



20 January 2012

Professor Brin Grenyer
Chair, Psychology Board of Australia
PO Box 16085
Collins Street West
Melbourne VIC 8007

Dear Professor Grenyer

Re: *Response to Consultation Paper 13: National Psychology Examination Curriculum*

Key points

The Institute of Private Practising Psychologists (IPPP) does not support the introduction of a National Psychology Examination, at this time.

- The IPPP has elaborated reasons for this opinion and made clear and practical recommendations for action that should be undertaken prior to the introduction of such an examination, principal among them being that consistent minimum professional standards of all entry level general registration psychologists have not yet been elaborated by the Psychology Board of Australia.
- Discussion about a curriculum for a National Psychology Examination is inappropriate before such standards have been identified.
- There already exist more cost-effective mechanisms to allow the Psychology Board of Australia to ensure consistent professional standards of those individuals who are seeking to attain general registration via the internship pathway.
- The Psychology Board of Australia should avoid creating further perceived discrimination between those seeking to attain general registration via the internship pathway and those doing so via 6 years of academic study. Multiple pathways are currently enshrined in legislation as a legitimate means to registration, and with particular reference to the internship pathway, the profession, by dint of the fact that many still choose this route to registration, clearly deems having a range of pathways important.

Rationale for deferment and recommendations

The National Psychology Examination is, in effect, making fundamental changes to what it means to be an entry level psychologist. Prior to making any comment on the proposed curriculum and the examination itself, it is important to acknowledge that such change is occurring and that the change is being driven by the actions of the Psychology Board of Australia.



The profession of psychology is, regrettably, in chaos and disunity. The introduction of the national board for psychology sited under the Australian Health Practitioner Regulation Agency (AHPRA), which is governed by the Health Practitioner Regulation National Law Act 2009, created as many problems as it solved for the profession. The key point being that psychology is what may be termed a 'broad church', and that while the majority of registered psychologists may work in health type activities, a significant number do not. Further, many work only in a subset of health activities, meeting their ethical responsibilities to work within their capabilities (according to training, supervision and experience) and according to their occupational and professional interests. However, since the advent of AHPRA and the increasing regulation of the profession by the Psychology Board of Australia, with its mission to "*protect the public and guide the profession*", psychologists have steadily and increasingly been 'guided' into a box labelled Clinical Psychology.

The IPPP accepts and indeed applauds the mission of protecting the public but we strongly reject what in effect is the purging of the profession of its important non-clinical elements, as we do also reject the robust push of many fine psychology practitioners to move outside of their areas of well-developed clinical expertise¹ to meet the demands of having to be clinicians across every aspect of clinical psychology, including working with individuals across the life span.

The general registration standard does ***not*** specify that the study, internship, or other approved pathways that lead to general registration, must be within a particular sphere of the possible scope of practice within the psychology profession. To this end, appropriately, a range of accredited Master's degrees are accepted by the Psychology Board of Australia, some of them with a minimal focus on subjects pertinent to the development of clinical psychology skills and knowledge. However, the introduction of the National Psychology Examination, with its predominant focus on matters clinical, in effect, is about to change the scope of the profession. It will do so using an 'in addition' clause under the general registration standard:

"(e) In addition to the completion of an approved qualification the Board may require the passing of an examination prior to accepting an application for general registration"
www.psychologyboard.gov.au?registration?general.aspx.

Leaving aside our significant qualms regarding the changes being made to this profession, the fact that all psychologists are now registered under a Health Act suggests that individuals who seek to enter the profession from now on may need to adjust their expectations about the training, and standards they will be expected to meet, irrespective of whether they wish to work as mental health clinicians or not. The reason put forward by the Psychology Board of Australia for having a National Psychology Examination, that it will "*ensure a consistent professional standard of psychologists nationally*" (p. 2, *Consultation Paper 13*) adds support for the contention that the profession is now being slanted towards a more unified base, rather than the present diversity that exists. Further, the Psychology Board of Australia made its position clear in Consultation Paper 9 having cited that all psychologists should have adequate knowledge and expertise to undertake work in some capacity in areas associated with mental health, given the nature of the work that psychologists have been shown to undertake (*The Australian Psychology Workforce 1: A National Profile of Psychologists in Practice. Australian Psychologist, 45, 154-167*) and their eligibility to provide mental health services.

"A psychologist who has obtained general registration is eligible to provide mental health services. The Board views these services as basic to many other areas of application of psychological knowledge and has the obligation to ensure that such services are delivered by psychologists who have demonstrated their competence. ... The Board's view is that that

¹ Many psychologists work with clinical problems but within confined parameters, for example, those who work within occupational health scenarios (including Employee Assistance Programs) or those who choose to work only with adults. The mental health workforce needs these skilled practitioners.



competence in the major most prevalent work types undertaken by psychologists should be carefully and thoroughly examined” (p.14).

