for registration in the profession. The requirements for registration in the psychology profession have therefore been detailed in the *Provisional registration standard* and the *General registration standard* which were developed by the Psychology Board of Australia and approved by the Australian Health Workforce Ministerial Council<sup>2</sup> (the Ministerial Council) on 31 March 2010 with approval taking effect from 1 July 2010.
2. The *Provisional registration standard* was revised in 2012 to account for the new 5+1 internship program pathway. The revised standard was approved by the Ministerial Council on 27 April 2012 with approval taking effect from 1 June 2012. The June 2012 version is the current version and is available on the Board's website under [Registration standards](#).
3. The Board developed the *Guidelines for 4+2 internship programs* to expand on and supplement the requirements set out in the National Law and the registration standards. The guidelines were approved by the Board with approval taking effect from 1 July 2010. An updated interim version was published on 1 October 2013 to take into account changes to related documents and processes that had occurred since the initial publication of the guidelines in 2010, while a more in-depth review of the guidelines continued. The October 2013 version is the current version of the guideline and is available on the Board's website under [Codes, guidelines and policies](#).

### Purpose of the proposals

4. The role of the Board is to work with AHPRA and other National Boards to achieve the objectives of the National Registration and Accreditation Scheme (National Scheme) in accordance with the guiding principles of the scheme. The proposals in this paper aim to produce a better provisional registration standard and 4+2 internship program that align with the objectives and guideline principles of the National Scheme as well as the legislative functions of National Boards.

### Legislation

5. Every Board decision must support the objectives and guiding principles of the National Scheme. The first consideration in every Board decision is the health and safety of the Australian public and all actions taken by the Board must fall within the functions assigned to National Boards under the National Law. Board decisions must often find a balance between two objectives or principles, such as facilitating high quality education and training of health practitioners while ensuring that the standards are not set impossibly high so as to inhibit the continuous development of the workforce to meet public demand for psychological services.
6. The main relevant sections of the National Law are included in [Appendix B](#) for easy reference. Please take a few minutes to read them and take them into account when providing your feedback.

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<sup>2</sup> Comprising the Health Ministers of the all state and territory, as well as federal governments.

7. To download the full version of the National Law that applies in your state or territory please visit [www.ahpra.gov.au/About-AHPRA/What-We-Do/Legislation.aspx](http://www.ahpra.gov.au/About-AHPRA/What-We-Do/Legislation.aspx).

### Consultation questions

8. The Board is inviting comments on its draft revised *Provisional registration standard*, and draft revised *Guidelines for the 4+2 internship program*. This paper also includes proposed reporting and recording forms to support the 4+2 internship program for comment.
9. This consultation paper provides background and overview of the *Provisional registration standard*, the *Guidelines for the 4+2 internship program*, and the suite of reporting and recording forms to support the 4+2 internship program, as well as explanations of the proposed changes. This paper also includes specific questions about the registration standards and guideline which you may wish to address in your response. Targeted consultation questions are included at the end of each of the three main section of this consultation paper: 1. Provisional registration standard; 2. Guidelines for the 4+2 internship program; and 3. Reporting and recording forms for the 4+2 internship. The consultation questions address matters discussed within each section on which the Board is seeking feedback. You may wish to specifically address some or all of these in your response.
10. The Board is also inviting general comments on the draft revised registration standard, guideline and supporting forms and welcomes any other feedback that is within the scope of this consultation.

### Related documents

11. This consultation paper includes the current drafts of the *General registration standard* and the *Policy for recency of practice requirements* as appendices. These documents were both part of a public consultation paper that was open from April to June 2014 (refer to [Consultation Paper 22 - review of the requirements for general registration, continuing professional development, and recency of practice](#)) and have been updated since to take stakeholder feedback into account.
12. The Board is not specifically seeking further feedback on the revised *General registration standard* and the revised *Policy for recency of practice requirements*, although general comment is welcome; they have been included as appendices as they are relevant to the proposed revised *Provisional registration standard*.
13. The *Provisional registration standard* and the *General registration standard* are closely related and designed to complement each other. Therefore the current draft of the general standard is included at [Appendix F](#) of this consultation paper to enable the proposed general and provisional registration standards to be compared. It is intended that following this consultation on the provisional standard, the general and provisional standards will be submitted to the Ministerial Council for consideration.
14. The *Policy for recency of practice requirements* has been included at [Appendix G](#) of this consultation paper to give context to the proposal to add non-standard transitional or re-entry pathway to the *Provisional registration standard*. The revised *Policy for recency of practice requirements* is intended to supplement the proposed revised *Recency of practice registration standard* which is currently being prepared for submission to Ministerial Council.
15. Please note that these two related documents are exposure drafts, not final documents, and there could be differences in the final versions if requested by the Ministerial Council as the Council must approve the *General registration standard*, and the *Recency of practice registration standard* that the policy at [Appendix G](#) is proposed to support. Further information on the outcomes of consultation paper 22 will be provided via the Psychology Board website in due course.

# Review of the Provisional registration standard

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## Background

16. The National Law requires National Boards to develop and recommend to the Ministerial Council registration standards about various matters, which may include matters relevant to the eligibility of individuals for registration in the profession.
17. The *Provisional registration standard* (the standard) was developed by the Psychology Board of Australia in the lead up to the commencement of the National Registration and Accreditation Scheme (the National Scheme) in 2010 (refer to [Consultation Paper 1 - Registration standards and related matters](#) for more background). The standard was approved by the Ministerial Council on 31 March 2010 with approval taking effect from 1 July 2010. In keeping with good regulatory practice<sup>3</sup> of ensuring that regulation remains relevant and effective over time, the Board scheduled its *Provisional registration standard* for review after three years.
18. The 2010 version of the standard included provision for a new 5+1 pathway and in 2012 when the new pathway became available, the standard was reviewed and updated to include details of the requirements (refer to [Consultation Paper 10 - Proposed amendment to the Provisional registration standard to account for the 5+1 program](#) for more background). The revised standard was approved by the Ministerial Council on 27 April 2012 with approval taking effect from 1 June 2012.
19. Following implementation of the 2012 version of the standard, the Board commenced work on a new internship guideline for the 5+1 program. The 5+1 project indicated there were several opportunities for improvement of the *Provisional registration standard*, particularly with regard to the structure and language, it was therefore agreed to undertake early review of the standard in conjunction with a review of the *Guidelines for 4+2 internship programs*.

## Objectives

20. The main objectives of this review are to produce a revised Psychology Board of Australia *Provisional registration standard* that:
  - provides for the protection of the public by ensuring that only individuals who are suitable trained and qualified to practise as a provisional psychologist under supervision are provisionally registered
  - facilitates the provision of high quality education and training of provisional psychologists in a consistent set of core competencies
  - facilitates access to psychological services in the public interest
  - enables the continuous development of a flexible, responsive and sustainable psychology workforce
  - does not place restrictions on psychology practice unless they are necessary to ensure psychology services are provided safely and are of an appropriate quality, and
  - uses a clear, logical format and is easily understood by a range of audiences and is able to be administered in an efficient and effective manner.

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<sup>3</sup> Council of Australian Governments. (2007). *Best practice regulation: A guide for Ministerial Councils and national standard setting bodies*. Barton, ACT. [www.coag.gov.au/sites/default/files/coag\_documents/COAG\_best\_practice\_guide\_2007.pdf]

## Options statement – Provisional registration standard

21. The Board has considered two main options in developing this proposal:

### Option 1 – status quo

22. Continue with the current *Provisional registration standard* with no changes. The current *Provisional registration standard* is available online at: [www.psychologyboard.gov.au/Standards-and-Guidelines/Registration-Standards.aspx](http://www.psychologyboard.gov.au/Standards-and-Guidelines/Registration-Standards.aspx).

### Option 2 – proposed revised standard

23. Submit a revised registration standard to the Ministerial Council for approval. The Board has identified several ways the current standard could be improved, including using clearer language and revising the structure, definitions and reporting requirements to make it easier to use and understand. The proposed revised standard is at [Appendix C](#) of this consultation paper.
24. The Board does not propose amending the minimum standard of education for provisional registration at this stage, nor changing the provisional registration pathways to become eligible for general registration. However any feedback that clearly demonstrates that a change to these would better achieve the objectives of the National Law will be considered.
25. Currently the Board's view is that the minimum four year sequence of study for entry into provisional registration, and a minimum six year sequence of study for entry into general registration are providing a good balance that produces suitably trained and qualified entry-level practitioners who are able to practise competently and ethically. Overall public demand for psychology services is being met with a flexible, responsive and sustainable psychology workforce<sup>4</sup>.
26. Under option 2 the revised *Provisional registration standard* would continue to establish the Board's requirements for provisional registration, with some minor changes to set out more clearly the qualification requirement, and the eligibility requirements for provisional registration and ensure the standard has clear wording and structure.

### Preferred option

27. The Board prefers Option 2.

## Discussion of proposed amendments

28. A number of matters that the Board would particularly like to highlight with regard to amending the *Provisional registration standard* are discussed in this section. Comments and feedback on any or all of these matters is sought. Feedback on any other issues or ideas for the standard that are not specifically discussed, but are within the scope of this consultation, are also most welcome.

### Rationale for provisional registration

29. The National Law provides for several different registration types that can be made available for the 14 health professions regulated by the National Law. All National Boards offer general and non-practising registration, and other available registration types are utilised or not by the different National Boards according to what is appropriate for each unique profession.
30. The additional registration types are:
- Specialist registration (applies to medicine, dental and any other profession approved by the Ministerial Council under section 13(1)(c) of the National Law)
  - Provisional registration
  - Limited registration (four different categories under sections 66-69 of the National Law), and
  - Student registration.

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<sup>4</sup> Labour Market Research and Analysis Branch Department of Employment. (2014). *Psychologists February 2014*. Australian Government: Canberra. [<http://docs.employment.gov.au/system/files/doc/other/2723psychologistaus.pdf>]



31. When the Psychology Board of Australia was established in 2009, all the options were considered and it was clear that of these, provisional registration was the most suitable option for individuals undertaking training in order to become a registered general psychologist. The Board maintains that provisional registration is the most appropriate registration category to enable individuals to complete the required period of supervised practice to be eligible for general registration as a psychologist.
32. For individuals undertaking an internship program, provisional registration is the only suitable option because they do not meet the requirements set out in the legislation of any other registration type. These individuals hold a four year accredited degree (or equivalent) so are qualified for general registration and therefore ineligible for all categories of Limited registration (refer to section 65(1)(a) of the National Law). However, while qualified for general registration they are not yet eligible for general registration; being qualified for general registration is one part of the broader set of requirements to be eligible for general registration (see section 52(1) of the National Law). Student registration is only available to individuals who are enrolled in an approved program of study and therefore not available to those undertaking unaccredited internships. Specialist registration and non-practising registration are clearly not intended for individuals who are actively practising in a broad generalist training program.
33. Details of qualification and eligibility requirements for each registration type are set out under Part 7 of the National Law.
34. The Board considered whether student registration could be used for higher degree candidates enrolled in accredited and approved programs of study, however provisional registration is a more suitable option for several reasons including consistency, public protection, and increased workforce flexibility through better preparation for general registration.

#### Consistency

35. The Board's view is that all individuals undertaking postgraduate training leading to eligibility for general registration as a psychologist should have a consistent title and consistent obligations and responsibilities as registered practitioners. This is important in helping the public understand more about the registration status and training pathways of psychologists. As provisional registration is the only option suitable for internships, higher degree candidates must also be provisionally registered if there is to be consistency and equality between the pathways.
36. A consistent registration type for the three training pathways also helps to ensure a consistent standard of entry-level competency and to meet the expectations of employers who hire graduates.. Employers want to recruit graduates who are work ready, who have practical experience applying the theoretical concepts learned at university, who have a sound understanding of professional practice issues, professional ethics, industrial/OHWS/legal issues, the ability to communicate effectively with colleagues, manage professional relationships, adapt to different workplace cultures and organisational structures, and who do not require a high level of supervision and workplace training. To facilitate the development of these competencies the Board must ensure there are not unnecessary restrictions on practice and that all training pathways enable development of these vital skills.
37. Provisional registration for fifth and sixth year trainees is also consistent with accepted standard practice in Australia given that prior to national registration commencing in 2010, six of the eight jurisdictions registered fifth and sixth year trainees in a category that is equivalent to provisional registration under the National Law (provisional, probationary, or conditional).

#### Public protection

38. Provisional registration provides more public protection than student registration because provisional psychologists are registered health practitioners; their names appear on the same public register as general, non-practising and limited registrants; and they have the same obligations and responsibilities, such as the obligations to be covered by professional indemnity insurance for all practice, to always practise in accordance with the *Code of ethics*, and to report notifiable conduct. This provides more public protection and also better prepares provisional psychologists for independent practice as a general psychologist.



39. Provisional psychologists are held to greater accountability than students and can therefore undertake placements with more autonomy and flexibility. Under the National Law there is no provision for mandatory notifications about students who practise under the influence of drugs or alcohol (unless this is due to a health impairment such as a drug or alcohol addiction); engage in sexual misconduct; or place the public at substantial risk of harm because they have practised in a way that represents a significant departure from accepted professional standards. Further, grounds for voluntary notifications against students do not include concerns about professional conduct, a lack of knowledge, skill or judgement, or that they are not a fit and proper person (except for criminal history or health/impairment concerns).
40. The lack of public protection from students means that if higher degree candidates were registered as students they would need to be much more closely supervised on placements, would have limited autonomy, limited opportunity for one-on-one consultations, and could not have an independent caseload of clients because the risk to the public would be too high. Psychology as a profession does not align well with this kind of intensive oversight of students, and it is at odds with best practice in training in the profession. Student registration would also remove the option to allow extra experience to be obtained outside the requirements of the higher degree on Board approval (in accordance with the *Policy on working in addition to placements*) because the National Law enables student registration to be granted only for the purpose of undertaking clinical training arranged by an education provider. This level of restriction would be at odds the guiding principles of the National Registration and Accreditation Scheme which include that restrictions on practice should only be imposed if necessary to ensure services are provided safely and are of appropriate quality. Provisional registration is less restrictive but requires sufficient supervision to ensure that services are provided safely and competently.
41. Some further background information on why there is no student registration for higher degree candidates is published online in the Psychology Board FAQ:  
[www.psychologyboard.gov.au/Standards-and-Guidelines/FAQ/Psychology-FAQ.aspx](http://www.psychologyboard.gov.au/Standards-and-Guidelines/FAQ/Psychology-FAQ.aspx).

#### Why not student registration for undergraduates?

42. Some other health professions (such as medicine and pharmacy) have provisional registration for graduates undertaking supervised practice and also have student registration for individuals enrolled in undergraduate programs. However the Psychology Board has determined that the first four years of psychology training do not require registration at this stage. This is primarily because undergraduate students study the science and discipline, and not the practice, of psychology and therefore do not undertake practical placements, making the risks to the public of these students very low. To require student registration for all undergraduates undertaking an accredited psychology sequence would be an unnecessary regulatory requirement with no public benefit.

