



13th April, 2011

Inquiry into the Administration of health practitioner registration by the Australian Health Practitioner Regulation Agency (AHPRA)

The Australian College of Specialist Psychologists (ACSP) would like to make comment on one of the Terms of Reference listed in the inquiry, as it relates to the profession of Psychology.

Impact of AHPRA processes and administration on health practitioners, patients, hospitals and service providers.

The ACSP would like to comment on the limited acknowledgement by the AHPRA of the range of professions having specialist titles and specialist training. The AHPRA chose to only grant specialist registration to the Medical and Dentistry professions and all other professions could only apply for generalist registration. Information was provided by the profession of psychology indicating it has accredited specialist training (*a minimum* of four years undergraduate training, plus two years post graduate university training plus two years professional supervision) in all universities around Australia. Information was also provided that specialist title registration for the profession of psychology existed for over 20 years, in the state of Western Australia. However AHPRA, chose not to allow specialist registration for the profession of psychology.

The Board of Psychology also indicated they would be asking for specialist registration for the profession in their consultation paper in October 2009. This proposal was supported by the majority of the submissions to the Board, but the Board's submission was later changed to generalist registration when they were challenged by the Advisory Council. We feel this indicates serious interference in the process of independent professional regulation and definition.

Furthermore, these decisions directly resulted in the loss of specialist title registration for Psychologists in WA, and the re-packaging of all our specialist training Australia wide, into the endorsement process. If the endorsement process is adequate to hold all the specialist training of a profession, then generalist registration and endorsement should be the only options available to all professions.

This process has greatly reduced the confidence of the profession of psychology in the independence of the professional Board from Government administrative bodies. We sincerely hope that in 2013, when the registration processes can be reviewed, that the AHPRA reconsider specialist registration for the Psychology profession.

A second major concern is that AHPRA is continuing to support standards of training for professional practice in psychology which are significantly below international training



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standards (an undergraduate degree in psychology). We are the only English speaking country in the OECD which allows people to professionally practice without post graduate training. Arguments have been raised regarding possible workforce shortages if changes were to occur, and the ACSP is greatly concerned that again professional issues are being interfered with by Government administrative bodies. Ways to promote the development and training of the profession which do not maintain low professional standards should be considered in order to deal with workforce shortages. For example, the Federal Government could provide more funding for post graduate university places in psychology, especially in the mental health field, along with more funding to adequately staff university departments to be able to provide training for more post graduate students. This has been done in other professional areas where workforce shortages have been found and was done in a limited way in the last financial budget of the Howard Government. State Government Health and Justice systems could also employ more, and eventually only, post graduate trained psychologists to allow for the supervision of new graduates into the profession. Such innovative ways to deal with workforce shortages need urgent attention if we are going to move the psychology profession in Australia towards international training standards.

We look forward to public hearings on these issues so that further input can be provided to the inquiry.

Sincerely

Dr. Jillian Horton
President of The Australian College of Specialist Psychologists