

To whom it may concern,

It the last few weeks, I have been trying to understand the process for registration as a psychologist in Australia. I am a qualified educational and child psychologist in the UK with a doctoral qualification (this includes 4 year internships/employed route placements) and 2 years of professional practice post-qualification. I came to Australia on a sponsored 457 visa for my husband's work. Before we left the UK, I applied to the APS for an assessment of my qualifications. These qualifications have been assessed as a 6 year + of study.

Following research into registering as a psychologist, I have become very confused about the process outlined by AHPRA/PsyBA. I have spoken to a number of employers and supervisors who have all expressed their shock to what I am required to apply for despite all the years of experience I have gained in the UK. They have also expressed how difficult and unrealistic the system seems to be. Employers are particularly reluctant to offer opportunities for a number of reasons which I will discuss further in this letter.

I have communicated on numerous occasions by different means (emails, phone calls) to different people in the AHPRA organisation. This has helped in trying to signpost me in the right direction. However, every time I spoke to someone I found something new which has made me very anxious about the process. Every time I have found additional costs and different loop holes. I have had to send emails again as some remained unanswered. I have had to wait for a number of days for a reply which has had significant consequences on my credibility to supervisors and employers.

Based on the advice of a number of people I spoke to, I am writing this letter with the aim to outline my concerns about the process to registration and the number of difficulties I have experienced when trying to research further about the transitional program and speaking to employers and supervisors for opportunities. I also aim with this letter to outline how confusing and impossible the process seems to be.

Below, I have used difficulties experienced as headings and guidelines from information available on the AHPRA website to outline key confusing areas which I have labelled with numbers for the purpose of clarity.

1. The process is confusing and guidelines are contradictory in many places.

From my research on the website, I have found it impossible to understand what comes first. In section 1.1, it is recommended to 'not seek employment' prior registration eligibility is assessed'. However, the forms APRO-76/APOS-76 both require the submission of the AATP-76 form, a transitional program signed off by a supervisor and an employer. Additionally, the process outlined in section 1.2 says that a transitional program will be submitted and approved (steps 5 and 6) after the application form APRO-76/APOS-76 has been submitted. However, the application form requires the

AATP-76 form to be completed and submitted. It does not make sense.

As stated in section 1.1., a psychologist must hold registration with the Board prior to taking up employment. My experience of speaking with a number of employers is that they will not employ you unless you have a full registration. How am I meant to gain experience of psychological practice? A supervision arrangement cannot be fully decided until an employer has agreed that an off-site supervisor could enter/observe/have access to records. Employment cannot be gained until full registration is obtained. Supervision needs to take place to gain registration. AATP-76 needs to be completed for provisional registration, but supervision cannot be finalised until employment is gained, employment cannot be gained until full registration. An impossible situation!

In section 1.3, it states that overseas qualified psychologists *may* be asked to complete a transitional program. It therefore stipulates that there is a possibility that an applicant may not need to complete a transitional program. Section 1.4 also stipulates a possibility of an exemption. Who decides and how, if this is the case? What are the criteria for an exemption? Should the process be transparent and clear so that an applicant can submit an application? The APRO-76/APOS-76 form does not give you the opportunity to justify reasons why you should not have to do a transitional program or apply straight to the general registration.

Section 1.1

Employment as a registered psychologist in Australia

You must hold registration with the Board prior to taking up practice or employment as a registered psychologist in Australia. *We recommend that you do not apply for work or set up a practice until your registration eligibility is assessed and confirmed.* Please note AHPRA and the Board cannot assist you in seeking employment or influence employment outcomes.

Section 1.2

Recommended pathway to registration in Australia for overseas qualified psychologists

1. Assess your ability to meet the registration requirements
2. Fill in [application form APOS-76](#) and provide all required documents to AHPRA
3. The Board will assess whether you meet the registration requirements
4. Receive advice that you need to complete a specified period of supervised practice and the National Psychology Exam
5. Use relevant form to submit a plan for your specified period of supervised practice to the Board for approval
6. Receive approval of your supervised practice plan and granted provisional registration
7. Complete specified period of supervised practice in accordance with your approved plan

8. Pass the National Psychology Exam

9. Apply for general registration

10. Granted general registration

Section 1.3

Provisional Psychologists

Additionally, provisional registration *may* be granted to overseas qualified applicants to enable the individual to complete a [transitional program](#) to be eligible for general registration as a psychologist in Australia.

