



8<sup>th</sup> July 2013

Dear Psychology Board of Australia,

**Re: Consultation Paper 19 submission: Draft Guidelines for the 5 plus 1 Internship Program**

The ACSP would like to outline its response to the draft guidelines and highlight major concerns for the safety of the public and for the potential down grading of profession training standards. Sections have been copied from the Boards consultation Paper and are in italics and then the Colleges comments follow each section.

**1. Section 2.3.3 National psychology examination**

*The Psychology Board of Australia has determined that a provisional psychologist who is undertaking the 5+1 internship program will be required to undertake the national psychology examination before applying for general registration as part of the requirements of the Board's General registration standard.*

*It is expected that the provisional psychologist and their supervisor will design a program of professional development, study and revision that will both prepare the provisional psychologist for the examination and meet the overarching requirements of the internship program and the provisional psychologist's own learning and development needs. (Pg. 9)*

The ACSP firstly does not believe that a multi choice exam adequately tests for professional skills and practical competency, as stated in previous submissions, it only at best (minimally) tests for professional knowledge. However to ask a supervisor to prepare the student for the exam, as well as supervise their practical placement, is a significant additional load on a supervisor. Such a requirement could greatly reduce the likelihood that anyone would wish to provide supervision to a five plus one trainee.

**2. Psychological practice**

*Within the internship, psychological practice involves the application to individual clients, groups or organisations, of psychological knowledge, methodology, principles, techniques, and ethical standards. It takes place in a wide range of professional practice settings and workplaces. Professional practice settings may include: clinical, counselling, organisational, neuropsychological, health, educational and developmental, community, sport and exercise, and forensic. Workplaces where psychological practice is conducted include corporations, educational settings, government departments, health and welfare and community agencies, and non-profit organisations.*

*A single placement for the internship will be approved if it will enable the provisional psychologist to meet the minimum client contact requirements (560 hours) and, together with supervision and professional development activities, enables the provisional psychologist to achieve all the required competencies.*



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Once a trainee has obtained general registration after meeting Board requirements, they are able without restriction, to practice in ANY area of professional psychology. However, if a trainee is supervised in a particular area of psychology there is no restriction on them working outside of this area, meaning that someone with minimal or no training in a given area of psychology would still be allowed to provide services in that area. This does not support public safety. It also means that a generalist, with post graduate training and supervision which is **at least half** of that required for endorsement, can practice in all the same specialist areas as an endorsed person without restriction, as there is no differentiation in professional practice roles and service provision. Currently, training which is needed for endorsement is not a required registration standard, therefore it could also be readily argued that there is a considerable disincentive to trainees to consider undertaking the Masters (2 year program) and two years supervision for endorsement, especially when there are significant time and costs attached to doing this. These concerns are validated by the following section in the Consultation paper on page 11 which outlines:

*For the purposes of the internship, psychological practice involves direct client contact and client related activities of a psychological nature, including:*

- individual client interventions - psychological practice activities such as assessment, counseling, diagnosis, intervention, case consultation, case conferences, report writing and case notes, evaluation, and modification of interventions*
- group interventions - psychological practice activities, such as training and development, group counselling, organisational development and change, consultancy, resource development, and program evaluation, and*
- individual or group interventions, rehabilitation, career development, outplacement counselling, employee assistance programs, report writing, consultation, and liaison. (Pg 11)*

All of this work and professional practice cannot be distinguished from that undertaken by and endorsed Psychologist.

3. *Provisional psychologists are not permitted to work independently or establish an independent private practice. This is because the provisional psychologist has not completed their supervised training and general registration is required for independent practice. The Board defines 'independent private practice' as a practice in which a psychologist operates as a sole trader, contractor or in a business arrangement with other sole traders and receives a fee for service from a client or third party (such as a referring agency).*

It is very concerning that the Board believes a person who has just obtained general registration is sufficiently skilled to work in independent private practice, especially in the mental health area. Many private practice settings are still solo practices without collegial support or the checks and balances of being in a public setting. The Board already has evidence that a considerable percentage of public complaints made to them are from people



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who have been treated by psychologists who have not undertaken post graduate training at endorsement level. Can the Board guarantee that this trend will not continue with the 5 plus one pathway? The ACSP would like to recommend that a newly registered Generalist should not be permitted to practice independently in a private practice setting, particularly in mental health, until they have at least 5 years experience in a public or NGO setting.

4. For an offsite supervisory arrangement, the applicant and the principal supervisor should ensure that:
- the employer (that is proposing to provide placement or employment for the applicant) is aware of the requirements of the internship, and
  - ensure that the arrangement complies with the goals of the internship as well as privacy, confidentiality, and any other relevant workplace and/or employment policies.

*If the supervisor is not onsite, there must be someone else on site (such as another psychologist, line manager and/or other health professional) who can oversee the provisional psychologist and whom the provisional psychologist can consult for professional guidance, if required. This arrangement is to be documented, and approved by the Board. The objective is to protect the public, through oversight of the intern's work and appropriate support being provided and available to the intern. These are the reasons that solo private practice by a provisional psychologist (intern) is regarded as unsuitable for an internship, and not permitted.*

The ACSP believes that the option to have off site supervisors can readily lead to very limited contact with a professional supervisor. In addition, having a supervisor who is not trained in psychology (and preferably endorsed) is also very problematic, as it reduces even further the potential for professional competencies to be reached. The ACSP would recommend that supervision off site and supervision by a professional who does not hold endorsement in a specialist area of psychology should not be considered as an option.

Finally, ACSP has previously argued that there should be **no Generalist registration standard** for the profession of Psychology. Our profession is unique under the National scheme as there are nine specialist areas in psychology covering a wide range of public needs including mental health, forensic and neuropsychology, performance and organisational psychology. In order to competently practice and be competitive with our main trading partners such as the UK and the US, the minimum registration standard should be a two year Masters degree in psychology (after a four year undergraduate psychology degree), followed by 2 years of regulated professional supervision. At completion of this training the psychologist should then gain specialist registration for their particular area of training. There is a precedent for this set in WA, where prior to National Registration, WA had specialist registration at this level and did not require the specialist to also hold generalist registration.

We urgently ask the Board and the Ministers to consider all these issues and arguments raised.



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Lastly, this whole process is very complex and places significant responsibility on very busy professionally practicing supervisors, requiring them to not only develop professional and practical skills in a trainee, but also to prepare them for a national Board exam. Personally I would not supervise a person under this five plus one pathway, and I would encourage others to seriously consider their duty of care to clients, the general public and our profession, before they did.

Yours sincerely,

Jillian Horton  
President of: *The Australian College of Specialist Psychologists*