



# PSYCHOLOGY PRIVATE AUSTRALIA Inc.

THE FEDERATION OF ORGANISATIONS OF PRIVATELY  
PRACTISING PSYCHOLOGISTS OF AUSTRALIA

<http://www.psychologyprivate.org>

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## CONSTITUENT BODIES

Association of Private Practising Psychologists (NT)  
Association of private Practising Psychologists (QLD)  
Australian College of Private Consulting Psychologists (NSW)  
Psychology Private Tasmania

Australian College of Psychologists in Clinical Private Practice (ACT)  
Australian College of Psychologists in Clinical Private Practice (VIC)  
Institute of Private Practising Psychologists (SA)

## ACCREDITATION ARRANGEMENTS SUBMISSION ATTENTION: PRACTITIONER REGULATION SUBCOMMITTEE

**Submission From:** Psychology Private Australia Inc. (PPAI)

**Date:** 15 December 2008

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### Introduction

PPAI is the only organization of psychologists in Australia that has as its sole purpose, representing psychologists in private practice in any area of Australian life that may impinge on the private practice of psychology and/or its practitioners. Our organisation considers that there are several matters in the Consultation Paper that do so impinge, amongst them, one that is reported as being enshrined in the COAG Agreement of 26 March 2008. The matters, together with related comments and recommendations follow in the order in which they occur in the Paper.

### Matters for Comment

#### 1.4 – COAG Agreement clause 1.39 Accreditation Committee – Composition

The accreditation of professional courses of **training** in psychology in Australia has been carried out to date in the main, if not only by the Australian Psychological Society (APS).

We are of the opinion that some of the APS accreditation 'teams' have been/are 'unbalanced' in membership because they are lacking in practitioner expertise as against academic expertise; but we do not have any question as to the professional per se composition of such teams.

Comment: Our organisation's view is that the Paper's stated composition of an *accreditation committee* could have substantially less professional representation than can ensure that such a committee will efficiently and effectively-for-the-outcome-for-trained-students, perform its assignments.

Recommendation: That COAG be requested to consider drastic revision of the composition of an *accreditation committee* in the direction of a substantial increase in re-  
presentation from a profession and within that, a balance between academics and practitioners; and with practitioners chosen from those in provincial towns and country centres as well as from capital cities.

#### 1.5 – Clause 9 – Special arrangements relating to accreditation

This clause appears to ensure that an accreditation that is in process on the date on which the national registration and accreditation scheme commences will continue unimpeded.. As Sub-clause (4) reads, however, it gives complete freedom to the person or body

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mentioned to decide the meaning of ‘wide-ranging’ consultation.

Comment: ‘Wide-ranging’ could be interpreted as teaching institutions only, but from widely-separated parts of Australia or even overseas.

Recommendation: Something after the style of a letter of understanding should be given to ‘a person or body’ to ensure consultation with employers of newly registered psychologists, with psychologists who have supervised newly-registered psychologists and with experienced practitioners who have had newly-registered psychologists working with them. It should also ensure some tapping of health service consumer opinion.

### **1.6 – The meaning given to the words ‘qualifications’ and ‘qualified’**

One of the above words appears in the preamble to 1.6 and in sub-paragraphs (a) and (b). Experience recently in the psychological services field (the Better Access initiative of the previous Government) has been of a limitation of these terms to relate to certain specific academic qualifications and related supervision, and to exclude substantial prior experience with other academic qualifications and supervision.

#### Comments:

(1) The net result of this limitation has been *firstly*, to disadvantage many needy patients, and *secondly* to divide a previously united field force of practising psychologists into two groups, both still providing the same set of services to patients, but with one group financially disadvantaged.

(2) Many very experienced psychologists have a need to be appropriately provided for under the new registration and accreditation scheme. They gained their academic qualifications and received their supervision before the current plethora of non-research Master degree courses began to be offered. Most, if not all have kept up-to-date with developments in their fields of practice. For all the years prior to November 2007 they provided psychological services to the community equally and alongside those usually less-experienced practitioners possessing an ‘area-directed’ Masters degree.

