

## Public consultation paper

---

13 July 2016

### Proposed guideline for transitional programs

#### You are invited to provide feedback

1. The Psychology Board of Australia (the Board) is releasing this public consultation paper about a proposed new guideline on the transitional program for overseas-trained psychologists.
2. The transitional program is a part of the regulatory framework of the National Registration and Accreditation Scheme<sup>1</sup> and has been required for overseas-trained applicants for registration since 1 July 2013. It is part of a recognised training pathway leading to general registration as a psychologist in Australia; the key requirements of the program are set out in the Board's registration standard for general registration.
3. The proposed new guideline would supplement the information in the general registration standard and provide extra guidance about the transitional program to applicants, employers and supervisors.
4. The purpose of this consultation is to obtain comments and suggestions about the proposal from the profession, the community, governments, employers, and other stakeholders. You may choose to provide feedback on any aspect of this consultation.

To provide feedback on the proposal please send your written submission attached to an email -

- with the subject title: **Consultation – transitional programs**
- to: [psychconsultation@ahpra.gov.au](mailto:psychconsultation@ahpra.gov.au)
- by: close of business<sup>2</sup> on **Wednesday 7 September 2016**.

Please provide your submission in a Word format document to help us meet international web accessibility guidelines<sup>3</sup>. You are welcome to provide your submission in a PDF format as well if you wish, and we can publish your submission in both formats.

5. Please consider that your submission will generally be published on the Board's website unless you request otherwise. We recommend that you do not provide personal contact details such as your home address and personal phone number or email address in your submission.
6. We also recommend that you do not include an electronic signature in the Word format version of your submission; if you wish to include a signature we recommend you provide a locked PDF version in addition to your Word format version.

---

<sup>1</sup> The national scheme for the regulation of the 14 health professions that is established under the [Health Practitioner Regulation National Law](#), as in force in each state and territory.

<sup>2</sup> 5pm Australian Western Standard Time (AWST)

<sup>3</sup> See [www.ahpra.gov.au/About-AHPRA/Accessibility.aspx](http://www.ahpra.gov.au/About-AHPRA/Accessibility.aspx) for more information.

### How your submission will be treated

7. Submissions will generally be published unless you request otherwise. The Board publishes submissions on its website to promote transparency, encourage discussion, and to inform the community and stakeholders. However, the Board retains the right not to publish submissions at its discretion and will not place on the website, or make available to the public, submissions that contain offensive or defamatory comments or which are outside the scope of the consultation.
8. 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.
9. Before publication the Board may remove personally-identifying information from submissions, including contact details where appropriate.
10. The Board will accept submissions made in confidence. Submissions made in confidence will not be published on the website or anywhere else. 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.
11. 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. You are also able to request that we publish your submission but remove your name and any other personally identifying information before publication.

### More information

12. 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](http://www.ahpra.gov.au/Publications/Procedures.aspx).
13. 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](mailto:psychologychair@ahpra.gov.au).
14. If you are seeking a response regarding an operational matter such as an individual application for registration, assessment of your overseas qualifications, or a notification/complaint matter, please contact your [local office of AHPRA](#) via phone or web enquiry.
15. If you require advice on making a submission, such as about the format or the submission deadline, please send your query to [psychconsultation@ahpra.gov.au](mailto:psychconsultation@ahpra.gov.au), this inbox will be monitored regularly while the public consultation is open.

# Contents

---

- Overview of consultation ..... 4**
- Options for providing guidance on the transitional program ..... 6**
- Discussion of the proposal ..... 7**
- Statement of assessment ..... 10**
- Draft guidelines for transitional programs ..... 13**

