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**Response to the Australian Psychology  
Accreditation Council Consultation draft paper:  
Accreditation Standards for Programs of Study in  
Psychology.**

**September 2012**

**Submission from:**  
*The Australian College of Specialist Psychologists Inc.*

**Written by:**  
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## **Accreditation Standards for Programs of Study in Psychology**

The Australian College of Specialist Psychologists (ACSP) is pleased to make a submission to APAC about the review of training standards for the Psychology profession. ACSP is a national college open to all specialists in psychology who have completed a four year undergraduate degree in Psychology, a minimum of two year masters program in psychology and two years of professional supervision, in any of the nine speciality areas in psychology.

We have concerns about some of the changes suggested in the review and hope that APAC will be very open to considering feedback and possible amendments to the proposed changes. We have gone through the review and have made comments relevant to certain sections of the review as outlined below, and there is also an executive summary of our concerns and recommendations at the end of this submission.

### **1. Context of the Review**

We wish to comment firstly on the section titled **Context of the Review: *International Standards for Education and Training in Psychology*** where it states:

“.....These requirements include taking account of relevant international standards and statements relating to education and training in the profession, as well as of accreditation standards applied in countries with comparable education and practice standards for the profession. APAC has substantially aligned the key elements of the proposed Standards to the European Certificate in Psychology (EuroPsy)....” (pg. iv).

The ACSP is very concerned that the psychology profession is aligning itself with the lowest level of international training standards for registration to practice in the profession. While the European standard may cover many countries in Europe, it does not align with the major English speaking countries in the OECD, with whom we would anticipate, Australia would have the most professional trading exchange with, such as the USA, UK and NZ. Each of these countries have at minimum a six year university training program *and* professional supervision (up to two years) before they can be fully registered to practice and use the title “psychologist”. We believe that Australia should align itself with this level of training to be competitive with our English speaking counterparts, and to allow for thorough training in each of the specialist areas in psychology. It is worth reminding APAC that Western



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Australia had specialist registration requiring this level of training for over thirty years before National registration and there were no workforce shortages or problems at any level. We wish to strongly suggest that eight years of training be *the minimum* requirement before anyone can be fully registered as a psychologist to practice. We do not support the five year Masters model.

### **Recommendation 1**

That APAC use the six year university training in psychology (two years masters) plus two years of professional supervision, as the minimum standard for full registration to practice as a psychologist.

### **2. Comments on Domain 1: Education provider standards**

We agree with and support the education provider standards as outlined by APAC, except for the last point in the summary of Domain 1. This states: “ The amount of education and training, competencies to be demonstrated and phases in the pathways allow for alignment with the EuroPsy regulations” (pg. v) as we do not support this level of training to be used as the minimum level for full registration and practice in the profession, as mentioned above.

### **3. Comments on Domain 2: Standards for Programs of Study at AQF Level 7**

This section raises some serious concerns in both the Domain section and Appendix A – Graduate Attributes for the Australian undergraduate Psychology program. The main area of concern is the introduction of basic counselling and assessment skills at this level, as outlined in the sections below from the APAC review, especially A6.3:

#### **2.1 Purpose and learning outcomes**

- (iii) include acquiring of foundational knowledge and skills in interviewing;
- (iv) include acquiring foundational knowledge and skills in basic counselling, and

#### **2.4 Assessment**

- (ii) the achievement of foundational knowledge and skills in basic counselling;
- (iii) the achievement of foundational knowledge and skills in interviewing, and

#### **Graduate Attribute 6: Learning and the application of psychology**

Understands and applies psychological principles to personal, social, organisational, technological and global issues.



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**A6.1** Understands the links between basic psychological theories and their application (e.g. capacity to explain psychological phenomena using the concepts, language, findings and major theories of the discipline).

**A6.2** Selects psychological principles that can be applied meaningfully in personal and professional contexts (with reference to ethics, privacy, human rights) and evaluates how well this is done (i.e. outcome evaluation).

**A6.3** Demonstrates a responsibility and capacity for lifelong independent learning to sustain personal and professional development in the changing world of the science and practice of psychology.

