



Public consultation paper

11 January 2016

Area of practice endorsements

You are invited to provide feedback

The Psychology Board of Australia (the Board) is releasing the attached consultation paper on a review of the *Area of practice endorsements registration standard* and the *Guidelines on area of practice endorsements*.

The Board is seeking comment and ideas from the profession, the community, governments and other stakeholders on the requirements for area of practice endorsements for psychologists in Australia. You may choose to provide feedback on one, some, or all aspects of this consultation.

Please provide your submission in a Word document (or equivalent¹) and email to psychconsultation@ahpra.gov.au by close of business on **Friday 4 March 2016**.

How your submission will be treated

Submissions will generally be published unless you request otherwise. The Board publishes submissions on its 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 reference.

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 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 These submissions will not be published on the website or elsewhere.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 (Cth), which has provisions designed to protect personal information and information given in confidence.

Please let us know if you do not want us to publish your submission, or want us to treat all or part of it as confidential.

Before publication, the Board may remove personally-identifying information from submissions, including contact details where appropriate.

¹ You are welcome to supply a PDF file of your submission in addition to a 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 format in addition to PDFs. More information about this is available at www.ahpra.gov.au/About-AHPRA/Accessibility.aspx.

For more information on the consultation process please refer to the document *Consultation process of National Boards* available at www.ahpra.gov.au/Publications/Procedures.aspx.

The Board does not provide individual responses to consultation submissions. If you are seeking a personal reply to a specific policy question please write a separate letter to the Chair of the Board at psychologychair@ahpra.gov.au.

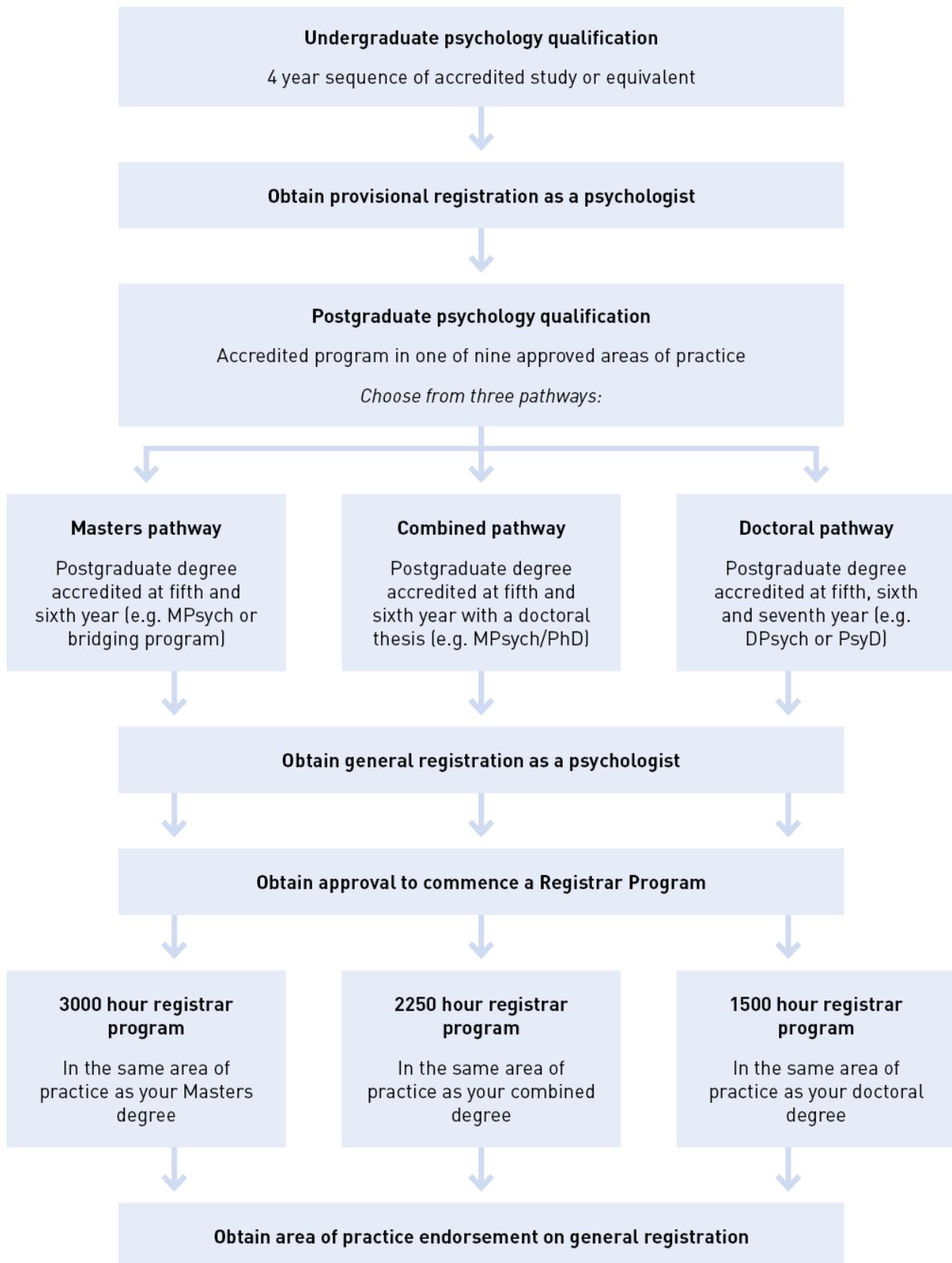
If you are seeking a response regarding an operational matter such as an individual application for registration or endorsement, or a notification matter, please contact your [local office of AHPRA](#) via phone or web enquiry.

If you require advice on making a submission such as about the format or submission deadline, please send your query to psychconsultation@ahpra.gov.au, this inbox will be monitored regularly while the public consultation is open.

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Figure1: Pathways to areas of practice endorsement



Overview of consultation

Consultation on proposed revisions to the *Area of practice endorsements registration standard*, and the *Guidelines for area of practice endorsements*

Summary

1. The role of the Board is to work with AHPRA and other National Boards is to achieve the [objectives](#) of the National Registration and Accreditation Scheme (the National Scheme) in accordance with the guiding principles of the scheme. To ensure continued relevance in a dynamic regulatory environment, the Board undertakes regular review of all its registration standards, guidelines and policies. The aim of this review is to streamline the area of practice endorsement documents, ensure continued relevance and identify any further opportunities for improvement.
2. In this public consultation, the Board is seeking input from the profession, the public and stakeholders on proposed amendments the *Area of practice endorsements registration standard* and the supporting *Guidelines for area of practice endorsements* as well as suggestions for further improvement.
3. In developing the proposed revised standard and guideline, the Board considered whether there is a need to propose significant changes, such as changing the nine approved areas of practice, detailed revision of the area of practice competencies, or significant revision of the requirements of the registrar program.
4. At this stage the Board believes that, for the most part, the requirements of the registration standard and guideline are appropriate and working well. Therefore significant revisions have not been proposed. It is also noted that there are a number of factors and developments in the broader regulatory environment that will influence area of practice endorsements that will need to be taken into account in the future reviews. Suggestions for more substantial improvements made in this review, which will demonstrably provide for increased public protection and directly contribute to achievements of the objectives of the National Law are also invited.
5. This consultation paper includes an overview before each proposed draft that explains the proposed changes. There are also specific [questions](#) about the registration standard and guideline which you may wish to address in your response.

