**Response to AHPRA public consultation: Proposed guideline for Transitional Programs**

As an overseas clinical psychologist currently completing the Transitional Program I am providing a response to the proposed guideline based on first-hand experience and my reflections on what would have helped me with the Transitional Program process.

Given the options proposed by the Board I would select ‘Option 2 - New guideline’ in order to provide more in depth guidance to psychologists in my position in the future. However, whilst I am pleased to see that the Board are recognising some of the difficulties with the Transitional Program and I welcome the introduction of clearer guidelines, I do not feel that those proposed here are sufficiently in depth as yet.

The proposed document does contain some information that I feel would have helped me at the start of my journey, which I believe needs to remain in the document. This includes the information on exemptions (parags. 104-111) and I think it is important that this remains in the guideline. This would have helped me at the start of my journey when I was unsure whether I needed to complete the Transitional Program or not and I was receiving conflicting information from AHPRA.

I also welcome the new system using form APOS-76 as an improvement on the old APRO-76 form as this now allows overseas psychologists to gain some form of registration prior to attempting to arrange the Transitional Program, which was something that I found difficult to explain to potential supervisors/employers some of whom were not willing to discuss any potential position without some form of registration. However, AHPRA do not seem to recognise that their own new assessment of overseas qualifications duplicates that completed by the APS for immigration purposes. Any psychologist coming to Australia on a Skilled Migration visa will now need to go through both of these processes, not to mention the additional cost of paying for a duplicate process.

In questions 5 and 7 AHPRA ask for things that are missing from, or not addressed in, the proposed guideline. I have outlined below the key difficulties that I have experienced with the Transitional Program that I do not feel are fully addressed by the proposed document:

1. **Lack of support from AHPRA in finding a position for the Transitional Program:**

Currently the only support AHPRA offer in finding a position for the Transitional Program is to direct overseas psychologists to the ‘supervisor search engine’ on their website. There appears to be little understanding that usually this merely provides you with a supervisor, not a caseload or place of work. Many of these supervisors also do not have sufficient knowledge of the Transitional Program. I contacted 60 supervisors via the AHPRA search engine. Of these only 22 replied, with 21 saying that they were not available to, or did not feel able to, supervise me for the Transitional Program. 7 of them specifically stating that they had not heard of/supervised someone completing the Transitional Program before and therefore did not feel able to supervise somebody doing this. Therefore this is not an appropriate way for overseas psychologists to find a supervisor for the Transitional Program or at all helpful in finding a position for the Transitional Program. I believe that AHPRA need to provide much more guidance and support in finding positions.

I also feel that the Board needs to be mindful that the people looking for a Transitional Program are probably new to Australia so are not likely to have local contacts in the field of psychology or even to know the set-up of local services. This makes it very difficult to know where to begin looking without any guidance.

The item you have detailed as ‘Step 2’ within the flow chart on the final page of the proposed new guideline (“arrange your work position and supervisor”) is actually a very complex step and requires a significantly more detailed explanation than this document currently provides. The information provided needs to include ideas for the types of jobs (e.g. counsellor) and services (e.g. EAPs) to look for a paid position within given that we are unlikely to be able to complete paid work in a job which has ‘psychologist’ in the title due to the reasons detailed in point 3.

1. **Lack of training for supervisors:**

The clarification in paragraph 97 that “supervisors who are board-approved in any supervision category may be proposed as a supervisor for a transitional program” is useful information for overseas psychologists to be able to clarify with potential supervisors. However, I have been informed that there is currently no specific training on supervising the Transitional Program provided within the Board approved supervisor training. This may help to explain why many supervisors appear to have never heard of the Transitional Program or to feel confident in supervising for it. My own supervisor considers supervising the Transitional Program to be distinctly different to supervising for other board approved programs. Therefore it seems that some specific training on supervising the Transitional Program within the generic supervisor training is required. The current lack of this training makes it both unfair on supervisors and more difficult for overseas psychologists to find a supervisor due to their reluctance to supervise for a program that they have no training or experience in. It may also be helpful for all Board approved supervisors to be sent a copy of this guideline once it is finalised to raise awareness of the Transitional Program amongst supervisors.

AHPRA have proposed including detailed competency information in the new guideline (parag 103). Whilst this is helpful in ensuring that this is a comprehensive document perhaps it would also be useful to provide some guidance to supervisors on how they determine whether or not a psychologist has met these competencies at the end of the Transitional Program.