Section 1.4

Registration standard: general registration

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).

2. Transitional program is not detailed enough to share with employers and supervisors.

I was told over the phone that if in doubt regarding the transitional program and supervision arrangements that I should look up the 4+2 internship information. I agree that it does give a better understanding of an internship. However, when talking to supervisors and employers, it becomes very complicated to explain that the transitional program is not a 4+2 internship. Additionally, most of the information available in the 4+2 program does not match the transitional program in terms of requirements, hours, supervision arrangements. Supervisors and employers are puzzled and confused. The provisional psychologist registration standard document (<http://www.psychologyboard.gov.au/documents/default.aspx?record=WD10%2f253&dbid=AP&chksum=bWNABG%2bDxbZmg83gN%2bqPyw%3d%3d>) does not include information about the transitional program.

Supervisors and employers have asked for the following clarifications:

- In the 210 hours required within the 3 months of practice, what is the requirement of contact hours vs professional development hours? The 4+2 refers to the applicant needing to complete a log book. Is this the same for the transitional program? The 4+2 gives details and a breakdown of the hours needed, but the transitional program does not.

- I have been told that the transitional program has been designed to support overseas qualified psychologists in understanding the Australian diverse context. How many hours of contact with a 'diverse clientele' is necessary? what is considered to be diverse groups, a wide range of diverse communities or specifically related to Aboriginal culture?
- clarity around professional practice activities that can be performed by a provisional psychologist, providing that supervision is in place fortnightly. Can the provisional psychologist carry out all duties required from a 'psychologist' role? What are the limits of the provisional psychologist role, if any? Where does the supervisor need to be involved in terms of countersigning documents? Signing all reports, casenotes, etc. or simply psychological reports?
- What constitute of psychological practice? In what role? A number of people have explained that I could apply for different work roles such as a student counsellor, welfare sector, organisational psychology role. How can I fulfill the requirements of the transitional program i.e. diagnosis and psychological testing in these roles? How can a provisional psychologist complete all required duties in a different role?

I looked up the Assessment of Capabilities form that the supervisor has to sign off following completion of the transitional program for further information. Looking at the form with a supervisor, the following queries came up:

- To what extent does the applicant need to show knowledge of all competencies in the Assessment of Capabilities, to what depth? Can an applicant demonstrate knowledge in all of these different fields within 6 sessions? Can this be provided as written work? Does it need to be discussed?
- 6 supervision sessions over 3 months, one fortnightly, does this include 4 direct observations? Or are the direct observations separate to the individual supervision sessions?

Section 2.1

Transitional Program Requirements

The transitional program requires the applicant to:

- Demonstrate competence in the following areas to a Board-approved supervisor through direct observation of practice and/or discussion in supervision sessions:
 - ethical, legal and professional matters as relevant to the Australian context
 - working with people from diverse groups as relevant to the Australian context
- Complete a minimum of 210 hours of psychological practice in an approved work role (note, provisional psychologists are not permitted to work independently or establish an independent private practice) over a minimum of three months/12 weeks and for at least 17.5 hours per week, and
- Complete a minimum of 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
- Sit and pass the National Psychology Examination

On successful completion of the requirements, the applicant can apply for [general registration](#).

I have been advised I have to complete a transitional program - what do I do next?

- 1 Arrange the transitional program - see below for guidance on what to do.
- 2
- 3 Submit your transitional program plan (form AATP-76) to the Board for approval.
- 4
- 5 Undertake the transitional program.
- 6
- 7 Pass the national psychology examination (at any time during or after the transitional program)
- 8
- 9 Submit the assessment of capabilities (ACTP-76) completed by your supervisor together with your application for general registration (AGEN-76).
- 10 You may continue to practise as a provisional psychologist while waiting for your application for general registration to be approved provided you continue to receive regular supervision.