#### Provisional registration pathways

43. The current *Provisional registration standard* provides for three main pathways to become qualified and eligible for general registration:
1. the standard pathway which is a six-year accredited sequence of study, comprising a Master's degree minimum qualification
  2. the 5+1 pathway which is a five-year accredited sequence of study followed by a one-year Board-approved internship, and
  3. the 4+2 pathway which is a four-year accredited sequence of study followed by a two-year Board-approved internship.
44. The proposed revised standard sets out this information under part (d) of the new *Eligibility* section.
45. The Board proposes retaining all three pathways for the foreseeable future because approximately one third of all psychologists in Australia are trained through Board-approved internships. Some jurisdictions have a much higher reliance on the internships, including the Northern Territory where there is only one psychology Masters program with a small number of places, therefore nearly 80 percent of Northern Territory provisional psychologists are training via the 4+2 pathway. Tasmania has three postgraduate psychology programs but still only has a fairly small number of places so 4+2 interns account for about 60 percent of provisional psychologists. In Western Australia approximately 30 percent of provisional psychologists are undertaking an internship pathway (4+2 or 5+1), in

Queensland it is 40 percent and in New South Wales 50 percent. In the ACT, South Australia and Victoria however, the majority of provisional psychologists undertake the higher degree pathway as there are more places in programs available in those jurisdictions.

46. Therefore discontinuing either of the internships would be likely to lead to shortages in the psychology workforce, and in some jurisdictions there would almost certainly be serious shortages. Any proposal to significantly change or discontinue any of the three main pathways would require a long lead time and the support of government, education providers, the accreditation authority, industry and the profession to ensure demand for services could continue to be met while maintaining a minimum standard of competence for safe and ethical practice.
47. The revised standard also recognises there are non-standard pathways that utilise provisional registration, such as overseas trained psychologists who complete a period of supervised practice in Australia to become eligible for general registration (see the section on Non-standard provisional registration pathway below).

#### Common core competencies

48. The Australian Psychology Accreditation Council (APAC) is responsible for developing accreditation standards for approval by the National Board in accordance with section 42(a) of the National Law. The current accreditation standards (June 2010 version) can be found on the APAC website at [www.psychologycouncil.org.au](http://www.psychologycouncil.org.au) under *APAC Standards and guidelines*.
49. The eight core competencies in the *Provisional registration standard* align with core capabilities and attributes that are set out under six headings at standard 5.1.12. The two additional competencies in the *Provisional registration standard* - working in a cross-cultural context and practice across the lifespan - comprise capabilities and attributes listed under the other six headings in the APAC accreditation standards; this highlights the importance of the cross-cultural and lifespan competencies but does not add further requirements.
50. In order to maintain a consistent entry level standard for psychologists it is important to maintain a consistent set of competencies in the three training pathways, therefore this review of the registration standard proposes to maintain consistency with the current APAC accreditation standards.
51. The APAC standards are currently under review and it is expected that APAC will propose new standards for approval by the Board after the review is concluded. If the Board approves new accreditation standards in the future that include any changes to the core capabilities and attributes, the Board will review the *Provisional registration standard* accordingly to ensure continued alignment.
52. As a result of recent consultation on the *General registration standard* (refer to [Consultation paper 22 - requirements for general registration, continuing professional development, and recency of practice](#)) the Board is proposing to retain the eight core competencies in that standard (see [Appendix F](#)).

#### Non-standard provisional registration pathway

53. A fourth pathway is proposed to be added to the *Provisional registration standard*: a Board-approved transitional program as specified by the Board. This non-standard pathway is already in place but not explicitly referred to in the *Provisional registration standard* or the *General registration standard*. The 'Board-approved transitional program' pathway applies to overseas-trained applicants who undertake the Transitional Program, and for applicants transitioning back into the workforce after a break via a re-entry program to meet recency of practice requirements. Provisional registration can be granted under the National Law without the pathway having to be explicitly referred to in the registration standard, so this is not an essential inclusion. However, adding it may better inform applicants and the public about provisional registration options.
54. The fourth option is shown in the proposed *Provisional registration standard* at [Appendix C](#) and includes footnotes referencing the *Policy for overseas applicants* and the *Policy for recency of practice requirements* where information about the specific supervision programs can be found. The current versions of both policies are published on the website at [www.psychologyboard.gov.au/Standards-and-Guidelines/Codes-Guidelines-Policies.aspx](http://www.psychologyboard.gov.au/Standards-and-Guidelines/Codes-Guidelines-Policies.aspx) under *Policies*. The Board recently agreed to revise the *Policy for recency of practice requirements* following public consultation to include more flexible return-to-practice requirements that can be better tailored to the needs of the individual practitioner.

The current draft of the policy is at [Appendix G](#) and is proposed to be adopted following Ministerial approval of a revised *Recency of practice registration standard*.

55. The exposure draft policy refers to a re-entry program plan template provided by the Board, the template has not been provided in this consultation paper, however for an example re-entry program plan template you can visit the Medical Board of Australia website at [www.medicalboard.gov.au/Codes-Guidelines-Policies/FAQ.aspx](http://www.medicalboard.gov.au/Codes-Guidelines-Policies/FAQ.aspx) and refer to their template under *Re-entry to practice*.

### **Terminology – Replacing the term ‘Masters’**

56. The current version of the *Provisional registration standard*, sets out the recognised pathways and states that ‘the Board has determined that the qualification that leads to registration as a general psychologist is a six-year accredited sequence of study, comprising a Master’s degree minimum qualification, or equivalent.
57. The new Australian Qualifications Framework<sup>5</sup> (AQF), for which universities must be compliant by 2015, defines qualifications by levels, rather than titles. In future, there is expected to be a variety of Masters qualifications of varying AQF levels and years of training, which may create contestable inconsistencies in application of the Board’s standard. For example a qualification at fifth year level may be titled ‘Masters’ but recognised as a fifth year qualification for the 5+1 internship pathway, not a fifth and sixth year qualification for the higher degree pathway, and both Masters courses may be classified as AQF level 9. Therefore to allow better alignment with the AQF while removing potential for misunderstanding of the Board’s intention, the revised standard will refer to year levels e.g. ‘fifth and sixth year’, instead of ‘Masters’ to differentiate between AQF9 masters by coursework and masters extended degrees.
58. Use of this terminology in the standard for the purpose of clarifying registration requirements will not affect a registrant’s ability to state their Masters qualification in advertising of any kind, or to record the full title of the Masters qualification on the *Register of practitioners*. Similarly, use of the term ‘fifth to seventh year of study’ in the standard does not change the registrant’s right to advertise their doctoral qualification, record it on the register, and use the title ‘Dr’ (provided it is used in accordance with section A5(b) of the *Guidelines for advertising regulated health services*). Alignment with the AQF will not affect how a Masters qualification is viewed by the public, employers, clients, and the academic community given that the term ‘Masters’ is widely understood.

### **Qualification for provisional registration**

59. The proposed revised standard has a new section ‘*Qualification*’ that clearly states the qualification requirement for entry into provisional registration. In the current standard qualification information is included under ‘*Summary*’.
60. Definitions of ‘accredited sequence of study’ and ‘qualification’ have also been added to the revised standard to help clarify that while postgraduate degrees and workplace internships and transitional programs are all supervised practice training programs, they are not all qualifications. An internship will not be recognised as an academic qualification for other purposes such as entry into the Board’s Registrar program, and should not be expected to be recognised as such by other organisations including overseas regulatory authorities, immigration departments, professional associations, and employers.

### **Eligibility for provisional registration**

61. Under section 62 of the National Law, in addition to being qualified for registration an applicant must meet other requirements to be eligible for provisional registration. The proposed standard has a new section on eligibility that clearly sets out the eligibility requirements. In the current standard eligibility information is included under ‘*Summary*’. Separating qualifications requirements and eligibility requirements also aligns the standard more closely with the National Law.

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<sup>5</sup> Australian Qualifications Framework Council. (2013). *Australian Qualifications Framework (2<sup>nd</sup> ed.)*. Canberra, ACT: Quality and Deregulation Branch, Department of Education. [<http://www.aqf.edu.au/>].

62. Eligibility requirements of the National Law include that the individual must meet any requirements set out in an approved registration standard – i.e. the *Criminal history registration standard* and the *English language skills registration standard*.
63. To be eligible for provisional registration the individual must genuinely require provisional registration in order to complete a recognised supervised practice pathway. The proposed revised standard sets out more clearly the four programs of supervised practice ('pathways') that can require provisional registration:
- higher degree pathway
  - 5+1 internship pathway
  - 4+2 internship pathway, or
  - non-standard pathway for overseas trained applicants and return-to-practice applicants.
64. The proposed revised standard is also intended to be more user-friendly for overseas trained applicants as there is specific reference to the transitional program as a pathway under the new eligibility section, whereas the current standard does not specifically refer to the program.

### **Registration options for higher degree pathway provisional psychologists**

65. The current provisional registration standard requires that students enrolled in an accredited higher degree must be provisionally registered from the commencement of enrolment and for the duration of enrolment. The draft revised standard at [Appendix C](#) retains this requirement; however the Board is seeking feedback on alternatives for the registration of higher degree candidates.
66. The options for consideration are:
1. provisional registration is required for the entire duration of enrolment in the degree (or until general registration is granted) – this is the current requirement
  2. provisional registration is required prior to commencement of the first placement, and then must be maintained for the remainder of enrolment in the degree
  3. provisional registration is required prior to commencement of the first placement, and then must be maintained until the final placement is completed but may be allowed to lapse after placements are completed while continuing with coursework and/or the thesis, or
  4. provisional registration is required only while undertaking placements and is allowed to lapse in between placements and after all placements are completed while continuing with coursework and/or the thesis.
67. For all these options the Board would continue to require that provisional registration must be held at any time that:
- the title 'provisional psychologist' is used, and
  - there is direct client contact, such psychological testing when undertaking a research thesis or for any other reason, and
  - the individual undertakes psychological work in a role that is not part of university placements, in accordance with the *Policy on working in addition to placements* (available on the Board's website under *Codes, guidelines and policies*).
68. If an option that allows for provisional registration to lapse while still enrolled in the degree (options three and four) is adopted, the provisional psychologist would have the choice whether to maintain registration or let it lapse.
69. For all options the provisional registration period would continue be 12 months. Under section 64 of the National Law the Board must decide a time period of no more than twelve months that applies to all provisional registrations. Consequently the Board cannot grant provisional registration for different periods, which rules out granting registration only for the duration of a specific placement; therefore for all options the same registration fee for twelve months' registration would apply.

70. The aim is to choose an option that provides sufficient public protection and has the minimum amount of red tape necessary to ensure that higher degree interns have current registration at any time that the protected title 'provisional psychologist' is used, for all practical placements, periods of time when supervision groups and other case conferences and reviews occur, and at any other time there is direct client contact while practising as a provisional psychologist.
71. The best option should also have regard to the efficient and effective operation of the National Scheme and consider the costs to all parties – including applicants, AHPRA and the Board, higher education providers, higher degree placement providers and any other organisations that may be affected.
72. In determining the most suitable option, some things to consider are:
- a. Whether there are financial impacts (positive or negative), particular for education providers and placement providers, associated with the different options.
  - b. How far in advance placements are confirmed and whether there would always be sufficient time for preparation by the applications (including arranging an academic transcript) and processing by AHPRA of an application for provisional registration after confirmation and before commencement of a placement. Four to six weeks should generally be allowed for a completed application for provisional registration to be finalised by AHPRA and the National Law allows up to 90 days for a registration decision to be made.
  - c. If a placement is due to commence but the higher degree student does not have provisional registration in place they will not be able to undertake the placement. Who would be impacted by this and what would be the impacts be?
  - d. When a higher degree candidate first applies for provisional registration it is the first time they consent to a criminal history check and declare any registration history or impairment that could affect their suitability to be registered. This is the Board's first opportunity to check for any 'red flags' that may be a barrier to their ability to go on to become a registered general psychologist.
  - e. An advantage of the current requirement to register at the commencement of enrolment (option 1) is that it is more efficient and cost effective to administrate than the alternatives given that most higher degree candidates will apply for registration at the same time of year.
  - f. Options 1 and 2 are consistent with the National Scheme's definition of practice in the profession, which includes undertaking research.
  - g. Options 2, 3 and 4 would place increased responsibility on students and education providers to ensure that registrations are in place for placements. Options 2 and 3 place increased responsibility on students to keep abreast of any legislative or policy changes that could affect them in the future while they are unregistered and not receiving any updates from the Board.

## Definitions

### Internship plans

73. Details of the requirements for the 4+2 internship program plan and the 5+1 internship program plan are proposed to be included in the definitions sections of the revised provisional standard. This includes the eight core competencies, and the framework on which the plan to achieve the core competencies is based: minimum hours of psychological practice, supervision and PD, case reporting, and progress reporting. This has created a lengthy definitions section; however this detail gives provisional psychologists, supervisors and their employers more assurance about requirements and protection against any changes that could be disadvantageous. It also helps to avoid jurisdictional bias in interpreting the requirements of the internship plan.
74. Internship programs are not accredited and are not specifically accounted for under the National Law. Therefore inclusion of a specific framework in the registration standard strengthens the requirements of the program because a registration standard is a legal document that is developed in accordance with the provisions of the National Law and approved by the Ministerial Council. Legal advice has confirmed that a training program framework in line with international standards must be specifically [Psychology Board of Australia - Consultation paper 24: Provisional registration standard and Guidelines for the 4+2 internship program/December 2014](#)



set out in the standard to ensure the highest level of protection available (for both boards and applicants) in the absence of legislation. It is not sufficient to state, for example that it is a requirement of a registration standard that aspects of a guideline must be complied with.

75. Outlining the framework of the internship plans in the registration standard also protects the integrity of the profession by ensuring consistent training. It gives the public confidence that all registered psychologists have undertaken a minimum period of training to achieve the requisite standard.
76. The framework of the internship component of the 5+1 internship program pathway in the standard are proposed to be amended to align with those set out in the *Guidelines for the 5+1 internship program* (available on the Board's website under *Codes, guidelines and policies*). The minimum hours of psychological practice, professional supervision and professional development in the proposed revised standard are almost the same as the current standard but are rounded to whole numbers that are multiples of 10 to make them easier to work with. The hours are also more clearly set out by stating the specific minimum hours (such as 560 hours of direct client contact), whereas the current standard requires some working out (e.g. client contact must be 40 percent of the psychological practice component which equals total hours (1,540) less professional development (60 hours) and supervision (1,480/17.5)).

### Competencies

77. A definition of 'core competency' is proposed to be included in the revised standard. The core competencies that must be developed in the supervised practice pathways to meet the entry level standard for general registration are proposed to remain the same, as they are consistent with Australian accreditation standards and international standards

### Key terms

78. The proposed revised standard included additional key terms including 'Board', 'National Law', and 'Provisional Psychologist'. It has also been proposed to add definitions of 'qualification' and 'accredited sequence of study'.

