**Submission re ‘Public consultation on revised area of practice endorsement registration standard’**

I would like to begin by thanking the Psychology Board of Australia for the opportunity to provide feedback on the above registration standard.

It is unfortunate that I cannot agree with either Option 1 or Option 2 as presented by the Board. In my opinion the system of endorsements should be fully retired.

I maintain the view that the decision to co-opt the system of specialist titles from WA into the national system of area of practice endorsements was a strategic mistake for the psychology profession. The system of endorsements misleads the public and is needlessly expensive for the Department of Health to regulate. The current system of endorsements fails to recognise that psychologists possess significant expertise in a particular area unless they have undertaken an APAC approved program in an endorsed area of practice and a superfluous registrar program. However, many practitioners provide psychological services that are indistinguishable from those with endorsements with no less skill or effectiveness and at no greater risk to the public.

Many psychologists have undertaken substantial professional development and possess formal qualifications in related areas of allied health that are not recognised by the Board. Certifications in the application of particular therapeutic techniques are also unrecognised, as are hours of clinical supervision outside of formal registrar programs. The combined education, training, and practical expertise of many psychologists is prodigious but often unrecognised by the Board due to current regulatory processes and the constraints of the endorsement system.

Further complicating the matter; a proportion of psychologists were granted area of practice endorsements by the Board in the transition period to national registration. While the precise figure of psychologists granted endorsement is unknown due to variations in the way the data was presented and transferred from state and territory jurisdictions and from the Australian Psychological Society (APS) Colleges, estimates are as high as 50% for some areas of practice. The granting of endorsements to a significant but unspecified number of psychologists further undermines the legitimacy of the endorsement system as a reliable indicator of the education, training, practical experience, skills and expertise of psychologists.

The system of endorsements also obscures the practical reality of the profession. Frequently psychologists gain the skills and expertise to work in various areas of practice through on-the-job work experience and through attending related professional development training. However, psychologists also work in professional settings that are not always congruent with their applied degree or area of practice endorsement. There are clinical psychologists that work in organisation development roles just as there are organisational psychologists that work in clinical settings. For all practical purposes a psychologist that works in human resources or organisational development is an ‘organisational psychologist’. A psychologist that works in clinical practice is a ‘clinical psychologist’. The regulation of endorsed areas of practice misconstrues the practical reality of the profession and misleads the public in relation to the actual skills and expertise of psychologists working in the field.

It must also be pointed out that the endorsed areas of practice recognised by the Board are quite limited. There are many different areas of psychology (and therefore psychologists) that are not recognised by the Board. This list includes but is not limited to; cognitive psychologists, critical psychologists, vocational psychologists, social psychologists, evolutionary psychologists, geropsychologists, engineering psychologists, peace psychologists, integrative psychologists and transpersonal psychologists.

Clearly it would be both impractical and unnecessary for the Board to regulate all areas of psychological practice. However, the argument to regulate some areas of psychological practice is also fairly tenuous. While psychologists are not monolithic, their competencies, skills and professional expertise are to a great extent overlapping. Approximately 87% of Australian psychologists practice in clinical settings and often use the same psychological assessments, similar therapeutic approaches and work with the same or similar client populations in the assessment, diagnosis and treatment of complex mental health conditions. While some psychologists may work in different occupational settings, or have different philosophical and theoretical approaches, all have a minimum of 6 years of combined education and training to meet the requirements for full registration.

For this reason, it is largely inconsequential what descriptive title psychologists choose to adopt. Irrespective of title, all psychologists are required to adhere to the professional Code of Ethics that has been adopted by the Board. The Board has also established the National Psychology Exam to ensure a consistent professional standard of psychologists nationally. These safeguards established by the Board to protect the public should be enough without also regulating select areas of practice and the use of endorsed or descriptive titles. If psychologists choose to adopt a descriptive title by virtue of their education, training and professional experience; what is the harm? As long as psychologists do not claim to be a specialist health practitioner or mislead the public by overstating their skills or abilities, there is little to be gained from regulating areas of practice.

Postgraduate programs in applied psychology may continue to offer units in different streams - organisational, community, social, critical, forensic, etc., but that is quite different to claiming that a clinical psychologist is so different from a counselling psychologist (or any other psychologist for that matter). While psychologists may work in different environments or differ in terms of philosophical or theoretical approach, all psychologists have a lot more in common than they have differences.

Accordingly, I strongly urge the Board to completely retire the system of regulating endorsed areas of practice in psychology and recognise full registration as an unrestricted license to practice professionally in the field.

Sincerely,



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