



The Australian College of Psychologists

Response to the Psychology Board of Australia

Re: Consultation paper on guidelines for the National Psychology Examination

Issued April 2011

Response due date: 13th May 2011

'Attention: Chair, Psychology Board of Australia' at chair@psychologyboard.gov.au

Written on behalf of the Australian College of Psychologists (formerly Australian College of Clinical Psychologists)

(Organisation formed 1980; purpose – to maintain the standards of the profession; to support psychologists working in the clinical field and to protect the public from malpractice).

Some historical facts:

The Australian College of Clinical Psychologists was established in July 1980 (now 30 years old). All members at that time (during their training) had hospital experience in psychiatric wards (hence 'clinical' which means 'at the bedside'). The College was registered in July 1987. The Australian Psychological Society (APS) approached us about using the title 'clinical' for one of their Colleges. Following legal advice we agreed that they could use the term 'clinical' for one of their Colleges which is only one of many in their private organisation. This was prior to legislation for the registration of psychologists.

Since the registration of psychologists is legislated in all States and Territories, the name of the Australian College of Clinical Psychologists has been changed following legal advice as the term "clinical psychologist" has been adopted under legislation to mean those psychologists who have been endorsed. Endorsement Applications are approved by the APS.

The Australian College of Psychologists continues to support the psychologist in clinical practice and maintain the standards of the practice of psychology.

Considering guidelines on the National Examination:

Comments on the National Law and the National Examination

See attachment A of the guidelines:

From quoted sections of the Law, there is no mention anywhere that a national exam is a necessary part for registration. The decision to hold an exam seems to have been made entirely by the Psychology Board of Australia.(PBA) It was noted that in 2007 at the National Council of Registration Boards that NZ abstained from instigating a process for developing options for a national exam. The APS seems to be the only professional organisation that has been part of the process. Although the background states that ' all key stakeholders at the time were consulted".

The resulting arguments for the instigation of a national examination do not follow a logical process.

Argument 1 for examining all registrants: the PBA argue that “registration of a psychologist requires 6 years of training but at present there are multiple pathways to achieve that training”. Yet they have chosen only those registrants who have not completed a masters or doctorate pathway to undertake the exam. If the argument is that the National Examination will provide “a mechanism for the measurement of a minimum level of applied professional knowledge” then why doesn't the PBA require all applicants for registration to sit the exam? This process would then assure the PBA so that there is a common standard of knowledge.

Argument 2 against the proposed exam only for the 4+2 pathway: The 4 domains on which the exam will be based seem to cover the material that those applicants doing the 4+2 pathway will have already had assessed before they complete their course. This implies that the PBA do not trust the professional supervision given to the students in the 4+2 course. . Given that the Board has approved of the supervisors then the Board is not trusting that the supervisors are competent to implement the internship program. . Should not the PBA respect the ability of supervisors to be able to assess the provisional psychologists' attainment of the necessary competencies without further examinations?

Argument 3 for evidence based practises by the PBA: The PBA have not quoted any research that supports their argument that exams will enhance the standard of practice. American registration systems do use an exam registration system. Has there been any research done by the PBA to ascertain whether that system has had fewer complaints (proportionally) from the public than the PBA and previous Boards have experienced? What is the need for more complex applications when there is no evidence that an exam will enhance either the protection of the public or the skills of the practitioner?

Argument 4 for exams only to registrants from overseas: The ACP approves the guidelines for an examination for those applicants who have been trained overseas. The domains provide a good basis of knowledge that Australian based applicants study in their Australian courses

Recommendation:

The ACP does not approve of giving exams to only pathway 2 applicants. If the PBA proposes to continue with exams then ALL applicants should undertake the exam.

However based on lack of evidence for the benefits of instigating an exam then the ACP suggests that only those applicants coming from overseas be given an exam as part of their application

The Australian College of Psychologists looks forward to feedback

Signed: Carolyn Rolls

(National President,)

Date: 13.05.2011