### 79. Review timeframes

80. When the Board developed its suite of registration standards and guidelines in 2010 it agreed that it would review its standards, code, guidelines and policies every three years. Three years was considered an appropriate timeframe as it was felt that the review of the suite of completely new standards and guidelines should happen as early as possible, while still allowing the new requirements to be sufficiently tested through two full renewal cycles after the transitional period.
81. It is expected that less regular review will be sufficient in the future as the Board's standards and other publications are refined and improved. The Board has a responsibility to ensure efficient and effective operation of the scheme which is fully funded by registration fees. This includes maintaining a balance between regular reviews of registration requirements in accordance with good regulatory practice and ensuring that resources are not overcommitted to cyclical review of Board publications. The review period must be sufficient for proposals to be well researched, for a rigorous and wide-ranging consultation process including appropriate consultation with government, and for new publications to be sufficiently tested in practice before they are reviewed again. The Board believes that a five year review cycle would achieve this balance.
82. Therefore the Board proposes that the next review of the *Provisional registration standard* will commence within five years of implementation of a revised standard following this current review. Early review the *Provisional registration standard* may be undertaken if necessary to ensure its continued relevance and workability in a changing regulatory environment.

### Potential benefits and costs of the proposals

83. The benefits of the preferred option are that the draft revised standard:
  - is more flexible and user-friendly
  - strikes a better balance between protecting the public and impact on applicants, and
  - has been reworded to be simpler and clearer.

84. The costs of the preferred option are:

- applicants for provisional registration, registered provisional psychologists, employers of provisional psychologists, Board-approved supervisors, higher education providers, other stakeholders, AHPRA, and the national and regional psychology boards will need to become familiar with the new standard, and
- there may need to be a period of transition to the proposed revised standard, if approved.

**Estimated impacts of the draft revised registration standards**

85. The changes proposed in the draft revised *Provisional registration standard* are relatively small, although more significant changes may be proposed through this public consultation. There is little impact anticipated on practitioners, business and other stakeholders arising from the changes proposed.

**Attachment**

The Board's *Statement of assessment against AHPRA's Procedures for development of registration standards and COAG principles for best practice regulation* is at [Appendix A](#).



## Consultation questions on the *Provisional registration standard* for consideration:

### Options statement – provisional registration standard

1. What is your preferred option for the provisional registration standard – option 1 status quo, or option 2, the revised standard (with or without further revisions)?

### Rationale for provisional registration

2. Is there a public benefit to introducing student registration for undergraduate psychology major students that the Board has not identified?

### Non-standard provisional registration pathway

3. Do you have any feedback about the proposal to include an option for non-standard applications for provisional registration that applies to overseas- trained applicants and return-to-practice applicants?
4. Are there other circumstances where the Board should grant provisional registration that have not been allowed for in the proposed *Provisional registration standard*?

### Registration options for higher degree pathway provisional psychologists

5. What is your preferred option for the registration of higher degree interns? (Options 1-4)
6. Which factors influence your preferred option?
7. If a placement is due to commence but the higher degree student does not have provisional registration in place they will not be able to undertake the placement. Who would be impacted by this and what would be the impacts be?
8. What other impacts would changing the registration requirements for higher degree provisional psychologists have?

### Definitions

9. Are there any definitions that should be amended or added to the standard?

### General questions

10. Do the proposed revisions the *Provisional registration standard* improve clarity and make the standard easier to understand?
11. Is there any content that needs to be changed or deleted in the revised draft registration standard?
12. Is there anything missing that needs to be added to the revised draft registration standard?
13. Do you have any other comments on the revised registration draft standard?

# Review of the Guidelines for the 4+2 internship program

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## Background

86. The Health Practitioner Regulation National Law as in force in each state and territory (the National Law) states that a National Board may develop and approve codes and guidelines to provide guidance to the practitioners it registers. The *Guidelines for the 4+2 internship program* (the guidelines) provide guidance to registered provisional psychologists undertaking the 4+2 pathway to become eligible for general registration, and to their supervisors and employers.
87. A national guideline for the 4+2 internship program was first developed in 2009/2010 in the lead up to the commencement of the National Registration and Accreditation Scheme (National Scheme) and they took effect from 1 July 2010. A background paper on the development of the national internship model is included at Attachment B of [Consultation Paper 1 - Registration standards and related matters](#) which is published on the Board's website under [Past consultations](#). Development of the national guidelines included a comprehensive review of the eight state and territory 4+2 internship programs that were in place before the National Scheme began. Copies of supervision guidelines for the previous state and territory programs are available online on the [pre-July 2010 supervision programs](#) page under *Registration > Forms*.
88. An updated interim guideline for 4+2 internship programs was published by the Board on 1 October 2013 to take into account changes to related documents and processes that had occurred since the initial publication of the guidelines in 2010. However there were no substantial changes to the structure or requirements of the program made at that stage, as more detailed review and comprehensive consultation with the profession, public, and stakeholders is necessary before making significant changes.
89. The proposed revisions to the guidelines take into account feedback received from a variety of sources including: the Board's preliminary newsletter consultation on workforce issues in November 2011; [Consultation Paper 19 on draft Guidelines for the 5+1 internship program](#) in May 2013; questions submitted for the Chair to address at national forums; and correspondence from individual psychologists, provisional psychologists, supervisors, professional associations, employers, educational institutions and other stakeholders.
90. **Objectives**
91. The objective of this consultation is to produce an improved Psychology Board of Australia guideline for the 4+2 internship program that:
- supports the objectives and guiding principles of the National Scheme, and supplements and complements the provisional registration standard
  - ensures that provisional psychologists receive sufficient support and oversight and reasonable steps are taken to minimise the risk of harm to clients and the public
  - recognises and values the skills and knowledge of the profession and promotes supervision responsibility
  - consistently prepares practitioners to practise safely and ethically in independent practice as a general psychologist
  - ensures consistent entry level-standard for general registration as a psychologist across the higher degree and internship pathways and across the participating jurisdictions
  - is sufficiently flexibility to allow for jurisdictional, regional, organisational and individual differences were appropriate without compromising efficiency and public safety.
  - enables innovation and technology in the delivery of supervision and training
  - supports employers and industry and ensures that regional and remote internships are viable
  - is clearly set out in a guideline that uses a clear, logical format and is easily understood by a range of audiences and is able to be administered in an efficient, effective and consistent manner.

## Options statement – Guideline for the 4+2 internship program

92. The Board has considered two main options in developing this proposal:

### Option 1 – Status quo

93. Adopt the existing interim guideline as the new guideline. The current interim *Guidelines for 4+2 internship programs for provisional psychologists and supervisors* are available on the Board's website at [www.psychologyboard.gov.au/Standards-and-Guidelines/Codes-Guidelines-Policies.aspx](http://www.psychologyboard.gov.au/Standards-and-Guidelines/Codes-Guidelines-Policies.aspx).

### Option 2 – Proposed revised guideline

95. Adopt a new 4+2 guideline including a number of changes to the requirements, definitions, and some components of the program. The proposed revised guideline is at Appendix D, which is a separate attachment to this consultation paper.

96. The Board has already undertaken comprehensive consultation with the professional, employers and key stakeholders in order to identify the main issues with the current guideline and ways in which the 4+2 internship program can be improved to better align with the objectives of the National Law. The Board has identified several ways in which the current guideline could be improved including:

- increased responsibility for supervisors
- streamlining of the assessment requirements
- recognition of technology and innovations that can be used in the internship
- clarification of language and revision of the structure to make it easier to understand, and
- increased flexibility in how the competencies can be demonstrated and assessed.

### Preferred option

97. The Board prefers Option 2.

## Discussion of proposed amendments

98. This paper presents the Board's proposals for revision of the 4+2 internship program, several of which have already been implemented for the 5+1 internship program and included in the *Guidelines for the 5+1 internship program*, released in December 2013. Feedback on how various aspects of the 5+1 internship are working in practice is being taken into account for the 4+2 internship program.

99. At this stage the Board is not proposing to amend the following key requirements of the 4+2 internship program:

- the qualification and eligibility requirements for provisional registration and entry into the 4+2 internship program (a four year accredited sequence of study or equivalent)
- the eight core competencies
- a two-year internship program that is aligned with the two-year minimum (Masters) in the higher degree pathway
- the internship must include: psychological practice including direct client contact, professional supervision with a Board-approved supervisor, and profession development.

100. However proposals for changes in these areas to better meet the objectives of the National Law are welcome.

101. A number of matters that the Board would particularly like to highlight are discussed below. Comments and feedback on any or all of these matters is sought. Feedback on any other issues with, or ideas for the guidelines not specifically discussed, but which are within the scope of this consultation, would also be most welcome.

## Two part internship

102. The proposed revised guideline has new sections outlining the areas of focus in the two years of the internship. It is proposed that the first year of the internship should focus on the acquisition of foundation skills, knowledge and competencies relevant to psychological work.
103. 4+2 pathway and 5+1 pathway provisional psychologists should all enter the sixth year internship with a comparable level of skill, knowledge and progress towards achieving the eight core competencies. The Board believes that some alignment with fifth year degree programs including a strong focus on skills acquisition in the first year of the 4+2 internship would help achieve this.
104. The second year of the internship should provide an opportunity to build on and extend the basic competencies to a level expected of a generally registered psychologist. The second year of the 4+2 internship program has been closely aligned with the final year of the 5+1 internship program.

## Assessment of the core competencies

105. Supervisor assessed tasks which develop the core competencies are set out in sections 2.43-2.49 of the draft guideline. This guideline places a strong focus on the role of the supervisor as the training provider and primary assessor in the internship.

## Psychological assessment and measurement

106. The current published 4+2 guidelines have detailed training objectives for this competency including mandatory psychometric testing category requirements (intelligence, personality and memory) and a detailed list of elective tests.
107. In 2012, following consultation with the professional and the public, the Board approved the *National psychology examination curriculum*. One of the four examination domains – *Domain 2 Assessment* includes detailed information about the skills and knowledge candidates need to have, including the different psychometric tests that candidates will be required to know in detail or be generally familiar with. Since 1 July 2014 all applicants for general registration who complete the 4+2 pathway are required to pass the exam to be eligible for general registration.
108. Currently the psychometric testing, assessment and diagnosis for the 4+2 internship and the exam are very similar but with a few differences that could be confusing for a candidate who is trying to meet the requirements of both. The Board proposes to simplify the testing requirements for the 4+2 internship by removing detail of assessment and measurement requirements and elective tests from the guideline. Instead interns and supervisors would refer to the exam curriculum and ensure that knowledge and practical experience in all the areas covered in the exam are incorporated into the internship program plan.
109. The Board believes that together with the exam, evaluation of psychological assessment and measurement skills should include some direct observation of the provisional psychologist by their supervisor/s. Observation of psychometric testing includes observing the administration of the test (in person or recorded), and supervising and reviewing the scoring, interpretation and report writing. The Board has also proposed that each test must be competently demonstrated to a supervisor more than once which allows the supervisors to report on the provisional psychologist's competence with more confidence.
110. The Board also proposes more flexibility in how and when competence may be demonstrated – it may be demonstrated live, via recording or distance communication, or in a realistic simulated learning environment; and it may be demonstrated at any time as the Board proposes to remove the minimum number of times the test must be practised. Removing the minimum number of practise tests means the minimum number of times tests could be administered in the internship would much lower under the new guideline; however in practice the number of times an individual needs to administer a test to be competent is not affected by a minimum set by the Board. This change does not reduce the level at which one is competent – rather it shifts the focus to the importance of the output rather than the input and recognises that different interns learn and different rates. It is important that intern becomes competent with using the test – not how many times it took them to achieve competence.

111. A summary of the proposed requirements for psychometric testing compared with the current requirements is as follows:

Current requirement	Proposed requirement
<ul style="list-style-type: none"> <li>• One adult test of intelligence, <b>or</b></li> <li>• One child test of intelligence</li> </ul>	<ul style="list-style-type: none"> <li>• One adult test of intelligence, <b>and</b></li> <li>• One child test of intelligence</li> </ul>
<ul style="list-style-type: none"> <li>• <b>One</b> standardised test of personality</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Two</b> standardised tests of personality</li> </ul>
<ul style="list-style-type: none"> <li>• One specialised test of memory</li> </ul>	<ul style="list-style-type: none"> <li>• One specialised test of memory</li> </ul>
<ul style="list-style-type: none"> <li>• Four other tests selected from a list of test categories where two categories are chosen and two tests chosen from each category</li> </ul>	<ul style="list-style-type: none"> <li>• Four other tests selected from the national psychology examination curriculum (any categories)</li> </ul>
<ul style="list-style-type: none"> <li>• Each of the tests must be administered, scored, interpreted and reported on at least five times and must be competently demonstrated at least once.</li> <li>• As many practise tests as necessary to achieve competence but no less than five each.</li> <li>• Minimum testing requirement: 7 tests administered at least 5 x each = <b>35</b></li> </ul>	<ul style="list-style-type: none"> <li>• Each of the tests must be competently administered, scored, interpreted and reported on at least twice to the observing supervisor.</li> <li>• As many practise tests as necessary to achieve competence (no minimum).</li> <li>• Minimum testing requirement: 9 tests administered at least 2 x each = <b>18</b></li> </ul>
<p>The minimum of <b>five</b> test demonstrations from each category must be demonstrated <b>on real clients in the workplace</b>.</p>	<p>The minimum of <b>two</b> competent test demonstrations may be demonstrated <b>to an observing supervisor with real clients or in realistic simulated learning environments</b>.</p>

### Case reports

112. Case studies have been renamed 'case reports' which reflects the updated format and more accurately describes this critical requirement of the supervision program. Provisional psychologists and supervisors are familiar with various formats for case studies in the university settings and in the professional literature; however some of these are unsuitable to the specific requirements of the internship. Changing the name and format is designed to focus the provisional psychologist on the specific requirements to report on actual intervention and assessment with real clients using a specific report format. It is not unusual in actual practice for statutory bodies to require that psychologists provide reports using specified format.
113. Case reports provide evidence of competent practice by provisional psychologist documented using Board specified format and criteria and having a specified format and assessment criteria for case reports is designed to provide for a more transparent and consistent assessment process.
114. Supervisors will have a responsibility for assessment of case reports, both in overseeing case report development and providing critical feedback and evaluation, and assessment and feedback of all final written up case reports. Half of case reports that are assessed as satisfactory by the supervisor are then submitted to the Board for review.
115. Information about case reports is included at section 2.7.2 of the guideline and the specific requirements proposed for each type of case report are included in Appendix E of the draft guideline (see Appendix D, which is a separate attachment to this consultation paper).
116. Case reports are a key component of the 4+2 internship program, enabling the provisional psychologist to develop and demonstrate their skills and knowledge to the supervisor during case report development and to both the supervisor and the Board in the final written up case reports.