1. **The problems with provisional registration:**

One of the major barriers to overseas psychologists being able to find a position in which to complete the Transitional Program is that we are only granted provisional registration with AHPRA for this period. This means that employers are not able to offer us a paid position as a psychologist (for example within the government). This type of registration also means that we are not eligible for Medicare provider status, making it extremely difficult to gain employment in the private sector.

I suspect that this leads to many overseas psychologists completing the Transitional Program in an unpaid capacity as I am currently doing. AHPRA have informed me that they are not collecting data on whether Transitional Programs are paid or unpaid so currently have no idea what proportion of people this applies to. I would argue that continuing to use a system that puts people in a position where they have no choice but to work without pay in order to gain registration constitutes exploitation.

To combat this problem I would suggest that general registration be granted to overseas psychologists with the condition of a ‘transitional period’ imposed. The transitional period could require the same as the current Transitional Program, including the supervision and observation requirements and passing the National Psychology Exam. Registration could naturally then be revoked (or not extended if it were short-term registration) if the psychologist fails to pass the transitional period. I feel that this approach would be looked on more favourably by potential employers and thus make it far easier to gain paid employment for the transitional period.

1. **Better links with APS/Department of Immigration:**

For most overseas psychologists planning a move to Australia as a Skilled Migrant obtaining a visa and hence an APS assessment of qualifications will be their first port of call. At this stage I had little idea of how complex and lengthy the AHPRA system would be and found it difficult to ascertain from them which was the correct next step for me. I spent my first couple of months in Australia simply trying to get a straight answer from AHPRA about what I needed to do and whether I needed to complete the Transitional Program or not being told ‘yes’ by some people I spoke to and ‘maybe not’ by others. Although I acknowledge that it is the overseas psychologist’s responsibility to find out about the necessary registration requirements, I feel that providing some support and guidance in this would be sensible given that these are professionals on the Skilled Occupations List and therefore individuals that we need in Australia. To assist in this I would suggest that some information about AHPRA and the registration process for overseas psychologists could be sent out by the APS at the time of their assessment for visa purposes to guide people in the right direction initially. This would allow clarity from the very beginning and perhaps pre-empt some of the multiple queries to AHPRA from overseas psychologists.

1. **The Impact on clients:**

I have some concerns about the impact of the current Transitional Program system on the clients that we work with during this program. The current system makes it more likely that overseas psychologists will move position at the end of the Transitional Program meaning that clients they work with during the Transitional Program will either only receive very short-term therapy or experience a disruption to their care due to a change of psychologist. It would be far more beneficial to clients if psychologists completing the Transitional Program were given a level of registration that allowed them to apply for the type of job they are likely to engage in following the Transitional Program thus enabling them to stay on in the position once the Transitional Program has ended.

1. **AHPRA employees lack of knowledge regarding the Transitional Program:**

My experiences of contacting AHPRA by phone regarding the pathway for overseas psychologists and the Transitional Program was that staff were often unaware of, or did not have in-depth knowledge of, the requirements and I was often told different things each time I phoned. In order to avoid others going through the same stressful and frustrating experience as myself I would suggest that AHPRA need a designated contact person(s) with in depth knowledge of the Transitional Program for queries to be directed to.

Overall, whilst in principle I understand what the Transitional Program is trying to achieve, I believe that there is still a way to go and further thought and modification required before it achieves this in practice. The proposed guideline provides some information that will be useful to overseas applicants but fails to acknowledge or provide information on other key difficulties. A more comprehensive document and service for overseas psychologists is required. It would be helpful if this were devised in consultation with psychologists who have completed the Transitional Program in order to bring it in line with first-hand experience. The current document reads as if it has been written by somebody who does not have first-hand experience of this program and the difficulties associated with it.

Psychologists continue to be on Australia’s Skilled Occupations List (SOL) thus suggesting that these professionals are needed in Australia, presumably to help Australian citizens. This is what I came to Australia wanting to do. The difficulties in finding positions for Transitional Programs and the limits to the work that can be completed during the program mean that the skills these psychologists bring are currently not being used to their full potential for many months when each psychologist initially arrives in the country (I have been here 5 months already and have not finished the Transitional Program yet). This does not appear to be in the interests of the public that AHPRA claim to be protecting with their current requirements for overseas psychologists.