Arranging a transitional program

The transitional program requires:

- work in a psychological position in Australia for at least three continuous calendar months for at least 17.5 hours per week (applications for two or more concurrent positions may also be approved).
- a [Board approved supervisor](#) who has agreed to provide you with direct supervision for at least one hour per fortnight for the duration of the Transitional Program. You must choose a supervisor who holds current Board-approved supervisor status, and who is eligible to provide supervision in any one (or more) of the following pathways:
 - 4+2 internship program
 - 5+1 internship program
 - Higher degree placements
 - Registrar program
 - Working in addition to placements for higher degree students

There is a [searchable online list](#) of all Board approved supervisors which may be useful for finding a suitable supervisor.

A supervision plan that is agreed between the applicant, their supervisor and their workplace that will enable the overseas applicant to demonstrate competency in ethical legal and professional matters to the standard required by an Australian entry level general psychologist. The supervision plan must include psychological practice and supervision and may also include professional development courses or activities.

For details of the entry level competencies that are required to be developed 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](#).

Section 2.2

4+2 Internship information

3. A provisional psychologist cannot work independently.

I was told over the phone by AHPRA that working in a private practice was an option. Some supervisors I have been in touch with are under the impression this is not allowed. The transitional program information does not refer to this 'rule' at all, except from saying that the provisional psychologist should not work independently. However, in the 4+2 program, it says that independent practice is not permitted.

Can employment be gained in a private practice under a different role such as a counsellor?

What does independent practice means? One must remember that overseas applicants may have different experiences of working in different trainee/supervisee roles, and that within their working context, working independently may mean something completely different. For example, it could be interpreted as 'must never work alone with clients'. When communicating with officers at AHPRA, I was given different advice as to what I could do and apply for in terms of employment. For example, I was told I could as a sole trader, but could not own my own company/business. Later, I phoned again, I was then told I could not work as a sole trader and must salaried or voluntary. A number of employers/opportunities are now based on sole traders under a business banner. It becomes incredibly complicated as overseas applicants to unpick different set up of practice and opportunities.

4. Employers are particularly reluctant to employ someone who has to complete a transitional program.

A number of employers I have spoken to explained that other candidates have had a long wait to registration (6 months to 1 year). This has had significant implications on their practice) and will therefore not employ a provisional psychologist for that reason. Many have the 4+2 in mind and feel it will take too long to train someone. They also feel that an applicant will probably leave after 3 months.

The information provided about the transitional program is minimal and supervisors and employers have asked a number of questions. I have had to ask for support from AHPRA on many occasions, but many questions remain unanswered. It does not look very credible to employers.

Many employers and supervisors do not seem to know about the transitional program. Some psychologists from the UK said to that full registration is straightforward. Some supervisors said that supervision arrangements (once a fortnight as per transitional program) seem different from other psychologists they know who had to do it.

Many employers I have spoken to will not employ a provisional psychologist because they do not have the capacity in their organisation to provide contact hours with a senior member of staff to oversee report writing and other tasks. Even a voluntary position

appears to be complicated for employers. Even with a doctoral qualification and 20 years experience in psychology and education, I have had over 25 refusals for employment, jobs in varied sectors, such as welfare, schools, education departments. It has been soul destroying to find myself to such a low start to my career in Australia. I even had refusals where employers decided not to employ anybody. I had refusals just for posts as a counsellor, student well-being, with my years of experience you would think of at least getting to an interview.

I spoke to many employers because I could not understand what was happening with my applications. Employers explained they cannot commit...There are issues with insurance, external supervisor accessing the workplace, supervision arrangements within the organisation. For example, I was told that employers cannot commit to training supervision costs and time within their organisation, cannot accept an external supervisor on site, cannot stretch time from a senior member of staff to mentor a provisional psychologist...so they will not even interview provisional psychologist applicants.