117. It is proposed to closely align the requirements and components of the case report development and assessment in both the 4+2 and 5+1 pathways. It is proposed that the new case reports will still include information about the full case but each case report will have a more detailed focus on either the assessment aspect or the intervention aspect of an actual case seen by the provisional psychologist. Focusing each case report on either assessment or intervention helps ensure that both of these core competencies are covered in sufficient detail and breadth. This approach also streamlines the assessment process for the supervisor/s and the Board and its delegated assessors.
118. This new approach also takes into account feedback that provisional psychologists often find it difficult to keep within the word limit (2,500 words) when writing up a complex case that details both the assessment and intervention aspects. The Board has agreed that it does not want to increase the size of case reports, therefore restricting the focus enables to provisional psychologist to include enough detail to demonstrate the extent of their skills and knowledge in relation to assessment or intervention.
119. The Board is interested to hear from psychologists and provisional psychologists who have experience with the 5+1 internship program and can comment on how the restricted foci format has worked in the 5+1 program. Following completion of this review of the 4+2 guidelines, the Board intends to undertake further review of the case report requirements for the 5+1 program therefore all relevant feedback to this consultation will be taken into account for the 5+1 case report review.
120. The Board also seeks feedback on proposals for the timing of submission of case reports to the Board for assessment
121. The previous, current and proposed case study/case report submission requirements are as follows:

Requirements for submission of case studies/case reports to the Board for assessment	
<b>Previous 4+2</b>	Submit all three case studies to be assessed by the Board with the application for general registration at the end of the internship.
<b>Current 4+2</b>	Submit case studies at any time during the final year of the internship (after 1540 hours) three must be assessed as satisfactory by the Board before an application for general registration can be made.
<b>Current 5+1</b>	Two case studies must be submitted and assessed as satisfactory by the Board at any time during the one year (1540 hours) internship. It is recommended but not mandatory that one is submitted in the first half (770 hours) of the internship year.
<b>Proposed 4+2</b>	Two case reports must be submitted and assessed as satisfactory by the Board in the first year (first 1540 hours) of the internship, and two more must be submitted and assessed as satisfactory by the Board during the second year before an application for general registration can be made.

The Board's view is that there are several advantages to submitting case reports during the course of the internship, rather than after the internship as was previously the case. These include:

- interns are able to obtain some feedback and guidance early on if they submit an unsatisfactory case report and take the feedback into account for completion of their next case report
- supervisors with less experience marking case reports are able to receive early review of their marking style, and seek guidance if necessary
- internships can be completed within the minimum timeframes more often because if a case report is assessed as unsatisfactory during the internship rather than at the end, a new case report can be completed without needing to extend the internship
- reduced processing times when applying for general registration as case reports have already been marked.



122. The Board has proposed to remove the requirements that:
- at least one case report that is submitted to the Board focuses on a client from a culture different from that of the provisional psychologist and demonstrates the ability to use and adapt appropriate assessment and intervention strategies in response to the cross-cultural context, and
  - at least one case report that is submitted to the Board focuses on a client in childhood or adolescence and at least one focuses on a client in adulthood or late adulthood and demonstrates the ability to use and adapt appropriate assessment and intervention strategies to different lifespan stages, as well as an understanding of legal, ethical and professional matters relevant to different lifespan stages.
123. While case reports are an excellent tool for demonstrating skills in the cross-cultural context and across the lifespan competencies, making these optional foci for case reports recognises that achievement of these competencies can be demonstrated in other ways to the supervisor, and they can be tested by the National Psychology Examination. A supervisor may still decide their supervisee needs to complete case reports that cover cross-cultural and lifespan issues to demonstrate competence in these areas if they feel it is not sufficiently demonstrated in other ways in the individual internship; however it is not mandatory that the case reports submitted to the Board include these areas of focus.
124. It is proposed to increase the number of case reports required for the 4+2 internship from six to eight with a requirement that four be submitted to the Board for assessment as part of the reporting requirements during the internship. This would make the case report requirement over two years double the requirements for the 5+1 over one year and the increase would be offset by removal of some of the other current assessments including case examples (see below). In order to align the final year of the 4+2 with the final year of the 5+1, four of the eight case studies would be completed in the in the final year with two submitted to the Board between 1,540 and 3,080 hours.

#### Changes in the requirements for other supervisor assessed tasks

125. The revised case report requirement is balanced by removal of the following assessment tasks currently required for the 4+2:
- theoretical analysis of six target problems presented in writing or orally to the supervisor
  - supervisor evaluation of a literature review regarding a problem situation/target problem
  - a written report of 500-2,000 words describing six situations in which the provisional psychologist has identified their professional limitations, assessed by the supervisor
  - a report of 500-2,000 words describing six ethical dilemmas and the provisional psychologist's responses to them, assessed by the supervisor (this is proposed to be replaced by new ethical dilemmas task – see Table 3 of the draft guideline)
  - two written case examples of approximately 400 words each submitted to the Board with each progress report (a minimum of three progress reports are submitted), and
  - supervisor assessment of practice documents is proposed to be reduced from twelve to eight (regular review would still be required and co-signing where appropriate).
126. It is proposed to introduce some new supervisor assessed tasks to be completed in the first year of the internship with the aim of ensuring 4+2 interns enter the final year of the program with an equivalent level of knowledge and competence to fifth year professional psychology degree graduates entering their sixth year internship.
127. Fifth year professional psychology degree requirements include:
- adequate education and training in profession skills and knowledge including ethical decision making for the practitioner prior to beginning the first placement
  - a minimum of 300 hours of logged supervised practica and skills training which can include role playing, skills practice, simulated learning environments, observations of supervisors working with clients, case analysis and internal or external placement/s



- demonstration of the same capabilities and attributes as a sixth year graduate (i.e. Masters) for capability 5.1.12(b) Ethical, Legal and Professional Matters – including issues concerning minors and different lifespan groups; issues concerning different cultural groups including gender and sexuality, and minority, marginalised and vulnerable groups; self evaluation skills including ability to identify professional limitations; sound knowledge of the relevant code, legislation, and legal requirements for psychologists; and ability to apply ethical principles to ethical dilemmas, and
  - demonstration of foundational knowledge of the other core professional attributes in the APAC accreditation standards (available online at [www.psychologycouncil.org.au/standards-and-guidelines/](http://www.psychologycouncil.org.au/standards-and-guidelines/)).
128. It is proposed that the 4+2 internship include mandatory supervisor assessed tasks that will demonstrate ability to apply ethical principles to ethical dilemmas, and an understanding of issues associated with practising across the lifespan and within a cross-cultural context. The proposed new tasks assessed by the supervisor are:
- three short presentations or written reports (approximately 500-1000 words each) describing an ethical dilemma and summarising his or her responses to them, assessed by the supervisor
  - a short presentation or written report to the supervisor on a cross-cultural context practice issue, and
  - a short presentation or written report to the supervisor on an across the lifespan practice issue.
129. These proposed tasks are outlined in further in Table 3 in the draft guideline and specific comment on the proposed requirements is invited.

### **Psychological practice and work roles for the 4+2 internship**

The Board proposes increased flexibility for different work roles to be approved where the internship plan demonstrates that the provisional psychologist will be able to develop all the core competencies through professional practice in that role together with work in any other roles, professional development activities including exam preparation, and professional supervision.

#### **Minimum timeframe for the internship**

The Board proposes to allow the internship to be completed after 88 weeks of practice instead of the current requirement of two calendar years. This recognises that many provisional psychologists do not take the full allowance of eight weeks annual leave per year, often because their employment contract only allows them four or five weeks of annual leave per year. The allowance of up to eight weeks will still be retained by the Board as this allows provisional psychologists working in schools to still finish the internship in two years, but provisional psychologists taking fewer holidays will be allowed to finish in less than two calendar years.

It is not intended to specify a minimum amount of mandatory annual leave in the guideline, which means provisional psychologists are not precluded from completing the internship in 88 weeks straight with no time off at all. However the Board's view is that training in professional self-care, work-life balance, and managing stress and compassion fatigue are important aspects of the internship, and strongly recommends that some annual leave is taken each year.

#### **Maximum timeframe for the internship**

The Board proposes to retain the maximum five-year timeframe for completion of the internship to ensure sufficient continuity of training. However there will be some flexibility to extend this if appropriate due to exceptional circumstances provided that the provisional psychologist is making satisfactory progress.

It is proposed that the Board may approve roles for the internship which will average 14 hours per week of psychological practice (2 days) plus supervision and professional development (average of 3.5 hours per week) provided that the internship will still be completed within the maximum five year time frame.

### Policy for 4+2 internship program limited work role

130. This current policy is available from the website at [www.psychologyboard.gov.au/Standards-and-Guidelines/Codes-Guidelines-Policies.aspx](http://www.psychologyboard.gov.au/Standards-and-Guidelines/Codes-Guidelines-Policies.aspx).
131. The Board proposes to discontinue this policy and include relevant information in *section 3 – psychological practice* of the new guideline instead.
132. To be approved for the internship a work role or placement would still require a breadth of experience and:
  - predominantly comprise psychological practice
  - include a broad range of experience with different assessments and intervention strategies, and
  - include sufficient client contact to enable at least 970 hours of real client contact to be logged (either in one work role or in combination with other work roles).
133. It is proposed there will be increased flexibility and recognition that core competencies may be developed and demonstrated to the supervisor in different ways. Under the proposed new 4+2 guideline the Board would consider the primary work role as part of the broader internship plan. For example a role which lacks cultural diversity in the client base may be acceptable as the main work role if it meets other requirements and the internship plan demonstrates other ways the provisional psychologist will develop the relevant competency (such as minor placements/organisational visits, professional development activities, focused supervision sessions, simulated practice, etc.).
134. The Board proposes to remove the variation to the limited work role policy with regard to across the lifespan. Therefore work roles with limited exposure to one of the major lifespan stages (childhood/adolescence and adulthood/late adulthood) would be assessed in the same way as limited experience for any of the other core competencies – case-by-case and taking into consideration other aspects of the internship plan that contribute to achievement of the competency. This proposal also takes into account the National Psychology Examination which is now in place and includes questions that specifically test the lifespan competency.
135. It is likely that some client contact in different lifespan stages would still be necessary to achieve the competency, demonstrate this achievement to the supervisor, and to pass the exam. However the 770 hours minimum client contact in each lifespan stage is proposed to be removed and internship plans with low exposure to different lifespan stages would be assessed on their individual merits. As with the recency of qualifications policy, individual assessment will require extra resources but is justified because it will facilitate the provision of high quality education and training, facilitate access to psychology services by enabling a wider range of employers to offer psychology internships, and be fairer for applicants.
136. The current *Limited work role policy* contains information for the research and evaluation capability which has been retained and included in *section 3.3.1 – scope of the psychological practice* in the proposed new guideline. The amount of applied psychological research permitted in the internship has been rounded up from 388 hours to 400 hours.

### Skills acquisition activities and simulated client contact

137. The *Guidelines for the 5+1 internship program* that were released in December 2013 include provision for skills acquisition/simulated learning activities. This includes allowing simulated client contact to be counted towards the client contact and client related activities for the internship. It is proposed that these activities also be recognised for the 4+2. This would recognise that most interns are already using simulated practice to develop their skills prior to applying new techniques in real client consultations, and iterate the Board's support for this. Skills acquisition activities, particularly simulated client contact, are encouraged by the Board as it means provisional psychologists are better prepared to provide services to real clients and there is reduced risk to the safety and wellbeing of clients.
138. As with the 5+1 program, it is intended that recognised skills acquisition activities would include simulation and role playing of both client contact and client related activities. However only activities that simulate face-to-face client contact would be counted towards the client contact requirements. For example undertaking research or report writing for a fictitious client is a skill acquisition activity but

does not include interaction with another person that simulates client contact, so it would be logged as client related activity.

139. For consistency with the 5+1 internship the Board proposes the same amount of up to 60 hours of simulated client contact be recognised in the sixth year. It is also proposed, for both consistency and client safety reasons, that a higher amount – 90 hours – be recognised for the fifth year (first year of the internship). This takes into account that 5+1 interns commence the internship having already completed at least 300 hours of practica and skills acquisition activities that include simulated client contact, so the Board would expect 4+2 interns to be completing a higher proportion of skills acquisition in their first year of the internship.
140. As with the 5+1 internship the Board does not propose a limit to the amount of skills acquisition activities that could be logged as client related activities. A limit imposed by the Board is not necessary as the principal supervisor oversees this and ensures that the amount and breadth of client related activities undertaken by the provisional psychologists are sufficient to support the level of client contact and develop the core competencies. Skills acquisition activities would be recorded in the log book which can be requested for submission by the Board if there are any concerns about the composition of psychological practice, or for general audit.
141. The alternative to the proposal for up to 150 hours of optional skills acquisition activities is mandatory skills acquisition activities. Mandatory skills acquisition could include a requirement for a specific amount of simulated client contact to be completed before real client contact takes place. The Board prefers the flexibility of optional skills acquisition activities but would welcome feedback on whether it should be made mandatory.
142. Further information and research on the benefits of simulated learning activities is available from Health Workforce Australia: [www.hwa.gov.au/our-work/build-capacity/simulated-learning-environments-program](http://www.hwa.gov.au/our-work/build-capacity/simulated-learning-environments-program)<sup>6</sup>.

### **Supervision**

143. The Board proposes several changes to the requirements for supervisory arrangements in the 4+2 internship. In considering amendments to the supervision requirements the Board has considered the objectives of the national scheme (refer to Appendix B of this discussion paper):
144. A key change in the proposed revised guideline is an increase in the amount of supervision a secondary supervisor can provide, from 25 percent to 50 percent. The change is intended to address several issues that have been raised by stakeholders including:
  - provisional psychologists practising in areas of need such as regional, remote and low-socio-economic areas sometimes have difficulties meeting the supervision requirements
  - provisional psychologists may undertake two (or more) work roles where a secondary supervisor is the on-site supervisor for the second placement. The secondary supervision limit is a problem if the second role comprises more than 25 percent of the internship, and
  - when a principal supervisor takes extended leave such as maternity leave or long service leave, a secondary supervisor may provide supervision during the period, but if the secondary supervision limit would be exceeded then a new supervision plan with a new principal supervisor is currently required.
145. The proposed changes to supervision requirements include an increased focus on face-to-face supervision. According to the Board's definition 'face-to-face' may include remote supervision via videoconference or Skype where each party has a clear view of the others' facial expressions and body language. Feedback from supervisors and interns as well as broader research on the benefits of professional supervision indicates that face-to-face supervision is more effective. Therefore the Board

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<sup>6</sup> This information can still be accessed via this link, however Health Workforce Australia (HWA) was closed on 6 August 2014 with essential functions transferring to the Department of Health. Therefore any enquiries about HWA publications or business functions should be sent to the Department of Health using the online enquiries form at the following address: [www.health.gov.au/internet/main/publishing.nsf/Content/health-central.htm](http://www.health.gov.au/internet/main/publishing.nsf/Content/health-central.htm).

has proposed limiting the amount of non face-to-face supervision (such as telephone) to 40 hours but placing no limit on the amount of remote face-to-face supervision (such as videoconference).

