20th November 2018

To Whom it May Concern,

**Re: Areas of Practice Endorsement (AoPE) consultation paper -** **Healthy Minds Allied Services suggests a full retirement of this system**

* Dr Vivienne Sullivan (Psychologist)
* Beatriz Pon (Psychologist)
* Lara Sullivan (Psychologist)
* Rebecca Sullivan (Psychologist)
* Melissa Donati (Psychologist)

We do not support AoPE in any form as it will have a negative impact on the profession for the following reasons:

**Creates confusion and possible restriction for clients and other stakeholders**

Our practice does not support the notion of Areas of Practice Endorsement (AoPE) within psychology as it confusing for our clients, our referrers and those people creating/reviewing policies around psychology in Australia. All registered Psychologists have completed one of the Psychology Board of Australia approved training pathways that cover assessment, treatment, report writing etc. An AoPE will only serve to make our profession more complex, cumbersome (e.g., more process to be monitored) and possibly restrictive for our clients and stakeholders (e.g., limiting a client’s freedom choice in selecting their psychologist) in the future.

**Not like other medical specialties**

Psychology is not like other areas of medical practice where there are clearly defined specialties. Psychology is the specialty. Psychologists can work in a variety of settings during their training and professional lives. Unlike specialising doctors a psychologist may start out working in prison (forensic) and then move to private practice (clinical/counselling) and then take on a role in a school setting (education). In fact this has been the pathway of several psychologists within our practice. The process of endorsement seems to be long, arduous and likely costly and will create unnecessary silos in the profession.

**The same client outcomes whether endorsed or not-endorsed**

There are currently psychologists working in the same setting (e.g., private practice) who have gained their unrestricted license to practice through a variety of approved training pathways. Some will have AoPE and some will not. When it comes to private practice and working within Better Access to Psychologists research has shown that psychologists, whether endorsed or unendorsed, are getting equivalent client outcomes. As such, what is the point of this costly and cumbersome process if it has been shown to make no impact on care for the clients?

**Labelling qualified psychologists is misleading (and possibly demeaning)**

A majority of our practice (under the current system) do not have endorsement and would be seen as “generalist” psychologists if you were considering the Medicare Better Access umbrella. This title does us little justice and does not reflect our expertise. It almost implies a “jack of all trades and master of none” when we are specialists in Psychology. Endorsement means labelling a psychologist as only one thing and may demean most of the professions extensive qualifications (i.e., Post Graduate/Masters/PhD degrees), experience, ongoing training and supervision to the public and stakeholders. Flowing on from this it will effect our ability to attract clients and/or gain roles within the profession (as has already been shown if you look at advertise positions in psychology wanting “clinical” psychologists only).

**Some ‘endorsed’ psychologist qualifications and experience are questionable**

On the other side of this, it has been found that many Psychologist who have been endorsed as “clinical” do not actually have the level of qualifications that this supposedly reflects (i.e., Clinical-focused Masters degree). They have been ‘grandfathered’ into this endorsement. Some may not have even worked within a “clinical” setting yet hold endorsement and are registered to provide “clinical” supervision to students. Understandably holding one group of psychologists up as more qualified when there is evidence to the contrary has created dissatisfaction within the profession. Going further down the path of endorsement creates further opportunity for disunity and dissatisfaction in the profession.

**Taking away freedom of choice**

Our practice wishes to stress the point that Psychology is the specialty. Registration with a peak body is optional for psychologists, as is joining a college within those bodies. We do not wish for endorsement to become compulsory (possibly through the restriction of trade) and feel that freedom of choice is a must. Many in our practice are not endorsed (due to the difficult, long and costly process and/or they choose not to be). They prefer to spend their time, money and effort on improving their professional skills through professional development and supervision which is guided by the needs of their clients and their practice.

**Bridging and registrar courses? Expensive financially and time wise and unnecessary**

It needs to be made clear that fully-registered psychologists have completed a Psychology Board of Australia approved pathway to be a psychologist. They have paid for, and completed, courses through Government-funded bodies (i.e. universities) that met the Australian Psychology Accreditation Council (APAC) Standards for Psychology, approved by the Psychology Board of Australia and endorsed by the Australian Psychological Society (APS – one the peak bodies in Psychology).

This model indicates that psychologists who have not completed a Masters or Doctorate will need to complete (and pay for) a 1 to 2 year “bridging course” as a first step to gain endorsement and likely return to working in the exact same role they are currently in. Our psychologists who have taken a 4+2 or 5+1 pathway have a minimum of 10 years experience since becoming fully-registered psychologists with an unrestricted license to practice. Completing a bridging course would be a major expense financially and time-wise to people who have already invested time and money (and continue to do so through professional development) into their qualifications.

Our psychologists who have completed a Masters degree (e.g., Counselling/Health Masters) also have extensive experience. It is not reasonable to expect them to complete, and pay for, what seems to be an unnecessary program given that they are highly experienced practitioners and engage in ongoing professional development and supervion any way.

**How will professional development be distinguished in “endorsement”?**

All psychologists are required to complete (and pay for) ongoing professional development each year as part of their registration. All these professional development courses have included ‘endorsed’ and non-endorsed psychologists learning the same information and strategies to use in their practice. How will this past and future equivalent training be recognised? This is likely to become a complex issue under AoPE.

**Creating divisiveness in profession**

Another issue is around the actual profession of psychology in Australia. Endorsement, in terms of Better Access to Psychologists, has already been so divisive in our profession, effected the diversity of post graduate courses, and impacted on fully-registered psychologists ability to practice (e.g., referrals, report writing, assessments). Our profession does not need further complex policies and procedures that will create further discrimination and dissention.

**Possibility of loss of experienced psychologists from the profession**

Our practice has spoken about the possible outcomes of endorsement. Several psychologists have indicated that they would leave the profession as they may be unable to continue in their role without ‘endorsement’. They feel it would simply be too complex and would be unwilling to engage in unnecessary processes and/or training for endorsement when they have already completed 6 or more years of education (plus ongoing professional development and supervision) to gain their full registration as a psychologist.

Thank you in advance for considering our practice’s position on this issue.

Regards,

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