5. There are a number of issues with supervision. Arrangements are not clear and detailed.

I asked clarifications over the phone about guidelines regarding supervision arrangements. I was told that AHPRA could not provide assistance with this. If AHPRA requires supervision for a transitional program, should there not be some guidelines? No guidelines are available on this issue. Supervisors seem to charge different fees. In such a regulated profession, if supervision is paramount to completing the program and gaining full registration, there should be clear guidelines and regulation. It is an incredibly costly process. An effective supervision is so important, it felt like shopping around, but I knew so little about the process and wanted some clarifications. I found that supervisors did not know either. The following queries came up:

- I had some emails saying they could not supervise me because they worked in private practice and could not offer placement. Why so many supervisors do not know about the transitional program?
- Why are some many supervisors unavailable to supervise? Out of 30 supervisors emailed through the AHPRA website, I had 3 successful emails back and 2 others unsuccessful. Are supervisors apathic to queries? Why are they on the website if they cannot supervise?
- What can I expect from a supervision session?
- What are the standard supervision fees?
- Who pays for these? Does the employer have a responsibility for this? There seems to be some informal arrangements i.e. if you volunteer in a practice, you get supervision free. Other supervisors will lift some of the fees if you are unemployed. Are there guidelines and regulations around this issue?
- Does the employer have responsibility in providing some areas of supervision? If a board approved supervisor can supervise within an employment role, does the applicant have to pay the supervisor?

- Can the supervisor charge for transport to the workplace for direct observations? Or is this included in the supervision fee?
- 6 supervision sessions over 3 months, one fortnightly, does this include 4 direct observations? Or are the direct observations separate to the individual supervision sessions?
- Can the supervisor charge for looking over work, if competencies cannot be demonstrated orally within the timescale?

6. There are many hidden costs to this process.

It does not seem quite right to be asked to pay \$436 for registration but then having to pay a huge amount of money as hidden costs. Should the costs not be more transparent i.e. the full process will cost you this in total? So far, I make the costs as:

\$1000 APS assessment of qualifications
 \$436 AHPRA provisional registration
 \$150 supervision x 6=
 transport to workplace for supervisor x 4
 \$450 National exam
 \$300 international police check
 \$436 AHPRA general registration
 \$150/supervision following three months of practice whilst waiting for general registration
 \$70 fees related to transcript requests
 \$105 working with children check
 \$650 APS membership (with reduced fees of assessed)
 \$250 Professional indemnity
 \$45 National Police Check

N.B.The APS charged \$1000 for assessment of qualifications and AHPRA charges \$700.

7. The system is undergoing a number of changes. There could be possibilities that changes occur and requirements change during a transitional program period.

I have enquired on a number of occasions about different questions as above. In the most recent answers, it was pointed out to me that there could be some changes which would impact on the transitional program. After spending months of heartaches, meltdowns and stress over this process, I sincerely hope that changes will not take place when a transitional program has been agreed. I was told to look at the website to note any changes. I feel this is not good enough. My transitional program has been

agreed by the board. I was told on so many occasions that everything is a statutory and legal process, well, I feel this has to be both ways and that should there be changes, notifications should be made to all applicants currently taking part. Additionally, there should be clear guidelines for all so that ambiguities are clearly addressed.

8. Different terms are used to qualify a psychologist in training.

Although an oversea qualified psychologist can only submit a provisional psychologist application to AHPRA, there seems to be different terms used 'intern', 'probationary' or 'provisional'. I have not found any information regarding this different terminology. In my questions to AHPRA over emails and the phone, this has never come up either. Employers have asked for clarifications about this issue. Some felt that if you are called 'intern', there are different duties, i.e. 'you can do more' and not so prescriptive in the role. Some clarity would be welcome as it has a huge implication for employment purposes.

9. Communication with AHPRA officers is difficult and confusing.

Initially, I was completely devastated at the thought of this very long process. I thought my application to the APS was going to give me the full registration. I felt that both AHPRA and APS very confusing in outlining the processes. The process was over 6 months to provisional registration. During this process, I had so many questions with huge implications in terms of job and supervisor seeking processes. My experience of communication with AHPRA officers have been varied, not always right, confusing, not always prompt. When I finally manage to get support from one registration officer in particular, the process seemed smoother, but again, there seemed to be huge gaps in understanding the work of a psychologist. At the end of the provisional registration process, the professional officer assessing my case phoned me to reassure me of the process ahead, it is only then, 4 months after the start of all my emails and phone calls, that I felt someone understood my profession and listened to all the obstacles I faced. When you start the process, admin officers do not let you speak to a registration and professional officers. I did not even know they existed. It feels it is a gatekeeping exercise to answer queries? Why? Because do not feel confident in their skills and knowledge? Even the professional officer I spoke to admitted that. It feels so frustrating to not be able to speak to someone who understands your profession, especially when you find faults and loopholes in the system.

