

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

To the Department of the Senate:

I am writing this submission as a Psychologist who has completed a Master of Psychology (Counselling) and is almost finished completing a two year supervision plan under the old Psychology Board of Western Australia system with the aim of receiving a Specialist Title in Counselling Psychology.

First and foremost, I wish to say that the process of changing regulation requirements taken on by AHPRA has been poorly handled and information provided to Psychologists at all points throughout this process has been confusing, contradictory information has been provided, and there is a lack of knowledge within AHPRA about their own regulation standards. Every practitioner that I have spoken with during this time has also has a similar experience.

One of my concerns is in relation to the current CPD requirements, both to maintain registration requirements, but also to maintain a Medicare provider number. It is appalling that Psychologists are now expected to write between 12 – 24 pages of personal reflections if they attend a 3 day workshop to maintain CPD requirements. This is unnecessary and unreasonable and would take hours to complete. I also do not think I could come up with 12 pages of reflection for an event I attended, no matter how valuable and informative it was. Given that many Psychologists are struggling to manage their workload as it is, I think this condition needs to be seriously reviewed. It seems that the registration standards are making it so difficult for Psychologists to remain registered that I think this is going to have an impact on the numbers of people who seek to be a part of this profession. This is a very serious concern as the mental health system is already under pressure and we are in desperate need of more qualified professionals not less.

In considering the CPD requirements to maintain a Medicare provider number (an important part of the current Mental Health system), it should be noted that I was not even made aware by the APS, Medicare, or the Psychology Board of Australia that this was a requirement and something which was going to be regulated by them. As I am not a current APS member I was not given this information. Again this is extremely concerning as if I had not found out through a member of this body I would not have made any submission to them and would have had my Medicare provider number stripped from me. The effects that this would have had on clients who are currently engaged with me would have been extreme and to have this practice as a part of our current system is ethically wrong and represents a risk to consumers. It is also important to point out the obvious difficulties inherent in having a private body regulate government regulation standards.

I appreciate being given the opportunity to air my concerns and I will keep this brief due to personal time constraints. I really feel that something needs to be done now before the problem becomes unmanageable and starts seriously impacting the ability of practitioners to work with clients.