

The Secretary
Senate Community Affairs Committee
PO Box 6100
Parliament House
Canberra ACT 2600



4th August, 2011

CONFIDENTIAL

Submission to:

Senate Inquiry into [Commonwealth Funding and Administration of Mental Health Services](#).

On behalf of Caraniche Pty Ltd

Caraniche is a private psychology company based in Melbourne. Caraniche has been in operation for over 18 years and is owned by three registered psychologists; Alexina Baldini, Alina Jonas and Jacinta Pollard. Caraniche employs over 50 permanent staff, of which 35 are registered or provisionally registered psychologists. All our staff receive weekly clinical supervision, and through our Clinical and Workplace services division, our senior psychologists provide external supervision to many registered psychologists. Caraniche also operates a graduate clinic which provides supervised practicums to approximately 12 provisionally registered higher degree psychology students, and supervises around 3 provisional psychologists to full registration each year.

These perspectives are presented below in relation to the specific terms of reference of the inquiry, namely (e): (i) and (ii).

Committee Terms of Reference

(e):(i) mental health workforce issues, including: the two-tiered Medicare rebate system for psychologists

All higher degree qualified psychologists undergo a 6 year program of full-time study (or part time equivalent) and supervision. Throughout this 6 year period, under the previous state-based registration schemes, every candidate had to demonstrate their “clinical” knowledge and competence, through curriculum-based learning and field placement, to gain registration, irrespective of the field of specialisation undertaken. Implicit in the two-tiered Medicare rebate system for psychologists is the suggestion that candidates

who chose the “Clinical” area of specialisation chose a superior higher degree warranting a higher level of rebate for services. This is not borne out in research or practice, as stated in the 2011 Better Access Evaluation Report, by Melbourne University, comparing Medicare services offered by generalist and clinical psychologists.

Clinical psychology is what all psychologists do in a clinical setting, employing their evidence-based learning and understanding of theories and concepts from the discipline of psychology to solve problems in a clinical setting. All psychologists, by virtue of their education, training and experience, irrespective of their field of specialisation, possess the clinical skills which distinguish our profession.

Caraniche has for many years supervised post-graduate students (Provisional psychologists) on placement at our organisation. These students are drawn from many Victorian Universities, and many fields of study. The experience of our organisation is that the highest performing students do not come from a particular field of specialisation, or for that matter, a particular university, they are those who possess a depth of understanding of the principles of psychology and approaches to treatment which, applied well, effect the greatest positive change in clients. This, in combination with an openness to new learning and feedback during placement, sets them apart. Clinical Psychology Master or Doctoral students do not demonstrate superior skills than the Counselling or Forensic students doing their 6 month placement with Caraniche. The two-tier Medicare system devalues the skill and qualification of non-Clinical Psychologists, and denies their clients access to funded longer-term, more intensive treatment options.

(e):(ii) mental health workforce issues, including: workforce qualifications and training of psychologists

Caraniche supervises 12 post-graduate students per year on placement at our organisation. This supervision is not funded, and relies upon the mutual benefit of our organisation utilising the skills of an unpaid workforce, whilst the universities benefit from professional, experienced oversight of their students in practice. AHPRA have implemented new supervision requirements such that placement students now require the equivalent of **1 hour of formal supervision per day** of placement per student. This is a significant increase from the previous **1 hour of supervision per week** of placement. This change was implemented without consultation as to its feasibility and risks undermining the critical role of supervised practicum in psychologists’ training. Universities are already struggling to find appropriately qualified psychologists willing to take on the responsibility of providing placement and the new supervision requirements are forcing organisations such as Caraniche to reconsider the viability of offering supervised placements.

It would appear that in order to expedite the establishment of a national psychology board, AHPRA worked closely with the Australian Psychology Society (APS) to establish processes, codes and guidelines. Whilst this is understandable, it is not necessarily appropriate. All registered psychologists are eligible for membership of the APS, but

many choose not to pursue this option. Under the new national registration scheme, APS college members were given automatic endorsement, where this privilege was not extended to members of any other psychology organisation.

The APS is a professional association that represents the interests of its members. It is not a registering body or a government agency, hence it is not neutral in its position. That a government agency would simply adopt the position of a professional society without consultation to the broader professionally registered group is the equivalent of replacing Vicroads with the RACV, and rendering all “other insured” road users disqualified. Unfortunately, this has led to significant divisions within the profession that are potentially very damaging in the long term.

We also have significant concerns about the recording of registration status on the AHPRA register. Currently, a fully registered and highly skilled psychologist without specialist endorsement is listed on the register as UNENDORSED. In the mind of the public this equates to being unregistered or deficient. We have already had longstanding clients who have checked the AHPRA register express concern that their psychologist is “unendorsed” as it is assumed this means they are not highly skilled. This has created significant distress, confusion, and anxiety for some of our clients and creates inaccurate and unreasonable impressions about the skills of fully registered and qualified practitioners.

Thank you for the opportunity to make this submission.

Yours faithfully,

Alina Jonas

Chair of the Board,
Graduate Clinic Manager
Caraniche P/L
On behalf of the Caraniche Board of Directors