

13<sup>th</sup> April 2011

Committee Secretary  
Senate Standing Committees on Finance and Public Administration  
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To whom it may concern,

**Re: The administration of health practitioner registration by the Australian Health Practitioner Regulation Agency (AHPRA)**

I am writing to point out a number of issues with the newly introduced registration requirements and mandatory professional development requirements for Australian Psychologists under AHPRA. Firstly, the scheme appears to have been rushed into practice following very little consultation with the profession, as a whole, and very little warning about when and how the scheme would be introduced. The scheme created widespread 'panic' within the profession when the new registration requirements were announced, in a piecemeal format, barely a month before the scheme was introduced in most states, and became mandatory. Testament to this was the fact that a large number of psychologists found themselves unregistered, and/or unendorsed after July 1<sup>st</sup> 2010, due to a lack of warning and communication, and significant ambiguity in the information provided from AHPRA. A scheme designed following such little consultation with the profession is bound to have serious major flaws, and unfortunately this has proven to be the case.

As a psychologist in Victoria, who has held full registration for almost 6 years, myself and my colleagues have come to feel very disheartened with the profession, following the newly introduced AHPRA regulations 10 months ago. Many psychologists, including myself, are considering leaving the profession in the near future. There are a large number of reasons for this.

Firstly, the requirement for mandatory professional indemnity insurance, as well as membership of the APS and clinical colleges in order to maintain endorsed status, and registration has sent the basic cost for paying all required fees, to work as a clinical psychologist, up from around \$500 a year to \$1,200. Thus, effectively, psychologists can discount \$1,200 off their wages for the year, before even beginning work. This is a very unfair burden for AHPRA to place on the profession of psychology, which is already undervalued, with psychologists receiving considerably less remuneration in most public sector jobs, compared to our foreign colleagues. For psychologists, such as myself, who work predominantly in the public sector, our psychologists award, negotiated with the state government has, in most years, not even maintained pace with inflation. Thus, to force psychologists to pay an extra \$700 just to continue to maintain employment is tantamount to forcing all psychologists' wages backwards.

Secondly, the new requirements for professional development are unreasonably onerous, and significantly penalise those who work part time (predominantly working parents). I am not suggesting that psychologists are against professional development. On the contrary, it is my experience that psychologists as a profession are very committed to furthering their skills and keeping their knowledge aligned with current evidence based research. This is clearly demonstrated by the existence of the APS professional development

scheme, prior to the AHPRA regulations, which allowed psychologists to log professional development points in a fair manner, with a broad number of activities and events counting towards a psychologist's personal professional development tally. In contrast to this, the present system, imposed without consultation, by AHPRA, is unfairly onerous, restrictive and utilises a 'one-size-fits-all' model. The sheer number of professional development hours required each year is unreasonable, particularly for those psychologists who work part time. To expect a psychologist working just one day per week to complete 30 hours professional development a year, is in my opinion utterly unreasonable. Many in the profession who work part time are supporting young families and to burden them with unreasonable expectations for professional development – most of which need to be completed out of work hours is unfair and further erodes the likelihood of a healthy work-life balance for those in our profession.

Further, the move towards mandating requirements for 'active' professional development is also unfair, as it forces psychologists to seek their professional development through expensive training courses and interactive seminars, which are not funded by public sector employers. This, in turn, forces psychologists to again fund a massive increase in the amount they are required to spend on professional development activities, further eroding the take home wages of those in the profession.

The requirement to log a set number of 'Peer Consultation' hours, focused on the psychologists own practice also penalises a large number of psychologists including those who work in rural and remote settings, and those who cannot access peer supervision through their employment. At the least expensive end of the spectrum, most senior psychologists charge \$120 an hour for the provision of supervision, with many charging in excess of \$200 per hour. For a psychologist in a remote setting, or those with no access to peer consultation through their employment (and no requirement for employers to pay for peer consultation under the current Victorian Award scheme), this amounts to a further \$1,200, at minimum, of out pocket expense for psychologists, just to complete 10 hours peer consultation sessions required to maintain registration. Thus, our running total, so far, for many psychologists is \$2,400, plus expensive 'active' professional development activities, just to maintain registration, each year.

The current professional development requirements are also set to erode the capacity of working psychologists to support the training of students' psychologists, and provide placement supervision for trainee psychologists. Under the previous Victorian registration scheme, gaining registration as a supervisor was a relatively straight-forward process for those with an appropriate amount of clinical experience (a Doctorate + four years clinical practice, or a Masters + five years clinical practice) who received an endorsement from senior colleagues as being capable of doing the job. This, in many cases, including mine, involved the co-supervision of a trainee psychologist in conjunction with a very experienced colleague, prior to applying for formal registration as a supervisor. Under the current AHPRA mandated requirements, all supervisors will need to have undergone a supervisors training course, in order to supervise students. This grossly overlooks the experience of current supervisors, and further requires psychologists *again*, pay for an expensive training course, when there is no empirical evidence to show that such a course actually improves the supervision skills of experienced supervisors. Thus, for those who are presently not mandated to take on students as part of our public service roles, but do so in order to support the future of the profession, there will now be a significant financial disadvantage to acting as a student placement supervisor. In addition to all the increased cost to maintain profession registration, as listed above, I am highly unlikely to pay out further for an expensive supervisors training course and thus will no longer be eligible to supervise the two to three students per year I currently take on in my public sector positions.

Taking on students has also become less attractive due to the fact that AHPRA have mandated that supervision sessions with provisional (student) psychologists, *cannot* be counted toward professional development points. In my opinion, this is an absolutely unreasonable decision. As a supervisor of student psychologists, I find this is where I learn the most as I am forced to reflect on my clinical practice and the standards of the profession in a very in-depth way. I am forced to explain basic conventions and practices of psychology/neuropsychology with a very critical mind and explain and justify my practice standards and clinical knowledge. The supervision of provisional (student) psychologists was previously counted towards professional development point under the APS professional development requirements. The fact that I am now unable to count my many hours of student supervision towards my professional development points under APHRA, is a significant disincentive to take on student psychologists. Given how unfairly onerous the new APHRA professional development requirements are, this is a gross oversight.

Finally, when compared to our other allied health colleagues, such as speech pathologists and social workers, with whom psychologists are generally remunerated at a similar level within the public sector, psychologists are being treated with unfair harshness, and a level of expectation that far exceeding that of other similarly paid professionals. Our out-of-pocket expenses for registration, APS and clinical college membership (which is now mandatory to maintain endorsement), and insurance far exceed those of other professionals. The sheer amount of professional development required also far exceeds that of other professions. The unfairly onerous requirement to provide a least half a page summary per hour of professional development, far exceeds all other allied health requirements, and is even considerably more onerous than that asked of our psychiatrist colleagues (who I am told need to merely provide a two sentence summary of professional development activity per hour).

I finish this submission by stating that I am at a loss as to figure out why the profession of psychology has been so harshly and unfairly treated under the currently introduced AHPRA regulations. It is my experience that many of psychologists now feel dishearten, disenfranchised and completely disempowered by the new regulation requirements. It is certainly a stressful time to be working as a psychologist in Australia, with little incentive to remain in the profession in the long term.

Sincerely,