

**Submission to the Senate Inquiry into the  
National Registration and Accreditation Scheme  
April 2011**

We acknowledge the benefits to the Australian community and registered health professionals of the National Registration and Accreditation Scheme. We also agree with the Psychology Board of Australia and the Australian Psychological Society about the importance of Continuing Professional Development (CPD) standards extending throughout a psychologist's professional working life. This includes acknowledgement of the benefits of some new requirements, including the introduction of individual learning plans. However, we believe that the implementation and benefits of CPD could be enhanced by some amendments to these requirements.

This submission relates to concerns about CPD requirements for ongoing registration, in particular:

- Definition of 'peer consultation'
- Journal entry for each hour of CPD

**Peer Consultation**

**Issue:**

The PBA Guidelines on Continuing Professional Development specify that:

- "A psychologist must complete a minimum of 10 hours of peer consultation a year within the 30 hours CPD required each year. 'Peer consultation' is defined as supervision and consultation in individual or group format, for the purposes of professional development and support in the practice of psychology and includes a critically reflective focus on the psychologist's own practice." (p. 3)
- "Providing peer consultation to others must not be counted in the 10 hours required to meet this standard, although it can be counted towards general CPD hours." (p. 4)
- "Participants in peer support groups must determine the appropriate allocation of time based on the proportion of time focused on each person's practice. This is generally done through the allocation of presenters." (p. 4)

**Our concern:**

- From discussion with other psychologists, there is evidence that, in practice, these new peer supervision requirements are discouraging group discussion of individual practise issues. This is because, for each psychologist in a group, an additional 10 hours of attendance annually is required by each members, eg, for a group of 3 psychologists the annual attendance requirement is 30 hours for each psychologist, 40 hours for four psychologists, and so on. This time does not include travel time, which represents lost productivity, particularly as many psychologists travel considerable distances to discuss topics of mutual interest and concern.
- For practical considerations, including ease of arrangements, cost and time, pairs of psychologists are setting up ongoing 1:1 peer consultation sessions, thus being denied the benefits of discussion with a group of peers and multiple viewpoints within each session and over time.
- The need to spend a minimum of 10 hours per year focused on each

psychologist's own practice, with time tracked through allocation of presenters, limits other important components of CPD. This includes highly interactive and ongoing peer consultation group discussions that are focused on developing topics of mutual interest that improve outcomes for clients and advance the profession, eg, goal setting with clients in neuropsychology.

**Suggested amendment:**

- Psychologists undertake CPD in order to learn and to reflect on how to integrate new information into their philosophy and practice. This learning and reflection occurs whether or not the psychologist is presenting in relation to their own practice and should be reflected in their journal entry. It should be acknowledged that peer consultation is mutually beneficial to presenters and discussants and that in a group setting all participants benefit. Therefore, it is respectfully requested that all participation in peer consultation should be recognised as 'peer consultation', and not just 'active CPD,' for the purposes of CPD, providing the content meets outcomes of an individual psychologist's learning plan and the journal entry shows evidence of non-trivial contribution to the psychologist's learning needs.

**Journal Entry for Each Hour of CPD**

**Issue:**

The PBA Guidelines on Continuing Professional Development specify that:

- "A professional development journal is a written outline of the content and relevance of each CPD activity. Please write ½ - 1 page of reflection and learning per CPD hour being claimed as professional development. Please include the action taken in response to this learning." (Professional Development Journal)
- "A peer consultation journal is a written outline of the content and relevance of each peer consultation. Please write ½ - 1 page of reflection and learning per CPD hour being claimed as peer consultation. Please include the action taken in response to this learning." (Peer Consultation Journal)

**Our concern:**

- The requirement to write a ½ to 1 page of reflection per CPD hour spent, necessitates 15 to 30 pages of writing per CPD cycle and will **add** approximately 10 to 15 hours to the current 30 CPD hours required. It is noted that while other registered professionals are also required to keep a record of personal reflection, the requirements appear to be less onerous. For example, the Physiotherapy Board of Australia requires 20 CPD hours per year and examples of "reflections" (Physiotherapy Board of Australia, Guidelines for Professional Development) comprise up to 20 words per activity, including 5-day courses. While recognising the value of reflection and writing to integrate new knowledge into a body of conceptual knowledge and its application, it seems unreasonable to require so much extra time of psychologists without it being included in CPD hours.
- The current journal-entry component is likely to discourage psychologists from including even half- or full-day workshops in their CPD activities because they would probably need to spend an extra 2 to 3 hours of journal-entry time which is not included in the calculation of CPD hours.

### **Suggested amendment**

- It is respectfully suggested that, as a valued activity, the time spent reflecting on, and writing about, each CPD hour and how it relates to individual learning plans, knowledge, and practice, should be included in the 30 CPD hours required each year.
- Thus, the total of 30 CPD hours currently required would be made up of the following components: 1) 10 hours of 'peer consultation' (for any individual or group consultation activity) plus 5 hours of writing and reflection time relating to each hour of CPD; 2) a further 10 hours for 'active' and other CPD activities plus the 5 hours of associated reflection and writing time. In practice, it is likely that each CPD hour will vary in terms of how much time needs to be spent in reflecting and writing, so it should be left to the individual's discretion to decide what proportion of CPD hours are to be allocated to CPD attendance time and reflection-and-writing time.

### **Summary of suggested CPD Amendments for Psychologists:**

- **'Peer consultation'**: All participation in peer consultation should be recognised as 'peer consultation', and not just 'active CPD,' for the purposes of CPD, providing the content meets outcomes of an individual psychologist's learning plan and the journal entry shows evidence of non-trivial contribution to the psychologist's learning needs.
- **'Journal entry for each hour of CPD'**: As a valued learning tool, the time spent in writing and reflection should be counted towards the total 30 CPD hours required each year. Up to 10 hours of the total 30 CPD hours should be allocated to the reflection and writing time required for compiling the journal entries.

We understand that the transition to national registration has been a significant undertaking and that some issues may need to be addressed in order to maximise benefits to the Australian community and registered health professionals. One can only imagine that the issues we have raised are unintended consequences of AHPRA's requirements. We thank you for your consideration of these issues.

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