Background

What is area of practice endorsement?

6. Area of practice endorsement of a psychologist's general registration is a legal mechanism allowed for under section 98 of the Health Practitioner Regulation National Law as in force in each state and territory (the National Law). It allows for the registration of registered practitioners to be endorsed by the Board as being qualified to practise in an approved area of practice for the profession.
7. Endorsement enables a notation to be included on the public register to identify psychologists who have an additional qualification and have completed advanced supervised practice in an approved area of practice that is recognised by the Board and approved by the Australian Health Workforce Ministerial Council (the Ministerial Council) under section 15 of the National Law.
8. In Australia, all psychologists are registered on a single register and the notation of an endorsement appears on the register for those with general, non-practising and provisional registration. There is no separate specialist register. Nor is an area of practice endorsement based on experience derived during the course of a professional career. To qualify for this practice endorsement, a psychologist must have an advanced qualification and training over and above the minimum level of psychological training required for general registration.

9. For the psychology profession, the Ministerial Council has approved nine areas of practice as being an area of practice for which the Board may endorse the registration of suitably qualified psychologists.
10. The nine approved areas of practice are:
 - clinical neuropsychology
 - clinical psychology
 - community psychology
 - counselling psychology
 - educational and developmental psychology
 - forensic psychology
 - health psychology
 - organisational psychology, and
 - sport and exercise psychology.
11. Psychologists whose general registration is endorsed for an area of practice are permitted to use a protected title associated with the area of practice, such as 'clinical psychologist' or 'organisational psychologist'.

Requirements of the National Law

12. Section 98 of the National Law states that the Board may endorse a practitioner's registration if they hold an approved qualification or another qualification that is substantially equivalent to, or based on similar competencies to, an approved qualification, and they comply with an approved registration standard relevant to endorsement.
13. Section 99 of the National Law sets out the requirements for applications for endorsement, including that an application must be on a form approved by the Board, be accompanied by the relevant fee, and accompanied by other information reasonably required by the Board. Section 99(3)(a) lists information that the Board may reasonably require, including evidence of:
 - the qualification/s the applicant believes qualifies them for endorsement
 - successful completion of a period of supervised practice required by an approved registration standard, and
 - successful completion of an examination or assessment set by the Board (if required).

Requirements of the registration standard

14. The Board's current *Area of practice endorsements registration standard* was approved by the Ministerial Council on 17 February 2011 with approval taking effect from 9 March 2011. The standard provides more detail about the requirements for endorsement under the National Law. This includes that the approved qualification must be an accredited doctorate or masters degree in the approved area of practice, or a qualification substantially equivalent (e.g. an overseas qualification based on similar competencies to an accredited qualification). It also specifies that a successful completion of a period of supervised practice with a Board-approved supervisor is required. The Board requires the supervisor to complete a final assessment of competence on successful completion of the period of supervised practice.

Guidelines on area of practice endorsements

15. The *Guidelines on area of practice endorsements* supplement and expand on the requirements of the National Law and the registration standard. In particular they provide guidance and details about:
 - use of protected titles associated with area of practice endorsements
 - recognised qualifications and equivalence guidelines
 - the required period of supervised practice ('the registrar program')
 - Board-approved supervisors for the registrar program, and
 - the core competencies, including general competencies and specific competencies for each of the nine areas of practice.

Previous consultations

16. The Board has publicly consulted on proposals for area of practice endorsements on four previous occasions as follows:

Consultation number	Consultation name	Consultation period
Consultation paper 1	<i>Registration standards and related matters</i>	October-November 2009
Consultation paper 2	<i>Codes and guidelines</i>	March-April 2010
Consultation paper 5	<i>Revisions to the Guidelines on area of practice endorsements</i>	August-September 2010
Consultation paper 7	<i>Exposure draft - Guidelines on area of practice endorsements</i>	November-December 2010

17. The public consultation papers and submissions are published on the [Past consultations](#) page on the Board's website.

Related matters

18. There are a number of factors and developments in the broader regulatory environment that have influence on the Board's consideration of area of practice endorsements. There are currently several pieces of work (as outlined below) being undertaken by partner organisations under the National Law, and other key stakeholders in Australia and internationally that are expected to influence the regulation of the profession in Australia with regard to area of practice endorsement.
19. The Board has not proposed significant revisions to the requirements for area of practice endorsements at this stage. It is acknowledged however, that the outcomes of these related projects and initiatives will need to be taken into account in the future reviews.

Area of practice endorsement accreditation standards

20. Under the National Law there are accreditation functions that are assigned either to an external accreditation entity, or a committee established by the Board. For the psychology profession, the function of developing accreditation standards for approval by the Board (see section 42(a) of the National Law) is assigned to an external accreditation entity, the Australian Psychology Accreditation Council (APAC).
21. APAC is currently working to develop new accreditation standards for the psychology profession which will include specific standards for the accreditation of programs of study leading to area of practice endorsements. This work will include wide-ranging consultation about the proposed content of the standards as required by section 46(2) of the National Law, and is expected to include public consultation. For more information about the work of APAC please visit their website at www.psychologycouncil.org.au/.
22. This review of the requirements for area of practice endorsements is based on the requirements under the [current accreditation standards](#). As the accreditation standards for endorsements need to be finalised first, the Board is limited in the extent of the changes to the requirements for area of practice endorsement that can be proposed at this stage. Once new accreditation standards are approved, the Board intends to undertake further work to account for the new standards.

Criteria for specialist registration

23. At the beginning of the National Scheme in 2009, the Board presented a proposal to establish specialist registration (refer to consultation paper 1 for details) and sought Ministerial Council approval of a separate specialist register for psychology. The proposal was not supported and the Board was advised that area of

practice endorsement is a more appropriate mechanism, as it identifies psychologists with specialist training without imposing restrictions on scope of practice. At that time, the Board agreed to review the issue of specialist registration in the future.

24. In 2011 the Ministerial Council agreed to develop a set of national criteria that must be addressed in proposals for specialist registration by Boards. Consultation was commissioned by the [Health Workforce Principal Committee](#) (HWPC) of the of Australian Health Ministers' Advisory Council (AHMAC) at the request of Ministerial Council. The Board agreed to defer its review of specialist registration, pending the outcome of that work. In deciding whether to make a submission about establishment of a specialist register and specialities for the profession, it was necessary to await the national criteria and guidance on what would be expected of Boards making such a submission.
25. The criteria and guidance for National Boards have now been completed and approved by the Ministerial Council. The criteria have been provided to the Board and AHPRA and published on the [AHPRA website](#). After considering the guidance, the Board formed the view that the 'case for action' for submitting the psychology profession and the public to the increased regulatory burden associated with specialist recognition under the National Law, has not yet been made.
26. The Board will not submit a proposal for specialist registration as part of this current review because there is a need for further discussion within the profession and community about the need for specialist registration. If a proposal for specialist registration is made, there must be strong agreement between different sectors of the profession and the higher education sector, employers, consumer groups and regulators on the matter. A proposal for specialist registration would need to identify and provide evidence of the specific regulatory risks that can only be addressed through specialist registration.
27. The Board encourages all stakeholders to review the criteria and consider and discuss in detail the likely benefits, disadvantages and limitations that may be associated with establishment of a specialist register for psychology. In particular there should be focus on how a proposal for specialist registration would be consistent with the principles of the Council of Australian Governments (COAG) and the objectives and guiding principles of the National Law.
28. For additional background information on specialist registration please refer to *Further Information* on the web page at www.psychologyboard.gov.au/Endorsement/Further-information.aspx.

