Professor Brin Grenyer,  
Chair, Psychology Board of Australia.

Dear Professor Grenyer,  
Re: Psychology Board Examination Consultation

Thank you for the opportunity to respond to the Psychology Board of Australia’s Consultation Paper No 9, Guidelines for the National Psychology Examination.

The School of Psychology at the University of Sydney currently offers the Doctor of Clinical Psychology programme, which holds full accreditation by the Australian Psychology Accreditation Council (ACAP). On the basis of our substantive experience in providing training in clinical psychology practice, and our experience with the ACAP accreditation process, we propose an exemption from the examination for all provisionally registered psychologists who complete the higher degree pathway for full registration.

In support of this proposal we offer the following arguments:

1. Universities who offer accredited post-graduate programmes in clinical psychology formally assess individual students on knowledge and skills as a continuous and ongoing process, across multiple domains and using multiple methods. Universities have their own quality assurance procedures for ensuring that the assessment of students meets rigorous standards. Universities in Australia are subject to review by the Australian Universities Quality Agency, which is the principal national quality assurance agency in higher education with the responsibility of providing public assurance of the quality of Australia’s universities and other institutions of higher education, and assisting in enhancing the academic quality of these institutions.

2. The accreditation of post-graduate professional programmes in Australia is a robust process that meets international accreditation standards. APAC is a member of the Forum of Australian Health Professions Councils, as well as the International Network of Quality Assurance Agencies in Higher Education (INQAAHE).

3. Performance on an examination will potentially be used by universities to market their courses. It will be unfortunate if the examination becomes the driver for the content of training (particularly for those professional programmes wanting to increase applications), with an over-focus on teaching to pass the examination rather than the range of graduate competencies that should be taught on
professional programmes. Given that the exam aims to test applicants for general registration, it is likely that the exam process would be below the standard set by the universities who offer accredited programmes in endorsed areas of psychology practice, and therefore would represent a lower standard than is currently in place.

4. It has been argued that the examination process for the entry into clinical psychology practice in the United States of America is a good analogy for the Australian system. However, in the US, there are multiple jurisdictions, multiple standards of licensure, and variable routes to PhD programmes (i.e., only 50% of PhD professional psychology graduates have any psychology in their undergraduate programme).

We therefore strongly argue that students who complete accredited post-graduate professional programs in Australia should be exempt from the National Psychology Examination. Students complete these higher degrees at considerable cost to themselves, and often their family. The impost of a further examination process will present an additional and unnecessary burden.

Yours sincerely,

Caroline Hunt,
On behalf of the School of Psychology,
The University of Sydney.