

I write this brief submission to be tended to the Inquiry into the administration of Health practitioner registration by the Australian Health Practitioner Regulation Authority (AHPRA).

My submission relates to the following terms of reference:

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

Legal liability and risk for health practitioners, hospitals and service providers resulting from any implications of the revised registration process.

Liability for financial and economic loss incurred by health practitioners, patients and service providers resulting from any implications of the revised registration process.

I just thought I would bring to your attention a significantly large group of psychologists who have been seriously disadvantaged by the current AHPRA endorsement process.

I refer to the hundreds if not thousands of School Counsellors in NSW Government schools. The NSW Government through the Department of Education and Training (DET) has been constantly actively recruiting and training School Counsellors for the last 16 years, due to a massive shortage of these professionals.

So, suitable candidates who were already trained teachers with undergraduate psychology degrees were hand picked for entry into a Masters degree in Educational and Counselling Psychology, either at the University of Western Sydney or Charles Stuart University and we were paid by the DET our full salaries while studying if we signed a contract to work as School Counsellors/ Educational Psychologists in DET schools on completion of training. After completing the Masters course, the majority of School Counsellors gained their registration with The NSW Psychologist's Registration Board and some went on and voluntarily became Australian Psychological Society (APS) members.

At this time The NSW Psychologist's Registration Board recognized the Master's degrees as 5 years of training and we had to do another year of supervision for registration. The Australian Psychological Society (APS) however, refused to recognize the Master's degrees as 5 years training and instead recognized them as 4 years training and so, we had to do 2 years supervision for full APS membership. As the NSW DET did not require membership of the APS, many School Counsellors chose not to pursue APS membership.

How is this relevant now?

The new AHPRA categorization of psychologists as "Endorsed" as a "Specialist" or "not Endorsed" as a "Specialist"/ "Generalist" only has placed severe, draconian limitations on our ability to practise in our particular field of expertise. Only psychologists who met the APS criteria for full college membership of an APS college and a few others who can demonstrate that they meet very limited criteria specified by the APS are able to be endorsed as specialists. This has placed a number of serious restrictions on practising psychologists in both the public and private sectors, including the following restrictions on Educational and Counselling psychologists:

Basically, the NSW Government has spent millions of dollars on training School Counsellors to staff its schools, where we are seen as Educational and Counselling Psychology specialists. We work in this role and yet now, according to the new AHPRA requirements, we can no longer refer to ourselves as either an "Educational Psychologist" or a "Counselling Psychologist" unless we

have been “Endorsed” as a “Specialist”. Where does that leave the NSW DET when they are legally challenged by a disgruntled parent that their child has not even seen a “Specialist” “Educational and Counselling Psychologist”???

Furthermore, for those of us who work in private practice, despite having a Masters degree in Education (Counselling Psychology), we can no longer refer to ourselves as specialists in this field and we have been told by AHPRA that we cannot call ourselves “Educational” or “Counselling” Psychologists because we are no longer deemed to be specialists. Despite a minimum six years training and in my case, sixteen years experience as an Educational Psychologist, I now have to tell potential clients that I am “only a Generalist” and I am not “Endorsed” as a “Specialist”. This has potentially serious financial disadvantages for me, as they may seek out a “Specialist” “Educational Psychologist”.

The APHRA/APS alliance is totally flawed because for those colleagues who joined the APS colleges, they are now deemed to be “Specialists”, but those who chose not to join the APS colleges are deemed “Generalists”! So, this brings us to the current bizarre situation whereby two colleagues can work for the same organization, doing the same job, have the same qualifications and have the same years of experience and yet, only the APS college member is deemed to be a “Specialist”- this makes no sense at all!

By allowing the APS/APHRA alliance to determine who is “Endorsed” as a “Specialist”, a closed shop has essentially been constructed which has severe restrictions on our ability to trade. I would like to know how this fits with the Trade Practices Act in terms of restrictive trade practices?

Additionally, the new AHPRA requirements do not take account of years of experience in determining registration status. We should follow the UK system, where years of experience counted towards registration status. The fact that the AHPRA requirements were determined in 2010, but applied retrospectively and based on qualifications and APS criteria only, is draconian to say the least. It also serves to further entrench the alliance with the APS which severely disadvantages and restricts the thousands of psychologists who were not full APS members at the time of establishing AHPRA.

Furthermore, the new dichotomy of “Endorsed Specialists” versus “Generalists” may present a host of serious ramifications down the track. For example, at present, School Counsellors in NSW work from Kindergarden to Year Twelve and our duties include counselling as well as assessment work; including psychometric and other tests. If down the track, the use of these tests is limited only to the “Endorsed Specialists” as determined by the APS in conjunction with AHPRA, this will mean that the same School Counsellors the NSW Government spent millions of dollars training are now redundant in terms of conducting necessary assessments and tests on the children in the schools we service. The children in NSW public schools will ultimately carry the terrible cost of this serious error in the registration process. The long term impact of these restrictions will only harm the very people they were set up to support, our clients in both public and private settings.

Once again, the potential financial losses of this are huge for me and other psychologists in private practice, when suddenly, after sixteen years of administering psychological tests, I find myself restricted because I am arbitrarily no longer deemed a “Specialist”. Who will carry the liability for this loss of income for thousands of registered psychologists? Our earning capacity can be severely restricted and in fact, we can become unable to earn an income in our profession due to the arbitrary nature of this endorsement dichotomy. As government budgets get tighter and private health insurance companies look for more ways to save money, this will become a ready made way to limit access to services and spend less. Ultimately, it is the Australian people who will miss out on access to mental health care in both public and private settings, we will be going backwards!

At present there is a massive shortage of Educational Psychologists/ School Counsellors in NSW and nationally, as indicated by the extremely high case loads/number of students serviced and the schools with no counsellor access at all. Given the nation’s attention to youth mental health and related issues, where is the future planning if the majority of the current highly trained School

Counsellor workforce is now deemed to be not “Endorsed” as “Specialists” and this arm of the psychology profession is now so limited and restricted that ultimately it may cease to exist. I pity the children, families and society at large that will ultimately miss out on the benefits of having highly qualified psychologists working in schools.