## Overview of consultation

---

### Guideline: Transitional programs for overseas-qualified applicants

#### Summary

16. The Psychology Board of Australia (the Board) provides for the protection of the public by ensuring that only psychologists who are suitably trained and qualified to practise in a competent and ethical manner are registered in Australia.
17. Applicants for registration whose psychology qualifications were completed overseas must demonstrate that their qualifications are substantially equivalent to recognised Australian qualifications. This helps to ensure that all individuals granted registration in Australia are able to practise competently and ethically in the Australian context, with Australian clients, employers and colleagues.
18. Australian-trained psychologists need to demonstrate competence in Australian ethical, legal and professional matters, and in working with diverse groups of people relevant to the Australian context, as part of their training. Overseas-trained psychologists will generally not have demonstrated these specific capabilities as part of their qualifications and training completed overseas. They are therefore required to demonstrate them by completing a period of supervised practice in Australia with a Board-approved supervisor – the transitional program, and by passing the national psychology examination.
19. The requirement for overseas-trained applicants to complete a transitional program is in the registration standard for general registration which is [approved by the Australian Health Workforce Ministerial Council](#) (AHWMC). The registration standard also includes the key requirements of the program, including the competencies to be demonstrated and the minimum psychological practice and supervision requirements.
20. The Board is not proposing to introduce any new requirements for overseas-trained applicants or to vary the key requirements in the registration standard for general registration. This consultation is about a proposal to provide extra information about existing requirements that would supplement the information in the registration standard.
21. It is proposed that the new guideline would include information about the application for registration process, including which form to use; guidance on finding a suitable supervisor; detailed guidance on the specific content of the two competencies that must be demonstrated; and information about how to apply for an exemption from the transitional program.
22. Currently, additional information about the transitional program is published on the Board's website at [www.psychologyboard.gov.au/Registration/Overseas-Applicants/Transitional-program.aspx](http://www.psychologyboard.gov.au/Registration/Overseas-Applicants/Transitional-program.aspx) and [www.psychologyboard.gov.au/Standards-and-Guidelines/FAQ/Transitional-program-FAQ.aspx](http://www.psychologyboard.gov.au/Standards-and-Guidelines/FAQ/Transitional-program-FAQ.aspx).
23. Previously, additional information about the transitional program was published in a policy for overseas qualified applicants together with information about the assessment of overseas qualifications process and possible outcomes. The policy was retired when a new overseas qualifications assessment framework was implemented (refer to the application and assessment information on the website under [www.psychologyboard.gov.au/Registration/Overseas-Applicants.aspx](http://www.psychologyboard.gov.au/Registration/Overseas-Applicants.aspx) for information about the framework). A copy of the retired policy is available at [www.psychologyboard.gov.au/Standards-and-Guidelines/Codes-Guidelines-Policies.aspx](http://www.psychologyboard.gov.au/Standards-and-Guidelines/Codes-Guidelines-Policies.aspx).

#### Purpose of this consultation

24. The purpose of this consultation is to:
  - identify any existing or potential operational, workforce or legal impacts or barriers to adopting a new guideline for transitional programs

- provide stakeholders with an opportunity to suggest improvements to the presentation of information about transitional programs, and
- provide stakeholders with an opportunity to consider whether the proposal could have any impact on them or the broader regulatory environment, now or in the future.

## Legislation

25. In developing this proposal for a new guideline the National Board has carefully considered the objectives and guiding principles of the [National Law](#) and the [regulatory principles for the National Scheme](#).
26. The proposals in this consultation paper relate to Part 7 of the National Law – Registration of health practitioners – specifically the following sections:
  - 52 Eligibility for general registration, and
  - 53 Qualifications for general registration.

## Options for providing guidance on the transitional program

---

27. The Board has considered two main options in developing this proposal for a guideline for transitional program.

### **Option 1 – New policy**

28. Option 1 would involve publishing a new policy for overseas qualified applicants that would include just the information from under the heading *Transitional program* in the retired policy for overseas qualified applicants.
29. The retired policy is available under *Retired versions* at [www.psychologyboard.gov.au/Standards-and-Guidelines/Codes-Guidelines-Policies.aspx](http://www.psychologyboard.gov.au/Standards-and-Guidelines/Codes-Guidelines-Policies.aspx).

### **Option 2 – New guideline**

30. Option 2 would involve publishing a new guideline for transitional programs. The new guideline would include information that is currently published on the [transitional program web page](#) plus additional guidance on the content of the competencies, and on applying for an exemption from the program.

