



27 June 2013

Professor Brin Grenyer
Chair, Psychology Board of Australia
PO Box 16085
Collins Street West
Melbourne VIC 8007

Dear Professor Grenyer

Re: Response to Consultation Paper 19: Draft Guidelines for the 5+1 Internship Program

The Institute of Private Practising Psychologists (IPPP) puts forward the following points (not presented in order of priority) for consideration in relation to the proposed Guidelines for the 5+1 Internship Program:

1. Section 2.2 is confusing with regard to the definition of the term *competency*.

The term *competency* is well-defined within Australia (e.g., refer to the range of documents published by the National Centre for Vocational Education Research NCVET). The first paragraph of Section 2.2 is confused and inconsistent in its definition and use of the term.

2. The final paragraph of Section 2.2 requires clarification.

It is unclear what is meant by “*cross-cultural and lifespan competencies form part of the supervision and preparation for the examination and therefore do not require separate or special placements to demonstrate competence*”.

Without specific clarification, it may be argued that Core Competencies 1 through to 6 also form part of the supervision and preparation for the examination and therefore do not require separate or special placements to demonstrate competence.

3. Many of the examples given in the table in Section 2.2, under the title of *Competency Based Assessment*, do not represent effective assessment of competency.

Once again, the term *competency-based assessment* is well-defined within Australia, for example, “the gathering and judging of evidence in order to decide whether a person has achieved a standard of competence” (Knight, A. & Nestor, M. 2000. A glossary of



Australian vocational education and training terms, NCVER, p.12. www.ncver.edu.au/popups/limit_download.php?file=research/core/). The IPPP recommends that the paper should be written with stronger examples of how competency should be assessed.

4. Section 2.2.2.2: This section raises the issue of *specific ratings* given by the principal supervisor in the progress report but gives no information about what this means.

This section states: *“the principal supervisor will provide evaluative feedback to the provisional psychologist and will allocate specific ratings of the provisional psychologist’s progress against each competency”*.

What ratings will be given? Is there a guide for supervisors as to what the ratings are and how rating should occur? Does each supervisor have to use the same rating scale? This paragraph raises questions but gives no answers. It needs more explanation and possibly a cross-reference to another source.

5. Section 2.2.2.3: The principal supervisor may not be the best person to assess all case studies.

This section states: *“the provisional psychologist must complete at least four case studies, each of which must be based on a different presenting problem. Case studies must be assessed by their principal supervisor”*.

The importance of having a secondary supervisor is well-recognised but has been overlooked here. Whilst it would be important for the principal supervisor to be kept apprised of the intern’s progress, it is undeniable that for some case studies the secondary supervisor may be the best person to assess a case study. There should be allowance made for this in these Guidelines.

6. Section 2.4 should include reference to *Special Leave*.

This section states: *“The Board will make reasonable accommodations for parental and sick leave on the provision of clear evidence of need”*.

It would be appropriate to include reference to *Special Leave* in this section.

7. Section 3: Psychological Practice

This section gives examples of professional practice settings and workplaces where psychological practice is conducted. Given the large (and growing) number of small, non-incorporated private practices that exist within Australia, and which the Government must rely on to provide placements for psychology students and interns, it would be politic to include reference to these workplaces.



8. Section 7.2.2: Extended leave

This section states: *“If a provisional psychologist needs to take a break from supervision longer than eight weeks, they are able to discontinue the internship and apply for recognition of prior supervised practice when commencing a new internship at a later time”*.

The IPPP suggests that breaks of up to 12 weeks (or possibly longer) should be allowed without an intern having to discontinue their internship and then having to submit to a bureaucratic process of applying for recognition of *prior supervised practice*. If an intern was ill, had a baby (the paid Parental Leave period is 18 weeks), or took an overseas holiday, anything up to a 12 week period would be reasonable and the intern should be able to return to their intern program without penalty.

The IPPP also raises the question as to whether there are established Guidelines as to the conditions under which *recognition of prior supervised practice* is granted. Section 7.7 states that such recognition is discretionary. The IPPP strongly recommends that the Board develop clear criteria for when recognition of prior supervised practice may be recognised and publishes the criteria on the Board website for transparency.

9. Section 7.5: offsite supervisory arrangements

In the realities of modern, mobile workplaces, different supervision arrangements need to be considered. For example, this section is silent on the situation where an intern is working offsite but has immediate access to his or her supervisor via telephone. Would this be considered adequate oversight by the supervisor, if direct, in-person supervision also occurred at other times?

10. Section 7.12.1: Complaints about the supervisor

The IPPP recommends that this section should be rewritten to demonstrate more balance between the obligations of the supervisor and the intern. For example, the supervisor also has a right to cease the supervisory relationship if a grievance cannot be satisfactorily resolved. The supervisor’s obligation to report an intern to the Board in certain circumstances is mentioned almost in passing, whilst the overall tenor of the section seems to focus on the rights of the dissatisfied intern. These Guidelines should be impartial to the supervisor and the intern.

In addition, the IPPP suggests that the paragraph pertaining to when the Board receives a complaint about a supervisor needs further refinement. It is suggested that the Guidelines should be rewritten to state: *“If the Board receives a complaint about a supervisor, the Board will undertake appropriate investigation, following which it may decide: ...”* (Text underlined by IPPP to show suggested inclusion).

11. Derivation of Core Competencies and consistency with other standards

The IPPP suggests that the PsyBA Guidelines for the 5+1 internship program should refer in some way to the National Standards for Mental Health Services (2010, <http://www.health.gov.au/internet/main/publishing.nsf/content/mental-pubs-n-servst10>) and the associated implementation guidelines (refer to the Mental Health Standing Committee website: <http://www.health.gov.au/mhsc>). The Australian Health Ministers' Conference endorsed these standards in September 2010.

The Foreword of the Standards document describes the Standards and their purpose, including as follows:

- *“The Standards have been developed to be applied across the broad range of mental health services.”*
- *“It is anticipated that the Standards will be incorporated into the relevant service accreditation programs.”*
- *“Demonstration of the delivery of services against these standards ensures that consumers, carers and the community can be confident of what to expect from mental health services.”*

These Standards appear to be most consistent with the PsyBA's overall mission to “protect the public and guide the profession” (<http://www.psychologyboard.gov.au/>) and yet there appears to be no linkage at all between them and the Core Competencies, which are specified as being “*common to all areas of psychology practice appropriate to a psychologist preparing for entry-level general registration*” (Consultation Paper 19, p.3.). The lack of harmonisation is confusing and requires redress.

In addition, the supporting documentation for the National Practice Standards explains how the Standards were derived and subsequently endorsed by the Australian Health Ministers' Conference. Their creation appears to have followed a robust process, including consultation with populations from ATSI, CALD and alcohol/tobacco/other drug use areas. There is transparency in how the standards were derived and there is a history of development and progressive refinement made readily available to the mental health professions and the public. In contrast, the Draft Guidelines for the 5+1 Internship Program stipulate competencies but make no reference to their derivation. As the body assessing fitness to practice, the PsyBA should provide justification for how it came up with the set of competencies it uses and have a review mechanism in place.





The IPPP trusts that the content of this submission will receive due consideration by the Psychology Board of Australia. We would also be pleased to have an audience with the Board to discuss the detail of this correspondence, should this be deemed useful.

Yours sincerely

Denise Keenan, PhD

President, IPPP

For and on behalf of the Executive Committee and membership

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