

9 June 2023

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Mr Jason McDonald
First Assistant Secretary
Regulatory Reform Division
Australian Government Department of Finance

Submitted via: HealthRegReview@finance.gov.au

Dear Mr McDonald

APS Response to the Independent Review of Overseas Health Practitioner Settings – Interim Report

Thank you for inviting the Australian Psychological Society (APS) to make a submission to the review of regulatory settings for overseas health practitioners to provide feedback on:

- the prioritisation of recommendations in the Interim Report; and
- what reform options are missing from the Interim Report.

The Interim Report identifies immediate actions that governments and regulators can take to alleviate shortages in the health workforce and ensure all Australians can access timely and appropriate health care. These actions focus on improving the applicant experience, expanding fast-track pathways, collecting better workforce data, increasing regulatory flexibility, and enhancing regulator performance and regulatory system stewardship.

- **Prioritisation of recommendations in the Interim Report:**

1. Enable applicants to ‘tell us once’ in one place.

The APS would be pleased to collaborate with the Psychology Board of Australia to streamline the registration and assessment process for overseas psychologists.

2. Fast track more cohorts from countries with similar regulatory systems;
3. Better recognise experience and skills to attract more experienced practitioners;
4. Align English language standards with the UK and NZ;
5. Collect and publish better workforce data;
6. Enable employers to recruit faster in areas of greatest need; and
7. Allow senior clinicians to obtain permanent residency.

- **Reform options missing from the Interim Report.**

As the assessing authority for psychologists wishing to migrate or study in Australia, we assess overseas psychology qualifications against institutional quality recommendations set out by Country Education Profiles and the Australian Psychology Accreditation Council (APAC) standards. Given the assessment complexity every application is assessed on a case-by-case basis relying on supporting evidence and an extensive precedents database.

There are many varied pathways to becoming a practicing psychologist both within Australia and overseas. This presents additional challenges in assessing the qualifications and work-experience of these applicants for several reasons:

- Psychology is not a regulated profession in most countries.
- Qualifications required to be a registered psychologist in some countries are less compared to Australia.
- The accredited 4th year for Australian psychologists requires graduates to meet a specific set of competencies in applied psychology skills and knowledge in addition to a research component in order to prepare graduates for provisional registration and working directly with the public in their 5th and 6th year.
- The accredited 5th and 6th year in psychology involves coursework, research, and practical experience supervised by registered psychologists at the master's level. In many countries professional training which results in students being eligible to register as a psychologist is only offered at the doctoral level which means many overseas master's degrees in psychology are not comparable to the APAC accredited 5th and 6th year.

For these reasons many applicants are not successful in obtaining a positive skills assessment as they do not meet requirements needed to enter the workforce as a registered psychologist. However, a majority of unsuccessful applicants do go on to apply for further study in Australia and later obtain registration this way.

Those applicants who are successful in obtaining a positive skills assessment (which means their qualifications compares to 6 years of accredited study in psychology) must then undergo a period of provisional registration where they are required to independently obtain a supervisor, a suitable work role and then complete the national psychology exam. This presents challenges as there may be very experienced psychologists who are unable to fill high-level positions due to their provisional registration status. Further to this, psychologists cannot obtain a Medicare provider number until they achieve general registration which presents challenges to securing employment in a private practice setting.

The APS proposes that applicants from certain countries who have completed a comparable qualification overseas should be granted general registration with a period of compulsory supervision. This would allow psychologists to work within government and non-government organisations at various levels. Specifically, countries where psychology is a regulated profession and qualifications are accredited by the relevant peak bodies and most institutions are classed as Section 1 and content is delivered in English include:

- South Africa
- United States
- United Kingdom
- New Zealand

Applicants who completed their 6-year program in English in the above countries are already exempt from taking the English language proficiently test. Most professional doctorates in psychology which lead to registration as a psychologist in the above countries aligns with the APAC standards resulting in professionally qualified and work-ready psychologists. We propose that an initial roll-out of this solution could be offered to psychologists who have completed doctoral level qualifications as stage 1 to manage the assessment risk, complexity, and anticipated influx of applications. This could be opened to master's level qualifications for these countries in stage 2. Additional countries could be added in stage 3, and this could be revised as needed. This solution will allow highly skilled and experienced psychologists to be fast-tracked while managing the level of potential risk to the public.

The APS and the Psychology Board of Australia could work together to minimise the double up and share the workload in assessing these applications, for various purposes. This would enable these fast-tracked migrants to obtain both their registration and positive skills assessment required to apply for a visa. We imagine this could work in a number of different ways. For example, the APS could triage all applications and then transfer them to Ahpra to complete the registration assessment. Once these applicants have obtained general registration, they will be eligible for skilled migration and can be referred back to the APS who, with appropriate funding, would be able to provide support and advice in navigating the landscape of the profession in Australia.

For example, migrating psychologists require support, ongoing mentoring and information about continuing professional developments (CPD) requirements. As such the APS could provide additional assistance for incoming psychologists to help them understand Medicare compliance, cultural competency, employment requirements, and ongoing best practice

Psychologists with doctorates in psychology should be fast-tracked. This will help attract highly qualified, experienced and work-ready psychologists to our profession. Essentially psychologists who have completed a doctorate and two years of supervised work experience should be eligible for endorsement, aligned with Australian standards.

The APS is supportive of ongoing collaboration and co-development of appropriate strategies to ensure optimal outcomes for applicants undergoing overseas assessments. We endorse ongoing communication between the APS, the Psychology Board of Australia and other relevant government agencies regarding this important issue.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Zena Burgess', with a small comma at the end.

Dr Zena Burgess FAPS FAICD
Chief Executive Officer