



Friday, 4 March 2016

The Psychology Board of Australia
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To whom it may concern,

Thank you for the opportunity to comment on the Board's Public Consultation Paper regarding the review of the **Area of Practice Endorsements Registration Standard** and the **Guidelines on Areas of Practice Endorsements**. As academics and teaching staff at the School of Psychology and Counselling, Queensland University of Technology, we currently offer two postgraduate psychology coursework programs – the Master of Psychology (Educational and Developmental) and the Master of Clinical Psychology. We are particularly affected by these standards and guidelines because they tie into the Board's relatively recent requirement that only Board-approved higher-degree supervisors can supervise psychology student placements at Master's-level and higher.

Currently, to be eligible to become a higher-degree supervisor, a psychologist must have obtained endorsement (a process that takes between one and two years at a minimum), and must have held this endorsement for two years. They must also have completed and passed a Board-approved supervisor training program. Due to the high costs associated with this process, we are concerned that the pool of supervisors available to support postgraduate psychology student placements will be severely limited from July 2018, when the Board's requirements for higher-degree supervisors will take full effect. Currently, approximately half of our available supervisors were higher-degree approved under the Board's grandfather clause program that ended in June 2013. They will not be eligible to continue to be higher-degree supervisors from July 2018, as they do not have an area of practice endorsement (even though many of them have completed the required postgraduate qualifications, and subsequent peer supervision and professional development that would be at least the equivalent of a registrar program). We are therefore in favour of any support that the Board can provide in increasing our pool of potential higher-degree supervisors, post-July 2018, at a minimum through making its endorsement requirements more flexible.

To this end, we would like to provide the following feedback:

1. As a general point, endorsement in no way guarantees quality of supervision. We believe that universities, specifically the experienced psychologists tasked with providing the training in postgraduate psychology programs, are best placed to judge whether a person (based on their qualifications, practice, personality and experience) is a suitable supervisor. A person other than an individual endorsed in the practice area that the student is currently studying, may well be exceptionally well suited and placed to supervise the student. For example, a clinical psychologist supervisor can round out the experience of an educational and developmental psychology student in the field of child psychopathology and treatment. Equally, an educational and developmental psychologist supervisor may round out a clinical psychology student's expertise in developmental assessment and disability. A teacher-trained psychologist who has no endorsement may be able to provide excellent supervision to an educational and developmental psychology student on placement in a school. **We contend that University practicum coordinators are well placed to judge what would be the most useful makeup of a student's supervision training**, which would also be based on the student's personality, skills, and prior experience.

2. It is crucially important for the Board to continue to work to ensure that the notion of “endorsement” – described as identifying “psychologists who have an additional qualification and have completed advanced supervised practice in an approved area of practice that is recognised by the Board” – is not confused with a notion that certain groups of psychologists have “exclusive competence” in a particular domain, or should be the only type of psychologist to work in a particular domain. As far as we are aware, the latter stance is not evidence-based, and is divisive; we therefore support the Board’s decision not to pursue the notion of specialist registration. Many of our current higher-degree supervisors have no additional postgraduate psychology qualifications, yet they are excellent and knowledgeable psychologists who are providing our postgraduate psychology students with invaluable training experiences. We have supervisors with clinical psychology postgraduate qualifications who work effectively in school psychologist roles, and supervisors with educational and developmental psychology postgraduate qualifications who work effectively in mental health roles. We have health psychologist supervisors who offer excellent placement opportunities to our students. **We support an approach by the Board that values and sustains what our diverse supervisors can contribute to our higher-degree students’ training experiences.**

Should the current endorsement system continue, as appears to be the Board’s intention, we would like to recommend the following:

3. Currently, only those who have obtained “substantially equivalent” qualifications overseas, or pre-2003, followed by a period of supervised practice acceptable to the Board, are eligible to apply for endorsement without completing the registrar program. **We suggest that for the purposes of fairness and equality, any psychologist who can demonstrate that they have “substantially equivalent” qualifications and supervised practice experience, should be able to apply for endorsement without needing to complete the registrar program.** This will increase our pool of prospective higher-degree supervisors.
4. We also suggest that psychologists who met criteria for endorsement prior to the cut-off for the new requirements, be offered another opportunity to apply for endorsement under the transition period requirements, to increase the pool of prospective higher-degree supervisors post-July 2018. We have a number of higher-degree supervisors who were eligible to apply for endorsement during this transition period, but did not appreciate the future significance of applying for endorsement at this time. There will be many more supervisors nationally in the same predicament. Many have expressed regret that they did not apply for endorsement, and that they must now complete a costly registrar program in order to achieve the same outcome. Almost as many supervisors have indicated that they will not take on the expense of a registrar program. Consequently, should there be no flexibility in the Board’s rules these excellent and valuable supervisors will no longer be eligible to be higher degree supervisors after July 2018. This is a significant loss of training opportunities for our students and an immeasurable loss to the profession.

We appreciate that it is important for the Australian training standards to be high. However, our overall concern is that those Board policies that have the effect of severely limiting the prospective pool of supervisors for higher-degree student placements (such as the current strict and costly requirements for endorsement and higher-degree supervisors) will result in universities having to reduce their student intakes significantly. They will need to do so in order to be able to offer an externship to each postgraduate psychology student, and because the number of externships is determined, in part, by the number of endorsed supervisors. Significantly reducing student intakes for postgraduate psychology programs will mean that proportionately fewer psychologists will be able to complete training at a Master’s level and above, which seems contrary to the Board’s goals.

Yours sincerely

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