

APS submission - Review of regulatory settings relating to health practitioner registration and qualification recognition for overseas health professionals and international health students

Question 1

The Review is considering recommendations to ease skills shortages in registered health professions including medicine, nursing, midwifery, psychology, pharmacy, occupational therapy, and paramedicine on the basis of current and projected labour market shortages.

- a. Do you agree there are current and/or projected skills shortages in these professions?
- b. If yes, is there any data or evidence you can provide to demonstrate these shortages?

The Australian Psychological Society (APS) strongly agrees that there are current and projected skills and workforce shortages in psychology. As of 31 December 2022, there were 35,588 registered psychologists across Australia with an additional 7,531 provisional psychologists.¹ However, these figures may overestimate the capacity of the psychology workforce:

- Firstly, rates of part-time work are very high in the psychology workforce. Labour Market Insights data indicate that just over half (51%) of psychologists are working in a full-time capacity.² This is likely to be influenced by the high proportion of women in the psychology workforce (80% of all registered psychologists)¹; and
- Secondly, registered psychologists may be engaged in roles which involve aspects of psychological practice other than clinical contact (e.g., direct client therapy).

In 2020-21, only 27% of psychologists were working 35 or more clinical hours per week. The vast majority (73%) worked fewer than 35 clinical hours per week, with most (40%) working between 20-34 hours clinically and 28% working between 1-19 clinical hours per week.³ AIHW data show that the clinical full-time equivalent (FTE) number of psychologists in 2020 was less than two-thirds (64%) of the total number of registered psychologists at the time.⁴

The APS has repeatedly called for the Government to take measures to address the significant geographical variation in the psychology workforce across Australia, including the provision of support or incentives for psychologists (including the provisional workforce) to train or work in a regional or rural setting. In the absence of such action, we unfortunately see a pronounced shortage of psychologists in regional and remote parts of Australia as shown in Table 1.⁴

Table 1: Clinical FTE of psychologists by remoteness area, 2020.

Remoteness Area	Clinical FTE	Clinical FTE per 100,000 population
Major Cities	16,502.2	95.9
Inner regional	2,630.2	59.9
Outer regional	842.4	40.3
Remote	97.1	31.6
Very remote	45.3	23.5

A background paper by ACIL Allen in August 2021 in relation to the mental health workforce in Australia, however, found that the shortage of the psychology workforce extends to all regions of Australia. Using the National Mental Health Service Planning Framework (NMHSPF) workforce targets, ACIL Allen’s analysis found that psychologists had the largest workforce shortfall compared with other mental health professions, with the current estimate supply of psychologists reaching only 35% of the NMHSPF target. A shortage was observed across all parts of Australia, with deficits more pronounced in rural locations.⁵

This critical shortage of psychologists across Australia is compounded by an increasing demand for psychological services. This burden on the health care system has only been amplified by the pandemic. The number of patients seeking Medicare-subsidised mental health services from psychologists continues to grow, with an average annual change of approximately 4 per cent from 2016-17 to 2020-21.⁶ A survey of APS members conducted in February 2022 found that 88% reported an increased demand for their services compared with before the COVID-19 pandemic.⁷ Half of psychologists reported that their waiting lists have become worse over this time, particularly for psychologists in regional areas. One in three (33%) psychologists reported being unable to take new clients, up from 1 in 5 (22%) in June 2021. These results point to the increasing pressure on psychologists – and their clients – which are underpinned by a critical shortage in the psychology workforce in Australia.

Question 2

What, in your view, are the key strengths and weaknesses of the current regulatory settings relating to health practitioner registration and qualification recognition for overseas-trained health practitioners?

As the main assessing authority for psychology, the APS has spent 25 years establishing a high-quality credible database founded on international precedence, previous assessments, and internal expertise. Our Assessments team have an in-depth understanding of the challenges faced by skilled migrants, and the psychology workforce more broadly.

