



You are invited to provide feedback on this public consultation

To provide feedback, please provide written submissions:

- In Word format document to help us meet international web accessibility guidelines;
- by email, with the subject title marked '**Consultation – Reducing regulatory burden: Retirement of the 4+2 internship pathway to general registration**'.
- to psychconsultation@ahpra.gov.au
- by close of business on **Friday 1 June 2018**.

Professor Brin Grenyer,
Chair,
Psychology Board of Australia

Dear Professor Grenyer,

Re: Public Consultation: Reducing regulatory burden: Retiring the 4+2 internship pathway to general registration

We thank the Psychology Board of Australia for providing this public consultation paper, and for seeking the opinion of stakeholders on the proposal to reduce regulatory burden by retiring the 4+2 internship pathway to general registration. We have provided our answers to the questions posed in the consultation paper below.

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.

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

We strongly endorse option two - retirement of the 4+2 pathway to general registration.

The School of Psychology at the University of Sydney has for many years delivered accredited training programs in clinical psychology, and is well versed in the training and practice required to ensure that graduates meet all competencies for safe, high-quality professional psychology practice.

It is our opinion that the 4+2 internship pathway, despite the improvements brought in by the Psychology Board over the past seven years, is no longer current or relevant for the profession.

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?

The status quo poses a number of risks for the profession. The Psychology Board's consultation paper clearly outlines these risks, which include that the pathway is unsustainable due to the high administrative and regulatory burden on employers, supervisors, interns and the regulator; evidence of inconsistency in the cost and the quality of training; and the regulatory risks inherent in this pathway.

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

Retention of the 4+2 pathway means the continuation of a training route that is not subject to accreditation or other standardised process that might confirm consistency in quality. There is no

minimum standard of academic performance for entry into the 2 years of supervised practice, no integrated coursework or applied research, and a reliance on one supervisor across the duration.

The lack of international equivalence in the training of psychologists in Australia (as outlined in the public consultation paper; Attachment D) is often surprising and shocking to our colleagues overseas, and poses a risk to the international reputation of the psychology profession in Australia.

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, the changes are consistent with the retirement of the 4+2 pathway.

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

Our preference is option b): last enrolment in the 4+2 internship is 30 June 2020

This option provides the fastest transition to the retirement of the 4+2 while not disadvantaging those currently in their final year of undergraduate training who might have planned to take this training pathway.

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

No

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

The consultation is clear and detailed. We do not recommend any changes.

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?

We argue that the retirement of the 4+2 would have benefits for the health workforce, ensuring that all psychology trainees undertaking placements or internships in health services have completed accredited professional training located within the higher education sector.

Yours sincerely,



Professor Frans Verstraten
Head of School
School of Psychology