Education and training reform

29. Psychology education and training reform is an important next step in the development of the regulatory environment for the psychology profession. Facilitation of such reform is a priority for the Board with continued engagement with key stakeholders including APAC, education and training stakeholders, employers (including representatives of the health workforce), government, and the profession. The program of work will also align with new accreditation standards APAC is developing.

Overseas qualifications assessment framework

30. The Board and AHPRA are working to develop and implement an improved overseas qualifications assessment framework to streamline and simplify the process of assessing overseas qualifications for registration in Australia. Once the new assessment framework is finalised, the Board will consider whether further review of the requirements for area of practice endorsements is necessary to ensure consistency with overseas assessment processes.

International psychology competency project

31. At the 4th International Congress on Licensure, Certification and Credentialing of Psychologists in Sydney in July 2010, international regulators scoped a 'future 2030 vision' to facilitate international mobility of psychologists.
32. The first step in this larger project was to develop an agreed core set of competences that define professional psychology. At the 5th International Congress on Licensure, Certification and Credentialing of Psychologists in Stockholm in July 2013, international regulators decided to promote the development of

this global agreement on benchmark competences. This work is known as The International Project on Competence in Psychology (IPCP) and its aim is to produce an international declaration on core competences in professional psychology.

33. A work group comprising members from Europe, North America, South America, Asia-Pacific, and Africa has made significant progress over the last two years with contributions from psychologists and psychology regulators from around the world. A draft *Declaration of core competencies in professional psychology* was presented at the 14th European Congress of Psychology held in Milan in July 2015. It is anticipated that the final proposed international declaration on core competences in professional psychology will be considered for acceptance at the International Congress of Psychology (ICP) in Yokohama, in July 2016.
34. The Board expects that following international acceptance of core competencies, it will undertake a review of the Australian competencies for general registration and area of practice endorsement. Development of core competencies is only one step in promoting international mobility. The Board, in conjunction with APAC, is also exploring international agreements between regulators and accrediting agencies on mutual recognition. The Board already has a mutual recognition agreement with New Zealand

Legislation and regulatory principles

35. Every Board decision must be in accordance with the [objectives and guiding principles of the 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 Boards under the National Law. Board decisions often need to 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 unrealistically high so as to inhibit the continuous development of the workforce to meet public demand for psychological services.
36. To guide decision making in accordance with the National Law, the Board has endorsed a set of [regulatory principles](#) together with AHPRA and the other 13 National Boards. The principles encourage a responsive, risk-based approach to regulation across all professions within the National Scheme. Regulatory decision-making is complex and contextual, requiring judgment, experience and common sense. The principles further support decision making which is consistent and balanced.
37. The relevant extracts from the National Law and the regulatory principles are included at the end of this consultation paper.

Review of the *Area of practice endorsements registration standard*

Background

38. The National Law requires National Boards to develop and recommend registration standards about various matters to the Ministerial Council. This may include matters relevant to the eligibility of individuals for registration in the profession, including endorsement of registration in the profession. The *Area of practice endorsements 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 in 2010. The standard was approved by the Ministerial Council on 31 March 2010 with approval taking effect from 1 July 2010.
39. The 2010 version of the standard included seven approved areas of practice which aligned with the seven specialist titles that psychologists could be registered for in Western Australia prior to commencement of the National Scheme. In 2011 the Ministerial Council approved two additional areas of practice and the registration standard was updated accordingly with the revised standard taking effect from 9 March 2011.

Options statement: *Area of practice endorsements registration standard*

40. The Board considered two main options for this review of the standard.

Option 1: status quo

41. This option proposes to retain the current *Area of practice endorsements registration standard* with no changes. The current [Area of practice endorsements registration standard](#) is available on the Board's website.

Option 2: proposed revised standard

42. This option involves the Board seeking Ministerial approval of a revised registration standard.
43. The Board has identified some ways the current standard may be improved, including clarification of language, revision of the structure and addition of key definitions to make the standard clear and easy to understand.
44. The Board is not proposing to change the qualifications and training required for endorsements at this stage. The current focus on psychology education and training reform could lead to changes that would require the Board to undertake significant revision of the standard in the future. Therefore the Board proposes to make some improvements now but wait until related matters and projects are completed or adequately progressed and then consider more significant changes that will reflect those outcomes.
45. The current requirements (an accredited postgraduate degree in an approved area of practice, followed by a Board-approved registrar program in the approved area of practice) appear to be providing a good balance between rigorous training that produces suitably trained and qualified practitioners in the approved areas of practice, and meeting workforce demand for psychology services in different areas.

Therefore the proposed revised registration standard would continue to establish the Board's current requirements for endorsement of registration until there is strong agreement between the profession and key stakeholders and a clear way forward for reform of area of practice training pathways.

Preferred option

46. The Board prefers option 2.

Discussion – review of the Area of practice endorsements registration standard

47. Matters the Board would particularly like to highlight for this review of the *Area of practice endorsements registration standard* are discussed below and comments and feedback are 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 welcomed.
48. The draft revised [Area of practice endorsements registration standard](#) is included at the end of this discussion section.

Summary

49. The Board proposes to update the summary section to provide an explanation of area of practice endorsement as the current standard may not adequately reflect the requirements under sections 98 and 99 of the National Law.
50. The current wording of the standard could be mistaken to mean that endorsement is based on the area in which a psychologist practises and has experience gained over the course of a career. In fact, the National Law states explicitly that applicants for endorsement must hold an approved qualification (a formal tertiary qualification) plus have completed any supervised practice and assessment or exam required by the Board. The Board therefore proposes revised wording as follows:

An area of practice endorsement is a notation on the public Register of Practitioners that indicates that the individual has completed an approved postgraduate qualification and a registrar program in an approved area of practice.

51. The Board intends that this will help to ensure consumers of psychology services, as well as the profession and industry, understand the concept of endorsement and are able to make informed decisions when choosing a practitioner or recruiting a psychologist.

