



Psychology

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Psychology Board of Australia

G.P.O. Box 9958

Melbourne VIC 3001

RE: Consultation – Reducing regulatory burden: Retirement of the 4+2 internship pathway to general registration (Retirement of 4 + 2 pathway)

Dear Board,

The School of Psychology and Behavioural Science, University of New England (UNE), would like to thank you for the opportunity to comment on the *Reducing regulatory burden: Retiring the 4+2 internship pathway to general registration* consultation paper (March 2018).

Our strong preference is for **Option C: last enrolment in the 4+2 internship pathway is 30 June 2021**. This preference has been formed through careful consideration of potential adverse impacts on our current students and concerns relating to the future training and supply of psychologists in regional and rural Australia that may eventuate if the retirement of the 4+2 pathway is executed too quickly. These concerns are discussed in our attached responses to the Questions for Consideration.

Regards,

A/Professor Einar Thorsteinsson
Convenor of Psychology
School of Psychology and Behavioural Science
Faculty of Medicine and Health
University of New England

UNE Responses to Questions for Consideration

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?

We agree with this proposal in principle.

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

- option one - status quo
- option two - retirement of the 4+2 pathway to general registration
- none of these options, or another option.

We do not currently have a preference – as discussed below, we are particularly concerned about the potential adverse impacts on the training and supply of psychologists in regional and rural Australia if the 4+2 pathway to registration is retired. Therefore, we would like further information regarding the likely impact of any change on current students prior to committing to a course of action.

To address this issue, we suggest that currently enrolled students at all Australian universities are surveyed to gain insight into their career plans and likely actions in relation to the proposed options. Such information should be collated and disseminated to all stakeholders for further consideration and comment prior to the Psychology Board of Australia making any final decisions regarding the future of the 4+2 pathway.

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?

While we understand the desire to retire the 4+2 pathway, we do have concerns regarding the impact of this on the training and supply of psychologists in regional and rural Australia. Specifically, a high proportion of students completing 4th year studies at UNE are seeking to follow the 4+2 pathway. In part, this is because it is not possible for them to relocate to complete on-campus Masters Programs.

The introduction of online 5th year programs does partially meet this gap, however, there are still far higher numbers of 4th year students seeking pathways to psychologist registration than can be currently accommodated in the existing 5th year programs. As such, if the 4+2 pathway is to be retired, we are in favour of a slow phase out to allow sufficient time for the further expansion of 5th year programs, including those offered online, to ensure they can meet current and expected demand from students located in rural and regional Australia.

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

As noted above, we are of the opinion that the training and supply of psychologists in regional and rural Australia requires additional consideration. In particular, there is a known deficit of psychologists in rural and regional Australia, hence, there is a need to be cautious regarding any change that may undermine efforts to rectify this problem.

In relation to this, it would be helpful if the internships by geographical location data (provided in Attachment C) could be further contextualised to allow comparison of the proportion of interns in each type of location that are completing 4+2 pathways. Specifically, our experience of UNE students leads us to expect that a higher proportion of provisional psychologists in outer regional, rural and remote locations are completing their training via the 4+2 pathway, as compared to those located in inner regional and metro (i.e., while 66% of 4+2 internships are based in metropolitan areas, this is affected by a higher proportion of the total number of interns residing in such areas).

Further to this, it would be beneficial to investigate whether or not the proposed retirement of the 4+2 pathway would impact on the likelihood of current psychology students continuing to seek psychologist registration if it entails completing the 5+1 pathway. Specifically, while there may be some trade-offs in terms of costs of an additional year of study versus CPD courses, we are aware that many 4+2 internships are completed in paid roles – hence, the consideration for some people will actually relate to their ability to be out of the paid workforce for an additional year, while accruing higher student debt.

This must also be considered in relation to the Government's current freeze on Commonwealth Supported Places (CSP), which will likely necessitate any new/additional 5th year places being available only as full-fee paying, which is likely to discourage at least some students from pursuing further training in psychology. Thus the PsyBA needs to ensure that the Government puts in place a support system (not loans) to support students during these transition years thus ensuring that the demand for psychologists is met in rural and regional Australia long term.

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?

Yes.

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

- Option c): last enrolment in the 4+2 internship is 30 June 2021

As noted above, we think that a slower transition is important to ensure universities have adequate time to develop and/or expand 5th year programs to ensure we can accommodate all who are seeking to pursue a pathway to registration after successful completion of 4th year. In relation to this, it is important to consider how long it takes to develop an academic program to the point where it is ready to enrol students – beyond developing curriculum, teaching resources and so on, a significant amount of time is often required to gain university-level approvals and APAC accreditation, let alone hiring appropriately qualified and experienced teaching staff. Essentially, the current consultation regarding the retirement of the 4+2 pathway is likely to be completed too late in 2018 for any university to bring in any meaningful changes to psychology program offerings until the beginning of 2020, making option c the most viable.

In addition to this, there is a need for greater consideration of the impact on part-time students and those who have taken breaks during their studies. For example, the current 4th year cohort at UNE includes approx. 85 part-time students who will not graduate until the end of 2019 – if option a is taken, they will be unable to follow the 4+2 pathway, yet, many have commenced their 4th year studies with this expectation. Further to this, we have a number of students who have taken intermissions for a variety of reasons (e.g., serious illness, death of spouse), who will now not complete 4th year until the end of 2020 – if option b is taken, such students will similarly be forced to change what are often long-term plans to follow the 4+2 pathway due to completely unforeseen and tragic life events.

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

As discussed above, we have concerns regarding the abilities of universities to develop/expand 5th year programs within the timeframes associated with both option a and b.

As such, we suggest that information be sought from universities regarding their ability to provide adequate 5th year places, including in rural and regional locations, or online, to accommodate the increased number of students requiring such additional training.

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

Yes, in general, however, it could be simplified to reduce repetition, increase clarity, etc.



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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 noted above, we have concerns regarding the impact of the proposed retirement of the 4+2 pathway on the training and supply of psychologists in regional and rural Australia. As such, we think that it is important that these issues are further investigated and considered by all stakeholders, prior to by the Psychology Board of Australia making any final decisions regarding the future of the 4+2 pathway.