Recommendation Add the following sentence to the preamble: *At the introduction of the national scheme, full recognition will be given to those experienced psychologists who were practising prior to November 2007 but who may not have the currently prescribed academic qualifications and associated supervision.*

### **3.1 – The activities of the accreditation function**

Mention is not made of a jurisdiction’s requirement of on-the-job supervision of a non-fully-registered practitioner. Where it exists, as it does in psychology, this supervision is prescribed and administered directly by a Board.

Comment: It could be expected that a national board would continue a practice that has long been followed by a board in one of the jurisdictions.

Recommendation: In the second paragraph, delete the word ‘four’ and substitute ‘five’. Add to activities (a) to (d), and designate it (c), *develop standards for on-the-job supervision and develop criteria for accrediting appropriate supervisors.*

**3.2 (b)** - *Appointment of a person or body with existing accreditation functions .... to undertake accreditation functions under the scheme*

(c) - *Ministerial Council's function of approval of standards*

(b) This arrangement as stated does not carry with it the condition of there being no conflict of interest which appears elsewhere in the document.

Comment: The Australian Psychological Society's policy in conducting accreditation over recent years has not been in support of the policies of State/Territory psychologist registration boards in their range of requirements to be fulfilled for full registration as a psychologist. The Society rather has pursued its own agenda in setting standards and stating requirements for accreditation of University courses in psychology.

Recommendation: Add to '**Ministerial Council ... (b)**' after the word *scheme* the words *subject to that person or body not conducting an accreditation exercise which contains elements which in any way may be seen to create a conflict of interest.*

(c) A new arrangement is proposed viz. that under items (c), (d) and (e) board's are not empowered to determine and promulgate as law, accreditation standards.

Comment: Legislation in some, if not all of the individual jurisdictions makes it a board responsibility to determine standards. A safeguard is needed to ensure that the functioning of a board is not vitiated by undue delays in obtaining the approval of the Ministerial Council.

Recommendation: Add a second footnote to this effect:

*The Ministerial Council shall respond to a submission or a recommendation from a board with a clear decision or direction within 45 days of receipt of a submission or recommendation.*

### **3.4 – Accreditation Scope and Specialties**

'Specialties' are mentioned in the second dot point and also 'specialist training'. 'Specialty', however, is not in the preamble.

Comment: Psychology accreditation includes specialties by way of Masters degrees. The accrediting body for psychology training has, with the ready compliance of universities, made one or other of these specialty degrees an entrance requirement for one or other of its Colleges. Members of its Colleges are by no means specialists comparable to specialists in medicine; they would have studied more intensely an area of psychological practice as part of a Masters degree. (There are many practising psychologists who have had relevant training and have done more work in a specialty without having done the formal work for a specific university qualification than have those who hold a specialty Master degree.)

Recommendation: In the second line of the preamble to **3.4**, after the word *specialist* insert the words *and/or specialty*.

### **Proposal 3.4.1 – Specialist Endorsement**

The test for assigning a ‘specialist’ designation to an allied health provider is equivalence of training and experience to that of a specialist in medicine. No such rigorous training is known to us to occur in any of the professions covered under the new scheme of accreditation/registration except medicine.

#### Comments –

(1) Certainly an endorsement as ‘specialist’ is not possible in psychology. There are different specialty areas that psychologists may work in, but most or all of these require for successful practice, a good working acquaintance with a common considerably large body of knowledge and range of skills.

(2) Not all psychologists are in a situation where there is sufficient work to permit limitation of work to one specialty. For example, a psychologist in a provincial town or in a regional country area, to be effective, needs to know enough in every specialty field to cover the many differing problems that beset his/her clients.

(3) For the information of the public and to denote a particular specialty area of work, descriptor titles may be defined by a board, and assigned to requesting ‘limited specialty’ practitioners. The Psychologists Board of Queensland has issued a policy outlining criteria for the use of specific descriptor titles for areas of specialty.

Recommendation: In the second line of **3.4.1**, following the word *specialist*, insert the words *or for specialty*.

