A submission in response to the Consultation Paper, August 2014, for the Review of the National Registration and Accreditation Scheme for health professions by the Directors of Organisational Psychology Training Programs in Australia.

We are writing on behalf of the staff and students of the Australian organisational psychology training programs.

By way of background, organisational psychology is one of the largest areas of professional practice within psychology, and is a rapidly growing area. Organisational psychologists work to improve the effectiveness and well-being of organisations and their people. For example, organisational psychologists develop recruitment and selection, training and development, and performance management systems for organisations, and work to improve organisational culture and morale. As such, the practice of organisational psychology has significant economic and social benefit for the community as a whole.

The eight training programs that we represent produce approximately 120 Masters and Doctoral graduates a year, who are eligible for registration as psychologists and to subsequently obtain an area of practice endorsement in organisational psychology. The standard Masters Program requires 1000 hours of practical placements, classroom skills acquisition and completion of a research project. There is strong demand within the business community for graduates of organisational psychology training programs, and our graduates are highly sought after.

The particular issue that we would like to comment on is #20: To what extent are National Boards and Accrediting Authorities meeting the statutory objectives and guiding principles of the National Law, particularly with respect to facilitating access to services, the development of a flexible, responsive and sustainable health workforce, and innovation in education and service delivery?

We are concerned that recent changes to placement supervision requirements for higher degree students introduced by the PsyBA are having a negative workforce impact within our area of specialisation, and are adversely affecting the quality of education that universities can provide. The PsyBA recently introduced a requirement for supervisors of higher degree students to be Board-approved. The requirements include the following:

- The supervisor must have held general registration as a psychologist for at least three years before beginning supervision;
- The supervisor must have held endorsement in the approved area of practice for at least two years before beginning supervision and continue to be endorsed throughout the period of supervision; and
- The supervisor must have successfully completed a Board-approved training program in psychology supervision.

To obtain an area of practice endorsement, a Masters graduate needs to enrol in a Board-approved registrar training program, and undergo two years (FTE) of
additional supervision, with a Board-approved supervisor who is endorsed to practice in the same area of practice as the registrar program.

The introduction of these changes, without any empirical evidence to justify the need for such changes, has had a negative impact on the availability of supervisors for organisational psychology training programs in psychology across the country. The staff managing placements for our professional training programs are finding it increasingly difficult to find supervisors who meet Board requirements, which makes it impossible for the universities to exercise adequate quality control. Indeed, some universities have been forced to cut enrolments due to the loss of supervisors. This is occurring despite a dramatic increase in demand for professional training in organisational psychology, which means that there is a growing imbalance between demand and supply.

In order to quantify the impact that these changes are having and to model their likely future effect, our universities are conducting surveys of their program alumni. Three hundred and sixty two alumni from five universities have responded to date (approx 50% response rate). As can be seen in Figure 1, below, only 18% of graduates from accredited organisational psychology training programs have become endorsed. Only 10% have gone on to become Board-approved higher degree supervisors with an area of practice endorsement, and only 5% are actively supervising. These figures suggest that the rate at which graduates are becoming endorsed and obtaining Board-approved supervision status is not sufficient to support the number of students that need to be trained, or to account for attrition as supervisors leave the workforce. This is a significant workforce capacity constraint.

![Figure 1: Proportion of graduates having progressed past each regulatory hurdle (error bars represent +/- 1 standard error; n=362).](image-url)
Qualitative comments provided by respondents regarding the regulatory changes introduced by the PsyBA were revealing. The comments were almost universally negative. Respondents argued that the regulatory changes are restricting the growth of the profession, clinically focused, out of step with the needs of practitioners, onerous and bureaucratic. Many of our most experienced practitioners report that they can no longer afford to supervise, because the burden is unrealistic.

The results suggest that, for the majority of graduates, the benefits of obtaining endorsement and becoming a supervisor are outweighed by the costs and burden. Respondents clearly believe that the level of red tape is excessive, and out of proportion to the level of risk to the public that is associated with the practice of organisational psychology.

Representative examples of comments are below:

“The arbitrary application of standards developed for clinical health practitioners onto all registered psychologists is detrimental to the profession of organisational psychology as it places a burden of cost and onerous requirements on people wishing to be a part of the profession while not offering any greater value for that cost and effort. There is a disconnect between the regulatory requirements and industry needs and the practitioner is caught in the middle - to their own detriment.”

“The regulations are dysfunctionally restrictive. The regulations have and will continue to reduce the pool of people eligible to supervise (to an astronomical degree), which raises grave concerns regarding provision of supervision to students, and flow-on effects for the viability of masters programs and the profession at large in Australia. There are a number of people who would be excellent supervisors (e.g., people in academic positions, not to mention all the registered practitioners who don’t have the time/funds to meet the restrictive eligibility requirements) who would be willing to provide supervision under different regulations. Our current and prospective students are thus missing out on un-tapped potential to learn from leaders in the field, which will reduce the number of people who decide to enter our profession as well as limit the students’ own potential. There is a highly dysfunctional mismatch between the regulations on the one hand, and the realities that are faced by students, teachers/academics and practitioners.”

“I understand the need for a consistent quality benchmark to be applied to the profession. At the moment however after 25 years in the field and as a board approved supervisor I despair of the AHPRA run adminstrivia [sic]. It adds nothing, is confusing, does not provide or ensure clear high standard or consistency, and is very disorganised and provides contradictory information. Let the unis take on the process and the consistency and quality will improve vastly.”

It is our view that the PsyBA is not taking adequate account of the negative impacts that regulatory changes are having, particularly with respect to the development of a flexible, responsive and sustainable workforce. If organisational psychology is to remain an endorsed area of practice under the National Scheme, then the PsyBA needs to be more responsive to the workforce impacts of regulatory changes, and needs to engage in a constructive dialogue with the universities in order to eliminate capacity constraints and remove barriers to innovation.

More generally, we believe that the PsyBA is encroaching upon functions that are the responsibilities of the universities and the accreditation agency (APAC). For example, the PsyBA is introducing a requirement for graduates of accredited
postgraduate training programs to sit a National Examination to become registered. This move has been vigorously opposed by the universities, because it is the role of the education provider to assess the competence of students graduating from their programs, not the Board. Similarly, it is not the role of the Board to dictate to universities who they can and cannot use to supervise their students. We believe that it is important to clarify the responsibilities of the Boards, and ensure that they do not encroach on functions that are best delegated to education providers and accreditation agencies.

We sincerely hope that the review of the National Registration and Accreditation Scheme results in a reduction of the regulatory burden that is restricting the development of our profession, and imposing unnecessary costs on both the industry and education providers.

Regards,
Professor Andrew Neal, The University of Queensland
Associate Professor Barbara Griffin, Macquarie University
Dr Graeme Ditchburn, Murdoch University
Dr Joanne Earl, The University of New South Wales
Dr Kathryn Von Treuer, Deakin University
Associate Professor Liz Jones, Griffith University
Professor Marylene Gagne, The University of Western Australia