146. The use of telephone supervision is proposed to be more flexible in that all interns may include up to 40 hours in their internship plan regardless of location and circumstances. Whereas currently telephone supervision must be approved case-by-case by the Board and special circumstances must be demonstrated.
147. Further feedback from the profession and stakeholders is sought, particularly from those with experience using remote supervision methods who can comment on the effectiveness of videoconference, Skype, telephone and any other remote supervision mediums.
148. The draft revised guideline also places increased emphasis on the responsibilities of the principal supervisor, including the key role of supervisors during the case report development and assessment process. The case report process is a critical component of the internship with case reports providing an outcome based assessment on the development and attainment of all core competencies.
149. In line with an increased focus on the responsibilities of the supervisor, the Board also proposes to remove the limit on the number of 4+2 interns a principal supervisor may be responsible for. The current interim guideline specifies that supervisors must not, at any one time, be a principal supervisor for more than five provisional psychologists undertaking the 4+2 internship program (section 9.2), although increases in the limit are granted on a case-by-case basis when appropriate. The Board has found that there are a wide variety of factors that affect how many 4+2 provisional psychologists is an appropriate number for a principal supervisor including experience, supervision style, employment context and other professional commitments. Therefore it needs to be the supervisors' responsibility to determine what is appropriate for them.
150. The five trainee limit was originally applied to the 4+2 internship but not to other training programs because of the higher level of responsibility placed on supervisors of 4+2 provisional psychologists. 4+2 interns enter the program without any professional practice experience and with limited professional ethics training; therefore a 4+2 supervisor has a significant responsibility to manage the risk of harm to clients, to teach foundation practice skills, and to provide a high level of supervision and support.
151. However a higher level of responsibility does not change the supervisor's ability to assess the limits of their own competence and ensure the quality of supervision is not reduced by over-committing themselves. All supervisors have a responsibility to only provide supervision within the limits of their experience and training, and in accordance with the National Law, registration standards, these guidelines, the *Guidelines for supervisors and supervisor training providers*, and the Board-endorsed Code of Ethics for the profession. Therefore the Board believes that there is already sufficient regulation in place and a five trainee limit is no longer necessary.

152. A summary of the proposed changes to the requirements for supervision compared with the current requirements is as follows:

Current requirement	Proposed requirement
Total supervision = 1 hour for every 17.5 hours of internship = 176 hours	Total supervision = 1 hour for every 17.5 hours of psychological practice = 160 hours
Individual supervision – at least 117 hours	Individual supervision – at least 100 hours
Group supervision – up to 59 hours	Other supervision – up to 60 hours including group supervision and up to 10 hours of indirect supervision (email communication, marking case studies and providing written feedback etc.)
Supervision with the principal supervisor – at least three quarters: 132 hours	Supervision with the principal supervisor – at least half: 80 hours
Up to 55% (96.8 hours) of direct non-visual supervision – e.g. telephone – may be permitted in special circumstances, such as remote location, if pre-approval is granted by the Board.	Up to 40 hours of direct non-visual supervision – e.g. telephone – is permitted, it is not restricted to special circumstances and special permission/pre-approval is not required.
No indirect supervision recognised for the internship.	Up to 10 hours of indirect supervision – e.g. emails, written feedback on case reports – may be counted towards the supervision requirements of the internship.
<ul style="list-style-type: none"> <li>• At least one hour per week of supervision</li> <li>• At least one hour per fortnight of individual supervision</li> <li>• The ratio of one hour of supervision for every 17.5 hours of practice must be met fortnightly.</li> <li>• The ratio of at least 66 percent individual supervision and up to 33 percent group supervision must be met in each six month period.</li> </ul>	Weekly supervision is recommended but the supervisor may vary the frequency of supervision over the course of the internship as appropriate provided the overall requirements are met and the intern receives adequate support.
Supervision must be at least one hour per session.	The majority of supervision must be at least one hour per session, however up to 20 hours of supervision may be claimed for short supervision sessions of less than one hour duration.
Direct observation of at least two assessment sessions and at least two intervention sessions every six months. Observation may in person or via video or audio recording.	Direct observation of at least two assessment sessions and at least two intervention sessions every six months. Observation may in person or via videoconference or video recording.
If the principal supervisor is unavailable for more than five consecutive weeks and new principal supervisor must be engaged which requires a new supervision plan.	If the principal supervisor is unavailable for an extended period, the provisional psychologist can continue to practice under a secondary supervisor for the period provided that the principal supervisor will still be providing at least half of the overall supervision for the internship. If a change of principal supervisor is required, a change of supervisor form (i.e. see CHPS-76 for the 5+1 program) is submitted which has the option for the new supervisor to take over the current internship program plan (no need to submit a new plan).
Supervisors must not, at any one time be a principal supervisor for more than five provisional psychologists undertaking the 4+2 internship program.	No Board-imposed limit on the number of supervisees. The supervisor is responsible for awareness of their own capabilities and ensuring that supervision is always provided within the limits of their competence and training.



### ***Policy on recency of qualifications***

153. This policy is currently titled *Policy for provisional psychologists with qualifications more than ten years old* and is available from the website at [www.psychologyboard.gov.au/Standards-and-Guidelines/Codes-Guidelines-Policies.aspx](http://www.psychologyboard.gov.au/Standards-and-Guidelines/Codes-Guidelines-Policies.aspx).
154. The Board proposes to discontinue the current policy and include the relevant information in an appendix to the 4+2 guideline instead. Therefore the draft revised policy is included in Appendix C of the draft guideline which is at Appendix D of this discussion paper (separate attachment). The policy is also referred to in section 2.1 of the proposed revised guideline.
155. The proposed policy no longer includes information on requirements for provisional psychologists wishing to commence supervised practice in the higher degree or 5+1 pathways. Entry into these pathways requires acceptance into an accredited higher degree program and universities and colleges have their own requirements – usually ten years – with regard to recency of undergraduate qualifications. Therefore it is the responsibility of the tertiary institution to advise about any conditions or refresher training that is required for entry into a course and not necessary to include these in a PsyBA policy.
156. The current version of the policy requires individuals seeking entry into the 4+2 internship program who do not meet recency of qualification requirements to complete four semester-length subjects that are part of an accredited program of study at third or fourth year. This policy is working very well in some states and territories and not at all well in others due to the differences in subjects offered by local universities and colleges, including whether single subject enrolments are permitted.
157. Therefore to make the policy fair for applicants in jurisdictions with limited or no opportunity to meet the current requirements, it is proposed to remove the specific requirement for third or fourth year subjects. Instead applicants could undertake a ‘course of study or training that is assessed by the Board as substantially equivalent to an accredited fourth year’. This allows the applicant to design their own program of refresher training which may include a variety of refresher training activities. Refresher training programs would then be considered case-by-case and the Board would consider accepting any combination of training that has covered the required areas, and included sufficient assessment and active learning to demonstrate the applicant’s skills and knowledge are at least equivalent to those of a recent fourth year graduate.
158. Case-by-case assessment will require increased time and resources from AHPRA and the Board, particularly when a proposed refresher program includes unaccredited components such as CPD workshops. However the Board believes this extra investment is necessary to ensure that the system is fair. The Board has considered the number of applications of this type that are received, and is confident the additional work can be accommodated using existing resources and will not affect the registration fees paid by the profession.
159. The Board is seeking feedback on the requirements for the content of refresher training for individuals who do not meet the ten year requirement. The current policy requires:
  - assessment and diagnosis
  - psychological intervention
  - ethics, and
  - psychopathology.
160. The Board is considering whether to keep these the same or whether to include any other areas. The draft policy in Appendix C of the proposed revised guideline includes two additional areas for consideration:
  - core knowledge of the discipline, and
  - research methods.
161. Including these additional areas would align the refresher training more closely with APAC’s fourth year graduate attributes.

## **Review timeframes**

162. As the with *Provisional registration standard*, the Board proposes that the next review of the *Guidelines for the 4+2 internship program* will commence within five years of the implementation of a revised guideline following this current review, with provisional for early review if necessary. Please refer to the discussion of the *Provisional registration standard* in this paper for details of the background and rationale.

## **Potential benefits and costs of the proposals**

163. The benefits of the preferred option are that the draft revised guidelines:
- are more flexible and user-friendly
  - strike a better balance between protecting the public and impact on applicants
  - focus more strongly on measuring the outputs (core competencies) of the internship than monitoring the inputs, and
  - have been reworded to be simpler and clearer.
164. The costs of the preferred option are:
- applicants for provisional registration, current registrants undertaking the 4+2 pathway, employers of provisional psychologists, Board-approved supervisors, supervisor training providers, AHPRA staff, and the national and regional psychology boards will need to become familiar with the new guideline
  - there may need to be training provided to Board-approved 4+2 supervisors on understanding and applying the new guidelines
  - there may need to be training provided to AHPRA staff and regional board members on understanding applying the new guidelines, and
  - there may need to be a period of transition to the revised guidelines.

## **Estimated impacts of the draft revised guideline**

165. There are several changes to the draft revised guideline, however the core components of the internship are proposed to remain the same so impacts would be fairly minor. It would not be necessary for current interns to make changes to their placements, supervisor arrangements or professional development program, however there will be opportunity for some interns to make optional changes.
166. It is anticipated that the impact on individuals currently undertaking the internship program and their employers and supervisors will be positive due to increased flexibility in some aspects of the internship and improvements to the clarity and structure of the guideline.
167. Impacts of the draft revised guideline will be managed as part of the implementation and communication plan for the new guideline.



## Consultation questions on the *Guidelines for the 4+2 internship program* for consideration:

### Options statement – guidelines for the 4+2 internship program

1. What is your preferred option for the guideline for the 4+2 program: option 1 – adopt the interim guideline as the new guideline; or option 2 – adopt the revised guideline presented here and as shown at Appendix D? (see separate attachment)

### Core competencies

2. Do you think that the eight core competencies accurately reflect the range of skills and knowledge common to all areas of psychology and necessary for general registration and independent practice?

### Assessment and case reports

3. Are the mandatory psychometric test categories appropriate for 4+2 interns?
4. Are the requirements for case reports clear and is there sufficient detail about what to include in case reports to guide provisional psychologists and their supervisors? (see Appendix E of the guideline at Appendix D which is attached to this paper)
5. What is your view on the proposal to require submission of two case reports to the Board in the first half (1540 hours) of the internship and two in the second half? Are there any specific advantages or disadvantages with early submission of case reports?
6. Do you have any feedback on how the 5+1 internship case studies are working in practice that is relevant to the 4+2 case reports? This may include the criteria, format, and timeframes for submission to the Board.
7. Will the proposed supervisor-assessed tasks, together with the exam, sufficiently test skill development and achievement of the core competencies?
8. Do you have any other feedback or suggestions about assessment tasks?

### Psychological practice and work roles

9. Do you support removal of the *Limited work role policy*?
10. Is there sufficient detail about what is required in work roles for the 4+2 internship?
11. Do you support the proposal for simulated client contact, including simulated test administration to be able to be counted towards the requirements of the internship?
12. Should skills acquisition activities be mandatory?

### Supervision

13. Do you support the proposed changes to supervision requirements for the 4+2 internship program?
14. Are remote supervision methods effective? (e.g. videoconference, Skype, telephone and any other remote supervision mediums) Do you have any other comments on the Board's proposals for supervision?

### Policy of recency of qualifications

15. What is your preferred option for the content of refresher training programs for applicants whose qualifications are more than ten years old?
  - a. Retain the four subject areas that are currently required (assessment and diagnosis; psychological intervention; ethics; and psychopathology), or

- b. Retain these four required subject areas, and add two more (core knowledge of the discipline; and research methods) to align the content more closely with the content of accredited fourth year programs of study.

16. Do you have any other feedback on the requirements for refresher training to meet recency of qualifications requirements?

**General questions for consideration**

17. Is the content and structure of the draft revised guideline helpful, clear, relevant and more workable than the current interim guideline?

18. Is there any other content that needs to be changed or deleted in the draft revised guideline?

19. Is there anything missing that needs to be added to the draft revised guideline?

20. Do you have any other comments on the draft revised guideline?

## Reporting and recording forms for the 4+2 internship program

The Board is providing draft versions of a number of revised and new forms to support the 4+2 internship program which are outlined in the table below. The reporting and recording forms include important information about how the internship will work in practice. It is intended that provision of these drafts during the public consultation stage of this review project will assist with providing a complete picture of the proposed internship and help stakeholders to give informed feedback.

The Board has tried to remove unnecessary detail in the forms; the proposed new SPPR-76 for example is only six pages long, whereas the current version on the website is 31 pages. The Board is seeking feedback on the content and formats of the reporting and recording forms in this public consultation. Draft versions of the forms are at Appendix E, which is a separate attachment to this paper. The draft forms are combined in a single PDF document for consultation. The final versions of the forms following consultation will be published in user-friendly formats such as interactive PDF and Excel, and the Board is seeking feedback on the best formats for the reporting and recording forms.

If you cannot access or view Appendix E in PDF format (such as due to vision impairment), please contact us on (03) 8708 9366 or email [psychconsultation@ahpra.gov.au](mailto:psychconsultation@ahpra.gov.au).

Please note that the attached forms are drafts only and cannot be used by individuals currently undertaking or supervising a 4+2 internship program – please continue to use the current versions of the forms at [www.psychologyboard.gov.au/Registration/Forms.aspx](http://www.psychologyboard.gov.au/Registration/Forms.aspx).