### **Preferred option**

31. The Board prefers Option 2.
32. The Board believes that including additional information in a new guideline instead of in a policy or fact sheet or as web content only, is the best option because the requirements for development of guidelines are more rigorous, and would therefore improve transparency about the development and review process.
33. Both Option 1 and Option 2 would involve continuing to provide some guidance on the transitional program on the website at [www.psychologyboard.gov.au/Registration/Overseas-Applicants/Transitional-program.aspx](http://www.psychologyboard.gov.au/Registration/Overseas-Applicants/Transitional-program.aspx). The specific web content would be tailored to complement the contents of a new policy or guideline.

## Discussion of the proposal

---

34. In accordance with the National Law, a key role of National Boards is to provide for the protection of the Australian public by ensuring that only practitioners who are suitably trained and qualified to practise in a competent and ethical manner are registered. One of the specific functions of National Boards, assigned under section 35(e) of the National Law is to oversee the assessment of the knowledge and clinical skills of overseas trained applicants for registration in the profession, and to determine the suitability of the applicants for registration in Australia.
35. The Psychology Board uses three different processes which together determine whether an overseas trained applicant is suitable to be registered in Australia:
  - assessment of overseas qualifications
  - the national psychology examination which tests the ability to apply knowledge to practice using case studies and professional issues, and
  - professional supervision and direct observation of practice in the Australian context by a Board-approved supervisor.
36. For overseas trained applicants whose qualifications are substantially equivalent to a six-year accredited sequence of psychology in Australia, but which did not include demonstration of skills and knowledge specific to practice in the Australian context, the professional supervision aspect is completed in the transitional program.
37. Information on the transitional program is available in the general registration standard and in the transitional program section of the website. The Board considers that inclusion of the key requirements in the standard is a good option for supporting overseas trained psychologists, and their employers and supervisors. However, providing requirements in the standard, plus further clearly set out guidance in an accessible format is the best option.
38. The proposed new guideline would include process guidance that is current published as web content, plus extra information that is not currently published, as outlined below.

### Competencies for the transitional program

39. The competencies for the transitional program are included in the registration standard for general registration and are also included on the transitional program web page.
40. For guidance on the specific content of the competencies, applicants are required to refer the core capabilities – Ethical, legal and professional matters and Working within a cross-cultural context in the *Guidelines for 4+2 internship program provisional psychologists and supervisors* - available under [Codes, guidelines and policies](#).
41. The previous policy for overseas qualified applicants stated that:
42. *APAC Standard 5.1.12 (b) requires all graduates of accredited postgraduate degrees to have demonstrated capabilities in Australian ethical, legal and professional matters and cross-cultural studies relevant to an Australian context. Even where the Board considers that an applicant's qualifications and supervised practice meet all other requirements for general registration, the applicant must still demonstrate that their overseas supervised practice included training in legal, ethical and professional issues, and cross-cultural issues relevant in an Australian context that is 'substantially equivalent' to that required by APAC standard 5.1.12 (b).*
43. The Australian Psychology Accreditation Council (APAC) standards are under review (see [www.psychologycouncil.org.au/consultations-and-projects/](http://www.psychologycouncil.org.au/consultations-and-projects/)). Therefore this reference to a specific section of the current standards is likely to become outdated. Consequently, the Board does not propose to include reference to accreditation standards in the new guideline. Instead the Board proposes to include a detailed list of what is expected to be covered in the transitional program in the new guideline.

