



THE PSYCHOLOGY FOUNDATION OF AUSTRALIA

(Incorporated in New South Wales)

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National Registration and Accreditation Scheme for the Health Professions

Consultation paper

The Psychology Foundation of Australia is a grouping of research oriented university Schools of Psychology that was created to promote high standards in the education of psychologists and a scientific basis for professional practice (i.e., evidence-based practice). These goals entail a professional training no less thorough and scientifically based than required internationally in comparable countries (e.g. UK and U.S.A). The Foundation has therefore always supported rigorous accreditation of courses and in this light we are in favour of a uniform national scheme of registration and accreditation.

Psychology has had such a system for accreditation of courses for many years and that system has been developed to ensure, first, an adequate coverage of the core discipline as an essential underpinning of professional application and second, to ensure that all of the wide array of professional outcomes in Psychology are supported by rigorous training and are delivered efficiently. There are many professional Psychology applications in addition to clinical psychology (e.g., educational, organisational, research), all of which require specialist training above and beyond the knowledge of the core discipline and many of which are not directly relevant to the Health workforce. The challenge for the universities is to provide a well prepared workforce in all of these areas while avoiding costly inefficiencies that may arise through duplication of teaching effort. Accreditation and registration requirements have a direct impact on these courses.

Accreditation and Registration requirements:

The current accredited training system, and one that has been strongly recommended by both this Foundation and the Australian Psychological Society for many years, requires students to complete an undergraduate major in the discipline of Psychology (3 years), followed by an Honours degree (1 year), in order to learn the evidence base, the ability to think about issues in a psychological manner, and the ability to analyse, research and answer questions pertaining to psychological issues. Following this, two additional years of Masters level study in one of the several professional application areas is recommended as a minimum, prior to registration as a Psychologist. The undergraduate training in the basic processes and measurement of behaviour, mental and emotional processes and behaviour

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change not only provides the evidence base for later training but distinguishes psychologists from other helping professions by providing them with the tools to be both critical and innovative in their professional practice.

This system therefore requires six years of study and this places our training at the lower end of international benchmarks for professional training in comparable countries. In recognition of this many Schools now also provide for either a three year postgraduate programme (D.Psych) or a four year combined Masters and PhD programme. Even with this level of training our students do not gain automatic recognition of qualifications in either the UK or the USA. At a minimum, we believe that the new system should require the six year model (3 years undergraduate, 1 year Honours, 2 year Masters) as a minimum standard. We would prefer the longer, more advanced training that has already been offered in many schools for over a decade. These longer models have the added advantage that they provide an adequately trained workforce to teach in the postgraduate programmes required to train the next generation of professionals in addition to providing enhanced specialist knowledge.

There is currently another route to registration as a Psychologist in Australia. At present it is possible for a student to leave university after the Honours degree and to then undertake two years of experience, supervised by a registered psychologist, in order to satisfy the requirements for registration. The Foundation does not believe this is currently an acceptable route. In part this is because the two additional years are not prescribed in content and are therefore very variable in terms of both the range of experience and also the type of supervision. The supervisors themselves have little access to support mechanisms that would help them with the process and usually have very little time available in their professional lives to ensure a broad based training in the skills of the wider professional application. It is also the case that for many years the students receiving this less comprehensive training have been the weakest in the Honours cohort and have taken this route because their weaker grades have meant that they failed to gain entry in to Masters level programmes. Since the time course of the route to registration is the same and the Masters training programmes are much more rigorously accredited we, like the Australian Psychological Society, strongly recommend that all students be required to complete a Masters degree in order to achieve registration. The required expansion of Masters training programmes is discussed below.

We, therefore, believe it is essential in any revision of the accreditation and registration system to maintain or enhance the currently recommended 6-year level of training. It is also important to recognise that modifications of the requirements for one of the professional outcomes (e.g. Clinical or Clinical Neuropsychology) may have direct implications for training leading to the other professional destinations. Such changes would be particularly problematic at the undergraduate level where programmes are currently designed to meet the common needs of all outcomes efficiently. Schools of Psychology have developed integrated training programmes over the last twenty years which provide a solid foundation in the discipline and allow specialist postgraduate training to be delivered efficiently.