Document/form	Purpose of this document/form	When is it submitted to AHPRA?	Things to consider
<b>SPPR-76 Internship program plan form</b>	This form serves multiple purposes, it is used: <ol style="list-style-type: none"> <li>1. by supervisors and provisional psychologists in planning and developing an internship program</li> <li>2. to seek approval from the Board to commence an internship program;</li> <li>3. to seek approval from the Board to make significant changes to an approved internship program (such as changes to work roles);</li> <li>4. as a record of a supervision agreement between the supervisor and provisional psychologist; and</li> <li>5. as a point of reference by the supervisor and intern throughout the program when reviewing progress, and is updated as necessary.</li> </ol>	<ol style="list-style-type: none"> <li>1. Together with the Next Steps Checklist after applying for provisional registration online, or Together with APRO-76 if making a paper application for provisional registration, and</li> <li>2. When changing to a new work role or adding an additional work role.</li> </ol>	<p>The internship program plan is the key point of reference for the program.</p> <p>The plan is used for its different purposes by different parties including provisional psychologists, supervisors, employers, AHPRA Professional Officers and other staff, and regional psychology boards.</p> <p>A version of this form is already in place for the current 4+2 internship; this draft version has updates to support the proposed changes to the internship and to be more user-friendly.</p>

Document/form	Purpose of this document/form	When is it submitted to AHPRA?	Things to consider
<p><b>PPLB-76</b> <b>Logbook: record of professional practice</b></p>	<p>To record psychological practice activities, and for reporting to the Board if required.</p>	<p>Within 14 days if requested by the Board at any time.</p>	<p>The log book is primarily for use by the intern and supervisors but may be requested for submission to AHPRA for review by the Board.</p> <p>Attachment E includes a PPLB that is similar to the current version that is published online with some amendments to reflect changes to the guidelines.</p> <p>Attachment E also includes an example of a simplified part C – supervision log, and comment of the preferred format is sought.</p> <p>Options for the log book could also include:</p> <ul style="list-style-type: none"> <li>- Separating parts a, b and c into three separate documents</li> <li>- More detailed log book</li> <li>- Less detailed log book</li> </ul> <p>The logbook is currently published in Excel; the Board seeks feedback from provisional psychologists and supervisors on whether this format is user friendly or whether there is a better alternative.</p>
<p><b>PPPR-76</b> <b>Progress report</b></p>	<p>For the principal supervisor to report to the Board on progress.</p> <p>This form should be used for the provisional psychologist and supervisor to review the progress of the program when preparing progress reports and planning the goals of the next supervision period, as well as reporting to the Board.</p>	<p>Every six months from the date provisional registration is granted</p>	<p>A version of this form is already in place for progress reporting in the current 4+2 internship.</p> <p>It is proposed that this new version will not be used for transitional reporting when changing supervisors as the current version is, as CHPS-76 (below) will be used instead.</p>

Document/form	Purpose of this document/form	When is it submitted to AHPRA?	Things to consider
<b>CHPS-76</b> <b>Application for approval for change of principal supervisor</b>	To advise the Board of a change of principal supervisor and gain approval for the change.	Not more than 28 days after changing supervisor.	This form includes a progress report by the outgoing supervisor; therefore a separate transitional progress report is not necessary.  A version of this form is already in place for use when changing supervisor in the 5+1 internship. It is intended that the same form will be used by both the 4+2 and 5+1 internship programs once the new 4+2 guideline is in place.
<b>CSSF-76</b> <b>Case report submission form</b>	A cover sheet for submission of case reports.	With each case report submitted – two before the end of 1540 hours of internship and two more before the end of the internship program.	A version of this form is already in place for case study submission for both the 4+2 and 5+1 internship programs.  An alternative option for case report submission would be to discontinue CSSF-76 and revise the proposed new submission checklists (SCAC-76 and SCIC-76) to serve as submission cover sheets as well as checklists for the supervisor.
<b>SCAC-76</b> <b>Assessment case report submission checklist</b> <b>SCIC-76</b> <b>Intervention case report submission checklist</b>	To be completed by the provisional psychologist and the principal supervisor to ensure all criteria have been addressed in assessment case reports (SCAC-76) and intervention case reports (SCIC-76) to be submitted to the Board.	Together with each assessment case report and CSSF-76.  One of each before the end of 1540 hours of internship and one more of each before the end of the internship program.	These are proposed new forms and the content should be considered together with Appendix E – Case report requirements of the draft 4+2 guideline.
<b>CSAA-76</b> <b>Assessment case reports</b> <b>CSAI-76</b> <b>Intervention case reports</b>	Case report marking and feedback forms for assessment case reports and intervention case reports.  The Board's case report assessors will use this forms to provide the assessment outcome to provisional psychologists on their case reports.	Not required to be submitted; instead this is provided to the provisional psychologist by AHPRA after their case report has been marked.	The form proposes a five point global assessment scale which is intended to give more guidance to provisional psychologists about their result than just a satisfactory/unsatisfactory grade.

Document/form	Purpose of this document/form	When is it submitted to AHPRA?	Things to consider
<b>PPAC-76</b> <b>Final assessment of competence</b>	For the principal supervisor to report to the Board on the provisional psychologist's achievement of the eight core competencies at the end of the internship program.	Together with AGEN-76 when applying for general registration and within five years of the date the internship commenced.	The final assessment of competence summarises the entire internship program and completion by the principal supervisor confirms that the provisional psychologist has successfully completed a broad generalist training program and demonstrated their achievement in the eight defined core areas of psychology that form the basis of all areas of psychology practice. Together with results from the National Psychology Examination PPAC-76 demonstrates whether the provisional psychologists has attained the requisite competencies for general registration.  A version of this form is already in place for the current 4+2 internship; this draft version has updates to support the proposed changes to the internship and to be more user-friendly.

## General forms matters

### Assessment task templates

Currently the Board publishes the following templates for recording and summarising assessment tasks in the internship:

- [Target problems template](#)
- [Written communications template](#)
- [Summary of ethical dilemmas](#)
- [Summary of professional limitations](#)

The Board proposes to discontinue these templates because all these tasks are either not mandatory or are wholly supervisor assessed in the proposed new 4+2 internship. Therefore a specific format is not necessary and it is expected that supervisors will ensure suitable records are kept.

### Online reporting

AHPRA is currently undertaking a feasibility study and reviewing options for online progress reporting and this may be available in the future.

**Consultation questions on the reporting and recording forms for the 4+2 internship program for consideration:**

1. Are there changes would you suggest be made to the draft reporting and recording forms at Appendix E to ensure they effectively support the 4+2 internship program as set out in the proposed new guidelines (Appendix D)?
2. What is your preferred option for layout and level of detail in the log book?
3. Should the case report submission cover sheet be retained or combined with the new case report submission checklists?
4. Are there any other forms that have not been included but are necessary for effective recording and reporting to the Board in the internship program?
5. What are your preferred formats for forms? Forms may in published in the following formats:
  - Microsoft Word: standard DOC or rich text format RTF
  - Microsoft Excel (XLS),
  - Portable Document Format: standard PDF or smart/interactive PDF (e.g. allows users to check boxes and type directly into the blue fields).
6. Are there any changes in these proposed forms for the 4+2 internship that should also be made to the forms for the 5+1 internship?
7. Do you have any other ideas or feedback about forms for the 4+2 internship program?



## Statement of assessment

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The Psychology Board of Australia's statement of assessment against AHPRA's *Procedures for the development of registration standards* and the *COAG principles for best practice regulation*

### Provisional registration standard

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The Australian Health Practitioner Regulation Agency (AHPRA) has produced the document *Procedures for the Development of Registration Standards* which is available at: [www.ahpra.gov.au](http://www.ahpra.gov.au). The procedures have been developed by AHPRA in accordance with section 25 of the Health Practitioner Regulation National Law as in force in each state and territory (the National Law) which requires AHPRA to establish procedures for the purpose of ensuring that the National Registration and Accreditation Scheme operates in accordance with good regulatory practice.

Below is the Psychology Board of Australia's assessment of the proposal for a revised draft *Provisional registration standard* against the three elements outlined in the AHPRA procedures.

<b>1. The proposal takes into account the National Scheme's objectives and guiding principles set out in section 3 of the National Law</b>
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#### **Board assessment**

The Board considers that the revised draft registration standard meets the objectives and guiding principles of the National Law.

The revised draft *Provisional registration standard*, if approved, will provide for the protection of the public by ensuring that practitioners granted provisional registration meet a minimum standard of education and that only practitioners who are suitably trained and qualified to practise in a competent and ethical manner are registered as provisional psychologists.

The revised draft registration standards also support the National Scheme to operate in a transparent, accountable, efficient, effective and fair way.

<b>2. The consultation requirements of the National Law are met</b>
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#### **Board assessment**

The Board considers that the revised draft registration standard meets the consultation requirements of the National Law:

- The National Law requires wide-ranging consultation on proposed registration standards.
- The National Law requires the Board to consult other National Boards on matters that may reasonably be expected to be of shared interest.

The Board is undertaking wide-ranging consultation on the proposed revisions to the *Provisional registration standard* in accordance with the consultation framework set out in the *Consultation process of National Boards* which is available at: [www.ahpra.gov.au](http://www.ahpra.gov.au).

## Appendix A

The Board will ensure that there is public exposure of the proposed revised standard by undertaking an eight week public consultation process which is an opportunity for public comment. This process includes the publication of the consultation paper (and attachments) on the Board's website and inviting feedback to be provided.

The Board will take into account the feedback it receives from preliminary and public consultation when finalising its proposals for submission to the Ministerial Council for approval.

### 3. The proposal takes into account the COAG Principles for Best Practice Regulation

#### Board assessment

In developing the revised draft registration standards for consultation, the Board has taken into account the Council of Australian Governments (COAG) *Principles for Best Practice Regulation* [www.coag.gov.au/sites/default/files/coag\\_documents/COAG\\_best\\_practice\\_guide\\_2007.pdf](http://www.coag.gov.au/sites/default/files/coag_documents/COAG_best_practice_guide_2007.pdf).

As an overall statement, the Board has taken care not to propose unnecessary regulatory burdens that would create unjustified costs for the profession or the community.

The Board makes the following assessment specific to each of the COAG principles expressed in the AHPRA procedures:

#### COAG Principles

##### A. Whether the proposal is the best option for achieving the proposal's stated purpose and protection of the public

#### Board assessment

The purpose of the *Provisional registration standard* is:

1. to provide for the protection of the public by ensuring that only practitioners who are suitably trained and qualified to practise under supervision in a competent and ethical manner are provisionally registered, and
2. to support the continuous development of a flexible, responsive, and sustainable psychology workforce that meets the needs of the Australian public.

The Board considers that its proposal for the Provisional registration standard is the best option for achieving the stated purposes. The proposal would maintain the current entry requirements for provisional registration and the available supervised practice pathways, and amend the language and structure of the standard to improve clarity.

As only minor changes to the existing standard are proposed the Board considers that the proposed revised standard would have a low impact on the profession. These low impacts are significantly outweighed by the benefits of continuing to provide the same high standard of public protection and providing clearer, simpler requirements, in the public interest.

##### B. Whether the proposal results in an unnecessary restriction of competition among health practitioners

#### Board assessment

The Board considered whether its proposals could result in an unnecessary restriction of competition among health practitioners. The proposals are not expected to impact on the current levels of competition among health practitioners.

### C. Whether the proposal results in an unnecessary restriction of consumer choice

#### Board assessment

The Board considers that the proposed revised *Provisional registration standard* will support consumer choice, by establishing clear requirements for the qualifications and training arrangements that practitioners must meet when they practise, in accordance with the National Law.

The *Provisional registration standard* will also support informed consumer choice by providing clarity about the entry and supervision requirements for provisional psychologists and clearly setting out the different supervised practice pathways that are available.

### D. Whether the overall costs of the proposal to members of the public and/or registrants and/or governments are reasonable in relation to the benefits to be achieved

#### Board assessment

The Boards considered the overall costs of the revised *Provisional registration standard* to members of the public, registrants and governments and concluded that the likely costs are appropriate when offset against the benefits that the revised draft standard contributes to the National Scheme.

Subject to stakeholder feedback on the proposed revisions, and if approved by the Ministerial Council, the revised draft standard should have only minimal impact on the costs to applicants by presenting the Board's requirements in a clearer and simpler way.

The Board does not anticipate there will be any impact on registration fees if the proposed revised standard is approved.

### E. Whether the requirements are clearly stated using 'plain language' to reduce uncertainty, enable the public to understand the requirements, and enable understanding and compliance by registrants

#### Board assessment

The Board consider the revised *Provisional registration standard* to have been written in plain English that will help practitioners and the public to understand the requirements of the standard. The Board has changed the structure and reviewed the wording of the standard to make it easier to understand.

### F. Whether the Board has procedures in place to ensure that the proposed registration standard, code or guideline remains relevant and effective over time

#### Board assessment

If approved, the Boards will review the revised *Provisional registration standard* at least every five years, including an assessment against the objectives and guiding principles in the proposed National Law and the COAG principles for best practice regulation. However, the Board may choose to review the standard earlier, if it is necessary to ensure continued relevance and workability.

# Legislation

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The Psychology Board of Australia is established under section 31 of the Health Practitioner Regulation National Law (the National Law); the purpose of the National Law is to establish a national registration and accreditation scheme for the regulation of health practitioners. The role of the Board is to work with AHPRA and other National Boards to achieve the objectives of the national scheme in accordance with the guiding principles of the scheme. The key sections of the National Law relevant to this consultation are set out below.

To download the full version of the National Law for your state or territory please visit [www.ahpra.gov.au/About-AHPRA/What-We-Do/Legislation.aspx](http://www.ahpra.gov.au/About-AHPRA/What-We-Do/Legislation.aspx).

### Part 1 Preliminary

#### 3. Objectives and guiding principles

- (2) The objectives of the national registration and accreditation scheme are—
  - (a) to provide for the protection of the public by ensuring that only health practitioners who are suitably trained and qualified to practise in a competent and ethical manner are registered; and
  - (b) to facilitate workforce mobility across Australia by reducing the administrative burden for health practitioners wishing to move between participating jurisdictions or to practise in more than one participating jurisdiction; and
  - (c) to facilitate the provision of high quality education and training of health practitioners; and
  - (d) to facilitate the rigorous and responsive assessment of overseas-trained health practitioners; and
  - (e) to facilitate access to services provided by health practitioners in accordance with the public interest; and
  - (f) to enable the continuous development of a flexible, responsive and sustainable Australian health workforce and to enable innovation in the education of, and service delivery by, health practitioners.
- (3) The guiding principles of the national registration and accreditation scheme are as follows—
  - (a) the scheme is to operate in a transparent, accountable, efficient, effective and fair way;
  - (b) fees required to be paid under the scheme are to be reasonable having regard to the efficient and effective operation of the scheme;
  - (c) restrictions on the practice of a health profession are to be imposed under the scheme only if it is necessary to ensure health services are provided safely and are of an appropriate quality.