## Applying for an exemption from the transitional program

44. The Board recognises there are sometimes exceptional circumstances where an overseas-qualified applicant is able to demonstrate achievement of the competencies specific to the Australian context. In these circumstances the Board will grant an exemption from the transitional program.
45. Substantially equivalent training may be achieved through partial completion of a recognised Australian training pathway together with completion of overseas postgraduate qualifications. For example, a person who completed an undergraduate psychology degree in Australia and commenced a 4+2 internship program but did not complete it as they went to study psychology overseas instead.
46. The following wording for the overseas applicants' pathway has been adopted for the standard for general registration that came into effect on 2 May 2016:
  - v. an overseas qualification and supervised practice assessed by the Board as substantially equivalent to either i), iii), or iv) and successful completion of a Board-approved transitional program (unless exempt)
47. During public consultation on the requirements for general and provisional registration (see consultation papers 22 and 24 under [Past consultations](#)), the Board received feedback that this wording is supported, including that there should be provision for exemptions. However feedback also indicated there is a lack of publicly available information on how to request an exemption from the transitional program, and evidence that should be provided in support of such a request.
48. The Board is addressing this feedback by proposing to include information about requesting an exemption in the new guideline, including:
  - information about the types of work experience and other activities that may qualify an applicant for an exemption, and
  - information about the types of evidence that may be submitted with a request for exemption.
49. The information is intended to provide better guidance, manage expectations, and help to assure applicants that requests for exemptions are considered in a fair and consistent manner.

## Potential benefits and costs of the proposal

50. The benefits of the preferred option are that the proposed guideline for transitional programs
  - uses plain, non-ambiguous English which would be easily understood by applicants, registrants and other stakeholders
  - would better inform applicants about the requirements for the transitional programs, facilitating a smoother transition into the Australian workforce for overseas trained psychologists, and
  - would achieve a balance between protection of the public, facilitation of access to psychological services for the Australian public, and impact on registrants and applicants for registration.
51. The costs of the preferred option would be that overseas trained applicants, employers, AHPRA, National Boards and other stakeholders will need to become familiar with the new guideline.

## Estimated impact of the proposed new guideline

52. Implementation of a new guideline for transitional programs would have minor impact as the guideline would not introduce new requirements or require new processes. The aim of the guideline is better communication of information about the transitional program, supplementing the requirements in the general registration standard.
53. There would be some operational impacts for AHPRA in terms of implementation and the ongoing management of a new guideline, if adopted.
54. There would be no financial impact for applicants and registrants as any changes will not affect application or registration fees.

### General questions for consideration

55. The Board invites feedback on the following questions. You may choose to answer one, some, or all of these in your submission.
- 1) Which option do you prefer for providing guidance on the transitional program?
  - 2) Do you have any suggestions for making the content and structure of the proposed guideline more helpful, clear, relevant and workable?
  - 3) Do you have any feedback on the proposal to include detailed competency information in the guideline?
  - 4) Do you have any feedback on the proposal to include guidance on requesting an exemption in the guideline?
  - 5) Is there anything missing that should be added to the proposed guideline?
  - 6) Is there any other content that should be changed or deleted in the proposed guideline?
  - 7) Are there any specific issues with the transitional program that are not addressed in this review but that should be? This may include impacts on workforce or access to health services.
  - 8) Do you have any other comments on the proposal?

### Next steps

56. The Board will consider the consultation feedback on the draft proposed guideline before finalising the proposal.

## Statement of assessment

---

Psychology Board's statement of assessment against:

- AHPRA's *Procedures for development of registration standards, codes and guidelines*, and
- COAG *Principles for best practice regulation*

### Proposed guideline: transitional programs for overseas-qualified applicants

57. The Australian Health Practitioner Regulation Agency (AHPRA) has produced the document *Procedures for the development of registration standards, codes and guidelines* which are available at: [www.ahpra.gov.au](http://www.ahpra.gov.au). These procedures have been developed by AHPRA 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 (the National Scheme) operates in accordance with good regulatory practice.
58. Below is the Psychology Board's assessment of the proposal for its draft Guidelines for transitional programs against the three elements outlined in the AHPRA procedures.

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

##### Board assessment

59. The Board considers that the draft guideline for transitional programs meets the objectives and guiding principles of the National Law.
60. In particular, providing additional guidance on the transitional program in a guideline would support rigorous and responsive assessment of overseas qualified psychologists. Together with overseas qualifications assessments and the national psychology examination, the transitional program helps to ensure that only practitioners who are suitably trained and qualified to practise in a competent and ethical manner are registered.