So, where does this leave us? The IPPP concludes that the profession of psychology is at a point in its development where there needs to be acknowledgement that, due to legislation, the profession now irrefutably has as its base a health perspective and that this shapes what is required of an entrant-level general registrant psychologist. Further, we accept the Psychology Board of Australia has a mandate to protect the public and to guide the profession within the parameters of the legislation by which it owes its existence, and we support it in doing so. The IPPP also points to a critical underpinning of the psychology profession, that being there is no restriction on area of practice. *“General registration as a psychologist enables an individual to work in any area of psychology that is within their scope of competence”* (www.psychologyboard.gov.au?registration?general.aspx). The ethics related to non-restricted practice is enshrined in the profession’s Code of Ethics, wherein psychologists are exhorted to *“working within the limits of their education, training, supervised experience and appropriate professional experience”* (p. 18. *The Australian Psychological Society Ltd, Code of Ethics*). The IPPP holds the opinion that if the profession wishes to keep the status quo with regard to having no restriction on practice that the profession must concede and comply with the consistent professional standards the Board sets for all entry level general registration psychologists regarding their competence to offer health-related services.

However, the IPPP also suggests that the Board does not own the mandate to shape the profession outside of these parameters and that it should be the profession itself; individual practitioners, the many professional associations, academic institutions and relevant others, along with contribution from the Board that should take charge of our future. This future should include the diversity within the scope of practice that exists currently.

Returning to the issue of the curriculum for the proposed National Psychology Examination and to the very introduction of this examination, it is the IPPP’s strong opinion that (1) the Psychology Board must justify the curriculum on the basis of its legislated brief, and (2) the curriculum must be dominated by a health focus. Any attempt to expand the curriculum in deference to the various broader knowledge and skill bases of the profession is likely to be, at best, a token effort and more probably, likely to present candidates for entry level general registration with an unreasonable task in preparing for it.

The introduction of the National Psychology Examination should be delayed

Based on the rationale set out above that underpins our thinking, we urge most strongly that the introduction of the National Psychology Examination should be delayed until the following essential activities occur:

1. The Psychology Board of Australia must make an explicit statement about what it considers to be the consistent minimum professional standards of all entry level general registration psychologists. Such standards are referred to in both Board consultation papers relating to the National Psychology Examination, however nowhere are such standards elaborated, other than what may be deduced or implied from the proposed curriculum of the examination.
 - *“The examination will contribute one source of evidence to the Board that an applicant meets the **minimum standard expected by the public of a generally registered entry-level psychologist**”* (p. 13, *Consultation Paper 9*).



- “The national psychology examination is a mechanism for measurement of a **minimum level of applied professional knowledge of psychology**, regardless of the various training backgrounds” (p. 13, Consultation Paper 9).
- “The National Psychology Examination will support applications for general registration and **ensure a consistent professional standard** of psychologists nationally” (p. 2, Consultation Paper 13).

Again we reiterate that these professional standards should only relate to those areas of health practice that the Board has an unequivocal mandate to regulate.

Until this occurs, discussion about curriculum for a National Psychology Examination, indeed even having such an examination, is akin to putting the ‘cart before the horse’. The domains to be examined and the content of each domain must surely be dictated by such standards.

2. The Psychology Board of Australia must conduct consultation with APAC, training institutions and the various organisations representing psychologists to consider changes to the curriculum of the 4 years training for psychologists. We note that the Board concedes the first 4 years of training provides “*the foundation knowledge*” for psychologists (p. 12, Consultation Paper 9). The IPPP supports the Psychology Board of Australia in its endeavour to ensure all psychologists receive basic training in certain topics and we suggest it may therefore be more appropriate for a National Psychology Examination to be introduced after the 4th year of training, rather than the 6th. If the National Psychology Examination was held after year 4, then the 5th and 6th years of training could still meet the aim of building applied professional skills that the Psychology Board of Australia acknowledges is what now occurs.
 - “The Australian examination ... tests **applied general psychology practice as studied and developed in the 5th and 6th years**” (p. 14, Consultation Paper 9).
 - “The **5th and 6th years of training, during which professional practice skills of psychologists are required**” (p. 12, Consultation Paper 9).

These professional practice skills could then continue to be within whatever area of the profession the individual chooses, as occurs at present. This would allow the profession to maintain the diversity of practice that is its strength, while still permitting the Psychology Board of Australia to regulate and monitor standards for the profession in relation to granting all psychologists a legal qualification to provide a range of counselling and mental health services to vulnerable individuals.