The approved areas of practice

52. The nine approved areas of practice are listed in the summary section of the registration standard. The Board's view is that the nine areas accurately reflect the current range of postgraduate degree options and specialised practice areas in Australia and proposes no changes the approved areas.
53. The Board would only seek approval of a new area of practice if a training pathway for the area was available in Australia. The current requirement for endorsement includes completion of an accredited postgraduate degree in the area of practice; that is, the degree title must specify the area of practice, such as Doctor of Clinical Psychology, or Master of Applied Psychology (Community Psychology).
54. The Board will not consider seeking approval for areas of practice for which there are not any postgraduate degrees in Australia, and therefore no pathway to endorsement. For example, 'occupational psychology' is a common term overseas, but not used in any degree title in Australia. Overseas-trained applicants whose degree is in an area that is not an approved area of practice in Australia may be eligible to apply for an equivalent endorsement. For example, a postgraduate degree in occupational psychology could be assessed as equivalent to an Australian degree in organisational psychology.
55. The Board has reviewed the postgraduate degrees in Australia that include non-approved areas in the degree title. The Board has considered whether defence psychology and clinical geropsychology should be considered unique areas of practice, and has formed the view that these are sub-specialities rather than unique areas of practice. Currently degrees in defence psychology (at Adelaide University) and geropsychology (at the University of Queensland and James Cook University) focus on these areas as sub-specialities of clinical psychology. Therefore these degrees would continue to qualify the holders for entry into the clinical psychology registrar program and defence and clinical geropsychology would not be proposed as new areas of practice.

56. The Board also considered whether school psychology is a distinct area of practice separate from educational and developmental psychology. At this stage the Board does not propose seeking approval of school psychology as a new area of practice. While school psychologists often have unique training pathway requirements, they cannot meet the specific educational requirements that the other areas of practice require. If an Australian university was to start offering, for example, a Master of School Psychology that met APAC's requirements for accreditation, the Board would reconsider seeking Ministerial Council approval of school psychology as an area of practice.
57. The Board has also considered whether the current nine areas of practice are all sufficiently distinct from one another to justify their being approved as separate areas of practice, or whether some areas should be considered subspecialties within the same area of practice. At this stage the Board feels that all nine areas should be retained as unique approved areas of practice. The Board would be prepared to review the matter further in response to workforce and professional changes and reform of education and training for area of practice endorsements in the future.

Eligibility

58. There are a number of proposed changes to the 'Requirements' section of the current standard, including that the title is proposed to be updated to 'Eligibility'. The changes to this section primarily clarify the current requirements and do not make any significant changes to the actual eligibility requirements.
59. The current registration standard sets out three pathways to become eligible to apply for endorsement: the masters' pathway, the doctorate pathway and the 'other' pathway (primarily for overseas qualified applicants). These would all be retained and explained more clearly.
60. The Board proposes updating the wording in this section to specify the level of qualification required rather than the name of the qualification; that is, 'fifth, sixth and seventh year' instead of 'doctorate', and 'fifth and sixth year' instead of 'masters'. This would align the standard more closely with the Australian Qualifications Framework (AQF)² which defines qualifications by levels rather than titles. Under the framework a variety of qualifications titled 'Masters' at varying AQF levels are becoming available. It is important for the Board to be clear that the minimum qualification for area of practice endorsement is a fifth and sixth year masters. This is so individuals who undertake a fifth year masters qualification, such as a Master of Professional Psychology, are not misled into thinking the degree will qualify them for entry into the registrar program.
61. This section is also proposed to be updated to specify 'the registrar program', instead of 'approved, supervised, full-time equivalent practice' and to also specify that the qualification must be completed first, followed by the registrar program.
62. It is also proposed to specify the number of hours of registrar program required, rather than 'one year' or 'two years' to make the requirements clearer, particularly for psychologists who undertake the program part-time. The minimum hours are proposed to be slightly less than those stated in the current *Guidelines on area of practice endorsements* e.g. a 'two-year' registrar program would be 3000 hours instead of the current requirement of 3080 hours.
63. The Board further proposes to include the combined pathway as a specific pathway in the revised standard. That is, for approved postgraduate qualifications accredited as a fifth and sixth year of study in one of the approved areas of practice which combine masters level coursework and placements with a doctoral thesis, such a combined Masters/PhD.
64. The current standard recognises combined degrees as fifth and sixth year masters degrees which require completion of a two-year registrar program to become eligible to apply for an endorsement. However the current *Guidelines on area of practice endorsements* provide a six month reduction (770 hours) in the requirements of the registrar program as credit for work undertaken in the PhD. By creating a separate pathway for combined degree applications, the only change in what will actually required for this group would be the small reduction in minimum hours (2,250 hours instead of 2310 hours); the purpose of the change would be to set out the available pathways to endorsement more clearly.

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

65. The fifth and sixth year ('masters') pathway (part c) in the [proposed revised standard](#)) is proposed to be expanded to include post-masters bridging programs accredited at sixth year which are beginning to become available in Australia. As with fifth and sixth year programs, graduates of sixth year bridging programs will require a two-year registrar program to become eligible to apply for endorsement of registration.
66. Under the current registration standard, bridging programs are assessed under what is currently part c) ('another qualification that in the Board's opinion is substantially equivalent to a) or b)'), as only accredited masters and doctorate qualifications are allowed for a) or b). The proposal to include bridging programs in a standard pathway would mean that applicants would have certainty that what is required to obtain an endorsement. The current standard part requires case-by-case assessment so until the Board assesses the application the applicant cannot be sure of what the requirements will be, particularly with regard to the length of the registrar program. This change would also remove the risk of inconsistent case-by-case assessments. Currently this risk is easily managed because of the very low number of programs, which are only offered in one jurisdiction (WA), but this could change in the future.
67. The 'other' pathway (part d) in the [proposed revised standard](#)) is proposed to be updated to specify that, in addition to a 'substantially equivalent' qualification, a period of approved supervised practice is required. Part c) would be used to assess applications with the following types of qualifications:
- qualifications completed overseas, and
 - masters or doctoral level qualifications completed prior to the establishment of APAC in 2003.
68. The period of supervised practice required would be the registrar program, or if the applicant has already completed formal post-masters supervised practice overseas it may be assessed as fully or partially equivalent to the registrar program.
69. The Board proposes to add a new eligibility pathway for endorsement. Part e) would allow applicants who have previously held an area of practice endorsement under the National Law to become endorsed again on the basis of the qualification and training that previously qualified them for endorsement. This would apply even if the qualification and training requirements have changed in the meantime. The intention is to prevent psychologists from being unable to reapply for an endorsement they previously held if they take time out of the workforce (for example to raise a family). This proposed provision would work the same as section 53(d)(ii) of the National Law which allows an applicant who previously held general registration to be re-registered on the basis of the qualifications that previously qualified them for general registration, even if the requirements have changed in the meantime.
70. Part e) would ensure psychologists are not adversely affected by any changes to training requirements for endorsement in the future. It would also ensure psychologists who were endorsed under transition provisions during the period of transition to the National Scheme (2010-2013) are not disadvantaged should they need to reapply for an endorsement after a period of lapsed registration.

Definitions

71. The Board proposes to add new section with definitions of key terms to make the standard clearer and easier to understand. The Board invites feedback on the proposed definitions and any suggestions for other definitions to be included.

Review

72. When the Board developed its suite of registration standards and guidelines in 2010, it agreed to review its standards, code, guidelines and policies every three years. However the first review of the *Area of practice endorsements registration standard* was brought forward and undertaken in 2011 instead of 2013 to enable two additional areas of practice to be added.
73. Now that the transitional phase of the National Scheme is over, the Board expects fewer reviews will generally be sufficient as standards and 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 resources are not overcommitted to cyclical

reviews 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.