#### 2. The consultation requirements of the National Law are met

##### Board assessment

61. The Board considers that the proposal to publish existing requirements in a new guideline for transitional programs meets the consultation requirements of the National Law.
62. The new guideline is proposed in response to key stakeholder feedback – including from government and the profession – received as part of wide-ranging consultations on the requirements for provisional registration and general registration in the profession.
63. Consultation on this specific proposal has included preliminary consultation with government and internal stakeholders about potential legal, operational, regulatory and workforce impacts. It has also included consultation with other National Boards, including consideration of opportunities for collaboration on matters of shared interest.
64. The Board is now undertaking public consultation which includes publication of the consultation paper and proposed guideline on the website and inviting feedback from stakeholders and interested parties via a range of communication channels.

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

#### Board assessment

65. In developing the draft guideline for consultation the Board has taken into account the Council of Australian Governments' (COAG) *Principles for Best Practice Regulation*.
66. 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.
67. The Board's view is that the proposed guideline as drafted will meet its mandate of protecting the public by providing information on the existing requirement in a more accessible format.
68. The Board makes the following assessment specific to each of the COAG principles expressed in the AHPRA *Procedures for the development of registration standards, codes and guidelines*.

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

##### Board assessment

69. The Board considers that the proposal is the best option for achieving the stated purpose.
70. The purpose of the guideline is to provide guidance on the transitional program for overseas-qualified applicants for registration. The guidance is intended to support the requirements for transitional programs in the registration standard for general registration. The registration standard provides for the protection of the public by ensuring that only practitioners who meet a minimum standard of education and training and are suitable to be registered are granted registration.
71. The Board considers that, while inclusion of the key requirements in the standard alone is a good option for achieving the purpose, providing additional and clearly set out guidance in an accessible format is the best option.
72. The Board has taken research, regulatory experience, the regulatory principles, and feedback from key stakeholders into account in developing the proposed guideline.

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

##### Board assessment

73. The Board considered whether its proposal could result in any unnecessary restriction of competition among health practitioners.
74. As the proposal would not involve changes to any requirements – only present existing requirements in a new format – the proposed new guideline would not be expected to impact on the current levels of competition among health practitioners. In making this assessment the Board also considered that the current requirements do not contribute to any unnecessary restriction of competition among health practitioners.

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

##### Board assessment

75. The Board considered whether its proposal could result in an unnecessary restriction of consumer choice.
76. As the proposal would not involve changes to any requirements – only present existing requirements in a new format – the proposed new guideline would not be expected to impact on the current levels of consumer choice. In making this assessment the Board also considered that the current requirements do not contribute to any unnecessary restriction of consumer choice among health practitioners.

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

**Board assessment**

77. The Board considered the overall costs of the proposed guideline to members of the public, registrants and governments and concluded that there are not likely be any significant costs involved. The costs of consulting on and implementing the new guideline will be absorbed using current resources and will not result in any costs to members of the public or government. Nor will they have any impact on registration fees or practitioner expenses.

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

**Board assessment**

78. The Board considers the draft guideline has been written using plain language that will help applicants, practitioners, employers, supervisors and the public to understand the requirements for overseas trained applicants.
79. The requirements for transitional programs are clearly stated using the same plain English principles as the registration standard for general registration. Stating the requirements in the registration standard alone is sufficient to ensure compliance by overseas trained applicants. However, providing extra guidance in a guideline is expected to enhance understanding and help reduce uncertainty for overseas trained applicants, their employers and supervisors, and the public about the requirements for overseas trained applicants.

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

**Board assessment**

80. The Board has procedures in place for regular review of all its standards, guidelines and policies which ensures they remain relevant and effective over time. Guidelines are generally reviewed 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.
81. The Board will also review guidelines earlier in response to any issues which arise, or new evidence that emerges, to ensure continued relevance and workability over time.

