

24 February 2022

Ms Nicole Lynch
Executive Director Strategy and Policy
Mental Health and Wellbeing Division
Department of Health Victoria

By email: Nicole.lynch@health.vic.gov.au

Dear Ms Lynch

Victoria's Mental Health and Wellbeing Workforce Strategy – VPA Feedback

I am writing on behalf of the Victorian Psychologists Association Inc (**VPA**) and to share feedback from members in response to the *Mental Health and Wellbeing Workforce Strategy 2021-2024 (the Strategy Paper)* that was released by the Department in December 2021.

By way of background, the VPA is the Union that represents psychologists employed in public mental health in Victoria and is a component association of the Health Services Union Victoria No 4 Branch.

VPA consultation with the Department

Following the release of the Final Report of the Royal Commission into Victoria's Mental Health System, the VPA has invested resources to engage with the Department in consultation towards the development of the Strategy Paper and other consultation processes the Department has facilitated.

Moreover, the VPA has continued to engage with the Department along with other senior psychologists on the finalisation of a Psychology Discipline Paper.

It is disheartening that notwithstanding this consultation, that there are substantial errors in the Strategy Paper and significant oversights in relation to psychology. These concerns are outlined below.

Concerns 1 – Errors in the Strategy Paper

The Strategy Paper aims to set out a coordinated and strategic approach to deliver the diverse, skilled and multidisciplinary workforce required for Victoria's reformed mental health and wellbeing system. From our perspective, it is not meeting this aim. There are significant confusions included in the document that go beyond errors in the use of terminology.

Concerningly, this appears to extend to newspaper articles being the unattributed source for incorrect comments on psychology training pathways, and other issues which we would view as significant gaps in research.

For example, on page 24 of the Strategy Paper the statement is made that:

*Mental health and wellbeing services need the capacity to support mandatory rotations in psychiatry training, and more senior psychologists are needed to fulfil the training requirements of **probationary psychologists**.*

The correct term is 'provisionally registered psychologists' not 'probationary psychologists'. Psychologists who successfully complete a Masters' or Doctorate in an area of practice are eligible for *general registration* as a psychologist with AHPRA/Psychology Board of Australia once they have successfully completed their higher degree.

To become endorsed in an area of practice, they must then undertake the *Psychology Registrar* program, which involves professional supervision by a Psychology Board of Australia approved supervisor, whilst employed as a generally registered psychologist.

Concern 2 – No additional funding/EFT for Senior Psychologists

Generally speaking, there is no need for more senior psychologists to fulfill the training requirements of *provisionally registered psychologists* (referred to in the Strategy Paper as ‘probationary psychologists’).

There is absolutely a need for additional senior psychologists who are PBA approved supervisors in public mental health to supervise *Registrars*. More senior psychologists are crucial to the expansion of the Psychology Registrar program. This is something which the VPA has raised with the Department in consultation.

There is also a need for senior psychologists who are classified Grade 4 and above, to support new entitlements negotiated by the union in bargaining. It is anticipated that many Grade 2 psychologists will take advantage of a new progression clause, and progress from Grade 2 to Grade 3 in 2022 and 2023 once the Enterprise Agreement is finalised. This will place demand on senior psychologists for clinical supervision. There is concern in health services about available resources to meet this demand.

This is something the VPA raised during consultation with the Department. It is notable that the Department has not invested in the expansion of additional senior psychology positions in health services to support the training of new registrar positions or Grade 3 psychologists.

Concern 3 – Psychology Registrar program

We note that there is no reference to the expansion of the Psychology Registrar program in the overview of key priorities and actions for building workforce supply on page 54 in relation to growing graduate and post-qualifying pathways for psychologists. We feel that this is an important oversight.

Concern 4 – ‘Training hurdle’ does not represent a concern of the VPA

On page 24 there is a reference to ‘training hurdles’ for psychology students. Specifically:

*For allied health graduates – including psychology and social work students – high training hurdles impact on entry and completion, including the requirement for social work students to undertake 1,000 hours of unpaid placements, and significant supervision requirements for psychology. **Removing these barriers, in collaboration with the Commonwealth Government, is a priority.** (p24)*

This is not a position supported by the VPA and is not something that the VPA raised during consultation with the Department.