### Part 5 National Boards

#### Division 2 Functions of National Boards

##### 35 Functions of National Boards

- (1) The functions of a National Board established for a health profession are as follows—
- (a) to register suitably qualified and competent persons in the health profession and, if necessary, to impose conditions on the registration of persons in the profession;
  - (b) to decide the requirements for registration or endorsement of registration in the health profession, including the arrangements for supervised practice in the profession (c)
  - (c) to develop or approve standards, codes and guidelines for the health profession, including—
    - (i) the approval of accreditation standards developed and submitted to it by an accreditation authority; and
    - (ii) the development of registration standards for approval by the Ministerial Council; and
    - (iii) the development and approval of codes and guidelines that provide guidance to health practitioners registered in the profession;
  - (d) to approve accredited programs of study as providing qualifications for registration or endorsement in the health profession;
  - (e) to oversee the assessment of the knowledge and clinical skills of overseas trained applicants for registration in the health profession whose qualifications are not approved qualifications for the profession, and to determine the suitability of the applicants for registration in Australia;
  - (f) to negotiate in good faith with, and attempt to come to an agreement with, the National Agency on the terms of a health profession agreement;
  - (g) to oversee the receipt, assessment and investigation of notifications about persons who—
    - (i) are or were registered as health practitioners in the health profession under this Law or a corresponding prior Act; or
    - (ii) are students in the health profession;
  - (h) to establish panels to conduct hearings about—
    - (i) health and performance and professional standards matters in relation to persons who are or were registered in the health profession under this Law or a corresponding prior Act; and
    - (ii) health matters in relation to students registered by the Board;
  - (i) to refer matters about health practitioners who are or were registered under this Law or a corresponding prior Act to responsible tribunals for participating jurisdictions;
  - (j) to oversee the management of health practitioners and students registered in the health profession, including monitoring conditions, undertaking and suspensions imposed on the registration of the practitioners or students;
  - (k) to make recommendations to the Ministerial Council about the operation of specialist recognition in the health profession and the approval of specialties for the profession;

- (l) in conjunction with the National Agency, to keep up-to-date and publicly accessible national registers of registered health practitioners for the health profession;
- (m) in conjunction with the National Agency, to keep an up-to-date national register of students for the health profession;
- (n) at the Board's discretion, to provide financial or other support for health programs for registered health practitioners and students;
- (o) to give advice to the Ministerial Council on issues relating to the national registration and accreditation scheme for the health profession;
- (p) if asked by the Ministerial Council, to give to the Ministerial Council the assistance or information reasonably required by the Ministerial Council in connection with the national registration and accreditation scheme;
- (q) to do anything else necessary or convenient for the effective and efficient operation of the national registration and accreditation scheme;
- (r) any other function given to the Board by or under this Law.

### **Division 3 Registration standards and codes and guidelines**

#### **38 National board must develop registration standards**

- (2) Subject to subsection (3), a National Board may also develop and recommend to the Ministerial Council, one or more registration standards about the following -
  - (c) any other issue relevant to the eligibility of individuals for registration in the professional or the suitability of individuals to competently and safely practise the profession
- (3) A registration standard may not be about a matter for which an accreditation standard may provide.

#### **39 Codes and guidelines**

A National Board may develop and approved codes and guidelines –

- (a) to provide guidance to the health practitioners it registers.

#### **40 Consultation about registration standards, codes and guidelines**

- (1) If a National Board develops a registration standard or a code or guideline, it must ensure there is wide-ranging consultation about its content.
- (2) A contravention of subsection (1) does not invalidate a registration standard, code or guideline.

#### **41 Use of registration standards, codes or guidelines in disciplinary proceedings**

An approved registration standard for a health profession, or a code or guideline approved by a National Board, is admissible in proceedings under this Law or a law or a co-regulatory jurisdiction against a health practitioner registered by the Board as evidence of what constitutes appropriate professional conduct or practice for the health profession.



## **Part 7 Registration of health practitioners**

### **Division 3 Provisional registration**

#### **62 Eligibility for provisional registration**

- (1) An individual is eligible for provisional registration in a health profession, to enable the individual to complete a period of supervised practice that the individual requires to be eligible for general registration in the health profession, if—
  - (a) the individual is qualified for general registration in the profession; and
  - (b) the individual is a suitable person to hold provisional registration in the profession; and
  - (c) the individual is not disqualified under this Law or a law of a co-regulatory jurisdiction from applying for, or being registered in, the profession; and
  - (d) the individual meets any other requirements for registration stated in an approved registration standard for the health profession.

## Registration standard: Provisional registration

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**Effective from:** <<date>>

**Review date:** <<date>>

### Summary

This registration standard sets out the Psychology Board of Australia's requirements for provisional registration for psychology.

Provisional registration may be granted to enable an individual to complete a period of supervised practice required to be eligible for general registration as a psychologist.

### Does this standard apply to me?

This standard applies to all applicants for provisional registration and applicants for renewal of provisional registration.

### Qualification

The minimum qualification required to be qualified to apply for provisional registration is a four-year accredited sequence of study in psychology completed within the last ten years, or a sequence of study that, in the Board's opinion, is substantially equivalent to an approved qualification.

### Eligibility

Applicants must meet the following eligibility requirements in addition to being qualified to apply for provisional registration:

- a. the individual must be a suitable person to hold provisional registration as a psychologist under the National Law
- b. the individual must not be disqualified under the National Law or the law of a co-regulatory jurisdiction from applying for registration, or being registered in the psychology profession
- c. the individual must meet all other requirements stated in an approved registration standard for the psychology profession that apply to provisional registration<sup>1</sup>
- d. the individual requires provisional registration in order to complete one of the following programs of supervised practice:
  - i. enrolment in a Board-approved qualification<sup>2</sup> accredited as a fifth and sixth, or fifth to seventh year of study, or
  - ii. a Board-approved 5+1 internship program – comprising a Board-approved qualification accredited as a fifth year of study followed by a Board-approved internship in accordance with the requirements of a Board-approved 5+1 internship program plan<sup>3</sup>, or

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<sup>1</sup> Refer to section 38(1)(a)-(e) of the National Law and the Psychology Board of Australia's registration standards at [www.psychologyboard.gov.au/Standards-and-Guidelines/Registration-Standards.aspx](http://www.psychologyboard.gov.au/Standards-and-Guidelines/Registration-Standards.aspx)

<sup>2</sup> Refer to the Psychology Board of Australia *List of approved programs of study* at [www.psychologyboard.gov.au/Accreditation.aspx](http://www.psychologyboard.gov.au/Accreditation.aspx)

<sup>3</sup> Refer to the Psychology Board of Australia *Guidelines for the 5+1 internship program*

## Appendix C

- iii. a Board-approved 4+2 internship program in accordance with the requirements of a Board approved 4+2 internship plan<sup>4</sup>, or
- iv. a Board-approved transitional program as specified by the Board<sup>5</sup>.

A provisional psychologist is not permitted to undertake dual pathways; that is, mixing components of two different pathways to make up a six year sequence of study and further training will not be accepted as having completed the requirements of an approved pathway leading to general registration.

### Maintaining provisional registration

Provisional registration must be maintained for the entire duration of the supervised practice program for all pathways including while awaiting the outcome of an application for general registration.

Higher degree candidates must maintain provisional registration from the commencement of enrolment and for the duration of enrolment in any component of an accredited qualification, including coursework, practical and research thesis, unless granted general registration prior to completion of the doctoral thesis.

Provisional registration must be renewed annually. When renewing registration, provisional psychologists will be required to declare that they are completing a program of study or supervised practice that requires provisional registration.

### Definitions

**4+2 internship program** means a supervised practice program undertaken in accordance with a 4+2 internship plan approved by the Board, over a minimum of two years and a maximum of five years, during which the core competencies are developed.

**4+2 internship plan** means a supervised practice plan on a form approved by the Board that details how the core competencies will be achieved and includes the following components:

- 3080 hours of internship including:
  - 2800 hours of supervised psychological practice in a work role approved by the Board consisting of sufficient opportunity to develop the core competencies
  - 1120 hours of direct client contact
  - 160 hours of psychological supervision with a Board-approved supervisor where at least one hour of supervision is received for every 17.5 hours of psychological practice
  - 120 hours of professional development activities
- Completion of case reports that demonstrate satisfactory development and attainment of the core competencies
- Submission of six-monthly supervisor reports on progress towards achievement of the core competencies

**5+1 internship program** means a supervised practice program comprising an accredited fifth year qualification followed by an internship undertaken in accordance with a 5+1 internship plan approved by the Board. The full program comprising both the qualification and the internship is undertaken over a minimum of two years and a maximum of five years, during which the core competencies are developed.

**5+1 internship plan** means a supervised practice plan on a form approved by the Board that details how the core competencies will be achieved in the internship and includes the following components:

- 1540 hours of internship including:
  - 1400 hours of supervised psychological practice in a work role approved by the Board consisting of sufficient opportunity to develop the core competencies
  - 560 hours of direct client contact

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<sup>4</sup> Refer to the Psychology Board of Australia *Guidelines for the 4+2 internship program*

<sup>5</sup> Refer to the *Policy for overseas qualified applicants for registration*

Guidelines and policies are available at [www.psychologyboard.gov.au/Standards-and-Guidelines/Codes-Guidelines-Policies.aspx](http://www.psychologyboard.gov.au/Standards-and-Guidelines/Codes-Guidelines-Policies.aspx).

## Appendix C

- 80 hours of psychological supervision with a Board-approved supervisor where at least one hour of supervision is received for every 17.5 hours of psychological practice
- 60 hours of professional development activities
- Completion of case reports that demonstrate satisfactory development and attainment of the core competencies
- Submission of six-monthly supervisor report/s on progress towards achievement of the core competencies

**Accredited sequence of study** means a program of study comprising one or more qualifications that have been assessed by the accreditation authority for the profession as meeting the requirements of the accreditation standards developed and approved under Part 6 of the National Law, and subsequently approved by the Board as providing a qualification for the purposes of registration in the psychology profession.

**Board** means the Psychology Board of Australia established under section 31 of the National Law

**Core competency** means the range of applied knowledge and skills common to all areas of psychology practice that are necessary for entry-level general registration. There are eight core competencies that must be achieved in the supervised practice component of psychology training which are:

1. knowledge of the discipline
2. ethical, legal and professional matters
3. psychological assessment and measurement
4. intervention strategies
5. research and evaluation
6. communication and interpersonal relationships
7. working in a cross-cultural context
8. practice across the lifespan

**National Law** means the Health Practitioner Regulation National Law as in force in each state and territory in Australia.

**Provisional psychologist** means a person registered as a provisional psychologist under section 62 of the National Law

**Qualification** means a formal qualification at a third year level or above that has been conferred by a recognised university or college.

**Transitional program** means a period of supervised practice stipulated by the Board and any other requirements in order to meet the general registration standard.

### Authority

This registration standard was approved by the Australian Health Workforce Ministerial Council on <<date>>.

Registration standards are developed under section 38 of the National Law and are subject to wide ranging consultation.

### Review

This standard will be reviewed from time to time as required. This will generally be at least every five years.

Last reviewed: <<1 June 2012>>

This standard replaces the previously published registration standard from 1 June 2012.

## Guidelines for the 4+2 internship program

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Please refer to the separate attachment.

## Reporting and recording forms package

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Please refer to the separate attachment.



## Registration standard: General registration

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**Effective from:** <<date>>

**Review date:** <<date>>

### Summary

This registration standard sets out the Psychology Board of Australia's requirements for the general registration of psychologists. General registration as a psychologist may be granted to individuals who meet requirements set out in this registration standard and the Health Practitioner Regulation National Law, as in force in each state and territory ('the National Law').

### Does this standard apply to me?

This standard applies to all applicants for general registration and applicants for renewal of general registration as a psychologist.

### Qualification requirements

The minimum qualification required to be qualified to apply for general registration is:

- a) a four-year accredited sequence of study in psychology that has been approved by the Board as providing a qualification for registration in the profession, that has been completed within the last ten years, or
- b) an overseas qualification that in the Board's opinion is substantially equivalent to a).

To be eligible for general registration as a psychologist, in addition to the minimum qualification, applicants must have completed a postgraduate degree accredited as fifth and sixth year of study in psychology, or another approved program of supervised practice and training as detailed in the eligibility requirements part e) below.

### Eligibility requirements

In order to apply for general registration a six year sequence of education and training is required.

In addition to holding the minimum qualification, applicants must meet the following eligibility requirements:

- a) the individual must be a suitable person to hold general registration as a psychologist under the National Law
- b) the individual must not be disqualified under the National Law, or the law of a co-regulatory jurisdiction, from applying for registration, or being registered, in the psychology profession
- c) the individual must meet all other requirements stated in an approved registration standard for the psychology profession that apply to general registration<sup>12</sup>
- d) the individual must provide evidence of having passed the National Psychology Examination (unless exempt)<sup>13</sup>

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<sup>12</sup> Refer to section 38(1)(a)-(e) of the National Law and the Psychology Board of Australia's registration standards [www.psychologyboard.gov.au/Standards-and-Guidelines/Registration-Standards.aspx](http://www.psychologyboard.gov.au/Standards-and-Guidelines/Registration-Standards.aspx)

## Appendix F

- e) the individual must have successfully completed a Board-approved supervised practice and training program while registered as a provisional psychologist.

The Board has determined that the supervised practice program requirement must be met by successfully completing one of the following:

- i. a Board-approved postgraduate qualification accredited as a fifth and sixth year of study, or
- ii. all fifth and sixth year-level coursework and practicum of a Board-approved postgraduate qualification accredited as a fifth, sixth and seventh year of study and having made sufficient progress in the research thesis, or
- iii. a Board-approved qualification accredited as a fifth year of study followed by successful completion of a Board-approved 5+1 internship program<sup>14</sup>, or
- iv. a Board-approved 4+2 internship program<sup>15</sup>, or
- v. an overseas qualification and supervised practice assessed by the Board as substantially equivalent to either i), iii), or iv) and successful completion of a Board-approved transitional program (unless exempt)<sup>16</sup>.

### Maintaining general registration

General registration is required to be renewed annually. When renewing their registration, psychologists are required to meet the requirements set out in sections 107 and 109 of the National Law.

### Authority

This registration standard was approved by the Australian Health Workforce Ministerial Council on <<date>>.

Registration standards are developed under section 38 of the National Law and are subject to wide ranging consultation.

### Definitions

**Accredited sequence of study** means a program of study, comprising one or more qualifications that have been assessed by the accreditation authority for the profession as meeting the requirements of accreditation standards developed and approved under Part 6 of the National Law, and subsequently approved by the Board as providing a qualification for the purposes of registration in the psychology profession.

**Board** means the Psychology Board of Australia established under section 31 of the National Law.

**National Law** means the Health Practitioner Regulation National Law as in force in each state and territory in Australia.

**Qualification** means a formal qualification in psychology at a Bachelor level or above that has been conferred by a recognised university or college.

**Successful completion of a Board-approved 4+2 internship program** means the individual has completed a 4+2 internship program in accordance with a supervised practice program that was approved by the Board in accordance with the *Guidelines for the 4+2 internship program*. To be considered to have successfully completed the program the individual must have achieved the following during the program:

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<sup>13</sup> Refer to the Psychology Board of Australia's *Guidelines for the National Psychology Examination*.

<sup>14</sup> Refer to the Psychology Board of Australia's *Guidelines for the 5+1 internship program*.

<sup>15</sup> Refer to the Psychology Board of Australia's *Guidelines for the 4+2 internship program*.

<sup>16</sup> Refer to the Psychology Board of Australia's *Policy for overseas qualified applicants*.