74. Therefore the Board proposes the next review would commence within five years of implementation of a revised standard following this current review, but with provision to undertake earlier review if necessary. The Board believes it is likely that earlier review of this standard will be necessary to take into account the outcomes of the related projects and initiatives described in the [Overview](#) section of this consultation paper; or if a review is requested at any time by the Ministerial Council in accordance with section 12(3) of the National Law.

Potential benefits and costs of the proposals

75. The benefits of the preferred option(s) are that the proposed revised standard includes:

- closer alignment with the requirements for area of practice endorsement under the National Law
- clarification of the qualification requirements for endorsement, including a definition of 'approved qualification'. This is fairer for applicants as it helps ensure they are not misled into thinking work experience, professional development courses, supervision, and self-directed learning activities will be recognised as being approved qualifications, and
- use of plain, non-ambiguous English to ensure the standard is easily understood by psychologists, employers and consumers of psychology services.

76. The costs of the preferred option include:

- the costs of managing the review project and the consultation process, which is primarily undertaken by permanent AHPRA staff with oversight and support from the Board. These costs are already accounted for in the Board's budget and will have no impact on registration fees
- registrants and other stakeholders would need to become familiar with a revised version of the registration standard, if approved by Ministers, and
- should the consultation process indicate that more substantial changes to the standard are required, transition arrangements and a period of transition may be necessary. However, if there were no further changes made to those proposed in this paper, transition arrangements would not be required because the requirements for entry into the registrar program and for obtaining endorsement are not proposed to change.

Expected impact of the draft revised registration standards

77. The proposed changes to the registration standard are relatively minor, although more significant changes could be proposed through consultation. There is little impact anticipated on practitioners, business and other stakeholders arising from the changes that are currently proposed.

Registration standard: Area of practice endorsements

Effective from: <<date>>

Summary

This registration standard sets out the Psychology Board of Australia's (the Board's) requirements for endorsement of general registration for an approved area of practice.

An area of practice endorsement is a notation on the public Register of Practitioners that indicates that the individual has completed an approved postgraduate qualification and a registrar program in an approved area of practice.

Areas of practice for endorsement are approved by the Australian Health Workforce Ministerial Council (section 15 of the National Law).

The approved areas of practice are:

- clinical neuropsychology
- clinical psychology
- community psychology
- counselling psychology
- educational and developmental psychology
- forensic psychology
- health psychology
- organisational psychology, and
- sport and exercise psychology.

Who does this standard apply to?

Area of practice endorsement is only available to psychologists who hold general registration³.

This standard applies to psychologists who wish to apply for endorsement of general registration for an approved area of practice.

Eligibility

To be eligible to apply for an endorsement in one of the approved areas of practice, a registered psychologist must have general registration and:

- a. an approved postgraduate qualification accredited as a fifth, sixth and seventh year of study in one of the approved areas of practice, followed by a minimum 1500 hours of approved, supervised practice with a Board-approved supervisor in the registrar program, or

³ Refer to the Psychology Board of Australia's *General registration standard*, which sets out the requirements for general registration as a psychologist, at www.psychologyboard.gov.au/Standards-and-Guidelines/Registration-Standards.aspx.

- b. an approved postgraduate qualification accredited as a fifth and sixth year of study in one of the approved areas of practice which includes a doctoral thesis, followed by a minimum 2250 hours of approved, supervised equivalent practice with a Board-approved supervisor in the registrar program, or
- c. an approved postgraduate qualification accredited as a fifth and sixth year of study, or as a sixth year bridging program, in one of the approved areas of practice, followed by a minimum of 3000 hours of approved, supervised practice with a Board-approved supervisor in the registrar program, or
- d. another qualification and period of supervised practice that, in the Board's opinion, is substantially equivalent to a. or b., or
- e. previously held an area of practice endorsement in an approved area of practice under the National Law, and met the requirements to maintain that area of practice endorsement while generally registered, and is not otherwise disqualified from holding that endorsement.

Definitions

Accredited means a program of study that has been accredited by the profession's accreditation authority as meeting the requirements of the accreditation standards developed and approved under part 6 of the National Law. For the purpose of this registration standard an accredited program must also have been subsequently approved by the Board as providing a qualification for registration or endorsement of registration and appear on the list of approved programs of study on the Board's website.

Approved area of practice means that the Australian Health Workforce Ministerial Council has, on the recommendation of the National Board, approved the area of practice in the profession as being an area of practice for which the registration of a practitioner in the profession may be endorsed.

Approved qualification for endorsement of registration means a qualification obtained by completing an approved program of study relevant to the endorsement which appears on the Board's *List of approved programs*.

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

General registration means general registration as a psychologist granted by the Psychology Board of Australia.

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

Psychologist or **registered psychologist** means a person who holds general registration as a psychologist under the National Law.

Registrar program is a program of post-masters or post-doctoral supervised practice comprising psychological practice in an approved work role, supervision with a Board-approved supervisor, and active continuing professional development undertaken in accordance with the requirements set out in the *Guidelines on area of practice endorsements*.

Authority

This registration standard was approved by the Australian Health Workforce Ministerial Council on <<date>> with approval taking effect from <<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: <<review date>>

This standard replaces the previously published registration standard from 9 March 2011.

Review of the *Guidelines on area of practice endorsements*

Background

78. The National Law states that a Board may develop and approve codes and guidelines to provide guidance to the practitioners it registers. The *Guidelines on area of practice endorsements* (the guidelines) provide guidance to registered psychologists who hold an endorsement, or are undertaking a registrar program to become eligible to apply for an area of practice endorsement, and their supervisors and employers.
79. The guidelines were first developed in early 2010 after feedback to *Consultation paper 1* indicated that the Board's proposal for specialist registration was unlikely to be supported by the Ministers and endorsement would be viewed as a more appropriate mechanism. The new guidelines were released for public consultation in March 2010 and took effect from 1 July 2010.
80. As the initial guidelines were developed in a short timeframe, the Board decided they would be the first guidelines for review after commencement of the National Scheme. The initial revisions were released in August 2010 and following that consultation, further revisions were made to take suggestions and feedback from stakeholders into account. The guidelines were then re-released as an exposure draft in November 2010.
81. In February 2011 the Ministerial Council approved two new areas of practice (community psychology and health psychology) which were incorporated into the revised guidelines. The Board approved the final revisions on 29 July 2011 and the new guidelines were published and took effect from 1 August 2011.

Options statement: guidelines on area of practice endorsements

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

Option 1: status quo

83. This option would retain the current *Guidelines on area of practice endorsements* with no changes. The current guideline is available on the Board's website under [Standards and guidelines](#).

Option 2: proposed revised guideline

84. This option would involve adopting revised *Guidelines on area of practice endorsements* with some changes to improve and update the content, but without significant changes to the requirements for endorsement or the registrar program.
85. Through engagement with members of the profession, employers and key stakeholders, the Board has identified some opportunities for improvement and better alignment with the objectives of the National Law, clarification of language and some revision of structure.
86. At this stage the Board does not propose amending the following key requirements of registrar program:
 - the qualification and eligibility requirements for entry into the program
 - competencies, and
 - the registrar program framework (the Board proposes minor amendments to the hours of psychological practice, but the framework of the program including direct client contact, professional supervision with a Board-approved supervisor, and profession development is essentially the same).