The ACSP strongly opposes the introduction of practical skills in the three year undergraduate program, in this case in the mental health area, but we would oppose this change for any of psychology's professional areas. We do not agree that this is in the best interests of people in the community, of the profession or for the understanding of future employers as to what training levels are required and adequate to provide psychological services. The APS published a recent paper in *InPsych* (*New APS model for psychology education under consideration*, August 2012) in which it indicated that our profession needs to address the Health Workforce Australia (HWA) demands of wanting more "generalists" in mental health, because of workforce shortages. We strongly disagree that this should be our core business or our mandate, but that we remain independent of the political agendas and economic policies. We also do not believe that our profession should become anxious about what the HWA may want or even choose to establish in order to deal with their concerns. It would be much more appropriate to not engage at all with their process and maintain our standards as a clear differentiation from lower level "counselling" training and practice. If the Psychology profession feels it needs to address possible workforce shortage pressures it would be more ethical and productive to continue to lobby for more funding to post graduate university training places, something which we achieved under the Howard Government.

A further concern with the introduction of practical training in the three year Degree is that it could then be used to promote the use of "psychology assistants" to fill workplace gaps, leading to a potential downgrading of our professional standards and a worsening outcome for clients. Many ACSP members are already aware of the pressures in the workplace, especially in the public sector and NGO sector, on lesser trained people to gradually take on roles which extend beyond their training base. There is no pathway for monitoring what low skilled people will undertake and what roles they will be employed to do. They will not be registered in the psychology profession and therefore there are no supervision or PD



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requirements, or processes to deal with community complaints – yet our profession would be “training” the undergraduates to take active roles in the community linked to our profession. This is not in keeping with APACs focus on community protection. Psychology needs to learn from our and others mistakes when considering training people with lower levels of skills to practice, even in a limited way, in any aspect of our profession. Our focus needs to remain on producing highly skilled and trained professionals who have thorough knowledge of developmental psychology, relationship and attachment models, learning models and pathology etc. A vision which holds a longer term focus for the profession and hence what standard of services the community will receive, should not be lost in the Governments climate of pushing for quantity not quality.

The ACSP recommends the above section of learning to be completely removed and replaced with units relating to the learning and theoretical understanding of each of the nine areas of our profession, and how they apply their skills to assist the community. This would also encourage undergraduates to consider the full range of our discipline and community services when thinking of applying for post graduate training in a specialist field. Professional psychology, after all, is not just about working in a mental health field.

### **Recommendation 2**

The undergraduate Degree at Level 7 should not include practical training in counselling, interviewing or assessment but should maintain its focus on the theoretical learning and professional socialisation of undergraduates for their progression into the fourth year and post graduate psychology training.

### **Recommendation 3**

The practical skills learning in the undergraduate Degree be completely removed and replaced with units relating to the learning and theoretical understanding of each of the nine areas of our profession and how they apply their skills to assist the community.

## **4. Comments on Domain 3: Standards for program of study at AQF Level 8**

The ACPS agrees with the learning goals and attributes for this level of training as outlined in the APAC review. If we have understood correctly, the fourth year of learning focuses on how to conceptualize and conduct outcome studies in professional psychology, extensive



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practical training in the understanding, implementation and interpretation of a range psychology assessments and the development of skills in writing reports based on these assessments, for all areas of psychology. There is also a research component.

Given that the scientific-practitioner model is adopted by the profession we believe it is highly appropriate that 4 year under graduates should be fully versed in psychological assessments and outcomes study methods. We would emphasize again the importance of this program covering assessments and report writing in all areas of psychology, not just mental health. Perhaps there could be room for some short practical placements to allow 4th year students to undertake targeted outcome studies or conduct some specified assessments in real settings under supervision, rather than a major research project. It would also be very helpful for students to become aware of and familiar with court settings and writing reports for courts, something that has been greatly missing in previous study programs. We also support that no other professional or practical skills be trained in this year.

#### **Recommendation 4**

That a short practical placement be undertaken to develop and implement an outcome study or conduct some specified assessments in real settings under supervision of a specialist psychologist.

