

**Submission by the
Australian Psychological Society
to the Psychology Board of Australia**

**Public Consultation Paper 31
Reducing the burden: Retiring the 4+2
Internship pathway to general
registration**

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Introduction

The Australian Psychological Society (APS) welcomes the opportunity to comment on the Psychology Board of Australia's Public Consultation Paper "Reducing the burden: Retiring the 4+2 Internship pathway to general registration" released in March 2018.

The APS is the largest national professional association for psychologists in Australia with over 24,000 members. The APS is committed to high standards of psychological care for all Australian communities, and has a history of actively providing continuing professional development activities to extend the competencies of psychologists from all registration pathways.

The APS has been aware of the regulatory and administrative burden for provisional psychologists and their supervisors to complete their psychology training through the 4+2 pathway, and has actively supported the introduction of the 5+1 training pathway to registration.

The uptake of this training pathway by some universities is most gratifying, but as outlined below, the major task to achieve a successful retirement of the 4+2 pathway will be achieving an adequate number of 5+1 training pathway programs. Although this might initially be thought to be an issue for the smaller States, on review of the published statistics, the major problem might be in the highly populated states where the number of HEPs does not match the training program demand.

Please find below the APS feedback and comments on the **Reducing the burden: Retiring the 4+2 Internship pathway to general registration** on the nine specific questions (p.43 of consultation paper)

1. [Do you agree with the Board's proposal to consider education and training reform, including focusing on reducing regulatory burden, as an important next step in the development of the regulatory environment for psychology?](#)

Yes, the APS is fully supportive of the proposed education and training reform.

2. [Which do you consider is the best option for reducing regulatory burden? Please provide reasons for your stated preference:](#)

- **option two - retirement of the 4+2 pathway to general registration**

The APS supports option two. The reasons are as follows:

- Reducing the regulatory burden for supervisors and provisional registered psychologists.
- The 4 + 2 pathway is no longer fit-for-purpose for workforce needs and education and training pathways.
- The 4 + 2 pathway is below international standards for psychology training.
- Benefits of retiring the 4 + 2 pathways include the improved protection of the public, the opportunity to promote a better accredited training sequence in the 5 + 1 pathway, and a work-ready workforce.

3. Are there any specific impacts (positive or negative) or advantages/disadvantages for each of the two options that have not been outlined in the paper?

In terms of option one (status quo), the APS is aware that psychologists trained under the 4+2 pathway may perceive that their status as a well-trained registered psychologist is not supported by some colleagues, government and non-government organisations. The notion of a 'second rate' psychologist is not a valid interpretation considering the structure of the competency framework to gain full registration and that supervisors undergo an approved Psychology Board of Australia supervisor training program. However, these individual programs for provisionally registered psychologists are not externally accredited. Therefore there is potential for variability in the quality of experience that a provisionally registered psychologist will gain.

4. Are there any specific risks (for each of the two options) that have not been outlined in the paper?

The APS cannot identify any specific risks of options one or three. However, we note that clear communication to students who are currently enrolled in psychology undergraduate programs is required to ensure that students do not feel disadvantaged by the changes.

5. If you prefer option two, do you support the Board making the changes (update/delete) to the standards, guidelines, fact sheets and forms as outlined in [Attachment G-J](#) to retire the 4+2 internship pathway?

The APS supports the proposed changes.

6. If you prefer option two, which transition option do you prefer and why?

None of the options, a), b) or c).

Instead the APS proposes another option: that the last enrolment in the 4+2 internship is 30 June 2024

The APS supports the last enrolment in the 4+2 internship as the 30 June 2024. This date allows for a reasonable transition process for currently enrolled psychology students, and for HEPs to successfully work towards an adequate number of 5+1 training pathway programs.

It will also be better for the public, future psychologists, employers and higher education providers to reduce the confusing number of psychology training pathways by retiring the current 4+2 pathway with all the disadvantages listed in this paper.

Overall, it will be desirable to retire the 4+2 internship pathway as soon as possible.

We have given serious consideration as to recommend the 30 June 2024 as the last date of enrolment, especially with respect to students who would have started psychology studies in 2019 without knowing that this pathway to general registration would be closed. Those students would have completed 4 years of study by December 2023 and thus still be able to enroll in the 4+2 internship pathway.

However, we note that a large number of graduates of the undergraduate psychology sequence do not proceed to fourth year and that a further number of fourth year graduates do not proceed with further psychology training pathways to become psychology practitioners.

Moreover, if we were to take into consideration the needs of part-time students or

those on leave of absence, the 4+2 pathway would need to continue for a longer time.

