

THE PSYCHOLOGY FOUNDATION OF AUSTRALIA

(Incorporated in New South Wales)

c/o School of Psychology, University of New South Wales, Sydney 2052, NSW, Australia

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Re: Psychology Board of Australia consultation paper 31: Reducing regulatory burden: Retiring the 4+2 internship pathway to general registration

We thank you for the opportunity to comment on this issue. The Psychology Foundation of Australia is a set of Schools of Psychology which advocate for and aim to deliver high quality training programmes in Psychology that provide students with a rigorous attention to the evidence base and its ongoing development, in addition to professional skills training.

One of the driving factors in the formation of the Foundation was concern about the adequacy of the 4+2 training route that is the focus of this consultation paper. We shared concerns about the inability to ensure consistency of outcome and the limited opportunity to provide a broad educational underpinning of professional psychology and have noted this concern over in many submissions over the intervening years. This limitation arises from the need to provide the discipline base in undergraduate and Honours programmes to ensure that the students are prepared for the broad array of potential outcomes that flow from training in Psychology.

We strongly support the wisdom of removing the 4+2 route to general registration, given the existence of a superior alternative route. Our preference has always been for students to undertake at least a two-year Masters programme following Honours, but with limited places available in such programmes, we accept that the 5+1 route provides a better educational support than the 4+2 programme. Additionally it is much easier to ensure that this component is of a consistent high quality through course accreditation processes. The more structured internship year is also an improvement. We therefore strongly support the intended change proposed in this consultation paper, as it is likely to lead to a standard of service for those with general registration that can be more easily guaranteed.

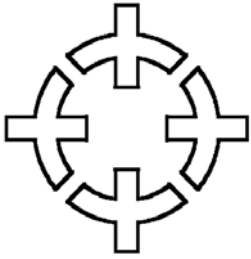
The questions from the Consultation paper are provided in italics below. Our responses are not italicised.

1. Do you agree with the Board's proposal to consider education and training reform, including focusing on reducing regulatory burden, as an important next step in the development of the regulatory environment for psychology?

The Psychology Foundation does agree with the reform because we believe it can improve the training of professional psychologists who currently enter the 4+2 training route. We also believe it will significantly reduce the regulatory burden and hope that this may lead to lower fees for registration as a consequence.

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2. Which do you consider is the best option for reducing regulatory burden? Please provide reasons for your stated preference:

- *option one - status quo*
- *option two - retirement of the 4+2 pathway to general registration*
- *none of these options, or another option.*

As noted above the Psychology Foundation has always argued for the retirement of the 4+2 training route and so option two has always been our preference, although we have always preferred a two year Masters degree, rather than the 5+1 training route as the two year Masters route is more comparable to countries we prefer as international benchmarks for quality training (e.g. UK, USA) but provided there is a clear distinction between general registration and the level indicating an area of endorsement, the current proposal is a clear improvement in the standard of training and the ability to monitor that standard. The apprenticeship model that is the basis of the 4+2 route is variable in the range of experiences that can be provided, is onerous for the provider and in many cases very expensive for the student, without a guarantee of a consistent standard of training. While we recognize that such training has usually been undertaken with the best of intentions and considerable energy, these negatives can be reduced and it is desirable that they are since they impact on the quality of service provided to the public.

3. Are there any specific impacts (positive or negative) or advantages/disadvantages for each of the two options that have not been outlined in the paper?

The Consultation paper has captured the salient issues well.

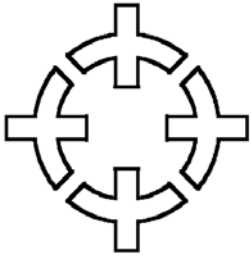
4. Are there any specific risks (for each of the two options) that have not been outlined in the paper?

The document provided good coverage of the issues. In previous discussion there has been concern that withdrawal of the 4+2 pathway would lead to a shortfall in trained practitioners, leaving aside the adequacy of the training this was a legitimate concern. The rise in the 5+1 training route has clearly catered for this concern by providing a better training option. Flow through of trained general registrants can now be maintained. We also think it is likely that following the withdrawal of the 4+2 route other universities will see advantage in adding their own 5+1 options, further increasing the supply of training places.

5. If you prefer option two, do you support the Board making the changes (update/

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delete) to the standards, guidelines, fact sheets and forms as outlined in Attachment G-J to retire the 4+2 internship pathway?

The Psychology Foundation does support these changes.

6. If you prefer option two, which transition option do you prefer and why?

- *option a): last enrolment in the 4+2 internship is 30 June 2019*
- *option b): last enrolment in the 4+2 internship is 30 June 2020*
- *option c): last enrolment in the 4+2 internship is 30 June 2021*
- *none of these options or another option (please specify)*

We have always argued against the existence of this pathway and believe it should be removed as soon as practicably possible. We therefore prefer option a.

7. From your perspective, can you identify any practical issues in retiring the 4+2 internship pathway?

The Psychology Foundation believes that it is sensible to make the changes. Retaining the ability for practitioners already trained through the 4+2 route to continue their general registration ensures there is no retrospective penalty for such training and therefore will not cause a shortfall in providers of service to the public. However, we do believe that the public would be better served by adopting the more consistently rigorous training offered by the 5+1 pathway.

8. Is the content and structure of the consultation paper helpful, clear, relevant and understandable? If not, what needs to change?

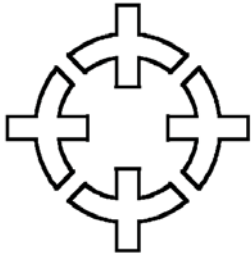
Overall the paper is clear and provides a solid rationale for the proposed change. Some of the key arguments could have appeared earlier in the document and we believe the stronger case for the change is the enhanced educational component and ability to maintain consistency of standards. It is clear that the regulatory burden is an issue for the Board but the more salient effect of the change is that with a lower burden costs could be reduced for all registrants and it may have been better to highlight that advantage more prominently.

We would also have liked greater emphasis on the inability of the 4+2 pathway to match current international standards for psychology. The Psychology Foundation wants the Australian public to be able to access high quality professional skills in this area of practice and that means we should be striving to match the best techniques available in the field.

9. Is there anything else the National Board should take into account in its proposal,

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such as impacts on workforce or access to health services that have not been outlined in the paper?

There are no outstanding pressing issues but it would be desirable to highlight that with enhanced education and more rigorous oversight it is likely that these better-trained psychologists will be able to increase the efficacy of service delivery due to greater use of evidence-based interventions.

In summary, the Psychology Foundation of Australia supports the proposed changes in the consultation paper and believe it will lead to an improvement in the consistency of the quality of service delivery provided to the public, a possible reduction in the cost of training for students and registration for all Psychologists while also facilitating the ability to monitor the standard of training.

on behalf of the Psychology Foundation of Australia

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