#### **5. Comments on Domain 4: Standards for programs of Study at AQF – Level 9 Masters Coursework**

As outlined earlier, the ACSP does not support this pathway towards general registration. This 6 year program re-creates the same problems and issues that have existed between the 4 plus 2 pathway and 6 plus 2 pathway. That is, the scope of professional practice is not sufficiently differentiated anywhere between these two levels of training, (except in title of registration) and we already know as a profession that this cannot be regulated by the market or internally by the profession. We will have the ongoing issue of clients and referring bodies having difficulty determining what level of expertise is needed for what problems. It perpetuates the assumption that it is acceptable to have different levels of expertise and training, for example in the mental health area, to assess and treat people with a diagnosable mental health problem. We have seen the consequences of this poor premise being then utilised by the Federal Government to inappropriately pigeonhole mental health problems into “mild, moderate and severe” levels and then extrapolate this to the level of training and expertise required to assess and treat mental health disorders. The ACSP strongly disagrees with this principle and believes that high levels of training (eight years of training) is needed for all levels of interventions, with the understanding that those who have less complex (mental health) issues will simply be treated more quickly than those with more complex



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issues. This understanding could apply to interventions undertaken by specialists in all areas of psychology.

What we wish to underscore however is that our profession needs to be very mindful of our mandate *to do no harm*, when we are considering the levels of training required to work with people in the community. This is a rare opportunity for our profession, with APAC and the Psychology Registration Board as leaders in this process, to finally correct the incredibly large number of multi-pathway levels into professional practice in psychology.

If we have also understood the six year pathway correctly, another major concern with this proposal is that most of the psychotherapy and other practical training in psychology falls onto the field supervisors to provide in a very tight time frame (one year university based training and one year registrar supervision). Field supervisors are themselves very busy in their practical work and for the proper training and supervision to occur a longer period of time is needed. This is especially true given the limited number of supervisors available, the limited number of workplaces which support supervision and registrar programs, and the possibility that students may struggle to obtain the required number of hours with “clients” to pass placement requirements. The practical professional training therefore requires a minimum of two years in a university based learning program (Masters program - now called “Masters Extended”), plus two years of registrar supervision. We do not believe that a one year program and one year of supervision will give sufficient time to prepare graduates for the complex work they face.

The ACSP is also concerned that with funding shortages in universities that this cheaper Masters program may reduce over time the likelihood that universities offer “extended Masters” programs, leading this later more appropriate training pathway to professional practice to collapse. This is especially possible when the professional competencies of the 5 plus 1 program, look almost identical to those required by the “Masters Extended”, and even the doctorate level training. For students, the question may become - What is the point of doing expensive further training, if you can practice as a generalist in any area of speciality you want? Are we re-creating the same problem our profession has been struggling with, with the 4 plus 2 pathway, but just with a bit more training?

### **Recommendation 5**

That the 5 plus one pathway be discontinued and only the “Masters Extended” pathway be offered for professional registration and practice.

### **Recommendation 6**

That generalist registration gives a person the right to use the title “Psychologist”, but which also means they have undertaken a minimum of six years university training (“Masters Extended”) *plus* two years supervision.



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## **6. Comments on Domain 5: Standards for Programs of Study at AQF Level 9 – Masters Extended**

As stated above, the ACSP strongly encourages APAC to support this be the minimum standard of training and practicum, plus the two years registrar program, which could lead to the use of the general title “Psychologist” under general registration. Once specialist supervision is completed, specialist registration (or endorsement) could concurrently be applied for (with one standard fee).

However we do not support that supervisors in the field are only required to have general registration – in its current form. We believe that supervisors should have “endorsement” in a specialist area in order to supervise students. Given the potential shortages of supervisors for a period of time, there may need to be a limited grandfather clause established for people who are not eligible for endorsement to supervise, for example those who have at least 10 years of professional experience.

We additionally suggest that in the mental health training programs, four external placements be required, to provide better scope of experience and supervision in readiness for this complex area of work. Two external placements are insufficient.

We do not support the Masters Extended Program has an exit point to an AQF Level 8 Graduate Diploma. Those wishing to practice in the profession should be required to fully complete the “Masters Extended” program.

We other support all aspects of this section of APACS standards.

