

To Whom it May Concern;

I write to you to express my concerns in response to the Inquiry into the administration of health practitioner registration by the Australian Health Practitioner Regulation Agency (AHPRA). Below are the terms of reference and my comments.

- (a) capacity and ability of AHPRA to implement and administer the national registration of health practitioners;

I am deeply concerned about the implementation of the National Registration of Health Practitioners. Specifically, with regard to the field of Psychology it has been deeply disappointing and bordering on farcical to observe.

- (b) performance of AHPRA in administering the registration of health practitioners;  
There has been ineffective communication from the PBA (the subsection of AHPRA responsible for Psychologists registration), most Psychologists have experienced some concern regarding the length of time it has taken to receive notification that they are in fact registered, with some inadvertently becoming de-registered in the process.
- (c) impact of AHPRA processes and administration on health practitioners, patients, hospitals and service providers;

A major concern for the field of Psychology and a concern that will have wide ranging implications for the Australian public is the change to having Psychologist registration 'levels'. I.e. Registered Psychologists are now known as either 'Endorsed' or 'Unendorsed'. This has and will continue to be problematic in a number of ways, not the least of which is the limiting of effective and available psychological help for people in the community who need it.

All registered psychologists have had rigorous and deep training in the assessment, diagnosis and treatment of people suffering with emotional health disorders. Some people chose to do a range of Masters degrees to reach this goal, other chose to do intensive 2 year practical internships. Both pathways registered people as safe, qualified and effective in practicing as a Psychologist.

Some facts.

There is no research to back one type of registered psychologist as being more effective than another. There is no evidence that 'Clinical Psychologists' treat a more specialized clientele than for example 'Counselling Psychologists'. There are 'Clinical Psychologists' that like to say that they are more effective than other psychologists. There is a voluntary professional body called the Australian Psychological Society (APS) that has had a schism within it between 'Clinical' and 'Counselling' Psychologists for some time. The APS has much less 'Clinical' Psychologist members than other members, though not perhaps at the top level/decision making part of the organisation. There is an Australian public with rapidly increasing levels of mental health concerns, impacting not only them, but their parents, their children, the already overburdened medical system (GPs, Emergency Departments, Mental Health Crisis Services, Hospitals etc). There is an Australian public now being 'sold' the idea (without founding) that they should only see, that it is only safe to see Psychologists

'endorsed' (albeit possibly via their own self serving professional organisation, through its, some would say unethical, influence on the PBA) as clinical.

Interestingly there was also a decision made that due to the small workforce in Australia it would not benefit the public to have 'Specialist' Registration, practically it seems there is little difference between being Endorsed as a Clinical Psychologist or being a Specialist Clinical Psychologist. The slight change in words means little to Mr Bloggs who is seeking help for his Depression, he will take it that endorsed means 'special' and 'better' than the unendorsed alternative.

The upshot of this is that the incomes and waiting lists of 'Clinical' Psychologists will get higher and longer respectively. Then there will be increased pressure on crisis services during the wait, and effective help going by the wayside (i.e. the unendorsed Psychologist with 30 years solid experience in treating all types of mental health conditions) as it is been sold to the people as less effective and unsafe.

The impact on non 'endorsed' Psychologists is clear, they will receive lower rates of pay, have been muscled out of career opportunities and many will leave the profession. I am aware of Psychologists with more than 30 years experience leaving the field in disgust at this sorry state of affairs. Again the flow on cost is that Mental Health consumers will have less choice, wait even longer for help at the same time exacerbating their condition, deteriorating and overburdening GP's and Emergency Departments and ultimately see a Psychologist with potentially far fewer years of experience.

- (f) liability for financial and economic loss incurred by health practitioners, patients and service providers resulting from any implications of the revised registration process;

See my response to point (C) above and in addition, briefly, there has been economic loss to 'unendorsed' Psychologists, as jobs are being offered to the endorsed above them. Those that were inadvertently deregistered have directly lost income. Mental Health Consumers are now preferring to see the 'Endorsed' under the illusion that there is evidence that this 'endorsement' equals practitioners are special/better. These short term costs are insubstantial when considering the direct, tangible and upcoming future impact on the pockets of the public in funding the higher hourly fees of the 'Endorsed' and funding the reactive responses of the already overloaded health system.

Isn't it true that our mental health system needs to become more integrated and responsive to the needs of the public...not less?

Sincerely,