

I wish to make the following submission to your inquiry into AHPRA, with particular reference to a, b, c, f, and g of the terms of reference.

I support the principle of a national registration scheme and body for health professionals, however, in my experience with AHPRA to date it has demonstrated a number of shortcomings which I believe need to be rectified. These include matters of policy and service delivery.

I am a Master of Counselling Psychology graduate and have recently become a registered psychologist. As I only finished my course in 2010, I have experienced the transition to the national registration scheme. This meant that I had to:

- I. obtain provisional registration in line with the new requirement for students to do so by 24 December 2010, even though I had completed my final placement before this date, and the stated rationale for provisional registration was to undertake student placements.
- II. Wait until my dissertation had been marked and passed, and the University advised AHPRA that I am eligible for graduation before I could apply for general registration (there was formerly provision for Masters' graduates to register prior to completion of their dissertation, but this was removed in the transition to the national scheme). This meant I could not apply for registration until the end of February 2011 and it was not approved until the end of March 2011.
- III. Apply for approval to commence a registrarship in counselling psychology so that I can obtain an area of endorsement. This application is still being processed despite being lodged in mid-March.

These new requirements meant that until my general registration was approved, in the interim I was treated as a four year trained psychologist applying for provisional registration. The implications of this were:

- I could only commence work as a provisional psychologist with approval by AHPRA of a Supervised Practice Plan (which is designed for 4 year psychology graduates undertaking a 2-year internship as the route to general registration). The point of completing a Masters degree is that it is an alternative to the 2-year internship. The 30 page proforma for the plan comes with 50 pages of guidelines! I put days of work into completing this form knowing that it was only for an interim arrangement.
- When AHPRA advised me that my provisional registration had been approved there was no mention of the need for a Supervised Practice Plan. I found out about it one week before I was due to start work as a psychologist when I was browsing AHPRA's website for information pertaining to supervision requirements for the counselling psychology endorsement. I had to defer by a fortnight my start date with my employer due to the requirement that I find a primary and secondary supervisor and have them both sign the form, and allow time to obtain approval for my plan. I lodged this plan on 17 January 2011 and received an email from AHPRA on 31 January informing me that it was approved; cutting it fine given that my deferred start date for work was 1 February 2011 (which AHPRA knew). This deferral meant that my employing agency needed to reschedule clients' appointments; an inconvenience to both the agency and clients.

- The obligation to comply with the plan for the two months between commencing work and obtaining general registration meant that I was required to have 1+ 3/4 hours supervision per week (for 30 hours work), while for general registration there is no requirement for supervision. My employer had already agreed to pay for one hour per week and to allow me the time for supervision. I had negotiated this with the requirements for Counselling Psychology endorsement in mind. The extra time for supervision cost me \$450 from my \$44,000 per year salary. I also had to keep a daily log book with details of my client work, which added to my heavy workload.

The Supervised Practice Plan requirements are clearly not intended for psychologists who have completed a Masters degree. For example, the requirement to administer a minimum number of certain psychometric tests is not possible in the setting I am employed in, and I completed psychometric assessments as part of my Masters course. I believe that there needs to be an alternative, streamlined assessment process for Masters graduates who have completed and passed all academic requirements with the exception of the dissertation. One option would be for graduates in this situation to be granted provisional registration for a 3-month period with an exemption from the Supervised Practice Plan requirements.

Since last September when I first began trying to obtain information from AHPRA, I have found it difficult to obtain clear, accurate and concise information from AHPRA about all the requirements that apply to a person in my situation – despite browsing the website, sending emails and making phone calls, and attending an information session on the national scheme. I believe that the time taken by AHPRA to process applications and to respond to email queries is unsatisfactory. I wrote to the head of the Psychology Board on 17 January 2011 to request the Board's urgent consideration of some flexibility in the application of the Supervised Practice Plan requirements to my circumstances and am still waiting for a response!

I also have concerns about the inaccurate and incomplete information provided by various staff members and the inconsistency between guidelines and forms. One example of this is that the university provided an academic transcript to AHPRA and I was told by AHPRA that it was unsatisfactory because although it specified that I had completed and passed all requirements of my degree and the date I had done so, it did not have a conferral date on it. I was then caught between AHPRA's insistence that it have this date and the university telling me that it could not provide such a transcript. I subsequently found that the FAQs on AHPRA's website mentioned that they will accept a letter from the Head of School at the university in such circumstances. The staff member I was liaising with at AHPRA was unaware of this, so I had to inform her of their guidelines! The to-ing and fro-ing over this caused a 2 week delay in my general registration. Furthermore, I question the rationale for the provision of a conferral date. Surely the point is that an applicant has either met the requirements for registration (i.e. completion of a Masters' degree) or not. Another example is that the application form for approval of registrar program still refers to a 2-year supervision period, when it is actually only 1-year under the transitional arrangements.

Had I known all this information in advance, I could have negotiated a later start date with my new employer and returned to my job in the public service for which I was paid \$120,000 pa (and from which I resigned at the end of December 2010) for 3 months to allow time for my dissertation to be marked, and then applied directly for full registration instead of going through this expensive and

time consuming rigmarole for the sake of a couple of months employment as a poorly paid provisionally registered psychologist.