### **Recommendation 7**

That the “Masters Extended” program be the minimum training standard for use of the general title “Psychologist”, and for full registration to practice as a specialist or endorsed psychologist - based on the area in which the Masters and supervision process was completed.

### **Recommendation 8**

That supervisors should have “endorsement” in a specialist area in order to supervise students on practicum and in the registrar program.

### **Recommendation 9**

That **four** external placements be required for those training in the mental health field (e.g. Clinical and Counselling programs).





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### **Recommendation 10**

There is no exit point to an AQF Level 8 Graduate Diploma from the “Masters extended program”.

### **7. Comments on Domain 6: Standards for Programs of study at AQF Level 10 – Doctoral degrees with professional coursework**

Given that there has been a requirement of an extra year of research in this level of training, then having two years for the research project and two years for coursework including practical training appears appropriate. When students are doing the two years of coursework and practical training component, they could join into the programs required for the Masters Extended program.

The same recommendations apply to this program as the Masters Extended i.e. that supervisors should have “endorsement” in a specialist area in order to supervise students on practicum and that four external placements be required for those training in the mental health (e.g. Clinical and Counselling programs).

We support all aspects of this section of APACS standards.

### **Recommendation 11**

That supervisors should have “endorsement” in a specialist area in order to supervise students on practicum.

### **Recommendation 12**

That **four** external placements be required for those training in the mental health field (e.g. Clinical and Counselling programs).

### **8. Comments on Domain 7: Standards for conversion programs of Study (AQF 7)**

The ACSP does not support that degrees outside of psychology can be converted over to allow a person to enter AQF Level 8 or above. This implies that the basic theoretical learning and socialisation process into psychology is not essential, which undermines the foundations



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of our profession. It is reasonable to allow credits for studies which significantly overlap with units in the 3 year undergraduate degree, but certainly not to fully replace an undergraduate degree or any part of programs at AQF Level 8 or above.

Similar for overseas psychology qualifications, these need to be considered against the Australian standards for equivalency, at any level of the psychology training program.

### **Recommendation 13**

The requirement remain that in order to enter the fourth year or a higher training level in psychology, a person must have completed the psychology undergraduate degree, in part or in full.

### **9. Comments on Domain 8: Standards for Masters of Advanced Practice (“specialised area”) Programs of study (AQF 9)**

This extra learning area is quite confusing. We have indicated that the “Masters Extended”, plus two years of practical on the job supervision be the minimum requirement for general registration to use the title “psychologist” AND for entry into endorsed or “specialist” areas (if the profession obtains specialist registration in 2013). It is unclear why further training/supervision requirements are needed or desired, and would represent an unjustifiable increase in expense and training time to students and universities. Therefore we do not support a further level of training called “Master of Advanced Practice”.

We strongly oppose that a certificate of successful completion of the APAC Advanced Practice Qualification entry examination be used to back door people who have not undertaken the “Masters Extended” program, into endorsed or specialist areas. Exams cannot be a replacement for two years of university learning and two years of field supervision. This situation would lead to the ongoing tensions within the profession which we have seen when the APS allowed 4 plus 2 graduates to be “examined” for higher Medicare rebates and transferred into specialist practice. If such options were to become sanctioned by APAC and the Board it would undermine the need to do the full training and would instead encourage people to just study for an exam for entry. Our profession should surely know by now that knowledge used to pass an exam is quickly forgotten, and cannot replace practical and theoretical learning over time.



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If the suggested system in this submission of only accepting “Masters Extended” for full registration and endorsement were adopted, then Board examinations would only be needed in very defined situations. Such as for overseas applicants whose training and knowledge for the Australian system needs to be checked, or for use in time limited grand-parenting clauses to bring forward those who have undertaken the old 4 plus two pathway and who have considerable experience.

#### **Recommendation 14**

That a further level of training called “Master of Advanced Practice” not be adopted.

#### **Recommendation 15**

That the APAC Advanced Practice Qualification entry examination not be used to back door people who do not have Masters Extended and two years supervision into endorsed or specialist areas.

#### **Recommendation 16**

That entry examinations, or Board examinations be maintained for use in only very limited ways such as for overseas applicants whose training and knowledge for the Australian system needs to be checked, or for use in time limited grand-parenting clauses to bring forward those who have undertaken the old 4 plus two pathway and who have considerable experience.