## Draft guidelines: Transitional programs for overseas qualified applicants

---

Effective from: <<date>>

### Introduction

82. In Australia all applicants for general registration as a psychologist must demonstrate a sound knowledge of, and competency in, Australian ethical, legal and professional matters, and working with people from diverse groups, as relevant to the Australian context.
83. Graduates of accredited postgraduate psychology degrees and Board-approved internship programs demonstrate these capabilities as mandatory requirements of their degrees and internships. However, overseas trained psychologists will not usually have addressed these specific capabilities in their psychology training. Therefore overseas trained psychologists whose qualifications and supervised practice experience otherwise meet the requirements for general registration must demonstrate these skills relevant to the Australian context, to the standard required of an entry-level general psychologist. This ensures that all individuals granted registration as a psychologist in Australia have acquired the necessary skills to practice safely, ethically and effectively with diverse groups of people in the Australian context.
84. Overseas trained applicants for registration in Australia will usually be required to demonstrate these skills and knowledge by completing a period of supervised practice with a Board-approved supervisor – ‘the transitional program’ - and by passing the national psychology examination (the exam).
85. These guidelines set out the skills and knowledge that are required to be demonstrated and other requirements for the transitional program.

### Who needs to use these guidelines?

86. These guidelines are for applicants for registration as a psychologist in Australia who have overseas psychology qualifications and are required to complete a transitional program to become eligible for general registration. They also provide guidance for employers and supervisors of overseas trained psychologists.
87. If you will be undertaking an accredited postgraduate degree or approved internship in Australia you will not be required to complete a transitional program and these guidelines do not apply to you.

### Registration

88. Overseas qualified applicants who require assessment of their overseas qualifications must apply for provisional registration and an assessment of overseas qualifications using [form APOS-76](#). The [outcome of the assessment](#) will determine if you need to complete a transitional program or other supervised practice program.
89. If the outcome is that you need to complete a transitional program, you will need to submit an application for approval of a transitional program - [form AATP-76](#). If your proposed transitional program is approved you will be granted provisional registration to enable you to complete the program and the exam.
90. For more details on the registration and assessment process refer to the registration information in the [overseas applicants](#) section of the website.

## Requirements

91. Successful completion of a transitional program requires the individual to demonstrate achievement of the following during the program:
1. competence in the following areas through direct observation<sup>4</sup> of practice by, and/or discussion in supervision sessions with, a Board-approved supervisor:
    - ethical, legal and professional matters as relevant to the Australian context, and
    - working with people from diverse groups as relevant to the Australian context
  2. completion of at least 210 hours of psychological practice in an approved work role over a minimum of 12 weeks in continuous calendar months, for at least 17.5 hours per week, and
  3. completion of at least six hours of individual supervision with a Board-approved supervisor, focussing on Australian ethical, legal, professional, and cultural matters, provided at a rate of at least one hour per fortnight.
92. At the end of the transitional period, the supervisor must submit a completed *Assessment of capabilities - transitional program for provisional psychologists - form ACTP-76* to the Board. Completion of ACTP-76 by the supervisor indicates the applicant has demonstrated the required competencies and is able to provide psychology services safely, competently and appropriately in the Australian context.

## Board-approved supervisor

93. At least six hours of formal supervision with a Board-approved supervisor is required in the transitional program. Your supervisor may be someone who is employed in the same practice or organisation as you with supervision occurring within the work role, or you may have an external/off-site supervisor.
94. If your supervisor will not be employed in the same location as you, your application for approval of a transitional program must provide detail of how the supervision requirements will be met. You will also need to confirm that provision has been made to address issues with confidentiality, privacy and any other relevant workplace or employment policies impacted by having an off-site supervisor.
95. Formal supervision includes both direct observation of your practice by, and one-on-one discussion with, the supervisor. Your supervisor will determine the appropriate mix of observation and discussion making up the minimum six hours of supervision that will enable them to assess your competence.
96. In Australia supervisors are approved by the Board to provide supervision in a number of different programs including postgraduate degree placements, internship programs, and registrar programs leading to area of practice endorsement. Different skills and training are often necessary to provide different types of supervision, therefore the Board grants approval as a supervisor for specific supervision programs.
97. Overseas psychologists come to Australia from a variety of professional, educational, social and cultural backgrounds, with different experiences, scopes of practice, and at different career stages; therefore they have different supervision needs. For this reason, the Board does not approve supervisors specifically for a transitional program category. Instead supervisors who are Board-approved in any supervision category may be proposed as a supervisor for a transitional program. This gives overseas psychologists flexibility to propose a supervisor who best matches their individual supervision needs.
98. A searchable list of Board-approved supervisors is available online at:  
[www.psychologyboard.gov.au/Registration/Supervision/Search](http://www.psychologyboard.gov.au/Registration/Supervision/Search)
99. More information about Board-approved supervisors, including a guideline for supervisors is available at:  
[www.psychologyboard.gov.au/Registration/Supervision](http://www.psychologyboard.gov.au/Registration/Supervision).