3. If it is determined that the National Psychology Examination must be conducted following the 6th year of training, then consultation should occur with the aim to develop short (1 term duration, similar to what occurs within Master’s programs), practical skills-based courses for individuals seeking entry-level registration that addresses the professional standards the Psychology Board of Australia is yet to outline. For example, there could be a course on working within the Medicare or workers compensation systems. (It is likely that the regulating bodies pertinent to these areas would be supportive of such training.) These courses should be readily accessible with the aim to capture a large number of psychologists, as opposed to a situation where individuals cannot gain entry to courses due to restricted numbers, excessive fees, or the hours or mode of delivery excluding those who need to earn an income while studying.

These courses should be suitable for graduates who:

- (a) Wish to attain only entry level knowledge and expertise within these realms of practice, and have intention to go on and study and work in a non-health setting (e.g., some forms of organisational psychology).



- (b) Seek registration through an internship and whose 4 year degree may not have covered all topics seen as meeting the essential criteria of the professional standards as yet to be elaborated by the Psychology Board of Australia for entrant level psychologists.

It is also suggested that these courses would be suitable for psychologists already registered, who wish to upgrade/update their skills in particular areas of practice.

- 4. Consultation should also occur regarding the range of courses available for the 5th and 6th years of training to ensure workforce needs are met, the Psychology Board of Australia's concerns are addressed, and the professional interests of students are accommodated. Put simply, we need to move outside of existing paradigms of thought about the nature of accredited training being offered. For example, the introduction of hybrid master's degrees, perhaps combining organisational and clinical training should be offered.

Further comments and recommendations

- 1. The exemption from the proposed National Psychology Examination of graduates of accredited Masters, Doctorate or combined Masters/PhD programs applying for general registration until a review is conducted in 2016, while not also exempting those who are currently completing their training to achieve general registration via approved internship, is inequitable and unreasonable.

The Psychology Board of Australia has advised that *"this exemption is based on the Board's view that the internal examination and assessment processes within accredited degree programs currently meet the Board's standards for general registration"* (p.2, Consultation Paper 13).

The IPPP asserts that few, if any of the current accredited Masters programs, would cover all of the topics listed in the proposed curriculum, even at a superficial level, let alone to the point where the development of *"application of that knowledge to real-world psychological problems"* (p. 13, Consultation Paper 9) could be claimed, albeit at an entry level to the profession. Discussion with current Clinical Master's graduates confirms this opinion. (This is further reason for delaying the introduction of the National Psychology Examination, so that the current accredited university based 5th and 6th year study programs can have the opportunity to make modifications to their curricula to allow their students to sit the examination.)

Unfortunately, by granting the current exemption, the Psychology Board of Australia appears to demonstrate a bias towards academic training as opposed to the internship path leading to the achievement of general registration. This should not be countenanced. The internship pathway is a legally accepted qualification leading to general registration and as such, individuals training via this method should not be subject to discrimination or differential treatment. If the internship is unacceptable, remove it as a pathway to registration, or if not, accord those who train via this method equitable treatment.

- 2. The IPPP observes that the attention of the Psychology Board of Australia is on the internship pathway to registration. We propose that there are existing mechanisms to ensure consistency of standards within internships that are acceptable to the Psychology Board of Australia and which may be implemented in the interim period of consultation and planning, prior to the eventual introduction of the National Psychology Examination.

Indeed, there is solid argument that these mechanisms supplant the need to introduce a National Psychology Examination at any future time.



The National Psychology Examination is a simplistic, academic and reactive solution to the issue of ensuring consistency of standards for psychology interns. Ironically, it also overlooks an existing solution that lies within academia. There is already in existence mechanisms to evaluate the Practicum units within accredited Master's degrees that meet the Board's standards for general registration. These mechanisms could be applied effectively to evaluating the internship period of training and are far more likely to evaluate whether the intern has developed the required "*applied general psychology practice*" (p. 14, *Consultation Paper 9*) than will a single multiple choice examination. These evaluation mechanisms can be applied throughout the duration of the internship and hence will have rigour, depth, breadth and be more realistic in the assessment of whether a candidate is ready to hold general registration.

Given that the Psychology Board of Australia is currently seeking to regulate the training of supervisors, this is a timely recommendation and is also a far more economical means of achieving a better practical outcome, as the costs associated with a National Psychology Examination will be extensive and on-going.



The IPPP trusts that the content of this submission will receive due consideration by the Psychology Board of Australia. We would also be pleased to have an audience with the Board to discuss the detail of this correspondence, should this be deemed useful.

Yours sincerely

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President, IPPP

For and on behalf of the Executive Committee and membership

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