#### **Conclusion**

The suggested APAC changes to professional training carries some serious concerns about the possible down-grading of professional training in psychology and the opening up of our profession to training which is not in keeping with our mandate of producing highly qualified and thoroughly trained professionals. Our profession should not focus on Government workforce shortage concerns as this shifts our focus to suit politically and economically driven agendas (which also change over time), that will potentially leave our profession decimated with low standards which are later very difficult to change.

Australian psychology decision makers need to very carefully think about these changes as this is also, again, an opportunity to “get it right”. We have already lost an opportunity two



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years ago when the Psychology Board and the APS did not support and adopt the Western Australian standards of six years university training (minimum Masters level) AND two years of professional supervision. WA had for over thirty years, an eight year training program, not a 6 year training program, and this fact appears to have been completely ignored. This level of training worked extremely well for the WA registration Board – both financially and administratively, for specialists as they were clearly identified by employers and the general public (and only paid one registration fee, lower than the current fee!), and for the general public, who received care, guidance and input from properly trained professionals. This factor is fully supported by for example Medicare statistics which show that WA has the highest percentage of rebates taken against “specialists” than any other State in Australia.

While APAC and the Board have emphasized that their mandate is the protection of the public, they also need to look to the wider picture and observe what is happening in practices on the ground and the trends in the Government policies. For example, it is currently clear that the professional standing of psychology in the mental health field in relation to the medical profession is in crisis, and without proper training we face being placed in the “allied health” basket - as “supports” to the medical profession - rather than an independent and fully complementary profession to medical treatments. It can be readily argued that without protecting the integrity and training of our profession, we have no hope of protecting the public.

Finally, the emphasis in training and examinations on the mental health area of our profession, almost to the detriment of the other non-mental health speciality areas, needs attention, otherwise our profession is at risk of losing the breath of practice and capacity to work with the broader community. Evidence based psychological skills and principles provide more than just mental health care to the community. They provide benefit to many layers and settings in the community, and needs to continue to do so.

We sincerely hope the APAC and other decision-makers will consider the recommendations in this submission and support the higher level of training for full registration and professional practice.

Yours sincerely,

Dr. Jillian Horton  
President of the *Australian College of Specialist Psychologists*



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## **Summary of the Australian College of Specialist Psychologists Recommendations**

### **Recommendation 1**

That APAC use the six year university training in psychology (two years masters) plus two years of professional supervision, as the minimum standard for full registration to practice as a psychologist.

### **Recommendation 2**

The undergraduate Degree at Level 7 should not include practical training in counselling, interviewing or assessment but should maintain its focus on the theoretical learning and professional socialisation of undergraduates for their progression into the fourth year and post graduate psychology training.

### **Recommendation 3**

The practical skills learning in the undergraduate Degree be completely removed and replaced with units relating to the learning and theoretical understanding of each of the nine areas of our profession and how they apply their skills to assist the community.

### **Recommendation 4**

That a short practical placement be undertaken to develop and implement an outcome study or conduct some specified assessments in real settings under supervision of a specialist psychologist.

### **Recommendation 5**

That the 5 plus one pathway be discontinued and only the “Masters Extended” pathway be offered for professional registration and practice.



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### **Recommendation 6**

That generalist registration gives a person the right to use the title “Psychologist”, but which also means they have undertaken a minimum of six years university training (“Masters Extended”) *plus* two years supervision.

### **Recommendation 7**

That the “Masters Extended” program be the minimum training standard for use of the general title “Psychologist”, and for full registration to practice as a specialist or endorsed psychologist - based on the area in which the Masters and supervision process was completed.

### **Recommendation 8**

That supervisors should have “endorsement” in a specialist area in order to supervise students on practicum and in the registrar program.

### **Recommendation 9**

That **four** external placements be required for those training in the mental health field (e.g. Clinical and Counselling programs).

### **Recommendation 10**

There is no exit point to an AQF Level 8 Graduate Diploma from the “Masters extended program”.

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The requirement remain that in order to enter the fourth year or a higher training level in psychology, a person must have completed the psychology undergraduate degree, in part or in full.

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