The Psychology Foundation endorses points 1.36 and 3.10.1 in the consultation paper (National Registration and Accreditation Scheme for the Health Professions) and recommends:

Recommendation 1: Any new accreditation system recognises the many years of development, expert knowledge and experience incorporated in the six-year academic training model specified by the current APAC accreditation system and adopts those standards as the minimum requirement for registration.

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Workforce Requirements:

One topic that has frequently been mentioned in discussions of the new accreditation requirements has been an impending Health workforce shortage that needs to be adequately addressed if at all possible. While this may not seem to be directly relevant to the current call for input we would like to provide some comment in case it does play a role in decisions about accreditation.

It is unclear to us what assumptions have been incorporated in the calculations that led to the conclusion that there is a looming workforce shortage, e.g. what balance is expected between the proportion of one-to-one clinical consultation and group work, nor whether private providers are seen as the major element of the workforce, or instead salaried employees in government facilities. These details are likely to have a major impact on the required workforce. However, it is clear that in time of workforce shortage there can be pressures to reduce both the quality of training and of service delivery. The Psychology Foundation strongly cautions against moves that would result in that outcome.

It is critical that newly trained psychologists are able to deliver the evidence-based services that professional psychologists currently deliver. That being the case there can be no argument for delivering practitioners with lower quality skills, or even a smaller subset of skills. Indeed it is likely to be the case that in those settings with the greatest shortage of Psychologists (low SES, rural and remote centres) the broadest range of skills in the practitioners is most required, since they will be the only person available within large distances.

The Foundation would also caution against any move that dilutes the training in Psychology since this would move us further away from international benchmarks and would mean that Australians would be obtaining poorer Psychological service than the discipline can support. In short there is a pressing need for more psychologists with the current skill level or better, a need that can't be solved by deskilling the workforce.

On the assumption that more Psychologists must be trained quickly, there is only one solution and that is to expand access to the current training programmes. Most programmes limit their intake so that the programmes can be delivered within an overall school budget. There are often suitable candidates who cannot be accepted into the programmes because places are not available. Allowing these students to move from Honours to Masters level would increase the professional cohort in two years without requiring any major restructure of the current training programmes.

There are two impediments to this growth:

- 1) Commonwealth funding for postgraduate training in Psychology currently represents a small proportion of the cost of delivering these programmes, primarily due to the inappropriate use of an undergraduate funding model adopted in 2004 (source: submission to Review of the impact of the Higher Education Support Act 2003 from the Australian Psychological Society and Heads of Departments and Schools of Psychology Association, 2007). This means that Schools must cross-subsidise the cost from undergraduate teaching and this inevitably places a stringent limit on the number of positions in the post graduate programmes.
- 2) A second requirement of postgraduate training is the provision of supervised practical experience in workplace settings. The availability of practical supervision places is currently severely limited and any expansion of postgraduate training will

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exacerbate this situation. The limitation arises because external supervisors of practical placements are not usually paid for this role and many experienced clinical psychologists are moving from the public sector to private practice, where they are less likely to offer supervision.

All increased training models will need to deal with the above impediments. At this stage we wish to make two points:

Recommendation 2. Commonwealth funding per student for postgraduate professional training should be increased to a level that allows Schools to cover their costs and hence scale up their intakes.

Recommendation 3. Consideration be given to increasing the number of salaried positions for psychologists in the community, particularly in areas of greatest need. These positions should build in an expectation of providing supervision for trainee psychologists, in order to help overcome the current shortage of supervision.

In summary, the current six-year training model offers many advantages in producing a skilled workforce that minimally meets international benchmarks. It also provides for the large array of professional outcomes in psychology, although the postgraduate programmes currently run at a level of funding that is below the cost of delivery. The Foundation sees no strong argument for altering the training model and requests that the accreditation and registration requirements that are in development follow the current APAC guidelines closely. Within this context, training of additional psychologists can be accommodated provided that the current impediments are effectively addressed. Increased costs of training would be more than compensated by increased effectiveness of services provided by properly trained psychologists working in the public sector.

Thank you for the opportunity to provide comment. We would welcome the opportunity to be more directly involved in future discussions regarding education, training, registration and workforce planning.

David Badcock