

Submission To: Finance and Public Administration References Committee

This submission is in reference to the impact of the Australian Health Practitioners Regulation Agency (AHPRA) on the profession of Psychology as well as the clients that the profession serves.

In relation to the terms of reference of the Senate Inquiry I would like to make the following submissions:

I am not convinced that AHPRA has the Capacity and / or Ability to implement and administer the national registration of health practitioners. I base this statement on the fact that AHPRA is willing to un-endorse thousands of Psychologists based on criteria developed by themselves and that has not been tested or proven over time. The criteria needs to be tested and a “Grandfather Clause” needs to be instated to allow Psychologists that have been practicing for years to gain equal eligibility rights as those who are currently endorsed by AHPRA.

The current criteria for registration has been set in place over many years (by the previous State Boards Psychology Board of Australia ((and endorsed by the Australian Psychological Association)). These criteria have allowed many Psychologists a right to practice based on what is known as the 4+2 principle. This principle allows a Psychologist to register after four years of study (equivalent to an Honours Degree) and then to complete two years of Supervision work with set and stringent criteria (it used to be one year of supervision but that was definitely insufficient). This is in comparison to the 6 year qualification (at a Masters level) which is 2 years extra training and supervision (on top of the Honours Degree). The two years is done at a University level and supervision provided by a supervisor (no different to the criteria set out to the 4+2 professionals).

There is no doubt that the system needs to be overhauled and that qualifications definitely need to be streamlined (and possibly improved) into the future. But not at the price of Psychologists that have been ALLOWED by the system to work and now not allowed to earn a living. Why should they suffer at the hands of AHPRA and academics that gave birth to the baby and now want to deny that the baby is theirs?

And what about those students that are currently busy studying to become a Psychologist ? The Universities are still offering a course that will only allow a small number of students’ future endorsement. Has AHPRA jumped the gun and put in place registration criteria before the Universities can address the issue of future courses in Psychology. Who would want to study to become a Psychologist if your chances of finally being a practitioner are so slim (currently only 10-15 places per year per University)? Who will explain to those students that they are wasting their time and funds?

The un-endorsed Psychologists are currently providing effective and much needed therapy to thousands of Australians, yet they are being un-endorsed from the profession and are being treated as inferior and insufficient (without being means-tested in any way). Whilst being un-endorsed and in the future un-recognised as a Profession, this move from AHPRA will further scar and stigmatise Mental Health in the eyes of all Australians, and will prevent the thousands that are receiving treatment and will need treatment in the future not to be able to access cost-effective therapy.

There is no evidence to date proving that there is a difference between the therapy provided by a 6 year qualification in Clinical Psychology versus a 4+2 year supervision program in Psychology or versus any therapy provided by a Registered Psychiatrist (excluding the fact that a Psychiatrist prescribes medication as a first line for treatment). AHPRA seems to be basing the un-endorsement of Psychologists on the fact that only Clinical Psychologists are of no threat to the public and that the public need no protection from them, unlike the Generalist Psychologist. Some Psychologists have more experience in years than the majority of Clinical Psychologists. Another qualification does not make a better therapist, and is not indicative of a well-rounded therapist.

I am of the opinion that AHPRA are on a witch-hunt to limit Psychologists in an attempt to make the profession exclusive and unobtainable to the public again. It will also strengthen the stigma already attached to Mental Health in the public by limiting Psychologists as well as having to put Psychologists out of work and to stop seeing patients after a therapeutic relationship has been formed.

The danger is that all the hard work to make Psychology affordable to the general public, at an affordable rate (as offered by General Psychologists) will be undone and that a few Clinical Psychologists will be able to charge at a higher rate as they already do now. The available places for sessions would become less (increase in demand) and the cost will increase, allowing the profession of Clinical Psychologists to maintain its 'Exclusivity' position again.

The performance of AHPRA in administering the registration of health practitioners has been a shambles and many colleagues and other health professionals have been either out of work for some time or not able to register due to administrative errors or changes in registration criteria.

The implications of the misadministration in the registration process for Medicare benefits as well as Private Health Insurance Claims has been compromised and has done damage to the image and integrity of the professions that it is meant to serve. The public does (and has had for a long time) not trust various regulatory boards and hold at the best of times a sceptical and cautious view of the various medical and Allied Health Professions due to the actions from Registration Boards. The public's sentiment and opinion has definitely not improved with the actions and work of AHPRA, especially when professionals that do work that does help people continuously become un-endorsed or de-registered based on new criteria. The public does see these actions and does not care about the politics. The public wants treatment.

There are definite Legal Questions and Concerns towards liability, especially if a profession (in this case Psychologist) become un-endorsed. What does this mean for their insurance and their chances of being insured against a claim? Where will the Registration Boards (AHPRA) stand to assist them in a case like that (the defendant Box? – no, rather in the Claimant's Box). Who does protect the health professional?

Who is going to explain to the 20000 plus Psychologist's families and those they care for, why there is no more income? And the staff that they employ?

In relation to Medicare and Psychologists:

The Medicare Psychology Items has been well received and welcomed by the public. It was overdue and needed. It has been controversial, and it will be, as it involves funding, and funding is between Academics / Universities / Institutes with costly research programs versus Therapists that deliver services.

The Psychology Board of Australia originally announced that it saw itself as being the regulator for Medicare providers in psychology, which is now apparently not the case.

This function is now between AHPRA and who knows who?

AHPRA said it would streamline and reduce duplication and needless paperwork that create barriers for both practitioners and consumers in the health system. It has done that by un-endorsing professionals! This has confused the system of being registered as Medicare providers in the field of Psychology. Many psychologists still have no idea how they are meant to maintain their provider status, so consequently we may lose quite a number of Medicare providers.

In conclusion, I would like to urge the committee to consider the cost, the cost to the public that suffers with a Mental Condition now and the future, as well as the one's that has already lost someone close to them due to the lack of sufficient Mental Health Services. Let's not take away when we need more.

I thank you,

Yours Sincerely

Renier Erasmus (Digitally Protected Document)