Clinical supervision of students on clinical placements is not a barrier; it is part of ensuring competence and to protect the public in the delivery of psychological services. It is required by AHPRA/PBA not the Commonwealth.

The VPA was never consulted on the proposition that watering down the supervision requirements for psychology students on clinical placements or psychologists undertaking Registrar programs would be a priority for the Victorian Government.

There also seems to be confusion regarding training pathways for clinical psychologists (on page 30). There is a conflation between the pathway to general registration between those undertaking a higher degree and area of practice who then go on to complete the Registrar program, and those who complete a fourth or fifth year of study and are required to undertake supervised practice in order to become generally registered.

This second cohort is not eligible to undertake the Registrar program to gain an area of practice endorsement.

It appears that the source for the assertions about psychology training on page 30 come directly from a newspaper article published on 4 December 2021– without attribution or quotation – and without

considering that the article is about psychologists in private practice in NSW, not mental health services.¹

CSP should be increased – For Clinical, Forensic and Neuropsychology

We agree with the suggestion on page 31 that Commonwealth Supported Places for postgraduate psychology courses should be increased; with the caveat that these should be in clinical psychology, forensic psychology and neuropsychology postgraduate courses.

The number of postgraduate places in forensic psychology and neuropsychology in Victoria have reduced dramatically over recent years, due to higher demand for the more profitable post graduate masters' courses in clinical psychology. There is a looming shortage of neuropsychologists in Victoria, which has implications for the effective diagnosis and treatment of people presenting to public mental health services.

However, we do not see as workable or practical the suggestion on page 31 that parallel university coursework/registrar pathways be run, or that there be a 'consolidated two-year intensive postgraduate (qualifying) training model. These notions were never discussed with the Workforce Technical Advisory Group.

Concern 5 – Incorrect information regarding overseas qualifications and the APS

On page 31 and page 51 reference is made to the registration of overseas trained psychologists:

Registration of psychologists: currently, only Registered Psychologists trained in New Zealand can apply for registration. Psychologists from other countries with comparable training standards are required to undertake additional probation and high-cost supervision to qualify. This is a disincentive for overseas trained professionals to practice in Australia. The Victorian Government will advocate to the Australian Psychological Society to recognise registration for psychologists registered for practice in the United Kingdom, the United States, Ireland, and Canada, and to review of eligibility for other countries. (p32/33) ...the Australian Psychological Society to recognise registration of psychologists registered for practice in the United Kingdom, the United States, Ireland, and Canada, and undertake a review of eligibility for other countries (page 31)

AHPRA/Psychology Board of Australia (PBA) is the body that recognises overseas qualifications of psychologists, not the Australian Psychological Society. The Australian Psychological Society (APS) is the professional association of psychologists, just as the Victorian Psychologists Association Inc (VPA) is the Union.

Secondly, it is not correct to say that only psychologists with NZ registration *can apply* for registration with the Psychology Board of Australia.

Overseas applicants with qualifications from other countries, and who are not able to apply for registration in Australia under the *Trans-Tasman Mutual Recognition Act*, can apply for provisional registration. They are not required to undertake 'additional probation'.

These applicants are required to apply for, and gain, registration with the Psychology Board of Australia as a provisional psychologist, undertake supervised practice, and then pass the Psychology Board of Australia's psychology examination in order to become generally registered with the AHPRA/Psychology Board of Australia. This is to ensure competency and to protect the public.

In our view automatic registration of psychologists who trained in countries other than New Zealand without the requirement to undertake supervised practice whilst employed as a provisionally registered psychologist and to pass the national psychology examination would not be in the public interest.