---

<sup>4</sup> Direct observation means observation (live or recorded) of the supervisee's practice with clients. The supervisor may be physically present at the session, or may observe via videoconference or web conference, or they may watch a video recording of the practice. Direct observation usually requires an image of each of the parties, including a clear view of facial expressions. However, the Board may approve audio observation (live or recorded) if special circumstances apply and Board approval is sought in advance.

## Psychological practice

100. At least 210 hours of psychological practice in an approved work role must be completed in the transitional program over at least 12 weeks in continuous calendar months. An approved work role is a professional psychology position which has been approved by the Board as suitable for the transitional program.
101. The Board approves work roles on a case-by-case basis when assessing a proposed transitional program plan. To be considered suitable, the role must allow for at least 17.5 hours per week of psychological practice – that is, the application of psychological knowledge, methodology, principles, techniques and ethical standards to individual clients, groups or organisations.
102. The Board will consider all types of psychology work roles for the transitional program, including salaried, contract, casual and volunteer, and all settings where psychological practice occurs.

## Competencies

103. In the transitional program the applicant must demonstrate competence in ethical, legal and professional matters as relevant to professional practice in Australia, and competence working with diverse groups of people in the Australian context, to the minimum standard required for general registration as a psychologist in Australia.

The knowledge and competencies required to be demonstrated include:

- Familiarity with the main provisions of, and understanding of when to consult, the [Health Practitioner Regulation National Law](#) as in force in the state or territory where you will be practising.

In particular you must have an understanding of what your obligations as a registered health practitioner in Australia will be with regard to:

- mandatory notifications
  - continuing professional development
  - professional indemnity insurance
  - notifying the Board of certain events or changes of details
  - advertising
  - use of protected titles, and
  - registration and renewal requirements.
- Familiarity with the main provisions of, and understanding of when to consult, other relevant legislation in a co-regulatory jurisdiction (e.g. Health Ombudsman Act (Qld) 2013).
  - Familiarity with the main provisions of, and understanding of when to consult, the state and Commonwealth Acts and Regulations of Parliament relevant to psychologists' work in Australia.

Areas where relevant legislation exists include:

- freedom of information
- mental health
- workers compensation
- disability services
- guardianship
- privacy
- health records
- equal opportunity and antidiscrimination
- victims of crime
- children and adolescents
- mandatory reporting (child protection and aged care), and
- ethical human research.

Where legislation relates directly to your intended scope of practice you would be expected to have a more detailed knowledge.

- Knowledge of Australian legal and political systems as relevant to your intended scope of practice.
- Detailed knowledge and understanding of the Australian Psychological Society's *Code of Ethics* which has been adopted by the Board for the profession.
- Detailed knowledge of the requirements of the Psychology Board of Australia's mandatory registration standards for psychologists:
  - continuing professional development
  - criminal history
  - English language skills
  - professional indemnity insurance, and
  - recency of practice.
- Familiarity with and understanding of professional matters and expectations as relevant to working in the Australian context, including:
  - sexual propriety
  - boundaries
  - confidentiality and privacy
  - administration and record keeping
  - billing practices and financial arrangements
  - conflict resolution
  - ethical and professional behaviour, and
  - organisational culture, as relevant to your area of practice.
- The ability to apply knowledge and understanding of how the practice of psychology is influenced by social, historical, professional and cultural contexts to professional practice in Australia.
- Familiarity with and understanding of cultural and social diversity issues as relevant to the Australian context and your intended scope of practice, including:
  - Aboriginal and Torres Strait Islander people
  - service needs of minority, marginalised or vulnerable groups in Australia
  - immigration and refugees, and
  - communication with diverse groups.
- Awareness of how one's own cultural and social background can influence perception, and
- Ability to work with people from diverse groups and to manage any cultural or social barriers.

