

## **Submission to the Senate Inquiry into the administration of health practitioner registration by the AHPRA**

Written by Carolyn Rolls

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Related to term of reference (a) 'capacity and capability of AHPRA to implement and administer the national registration of health practitioners'

This submission will draw attention to the viewpoint of the Australian College of Psychologists on such matters as stated in (a).

### **Background.**

The Australian College of Psychologists is an independent professional association. It was founded (as the Australian College of Clinical Psychologists) in Canberra in 1980 and endorsed as an association on the 27<sup>th</sup> of July 1987. It was set up to promote the professional development of its members and therefore the provision of high quality psychological services to the public. Since its foundation Branches of the ACCP have started in Melbourne, Sydney, Brisbane, the Gold Coast and the Riverina.

From its inception the ACCP has had rigorous requirements for membership including 35 hours per year of professional education and an annual case presentation to College members.

When the Mental Health Initiative 2006/2007 was being planned the then ACCP (as well as several other psychologist associations) made representations to the relevant authorities to encourage an inclusive approach to decision making processes. Unfortunately it appears that the decision was made to take the simplest path of assuming that the largest association spoke for all psychologists, and to install the Australian Psychological Society as gatekeeper in deciding which psychologists had the right to be called Clinical psychologists under what became the *Better Access Initiative*.

This iniquitous decision (privileging one association over others) and associated processes (authorizing that one association to be the gatekeeper for all psychologists) has since been adopted by the Psychology Registration Board where it is used to decide on psychologists' eligibility for endorsement. This is a huge, unjustified and unnecessary extension of a 'two tier' system (i.e generalists and clinical psychologists) that was set up with relevance only to Medicare item numbers. It now impacts on all psychologists, including those who have never worked in private practice.

## **Impacts on the members of ACCP**

The Australian College of Psychologists wishes to remind the committee that when the Psychology Board of Australia was established, it was seen that the Board would regulate the Medicare providers in psychology. Recently the Board has notified psychologists that it has relegated the task of monitoring the professional development required by Medicare (a national government body) to a professional organisation (the Australian Psychological Society, APS) which represents only two-thirds of the total number of psychologists in Australia.

This decision implies the following:

- 1) That the Psychology Board of Australia does not have the capacity to administer all of its responsibilities
- 2) That the Psychology Board of Australia shows favour to one professional organisation (APS) when in reality it is responsible for all psychologists
- 3) That the Psychology Board has off-loaded at least one of its responsibilities to an organisation that has not shown fairness to non-members. For example when this same professional organisation (APS) was given another task (mentioned in 'background' to vet endorsement applications), then not one member of the then ACCP who applied was granted clinical endorsement (although credentials were of superior quality in several cases.) Given this history, non-members of the professional organisation (APS) do not trust that this latest task of monitoring professional development will be open and fair.

The Australian College of Psychologists would like to see an end to these discriminatory practices. The Psychology Board of Australia has been given responsibility by government authority, thus those tasks that they cannot manage should be given to appropriate government bodies to manage such as the regional Boards. Professional associations should not be gatekeepers when they are not representative of the whole.

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