Preferred option

87. The Board prefers **option 2**.

Discussion

88. Matters the Board would particularly like to highlight for this review are discussed below and comments and feedback are 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 welcome.

General changes proposed for the guideline:

89. There are a number of general changes made throughout the guidelines including:
- updating of the definitions and other information to match updates in other documents (such as the supervisor guidelines)
 - revising the language and structure with the aim of making the guideline easier to read and understand, and
 - more accurate explanation of area of practice endorsement.

Introduction

90. The Board proposes some amendments to the information under *Summary* in this section in order to provide a better explanation of what an endorsement is and the eligibility requirements.

Endorsement and use of title

91. The revised guidelines propose removing out-of-date transitional information regarding specialist title as this transition provision under section 281 of the National Law ended on 18 October 2013.
92. This section includes some information about titles approved under a public sector industrial award, such as 'clinical psychologist'. It is understood that some jurisdictions still have awards in place that allow protected titles to be used by individuals who do not hold the relevant endorsement but in time these will be reviewed and aligned with the national endorsement standard.
93. The Board confirms that psychologists who use titles permitted under an award in their work role but do not hold the relevant endorsement are not in breach of the National Law, provided they do not use the title in a way that is misleading, as outlined in the guidelines.
94. The Board has not made changes to the information about industrial awards as it is understood the information still applies. If there are plans to update the relevant industrial awards in the near future, the Board would appreciate being advised to allow the guidelines to be updated at the same time.

Qualifications for endorsement

95. The wording of the qualifications and training pathways to become eligible to apply for endorsement are proposed to be updated to match the proposed revised wording in the registration standard.
96. This includes:
- stating the level of the degree rather than the title e.g. 'fifth and sixth year' instead of 'Masters' this applies to both the general requirements and the equivalence sections of the guidelines
 - including the combined degree pathway as a separate pathway
 - stating the registrar program requirements in hours rather than years e.g. 3000 hours instead of two years, this would be applied throughout the guideline where relevant
97. A definition of approved qualification, consistent with the definition in the National Law is also proposed to be added to the guidelines.

Post-masters bridging programs

98. Information on bridging programs has been updated to reflect the availability of accredited postgraduate bridging programs. The Board has approved these programs for registration purposes. In the absence of area of practice endorsement accreditation standards, interim arrangements for the recognition of these programs for endorsement purposes are that a bridging program accredited at sixth year is equivalent to a qualification accredited at fifth and sixth year. The information on bridging programs will be reviewed again once the new accreditation standards become available.

Equivalency guidelines

99. The equivalency section is proposed to be updated to specify that for psychology qualifications gained overseas, the Board may consider a relevant membership of a recognised overseas professional body (additional credentials held by individuals to practise in the profession) to assess whether the two qualifications, together, satisfy the requirements of substantial equivalence.
100. The circumstance in which this will be applicable is where the overseas postgraduate qualification alone is deficient in the satisfactory completion of a practical component or a constituent element.
101. In assessing the quality of overseas memberships or credentials, the Board will seek evidence of independent quality review/accreditation process and/or independent peer recognition (examples might include governments, employers (holding positions in the country consistent with the area of practice), and international bodies such as membership of a body recognised by the International Union of Psychological Science). Further, overseas post-qualification professional membership or credentials must relate to the same area of practice as the postgraduate qualification and requires a formal assessment component.

Maintaining endorsement

102. In the current guideline this section deals with CPD requirements for endorsed psychologists. The Board's revised CPD standard and guideline came into effect on 1 December 2015 and do not include specific CPD requirements to maintain endorsements. The Board's view is that the CPD requirements for maintaining general registration and the obligation of all psychologists to bring and maintain appropriate skills to their areas of practice in accordance with the *Code of ethics* are sufficient and additional regulation of CPD for endorsed psychologists is not necessary.
103. This section is therefore proposed to be updated to remove detailed information on CPD and instead include relevant information about psychologists' obligation to maintain competence in their area of practice.

Entry into the registrar program

104. The requirements for entry into the program are proposed to stay the same, but this section is proposed to be revised to clarify the information more clearly and to add some information for overseas-trained applicants.

Content of the registrar program

105. Feedback from the profession indicates that the registrar program is working quite well and does not require significant refinement. However it is proposed to review the framework of practice hours, supervision and CPD and incorporate some of the flexibility that has been proposed for the 4+2 internship program, such more flexibility for the supervisor to vary supervision frequency.

Hours of practice

106. The Board proposes to round down the number of hours to be completed in the registrar program from 1540 to 1500, from 2310 to 2250, and from 3080 to 3000. This would align with the requirements for post-masters and post-doctoral internship in the USA and Canada.

107. The Board also proposes to specify the minimum weeks of practice for the registrar programs instead of the length in years for a full-time registrar program. It is intended that this will make the requirements clearer and to recognise that it is common for psychologists to undertake the program part-time or to take a leave of absence during the program.
108. Additionally, the Board proposes to remove the specification that the registrar program must be completed and the application for endorsement lodged within five years of the date the Board approves the registrar program. This is because the five year limit may be too restrictive in some circumstances.
109. The proposed revised guidelines include clarification of CPD requirements for registrars due to feedback that some people interpret the requirements as 40 hours of CPD in the registrar program on top of the 30 hours required for general registration. The 40 hours is inclusive. Additionally the Board clarifies that if a registrar is undertaking the program part-time, the minimum CPD requirements to maintain general registration still apply.

Supervision

110. The Board proposes some amendments to the supervision requirements which aim to increase flexibility in the program including:
 - Removal of the requirement for supervision to always be provided at least fortnightly when practising. Fortnightly supervision would still be recommended, but in practice the supervisor can choose to vary the frequency over the course of the program as appropriate, provided the total supervision hours are met and the registrar is receiving adequate support.
 - Removal of the requirement for every supervision session to be at least an hour long. Supervision should still be predominately at least one hour per session but the Board proposes that up to 25 per cent of the total supervision may be accrued in shorter supervision sessions.
 - Defining 'direct supervision' for the registrar program as 'real-time verbal communication between the registrar and the supervisor'. Registrars already have the option to undertake all their supervision remotely (e.g. by telephone or videoconference) but the Board wishes to make this clearer as feedback indicates it has sometimes been misunderstood. Remote supervision allowances are important to ensure registrar programs in regional and remote locations are viable and to enable states and territories with shortages in particular areas to source supervisors interstate.

Competencies

111. The Board has previously agreed that this review of the guideline will include a review of the area of practice endorsement competencies. A review has been undertaken during the research and development phase of this project and the current area of practice competencies are now submitted for public consultation.
112. The Board therefore invites feedback on the competencies, including suggestions and rationale for any changes and comment on current aspects that are supported and should be retained.
113. The Board notes that area of practice endorsement competencies may need to be reviewed in conjunction with proposed area of practice endorsement accreditation standards once they become available. Similarly, the outcome of the international psychology competency project, which is expected in mid-2016, may warrant further review of the competencies.