10. Is this process all necessary?

Throughout my research and this painful process of supervisor and employment searching, I could only think to myself...so why am I doing this? Because the system wants me to be skilled and competent in an Australian context...I already have a

doctorate from a highly regarded international university. I quoted in my own thesis work a high number of Australian papers. I read the Australian Code of Practice. I read literature about the health and education systems. I have attended a number of lectures on cultural diversity, vulnerable and at risk clients. I am from a country where indigenous cultures exist and are part of the societal dilemmas. I wrote a website on global migration and cultural diversity. I trained to work across lifespan during my first degree and continued to work across the lifespan in schools. During my studies, one important message was that the psychologist must be able to reflect and research, and consult with clients from all different backgrounds. Another message was that learning is a lifelong experience and that, despite being qualified, we still learn through practice, and that it is important to continue research and reflection skills to meet the need of clients. Why would it be different in Australia? Isn't in the nature of psychologists to research, find out, expand knowledge on an unfamiliar subject?

Yes, there are differences depending of the country you have trained in, there is no doubt about that. Instead of saying there must a transitional program for everyone, could there be some flexibility within the system to allow candidates to demonstrate their skills and their knowledge of the Australian system through interviews for example. I have had to do so much research to get my job and AHPRA applications through that it feels that the so many hurdles (no job, no supervisor, papers after papers, confusing communication) are not necessary. To be a competent and skilled employee, you need to learn about the ethical, legislative system anyway, why creating less opportunities to be able to learn all of this? If I had found a job straightaway, when I arrived in the country, I could have completed my transitional program by now. Most employment opportunities have a probation period, could there be a way that elements of the transitional program are included in the first 3 months of employment and that the applicant must demonstrate skills within that period. The title 'provisional psychologist' clearly restrict opportunities, and employers and supervisors have challenges they face too, could we not be registered as 'psychologist' straight away with the requirement of completing the necessary training within a 3 month period? What about having to complete a number of training modules (including e-modules) that are outlining the legislative and ethical context specific to Australia?

Surely, there could be other ways to support newly arrived migrants in the country, migrants that are highly skilled within a highly regarded profession, with years of training in their 'home country' (and part of the skilled workforce Australia welcomes). When I spoke to Australians and people close to me about all of these difficulties, they have been shocked at how it feels to be treated as a new migrant in the country. Lack of employment and the need to accept voluntary positions means that migrants are left with no money, difficulties with housing, and struggling financially. The migration challenges are already significant financially and personally, why add so much on the top? Challenges include: settling my children in schools, settling my husband in a new job, living with limited furniture/waiting for the container to come, meeting new people, needing to talk to many people regarding buying furniture, cars, a house. Our more personal challenges have been that we cannot get a mortgage on my husband salary alone until I have a salary, I cannot have a decent salary until I am fully registered. We

are not entitled to childcare rebates, we have to pay \$107 a day of childcare as well as all the costs outlined above and supervision fees. Who can go to work/volunteer needing to pay such a high price?

It feels that this registration process clearly delays adaptation to the country and delays learning about all the essential skills needed to be a competent professional.

I decided to contribute to the consultation process because the process has felt completely overwhelming and heartbreaking, considering I was a fully qualified psychologist in the UK and took years of training to complete this qualification. I sincerely hope this letter can give an insight into my experiences. Some positive points have come out of this process:

- Whilst waiting for registration, I wrote a website on global migration. (Pascaleparadis.org) Articles are now published in a French Canadian magazine/blog as well as on my site.
- My blog post 'registration as a psychologist when moving abroad' travelled around the world and connected a number of psychologists whose experiences felt to be highly similar to mine. My blog post also gives some more insight into my experiences with the AHPRA process.
<https://pascaleparadis.org/2016/08/17/registration-as-a-psychologist-when-moving-abroad/>
- We subsequently decided to create a support group/network on Facebook 'UK/overseas psychologists in Australia' so that we can support one another.

I am more than happy for my thoughts to be shared as I have written these to help the process. I would also be happy to meet a panel/relevant individuals to talk through issues outlined in this letter.

Yours Sincerely,

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pascaleparadis.org: a toolkit to opportunities and challenges as global families

