

3<sup>rd</sup> of March 2016

AHPRA - consultation

## **Response to the Psychology Board of Australia's consultation paper - Area of Practice Endorsements**

Dear Sir/Madam.

In relations to the current Consultation on area of practice endorsements: I want to stress one particular area of concern regarding what I consider is a big oversight in the pathways to endorsement.

The public consultation paper states that:

“Nor is an area of practice endorsement based on experience derived during the course of a professional career” (p. 5)

“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” (p. 11)*

*I have always asked myself why AHPRA has not introduced alternative pathways to gaining Area of Practice Endorsement. Whilst completing formal study as through a Masters Degree one would expect this to offer some guarantee of being proficient in an area or speciality, it is clearly not the only pathway to expand on basic training and acquire expertise in a field of practice.*

*I am an overseas graduate that only holds General Registration in Australia. I have worked in Australia since January 2004 within NSW Health in different specialised clinical roles. What I feel and what I have observed in the last years, and which is something that is of real concern to me, is a professional “prejudice”, which flows into the public perception, which tends to place all the General Registered Psychologist that don't hold endorsement, as less prepared and less trained and ultimately less experienced and in essence less able to offer good quality mental health clinical service. In essence, and I will clarify bellow, the scope of practice of the General Psychologist is being belittled when compared to other allied health professionals.*

*It seems that the Psychology professional body in an attempt to highlight/guarantee expertise in an area of Psychology, and maybe highlight/endorse a group of professionals as more equipped to treat the public, has ended in a way undermining certain sectors of the Psychology professionals. In my opinion Medicare has had a lot to do with this, but now also the introduction of Area of Practice Endorsement, has also done its part.*

*I feel that AHPRA has forgotten that there are many General Registered Psychology with not only a lot of experience, but that also have continued to train and develop their knowledge and skills through other study pathways, and not necessarily by completing a Masters Degree. These Psychologists have no pathway to stand in the public arena and prove/“be endorsed” for their expertise, as they are by definition unable to gain the recognition from within the professional body. The only recognition is that of being registered with AHPRA with General Registration. The issues is that AHPRA certifies their professional status on the one hand, but by a series of implicit discourses their certification is being undervalued,*

*leaving this group of professionals more and more in a type of virtual professional limbo.*

*I believe that this is a huge oversight as there is no current means to have this knowledge and experience somehow validated within the professional body and consequently no avenue to offer the public assurance of their expertise and hence of their capacity to offer a high standard of service. And this leads to a misconception at different levels that a Psychologist that has only General Registration has no means or possibilities to acquire skills and knowledge to improve his or her practice other than by completing a Masters Degree.*

*As an example of the flow on effect of all the above, I can say that within NSW Health where I have worked since 2004, I am seeing more and more multidisciplinary job positions advertised that as a General Registered Psychologist, I cannot apply because these are advertised with more frequency as requiring a Social Work Degree, or an Occupational Therapist Degree, or a Nursing Degree, but will exclude altogether the General Psychologist (regardless of experience etc.) but are open to Clinical Psychologists, that by far exceed in the training required by the other professions. These positions that I am referring to are not specific Psychology Positions but rather Multidisciplinary positions, that a few years ago would have been open to General Registered Psychologist (with the appropriate experience etc.) but that in the last years have only been open to Psychologist that have a Clinical Masters or Social Work Degree or the other professionals, but I state again, not open to General Registered Psychologist.*

*To state this clearly, it seems that a Psychologist that only has General Registration is not deemed experienced, qualified or even able to gain the experience that the other professionals seem to be able to acquire. I don't believe that this is only a matter of NSW Health, but rather I feel that it is a consequence of certain discourses within the Psychology community that undermine, with some wholehearted supporters, that encourage the belief that it is not sufficient, desirable or even wanted to have a half-cast or lower class Psychologists and believe that to practice any sort of Psychology one must have a Masters.*

*If we are Psychologist and are registered to practice, we have by definition a level of knowledge and ethical conduct and capacity to work and continue to develop our skills and knowledge and expertise. I believe that the current standards as they are, work in favour of undermining a large group of Psychologists that are performing at very high standards. AHPRA should advocate also for these group.*

*Maybe one alternative would be to introduce a category of Endorsement that would take into account training and experienced gained through other means other than that of completing a Masters in Psychology. This would validate the skills of many very experienced and very knowledgable Psychologist, but would also help the public, offering them more options to choose the right supports for them, but also inform the general public better.*

*Regards,*

*Registered Psychologist*