Review timeframes

114. As the with *Area of practice endorsements registration standard*, the Board proposes that the next review of the guidelines will commence within five years of the implementation of a revised guideline following this current review, with provision for early review if necessary.
115. As noted in the overview section of this consultation paper, there are currently several related projects in the broader regulatory environment which will potentially lead to an earlier review of the area of practice endorsements registration standard and guidelines.

116. At this stage it is not possible to commence planning for a more in-depth review or commit to a specific timeframe for earlier review. Therefore the Board believes that the best approach to a review timeframe at this stage is to maintain the standard five year review period but to continue to take external factors into account and be prepared to adapt and review its own standards and guidelines accordingly.

Potential benefits and costs of the proposals

117. The benefits of the preferred option are that the draft revised guidelines, include being:

- more flexible and user-friendly
- a better balance between protecting the public and impacting applicants
- more focused on measuring the outputs of the registrar program than monitoring the inputs, and
- simpler and clearer.

118. The costs of the preferred option are:

- applicants, registrants undertaking the registrar program, employers of psychologists, Board-approved supervisors, supervisor training providers, AHPRA staff, and the national and regional psychology boards will need to become familiar with any changes to the guideline
- 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 impact of the draft revised guideline

119. The core components of the registrar program and are proposed to remain unchanged so the impact of changes proposed by the Board would be fairly minor. It would not be necessary for current registrars to make changes to their placements, supervisor arrangements or professional development program, however there will be opportunity for some registrars to make optional changes.
120. The Board anticipates that the impact on individuals currently undertaking the registrar 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.

General questions for consideration – Area of practice endorsements registration standard

121. The Board invites feedback on the following questions:
1. From your perspective, how is the current registration standard working?
 2. Do the nine approved areas of practice accurately reflect the current range of postgraduate degree options and specialised practice areas in Australia?
 3. Do you support the addition of a pathway to endorsement for previously endorsed applicants?
 4. Is the content and structure of the draft revised registration standard helpful, clear, relevant and more workable than the current standard?
 5. Is there any content that needs to be changed or deleted in the revised draft registration standard?
 6. Is there anything missing that needs to be added to the revised draft registration standard?
 7. Do you have any other comments on the revised registration draft standard?

General questions for consideration – Guidelines on area of practice endorsements

122. The Board invites feedback on any aspect of the proposed amendments discussed above. You may also wish to consider the following questions when writing your submission:
1. From your perspective, how are the current guidelines working?
 2. Do the draft revised guidelines address issues that you may have previously raised?
 3. Is the content and structure of the draft revised guidelines helpful, clear, relevant and more workable than the current guidelines?
 4. Do you think that the area of practice competencies accurately reflect the range of core skills and knowledge common to all psychologists who work in the area of practice?
 5. Are there core areas of skill and knowledge that are specific to a particular area of psychology practice that are missing from the competencies (Appendix B) for that area of practice?
 6. Is there any other content that needs to be changed or deleted in the draft revised guidelines?
 7. Is there anything missing that needs to be added to the draft revised guidelines?
 8. Do you have any other comments on the draft revised guidelines?

Guidelines on area of practice endorsements

Please refer to the separate attachment.

Statement of assessment

The Psychology Board of Australia's *Area of practice endorsements registration standard* and *Guidelines on area of practice endorsements*

Statement of assessment against AHPRA's *Procedures for the development of registration standards, codes and guidelines* and the Council of Australian Governments principles for best practice regulation.

The Australian Health Practitioner Regulation Agency (AHPRA) has produced the document [*Procedures for the development of registration standards, codes and guidelines*](#). The procedures have been developed in accordance with section 25(c) 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 statement of assessment of the proposal for revisions to the *Area of practice endorsements registration standard* and the *Guidelines for area of practice endorsement* against the three elements outlined in the AHPRA procedures.

1. The proposals take into account the National Scheme's objectives and guiding principles set out in section 3 of the National Law

Board assessment

The Board considers that both the proposed revised registration standard and guideline meet the objectives and guiding principles of the National Law.

The proposed revised registration standard and guideline:

- Together with the provisions of the National Law, provide a mechanism that enables the public, employers, and the profession to identify practitioners who have completed an approved postgraduate qualification and registrar program training in a specific approved area of practice. This helps the community make informed choices when seeking psychology services. It also facilitates access to services in the public interest by making it easier for the public to identify practitioners who are trained provide the types of psychological services they require.
- Facilitate the provision of high-quality education and training by supporting higher degree programs in approved areas of practice, and provide incentive for psychologists to undertake post-masters or post-doctoral supervised practice (the registrar program) structured around the achievement of advanced competencies in specialised areas of practice.
- Do not place restrictions on the practice of psychologists and therefore support the continuous development of a flexible, responsive and sustainable Australian psychology workforce.
- Promote transparency and accountability by providing the public with more information about registered psychologists' training, using a mechanism that is efficient, effective and fair because it imposes the minimal regulatory burden necessary.
- Take into account the costs of endorsement with regard to the efficient and effective operation of the scheme. The proposed revisions to the standard and the guideline will not require any new fees to be charged and the cost of renewing endorsements will continue to be absorbed into the general registration renewal fee.

2. The consultation requirements of the National Law are met

Board assessment

The Board considers that both the proposed revised registration standard and the proposed revised guidelines meet the consultation requirements of the National Law, including:

- wide-ranging consultation on proposed registration standards, and
- consultation with other National Boards on matters that may reasonably be expected to be of shared interest.

The Board is undertaking wide-ranging consultation on the proposals in accordance with the consultation framework set out in the *Consultation process of National Boards*, available at: www.ahpra.gov.au. This process has included preliminary consultation with internal stakeholders (including AHPRA and other National Boards) and government. The process has also involved meeting the requirements of the Office of Best Practice Regulation.

The Board is also ensuring there is public exposure of both the proposed revised standard and guideline by undertaking an eight week minimum public consultation process which is an opportunity for public comment. This process includes the publication of the consultation paper on the Board's website, notifying stakeholders and interested parties and inviting feedback to be provided.

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

3. The proposal takes into account the Council of Australian Governments *Principles for best practice regulation*

In developing the proposed revised registration standard for consultation, the Board has taken into account the Council of Australian Governments (COAG) [Principles for best practice regulation](#).

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 assessments specific to each of the COAG principles expressed in the AHPRA procedures.