### **3.5 - Governance arrangements for external accreditation bodies**

(A) The third paragraph proposes that the Ministerial Council which meets only a few times in a year is to be the body which will give guidance on governance matters. *Firstly*, for a ‘governance enquiry’ from a national accreditation body to be on the Ministerial Council agenda for perhaps three or four months before consideration, could hardly be thought to reduce ‘lead times’, such reduction being the very intention of the proposal. *Secondly*, guidance given should be of a type which will contribute to the setting of the IGA ‘standards and criteria for establishment, governance and operation as set by the national agency’.

#### Comments:

(1) If the proposal carries the implication that it would be the Council’s secretariat that would give the guidance, there can be no confidence placed in the advice or guidance of persons, none of whom presumably would, simply by being a secretariat member, have had experience in the ‘inside running’ of an external accreditation body.

(2) The Ministerial Council may appoint an expert committee to consider governance queries and empower that committee to develop principles for governance and give guidance, the principles and related guidance given to be adopted/ratified or otherwise by the Council at its meeting next after the date of the giving of such guidance.

Recommendation: In the paragraph’s second line, after the word *will* insert the words, *at its next meeting, set up a three-person expert committee to function between its meetings to;* and in the paragraph’s fourth line after the words *Ministerial Council* add the words *by way of ratifying or otherwise at its successive meetings such guidance (and thus establishing as a set, those principles*

on which the given guidance relied) as may have been given, and as necessary, in turn, give policy and in-principle directions to the expert committee.

(B) In accepting the fifth paragraph's invitation 'to provide comment', we offer no more than the existing practice of some if not all State/Territory registration boards who desire to have community input into board decisions and policy making. Current practice is to advertise in the press for expressions of interest from the public.

Recommend: Advertise for expressions of interest from persons prepared to have an input into policy and decision making on accreditation programmes –

- \* In city, provincial and country newspapers, seeking in particular consumers of the particular professional services covered by a board;
- \* In State/Territory 'board' newsletters for professional supervisors, for professionals not yet 'fully' registered and for experienced professionals who have worked with newly-graduated not-fully-registered professionals;
- \* In universities staff circulars and in universities 'graduates' newsletters for education-ists; and, but by no means only,
- \* In professional association journals for members of the profession.

The advertising must be clear yet concise, professionally done and convey the importance of the part an interested party may play in the development of quality professionals

**Proposal 3.5.6 – Requirement to consult widely when developing accreditation standards**

This proposal has been dealt with in **1.4** and **1.5** above. Recommendations in respect of these paragraphs deal particularly with the need to indicate something of the scope of the phrase *consult widely*.

**Proposal 3.6.1 – Composition of accreditation committees**

This proposal has been dealt with in **1.39** above. The recommendation there is for COAG to be requested to revise drastically the composition of an accreditation committee.

**3.7 – Registration and accreditation with the one authority**

The principle of consistency of application can be fully invoked under the new scheme's arrangement of control and regulation of both registration and accreditation under a common 'directorate'.

Comment: As stated in **3.2** (b) above, in psychology the course accrediting body, the APS has ignored the actuality of a registration board's requirements for registration and by so doing has almost fatally reduced many psychology graduate's chances of doing professional work efficiently and effectively in perhaps the first year of their employment as a 'trainee psychologist'.

**3.7 – Review and appeal provisions, fourth paragraph**

Comment: It is not at all certain that all accreditation decisions will be covered for individual practitioners. 'Grandfather' practitioners whose academic qualifications do not match those that

will be laid down under the new national scheme, particularly may need some special provision to preserve their status and standing.

Recommendation: It is difficult to make a recommendation in the absence of details of the 'review and appeal provisions of registration decisions'.

### **3.10 - Accreditation Processes**

Comment: With all care being taken in setting standards to ensure that the accreditation process is rigorous, transparent and fair, it is important that the process and the composition of the assessment panels for psychology is not dominated by strong bullying personalities within professional organizations; and that steps are taken to guard against the influence of conflicts of interest, and bias towards particular agendas and structures of individual professional bodies.

### **6 - Transitional arrangements**

*It is not intended that the introduction of the new scheme will force changes to current education standards which are working well.*

Comment: It is assumed that if current standards are not working well (as is the case with psychology) the machinery needs to be put in place to enforce a change to remedy defects.

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