## Appendix F

1. Demonstrated competence in the following areas:
  - knowledge of the discipline
  - ethical, legal and professional matters
  - psychological assessment and measurement
  - intervention strategies
  - research and evaluation
  - communication and interpersonal relationships
  - working in a cross-cultural context
  - practice across the lifespan
2. Completed a minimum of 3080 hours of the approved internship over a minimum of two years and a maximum of five years of which at least:
  - 2800 hours are supervised psychological practice in a work role approved by the Board consisting of sufficient opportunity to develop the required competencies
  - 1120 hours are direct client contact
  - 160 hours are psychological supervision with a Board-approved supervisor where at least one hour of supervision is received for every 17.5 hours of psychological practice
  - 120 hours are professional development
3. Completed and submitted to the Board four case reports that the Board assesses as meeting the requirements of case reports set out in its guideline and demonstrating the attainment of the required competencies, and
4. Completed all the internship requirements set out in the *Guidelines for 4+2 internship programs*.

**Successful completion of a Board-approved 5+1 internship program** means: the individual has completed a 5+1 internship program in accordance with a supervised practice program that was approved by the Board in accordance with the *Guidelines for the 5+1 internship program*. To be considered to have successfully completed the program the individual must have achieved the following during the program:

1. Demonstrated competence in the following areas:
  - knowledge of the discipline
  - ethical, legal and professional matters
  - psychological assessment and measurement
  - intervention strategies
  - research and evaluation
  - communication and interpersonal relationships
  - working in a cross-cultural context
  - practice across the lifespan
2. Completed and graduated from a Board-approved qualification accredited as a fifth year of study, and completed a minimum of 1540 hours of the approved internship over a minimum of two years and a maximum of five years of which at least:
  - 1400 hours are supervised psychological practice in a work role approved by the Board consisting of sufficient opportunity to develop the required competencies
  - 560 hours are direct client contact
  - 80 hours are psychological supervision with a Board-approved supervisor where at least one hour of supervision is received for every 17.5 hours of psychological practice
  - 60 hours are professional development
3. Completed and submitted to the Board two case reports that the Board assesses as meeting the requirements of case reports set out in the *Guidelines for the 5+1 internship program* and demonstrating the attainment of the required competencies, and
4. Completed all the internship requirements set out in the *Guidelines for the 5+1 internship program*.

## Appendix F

**Successful completion of a Board-approved transitional program** means: the individual has completed a transitional program that was approved by the Board in accordance with the *Policy for overseas qualified applicants*. To be considered to have successfully completed the program the individual must have achieved the following during the program:

1. Demonstrated competence in the following areas to a Board-approved supervisor through direct observation of practice and/or discussion in supervision sessions:
  - ethical, legal and professional matters as relevant to the Australian context
  - working in a cross-cultural context as relevant to the Australian context
2. Completed a minimum of 210 hours of psychological practice in an approved work role over a minimum of three months/12 weeks and for at least 17.5 hours per week, and
3. Completed a minimum of six hours of individual supervision with a Board-approved supervisor that focussing on Australian ethical, legal, professional, and cultural matters, provided at a rate of at least one hour per fortnight

**Sufficient progress in the research thesis** means that work on the doctoral thesis has progressed to the point where the Head of Psychology School at the educational institution at which the individual is undertaking a Board-approved qualification accredited as a fifth to seventh year of study, is satisfied that the thesis writing is equivalent to a sixth year thesis in size and scope.

### Review

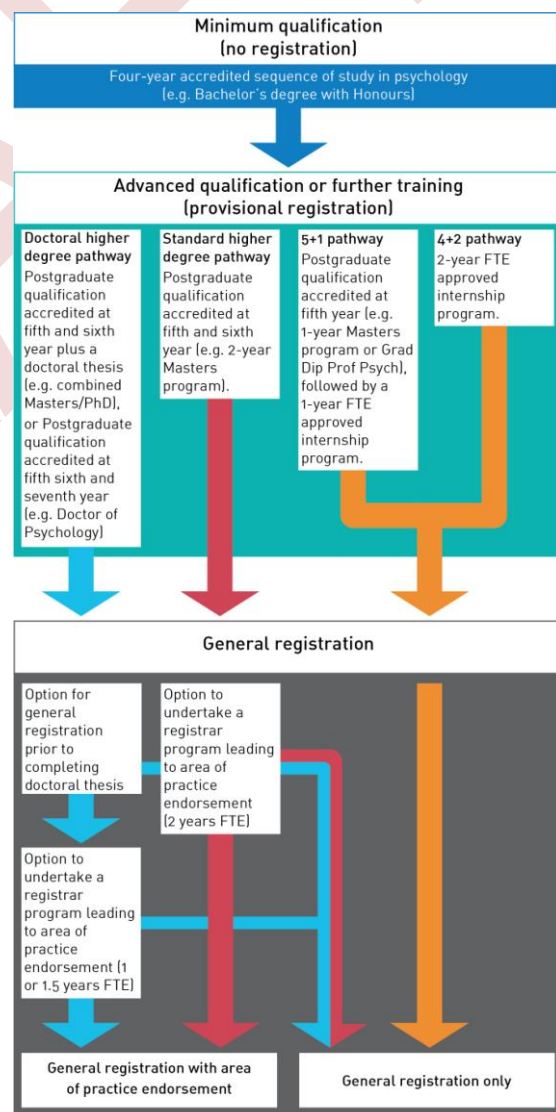
Registration standards are reviewed at least every five years.

Review date: <<date>>.

Last reviewed: <<date>>

This standard replaces the previously published registration standard from 1 July 2010.

### Training pathways to general registration



DRAFT

## Policy for recency of practice requirements

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### Summary

The Psychology Board of Australia's *Recency of practice registration standard* was approved by the Australian Health Workforce Ministerial Council on [date month year] under the Health Practitioner Regulation National Law (the National Law) as in force in each state and territory. The standard took effect from [date month year].

Consistent with the registration standard, an applicant who has not practised as a registered psychologist for five years or more before the date of application for registration, or for renewal of registration, is not automatically eligible for registration or renewal of registration. They may be required to undertake remedial action to become eligible for registration or renewal of registration. The *Recency of practice registration standard* sets out the remedial action applicants may be required to complete, if they are not able to comply with the registration standard. This policy sets out the level of remedial action required, depending on the length of practice lapse.

To practise as a psychologist in Australia, an individual must be registered by the Board. On this basis, the Board will not accept as evidence of practice:

- a) unregistered practice involving activities of a psychological nature, or
- b) practice involving activities of a non-psychological nature despite these being performed by a registered psychologist.

However the Board may take into account unregistered practice in countries where registration is not available, or practice in a related field into account when determining remedial requirements to meet the registration standard. The level of remedial action required will depend on the amount of time the applicant has not practised as a registered psychologist.

### Definitions

**AHPRA** means the Australian Health Practitioner Regulation Agency

**Board** means the Psychology Board of Australia established under section 31 of the National Law

**4+2 internship program** refers to the supervised practice program as outlined in the guidelines

**National Psychology Examination** refers to the exam as outlined in the Guidelines for the National Psychology Examination.

**Practice** means any role, whether remunerated or not, in which the individual uses their skills and knowledge as a registered psychologist in the profession. Practice in this context is not restricted to the provision of direct clinical care. It also includes using professional knowledge in a direct, nonclinical relationship with clients, working in management, administration, education, research, advisory, regulatory or policy development roles, and any other roles that impact on safe, effective delivery of services in the profession.

**Provisional psychologist** means a person registered as a provisional psychologist under Part 7, Division 3 of the National Law

**Psychologist** means a person who holds general registration as a psychologist under Part 7, Division 1 of the National Law

**Recency of practice** means that a practitioner has maintained an adequate connection with, and recent practice in, the profession since qualifying or obtaining registration, in accordance with the requirements of the Recency of practice registration standard.

**Supervisor**, or **Board-approved supervisor** or **Principal supervisor** means a person who holds general registration as a psychologist and who has been approved by the Board to supervise provisional psychologists



## Responsibilities

The Board is responsible for formulating, approving and overseeing this policy. AHPRA is responsible for ensuring that the policy is implemented and effectively managed.

## Scope

This policy applies to individuals who do not meet the requirements of the *Recency of practice registration standard* who:

- 1) were previously registered with the Psychology Board of Australia, or a prior state or territory board of Australia, whose registration has lapsed and who are applying for general registration, or
- 2) currently hold general registration with the Psychology Board of Australia and who are applying to renew their registration, or
- 3) are applying to change registration status from non-practising registration to general registration, or
- 4) are applying for registration in Australia for the first time.

## Registration decision

When the Board considers an application for general registration or renewal of general registration and the applicant does not meet the requirements of the *Recency of practice registration standard* it may decide:

- 1) To refuse the application for general registration or renewal of general registration, and
  - a) require the applicant to successfully complete the National Psychology Examination before a new application for general registration will be accepted, and/or
  - b) advise the applicant to make an application for provisional registration in order to undertake a period of supervised practice approved by the Board in order to meet the recency of practice requirements and become eligible for general registrationor
- 2) To grant provisional registration instead of general registration if the application is made under section 77 of the National Law (i.e. does not include application for renewal), and
  - a) require the applicant to successfully complete the National Psychology Examination before a new application for general registration will be accepted, and/or
  - b) require the individual to undertake a period of supervised practice approved by the Board in order to meet the recency of practice requirements and become eligible for general registrationor
- 3) To grant or renew the application for general registration but impose a condition that the applicant must:
  - a) successfully complete the National Psychology Examination, and/or
  - b) successfully complete a period of supervised practice approved by the Board in order to become eligible for general registration.

## Supervised practice requirements

A period of supervised practice as determined by the Board should be grounded in a return to practice plan. The purpose of the plan for professional development and for re-entry to practice is to ensure that the practitioner is returning to safe practice with appropriate supports in place. This is for the safety of client and the practitioner. The plan for professional development and re-entry to practice will be different for each practitioner. It should be tailored to the practitioner's particular circumstances and their individual learning needs. It is therefore not appropriate for the Board to issue a standard re-entry plan with set tasks or supervision levels.

However the Board does provide a re-entry program plan template which requires you to undertake an objective self-assessment of learning needs taking into account previous experience and the position you

propose to return to practice in. You are required to identify any gaps in your knowledge and skills and areas for improvement, set your learning goals and then develop a plan for meeting those goals. Your plan must also include how you will demonstrate achievement of your aims and your current competence to practice to your supervisor and/or the Board.

Additionally, the following broad guidelines are provided to assist practitioners in designing their re-entry program:

### **Psychological practice**

All re-entry programs must include psychological practice in a work role that has been approved by the Board. Your re-entry plan must include a proposed number of psychological practice hours you will complete. The Board will review the plan and make the final decision on how many practice hours are required.

You should base your proposed re-entry plan on the following ranges which the Board uses as a guide when determining the minimum psychological practice hours for a re-entry program:

If an applicant has not practised as a registered psychologist for:

1. More than five years but less than ten years: the standard range is **500 to 1000 hours**, this may be varied taking into account the factors listed below and in exceptional circumstances may be varied outside the standard range, but will be no less than 250 hours and no more than 2000 hours
2. More than ten years but less than fifteen years: the standard range is **1000 to 2000 hours**, this may be varied taking into account the factors listed below and in exceptional circumstances may be varied outside the standard range, but will be no less than 800 hours and no more than 2800 hours, and
3. More than fifteen years: the standard range is **1500 to 2500 hours**, this may be varied taking into account the factors listed below and in exceptional circumstances may be varied outside the standard range, but will be no less than 1200 hours and no more than 2800 hours.

The factors the Board will consider when deciding the number of supervised practice hours that will be initially required:

- Specific length of absence (e.g. five years vs. nine years)
- Reason for absence (e.g. maternity leave, overseas practice, suspended following disciplinary action)
- Registration status during absence (e.g. general, non-practising, lapsed, suspended, cancelled)
- Amount of prior practice experience
- Whether prior practice experience was full-time or part time and whether continuous or broken periods of practice
- Whether the applicant is returning to the same scope of practice or a different scope of practice
- Further education, CPD and peer consultation undertaken during absence
- Work in a related field during absence
- Overseas practice during absence (but that does not meet the standard e.g. because it was in a country with no registration)
- Contents of the proposed re-entry plan (e.g. it may be acceptable if the plan proposes more supervision and CPD but less practice hours)
- Whether the applicant will be required to sit the national psychology exam

The required practice hours may be varied from the initially required hours after the re-entry plan has commenced in the following special circumstances:

- Application for review of conditions – if conditions have been placed on registration the Board sets a minimum review period and after that time the registrant can apply to the Board for the conditions to be changed or reviewed. For example a registrant who by the end of the review period has successfully completed all the output elements of the re-entry program (see below) but has not completed the required number of practice hours, may apply for the review or removal of the relevant condition; or
- Unsatisfactory progress in the re-entry program. For example if a registrant has completed 2800 hours of practice but has not successfully completed all the output elements of the re-entry program (see below) the Board may decide it is necessary to change the relevant condition of registration to require more hours of practice to be completed.

## Supervised practice requirements

All re-entry plans must include the following minimum inputs:

- Psychological practice – hours as specified in approved work role/s
- Supervision with a Board approved supervisor – usual requirement is 2 hours per week/1 hour per 17.5 hours of practice (as per internships), may be varied as appropriate but no less than 1 hour per week/38.5 hours of practice (as per registrar program)
- Direct observation of practice by a Board approved supervisor – at least two observations for every six months and minimum of two for supervision programs of less than six months
- CPD – standard requirement: 40 – 60 hours per year, may be undertaken pro-rata if part time provided the minimum requirements of the CPD standard are still met

All re-entry plans must include the following minimum outputs:

- Progress report/s – one every six months and at least one for programs that are shorter than six months
- Final assessment of competence report
- Pass the national psychology exam
- Case report – at least one and usually one for every six months of FTE practice.

Depending on your individual skills development foci other assessment tasks may be appropriate and you may choose to propose other tasks in your re-entry plan such as written report/s on ethical dilemmas/professional limitations/cross-cultural practice issues/practice across the lifespan issues/or other as appropriate; or you may propose a research project in a specific area of practice identified in the re-entry plan as a skills development focus area. When proposing additional tasks in your plan you should assume they will be self directed and assessment will be undertaken by your supervisor/s. However the Board reserves the rights to require submission of any tasks you have proposed and also to require amendment of the plan to include other tasks it believes are necessary.

## On completion of remedial action

For individuals who have been granted provisional registration to undertake the remedial action, on successful completion of the remedial action to the satisfaction of the Board, the applicant may apply for general registration.

For individuals who have been granted general registration with conditions to undertake the remedial action, the applicant may apply to have the conditions changed or removed at any time after the minimum review period that has been set by the Board, using the form [Application for review of conditions or undertakings by a psychologist - ARCD-76](#).

The Board reserves the right to vary the conditions in this policy in accordance with individual circumstances.

## Authorisation

Psychology Board of Australia

Date of issue 1 August 2011

## Review

This policy will be in effect from 1 August 2011. The Board will review this policy at least every five years.

Last reviewed: (day/month/year)