COAG principle 1:

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

Board assessment

The purposes of the *Area of practice endorsements registration standard* are to:

- provide for recognition of psychologists who have completed advanced qualifications and supervised practice in a specialised area of practice via notation on the register and the right to use a protected title associated with an area of practice, and
- clearly set out the following minimum requirements for becoming eligible to apply for an area of practice endorsement:

To be eligible to apply for an endorsement in one of the approved areas of practice a registered psychologist must have general registration and:

- an approved postgraduate qualification accredited as a fifth, sixth and seventh year of study in one of the approved areas of practice, followed by a minimum 1500 hours of approved, supervised practice with a Board-approved supervisor in the registrar program, or
- an approved postgraduate qualification accredited as a fifth and sixth year of study in one of the approved areas of practice which includes a doctoral thesis, followed by a minimum 2250

hours of approved, supervised equivalent practice with a Board-approved supervisor in the registrar program, or

- an approved postgraduate qualification accredited as a fifth and sixth year of study, or as a sixth year bridging program, in one of the approved areas of practice, followed by a minimum of 3000 hours of approved, supervised practice with a Board-approved supervisor in the registrar program, or
- another qualification and period of supervised practice that, in the Board's opinion, is substantially equivalent to a. or b., or
- previously held an area of practice endorsement in an approved area of practice under the National Law, and met the requirements to maintain that area of practice endorsement while generally registered, and is not otherwise disqualified from holding that endorsement.

The purpose of the *Guidelines on area of practice endorsements* is to support and provide further clarification on the requirements of the registration standard. This includes providing guidance to registered psychologist whose registration is endorsed for an area of practice on maintaining their endorsements; and to psychologists who are seeking to become endorsed.

The Board has considered various options for achieving these purposes using other regulatory mechanisms under the National Law (such as specialist registration) as well as non-regulatory options. The Board considers that the proposal to update the *Area of practice endorsement registration standard* and the accompanying *Guidelines on area of practice endorsements* is the best option for achieving the stated purposes.

The proposal seeks to maintain the current approved areas of practice and the qualification and training requirements for area of practice endorsements, which have been proven effective for achieving this purpose. It is proposed to make some improvements to the structure and language of both the standard and the guideline to improve clarity and ensure the documents are easy to understand.

As only minor changes to the existing standard and guidelines are proposed, the Board considers that a revised standard and revised guideline 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.

COAG principle 2:

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 have any impact on the current levels of competition among health practitioners.

COAG principle 3:

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

[Board assessment](#)

The Board considers that the proposal to revise the *Area of practice endorsements registration standard* would not result in any unnecessary restriction of consumer choice. Rather, the proposal supports and promotes consumer choice. The standard does this by establishing clear requirements for the qualifications and training arrangements that practitioners must meet to obtain an endorsement that ensures consumers can be confident about the education and training of psychologists who have endorsements. The guidelines support and further clarify the requirements of the standard.

COAG principle 4:

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 Board has considered the overall costs of a revised *Area of practice endorsements registration standard* and a revised *Guidelines on area of practice endorsements* to members of the public, registrants and governments. It is concluded there are not likely to be any significant costs involved in the revision and implementation of a revised standard.

The Board does not anticipate there will be any impact on registration/renewal fees (which the Board does not apply to endorsement) or on the application for endorsement fee which is not proposed to change if the proposed revised standard is approved.

COAG principle 5:

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 considers the revised *Area of practice endorsements registration standard* and the *Guidelines on area of practice endorsements* are both written in plain English that will help practitioners and the public to better understand the requirements of the standard. The Board has proposed changes to the current structure and reviewed the wording of both documents to make them easier to understand.

COAG principle 6:

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 *Area of practice endorsements 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. The Board will also review the standard earlier, if it is necessary to ensure continued relevance and workability. Additionally, the Ministerial Council may, at any time, ask the Board to review the standard.

Additionally, when reviewing a standard the Board will also review relevant guidelines and other supporting documents – in this case the *Guidelines on area of practice endorsements*. The Board will also consider reviewing the guidelines independently if there are developments in the broader regulatory environment that affect the content of the guideline – for example changes to competencies for specialist areas of practice.

Legislation

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 sections of the National Law relevant to the consultation are set out below.

General provisions

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

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) 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.

39 Codes and guidelines

A National Board may develop and approve codes and guidelines –

- (a) to provide guidance to the health practitioners it registers; and
- (b) about other matters relevant to the exercise of its functions.

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.

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 of 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.

Specific provisions

Part 2 Ministerial Council

15 Approval of areas of practice for the purposes of endorsement

The Ministerial Council may, on the recommendation of a National Board, approve an area of practice in the health profession for which the Board is established as being an area of practice for which the registration of a health practitioner registered in the profession may be endorsed.

Part 7 Registration of Health Practitioners

98 Endorsement for approved area of practice

- (1) A National Board established for a health profession may, in accordance with an approval given by the Ministerial Council under section 15, endorse the registration of a registered health practitioner registered by the Board as being qualified to practise in an approved area of practice for the health profession if the practitioner—
 - (a) holds either of the following qualifications relevant to the endorsement—
 - (i) an approved qualification;
 - (ii) another qualification that, in the Board's opinion, is substantially equivalent to, or based on similar competencies to, an approved qualification; and
 - (b) complies with an approved registration standard relevant to the endorsement.
- (2) An endorsement under subsection (1) must state—
 - (a) the approved area of practice to which the endorsement relates; and
 - (b) any conditions applicable to the practice by the registered health practitioner in the approved area of practice.

99 Application for endorsement

- (1) An individual may apply to a National Board for endorsement of the individual's registration.
- (2) The application must—
 - (a) be in the form approved by the National Board; and
 - (b) be accompanied by the relevant fee; and
 - (c) be accompanied by any other information reasonably required by the Board.
- (3) For the purposes of subsection (2)(c), the information a National Board may require an applicant to provide includes—
 - (a) evidence of the qualifications in the health profession the applicant believes qualifies the applicant for endorsement; and
 - (b) evidence of successful completion of any period of supervised practice required by an approved registration standard; and
 - (c) if the applicant is required to complete an examination or assessment set by or on behalf of the Board, evidence of the successful completion of the examination or assessment.

Regulatory principles

The following regulatory principles have been adopted by AHPRA and the National Boards. The principles underpin the work of AHPRA and the Boards in regulating Australia's health practitioners in the public interest. They shape our thinking about regulatory decision-making and have been designed to encourage a responsive, risk-based approach to regulation across all professions.

1. The Boards and AHPRA administer and comply with the Health Practitioner Regulation National Law, as in force in each state and territory. The scope of our work is defined by the National Law.
2. We protect the health and safety 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.
3. While we balance all the objectives of the National Registration and Accreditation Scheme, our primary consideration is to protect the public.
4. When we are considering an application for registration, or when we become aware of concerns about a health practitioner, we protect the public by taking timely and necessary action under the National Law.
5. In all areas of our work we: - identify the risks that we are obliged to respond to - assess the likelihood and possible consequences of the risks and - respond in ways that are proportionate and manage risks so we can adequately protect the public. This does not only apply to the way in which we manage individual practitioners but in all of our regulatory decision-making, including in the development of standards, policies, codes and guidelines.
6. When we take action about practitioners, we use the minimum regulatory force appropriate to manage the risk posed by their practice, to protect the public. Our actions are designed to protect the public and not to punish practitioners. While our actions are not intended to punish, we acknowledge that practitioners will sometimes feel that our actions are punitive.
7. Community confidence in health practitioner regulation is important. Our response to risk considers the need to uphold professional standards and maintain public confidence in the regulated health professions.
8. We work with our stakeholders, including the public and professional associations to achieve good and protective outcomes. We do not represent the health professions or health practitioners. However, we will work with practitioners and their representatives to achieve outcomes that protect the public.