In the words of the PBA:

The Psychology Board of Australia is committed to protecting the public by ensuring that only practitioners who are suitably trained and qualified to practice in a competent and

¹ <https://www.smh.com.au/politics/federal/universities-lose-money-on-psychology-degrees-as-waitlists-languish-20211203-p59ei0.html>

ethical manner are registered. Supervisors help to achieve this commitment by assessing competence in those seeking general registration or area of practice endorsement.²

Concern 6 – Supply of psychologists and outsourcing of psychology services

Overall, it feels that addressing issues around the supply of clinical and other endorsed psychologists in mental health services appears to be an addendum in the Strategy Paper.

On page 16 of the Strategy Paper, the Department has identified that there are approximately 11,387 registered psychologists in Victoria by headcount. On page 17, it is published that only 745 psychologists are employed in public mental health by headcount. The EFT is significantly lower.

Throughout this consultation process, a number of concerns were raised by the VPA, chief among them, that psychologists were opting for private practice over public health employment. It is concerning, that the Strategy Paper has no strategy to address the concerns raised, or at increasing the EFT of psychologists in public mental health services. Instead, it seems that the Department accepts that psychology services will increasingly be accessed privately at the cost of the community.

The VPA is particularly concerned that the Department has not set out a strategy how to increase the workforce of psychologists in public mental health services by mapping needs and allocating any additional funding/EFT to grow services as it has for other professions. Without additional funding for new positions, our members are concerned that health services will struggle to meet demand.

The VPA is committed to working proactively with the Department to improve this situation.

Concern 7 – No voice for psychology within the Department

The VPA is concerned to ensure that the interests of Psychologists employed in public mental health is genuinely represented so that Victorians can continue to access high quality mental health services. It is clear to us, that not having a Chief Psychologist which the Department can call upon to obtain expert advice about psychology during this critical reform period, is something which is impacting this process.

This position could be via secondment of a senior psychologist from a mental health service, or by permanent appointment. While these consultation processes are ongoing, we feel strongly it is important that knowledge is readily available to the Department about psychology; which is a critical part of the mental health workforce. Feedback from members, is that they feel psychology is consistently underrepresented and overlooked by the Department. It is our hope that this can change moving forward.

Concern 8 – Workplace entitlements

Finally, we draw your attention to the discussion on page 44 of pay and working conditions to attract, retain and support the mental health workforce.

The discussion focuses on the *Public Mental Health Services Enterprise Agreement 2000-2004* (the Mental Health Agreement). Reflecting on the comments immediately above, the Mental Health Agreement *does not* cover psychologists working in public mental health. Psychologist's terms and conditions of employment are covered by the *Victorian Health Sector (Medical Scientists, Pharmacists and Psychologists) Single Interest Enterprise Agreement 2017-2021*. And the employment framework for psychologists is not identical.

The Health Services Union Victoria Branch 4 and the VPA negotiated significant improvements in the terms and conditions applying to psychologists under the 2017-2021 Agreement which were agreed in a MOU in December 2021.

Among other entitlements, an increase of 85 psychology Registrar positions each year and the introduction of psychology clinical educators was negotiated, including two psychology clinical educator positions at the Centre for Mental Health Learning.

² <https://www.psychologyboard.gov.au/Registration/Supervision.aspx>

A new classification of Director of Psychology was also agreed on, as well as enhancements to career paths and career progression, and improvements in access to professional development leave, supervisor training and clinical supervision. Psychologists were already entitled to 5 weeks annual leave under this Agreement.

The same improvements in long service leave and paid parental leave as apply in the Mental Health agreement will apply to this Agreement.

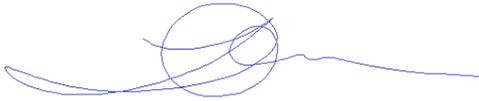
It is important that the Department acknowledges and understands the differences in employment conditions for psychologists from other segments of the mental health workforce.

Invitation to meet

We would like to meet with you to discuss the issues outlined in this letter and the opportunity regarding Concern 7. Please let us know when you are available.

I look forward to meeting you.

Regards

A handwritten signature in blue ink, consisting of a series of loops and a long horizontal stroke extending to the right.

Lisa Alcock
Secretary
Victorian Psychologists Association Inc