### Exemptions

104. Individuals who are able to demonstrate they have already achieved competence in all these ethical, legal, professional and diversity matters may request an exemption from the transitional program. Such requests will be considered on a case-by-case basis.
105. A request for an exemption must include evidence that you have completed some relevant work experience in Australia, whether full-time, part-time, casual, contract or voluntary.
106. Relevant work experience may include work as a provisional psychologist in a previous internship or postgraduate degree (e.g. that was not completed so did not qualify you for general registration). Alternatively, relevant work experience may have been gained in a role related to the practice of psychology which gave you exposure to relevant socio-legal frameworks, and experience working with the Australian public, psychologists, and other professionals in an Australian context. This may include working as a case manager, counsellor, or in administration, management, education or research where you did not use the title 'psychologist' or directly provide psychology services to clients
107. Requests for exemption require evidence of a combination of different activities which together demonstrate that all the content of the competencies, as listed in the previous section, has been covered. The evidence should also indicate how competence has been demonstrated, such as formal assessments, performance evaluations or discussion in supervision sessions.

108. The Board does not assess for partial exemption – if you cannot provide evidence that you have achieved all aspects of the competencies, they will need to be demonstrated to a Board-approved supervisor in the context of the transitional program.
109. Documentation in support of the request for exemption must be provided (originals or [certified copies](#)) and must be in English, or [appropriate translations](#) must be provided.
110. Documentation may include:

| Activity   | Evidence  |
|--|---|
| Relevant work experience in Australia (mandatory), this may include: <ul style="list-style-type: none"> <li>- psychological practice as a provisional psychologist in placements for a partially completed degree, internship or other supervision program approved by the Board or a prior state or territory psychology board, or</li> <li>- work in a role related to the practice of psychology in Australia.</li> </ul>   | CV, position descriptions, letters from employers, supervisors or education providers, supervision plan, log book, performance plan, performance evaluation.                          |
| Professional supervision or mentoring with an Australian psychologist, this may include: <ul style="list-style-type: none"> <li>- private supervision and mentoring arrangements</li> <li>- workplace supervision for a relevant role in a setting where psychology services are provided</li> <li>- supervision in a partially completed Board-approved internship, or other supervision program approved by the Board or a prior state or territory psychology board</li> <li>- supervision in a partially completed accredited Australian psychology degree, or</li> <li>- supervision for placements in Australia as part of an overseas psychology degree.</li> </ul> | Supervision log book signed by the supervisor or mentor that summarises dates and times of meetings, what you discussed, outcomes etc and/or a letter from your mentor or supervisor. |
| Relevant formal study in Australia (secondary, tertiary or vocational studies that specifically covered some of the required knowledge and competencies)   | Academics transcripts, letters from the school/college/university, course/subject content outlines  |
| Completion of relevant professional development activities e.g. workshops, conferences, short courses etc. in the Australian context   | CPD portfolio including activity log, certificates of completion/attendance, receipts etc.  |
| Residence in Australia and immersion in the psychology community   | Professional memberships, character references from registered Australian psychologists, evidence of community activities and volunteer work.   |

111. All overseas trained applicants are required to pass the national psychology examination before being granted general registration, even if granted exemption from the transitional program.

### Responsibilities

112. The National Board is responsible for formulating and approving this guideline. AHPRA is responsible for ensuring that the requirements are implemented and effectively managed.

### Review

113. This guideline will be reviewed as required; this will generally be at least every five years.

DRAFT

## Registration process via the transitional program pathway for overseas trained psychologists