Taking all of these issues into serious consideration, the APS believes that the timeline outlined for the preferred option will allow a range of key stakeholders the opportunity to prepare for these changes:

- Currently enrolled students will be able to plan for other options towards general registration, or have sufficient time to change their study and career focus.
- Future students and high school career advisors can be informed of the changes in a timely manner.
- Higher education providers (HEP) can plan and introduce programs to offset the loss of the 4+2 pathway. For those HEPs that have not yet introduced the fifth year of study, a reasonably longer lead time would be adequate to develop the curriculum, obtain faculty board, academic board and other university approvals, submit an application for APAC accreditation, employ staff as per current APAC accreditation standards, meet any other APAC requirements for new courses, and organise placements for the fifth year of training.
- Employers can become familiar with the strengths of 5+1 trained psychologists and set up relevant positions, both as fifth year placements and for the +1 internship.

7. From your perspective, can you identify any practical issues in retiring the 4+2 internship pathway?

The major concern of the APS is related to HEPs being able to provide an adequate number of 5+1 training pathways, including the introduction of online programs for those living in regional, rural and remote locations to sustain the psychology workforce.

As valid as the proposed retirement plan appears, the APS would like reassurance of the Board's proposed engagement strategies with HEPs and/or the proposed recommendations to government to develop incentives for HEPs to run 5+1 training pathway programs. It is noted that Schools and Departments of Psychology typically report staff recruitment restrictions and funding issues, and therefore the scope of introducing a new program that requires additional staff time and placement arrangements on the current data appears to be problematic without known funding guarantees.

Potential inadequacy of 5+1 programs:

The APS would also like to highlight the issues around the potential inadequacy of the number of 5+1 training pathway programs to meet sufficient psychology training demands into the future. Based on the current numbers of provisionally registered psychologists there could be a short-fall of the availability of 5+1 training pathways, particularly in NSW, Qld and WA, even if all universities offer a 5+1 training pathway program (see Table 1). The data presented in Table 1 is to illustrate the number of future programs that would be required to maintain the existing figures of provisional registered psychologists. **Note: These figures are based on best estimates to give an indication of future demand for 5+1.**

Explanation of data presented in Table 1

- The number of the current 4+2 provisional psychologists (Column C) was halved to represent the potential number of future enrollees into a 5+1 program (4+2 is a 2-year program, so only half that number would enroll per year in 5+1, on average).
- The number of the current 5+1 enrollees was also halved to estimate and

account for those completing the placement year (Column D)

- The number in Column E represents the projected number of enrollees (sum of Column C and D) into 5+1 program in order to maintain current training numbers.
- Assuming an average of 30 students per 5+1 program, Column F lists the number of programs needed per State or Territory and the total across Australia (assuming prospective students wish to train in their local geographic area)
- Based on the current number of 5+1 programs around Australia, Column H lists the number of new programs required per State or Territory.

Multiple teaching modalities needed to maintain training numbers:

Comparing the number of 5+1 programs in Column A to the number of new programs needed in Column H (the number of Universities per State or Territory) there will be a shortfall in programs in some States and Territories. It is proposed that HEPs should be encouraged to offer online/blended-learning training options for metropolitan-based provisional psychologists residing in other states, as well as for regional, rural and remote provisional psychologists.

8. *Is the content and structure of the consultation paper helpful, clear, relevant and understandable? If not, what needs to change?*

We found the Consultation Paper to be very comprehensive, and apart from the assumption that universities will provide adequate numbers of 5+1 training pathway training programs, the arguments and retirement plan is fully supported by the APS.

9. *Is there anything else the National Board should take into account in its proposal, such as impacts on workforce or access to health services that have not been outlined in the paper?*

As outlined in our response to question 7 above, the APS is concerned that psychological services will be impacted if there is an inadequate growth of 5+1 training pathway programs in the near future to meet the current training numbers. This would have a substantial negative impact on the mental health care and safety of the Australian public. The difference of students to make the

Table 1: Projected 5+1 training needs for Australia
(Adaption of Consultation Paper Table 5 and Table 2)

A	B	C	D	E	F	G	H
State/ Territory #current 5+1 programs	Current 5+1 providers	4+2*	5+1*	Future 5+1 **	Programs needed ***	Uni per state	New programs needed
ACT 0	Nil	17	3	20	1	2	1
NSW 6	Aust College of Applied Psy Charles Sturt University Macquarie University University of New England University of Wollongong Western Sydney University	331	110	441	15	10	9
NT 0	Nil	8	2	10	1	1	1
Qld 3	Australian Catholic University University of Southern QLD University of Sunshine Coast	145	68	213	7	10	4

SA 0	Nil	20	3	23	1	3	1
Tas 0	University of Tasmania	10	6	16	1	1	0
Vic 5	Australian Catholic University Cairnmillar Institute Deakin University Monash University Victoria University	60	136	196	6	10	1
WA 2	Curtin University Murdoch university	101	57	158	5	3	1
Totals	17	692	385	1077	38	41	17

* Data estimated on figures as presented in Table 2 of Consultation Paper (p.13, 2018)

** Future 5+1 numbers calculated on half the number of 4+2 provisionally registered psychologists and half the number of 5+1 provisionally registered psychologists.

***5+1 programs required for numbers in previous column – assuming average 30 participants per course