As it stands psychologists migrating from overseas must engage with three independent bodies to have their applications assessed. These are:

- The Australian Psychological Society (APS)
- The Psychology Board of Australia (PsyBA)
- The Department of Home Affairs

Further to this, the PsyBA and the APS assess against the standards set by the Australian Psychology Accreditation Council (APAC). Skilled migrants find it challenging to navigate these independent processes and there is an opportunity to improve their end-to-end experience.

Each of these bodies plays a distinct and integral role within the profession of psychology, all sharing the same objective: ensuring that incoming psychologists are highly trained, competent, and ready to fortify the Australian mental health workforce. We propose that regular collaboration and consultation between the assessing authority, the national board, and the higher education accreditation council will assist in increasing transparency and consistency of assessment approaches and ensure that the qualifications assessment process for psychologists is streamlined and consistent.

The APS receives a high volume of enquiries from prospective migrants who require assistance in explaining and interpreting the range processes that take place both before and after successful migration. At present there is no centralised, tailored support for prospective and successful migrants to navigate the following:

- Applying for a skills assessment
- Applying for general registration
- Completing a transitional program
 - Finding a supervisor
 - Finding a suitable work role
 - Completing the National Psychology Exam
- Applying for Area of Practice Endorsement
- Understanding the role of psychologists in Australia

There is an opportunity to collaboratively develop a consolidated resource for prospective psychologists to house and present this information in one centralised place. We would anticipate that this resource would not only assist in clarifying the migration process for psychologists, but also reduce the number of duplicate/repeated enquiries each organisation receives, thus freeing up valuable time and capacity to process assessments. Additionally, the APS could partner with various government departments, to assist in providing solutions to the unique work force challenges faced by psychologist, in, and migrating to Australia.

As psychologists, we can all acknowledge that the process of migration to a foreign country and starting work in an under-resourced and in-demand profession, represents an immense upheaval for migrants. Improving our approach, starting with welcoming and transparent communication and support, will make all the difference to our incoming workforce.

Question 4

The end-to-end process for overseas health practitioners seeking to work in Australia can be complex, time- consuming and costly. **Current regulatory requirements may set unduly restrictive barriers**, which in turn may deter potential practitioners from seeking to work in Australia.

1. Do you agree with this premise? If so, why?
2. What practical changes could be made to current regulatory settings to most significantly improve the end-to-end process:
 - a. over the next 12 months
 - b. in the medium- to longer-term?

- The registration process is not a barrier, however, support to meet the PsyBA's requirements in the *transitional program* could be improved.
- Prospective migrants have reported that they find it challenging to arrange their transitional program from overseas.
- There is limited transparency regarding what conditions overseas psychologists need to meet in order to claim an exemption from completing the transitional program.
- In most cases psychologists cannot obtain provisional registration until their transitional program is approved, however, they also require provisional registration to obtain a suitable work role and visa.

- An accelerated pathway to obtaining endorsement is required for psychologists who have a demonstrated work history in a suitable role i.e., clinical endorsement for psychologists working in psychiatric hospitals overseas.
- There are limited suitable work roles for overseas psychologists seeking to work in Australia as many Australian psychologists work in private practice which is heavily reliant on Medicare funding. Medicare subsidised sessions can only be claimed from psychologists with general registration not provisional registration, making provisional psychologists less desirable candidates for employment. (This situation has improved somewhat with NDIS funding now including provisional psychologists, however, not all overseas psychologists seeking work in Australia are experienced in working with disability.) In addition, other employers, including public service, have limited roles for provisional psychologists. As it stands, we are expecting highly trained and experienced overseas psychologists to return to intern status as a provisional psychologists for three months or longer depending on their circumstances when they immigrate to Australia.
- Proposed solution: The APS recommends that the transitional program is completed under general registration (not provisional registration) with compulsory supervision and continuing professional development so that the clients of overseas psychologists completing the program are eligible for Medicare rebates. This would mean that overseas psychologists become eligible for migration as soon as they have secured appropriate employment and supervision, as they will have (conditional) general registration. In addition, they are far more likely to secure work and supervision with general registration than provisional registration.

References

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