I would like to provide feedback on the above registration standard.

I am in a unique position as I completed a 4+2 around 15 years ago but later completed a postgraduate degree, so I have experienced both pathways. As the Board is proposing two significant changes, I will address each in sequence.

Proposal to make the higher degree exemption from sitting the National Psychology Exam (NPE) permanent

I strongly disagree with the Board's proposal to allow psychologists registering via the higher degree pathway be exempt from sitting the NPE permanent. The public should be guaranteed that those who are registered as psychologists have a good general knowledge of psychology. To protect the public and the professional reputation of our profession, all psychologists should be able to demonstrate a good understanding of the many and varied areas of psychology.

The Australian Psychology Accreditation Council oversees which postgraduate courses are accredited, however the guidelines are very broad and don’t guarantee that a wide range of psychological topics are covered in each program. I would encourage the decision-makers to review a number of postgraduate psychology programs to see for themselves how focused some courses actually are. For example, most organisational psychology postgraduate programs focus on recruitment, organizational well-being/development and coaching, but cover very little in terms of diagnosis, psychological testing, treatment and counselling. Similarly, most clinical psychology postgraduate programs focus on diagnosis and treatment, but scarcely cover disability and in particular Autism Spectrum Disorders (a rapidly growing area of psychology). These clinical programs also focus heavily on CBT, whilst other treatments are briefly (if at all) covered.

At present, there is little to stop graduates from organisational psychology programs (apart from the Code of Ethics) working in clinical practice settings for which they have received little training. Similarly, a clinical psychology graduate could commence employment in a role specifically assessing and diagnosing children with ASD, despite only completing one or two lectures (4 hours) on the topic. This situation poses an increased risk to the public if the NPE is not applied consistently across all registration pathways and higher degree programs.
According to the PsyBA website:

*The purpose of the exam is to ensure that a minimum level of applied professional knowledge of psychology is obtained by all applicants for general registration regardless of which of the various pathways to general registration has been undertaken by the applicant. The aim is to better protect the public by ensuring a consistent professional standard of applied knowledge and competence of psychologists nationally (PsyBA, 2018).*

The NPE ensures that despite variability in the content of psychology postgraduate programs all registered psychologists are able to meet a similar standard of applied and theoretical knowledge that is fundamental to the profession. While I understand that there is continuing debate around the content of the exam, if the NPE is to achieve its intended purpose it must be applied consistently across all pathways to registration.

If we liken ‘registration to become a psychologist’ to the process of gaining a senior certificate for schooling in Australia: each state has their own process but all involve an independent examination process that all school students applying for senior certification must complete. This gives assurance that each student has achieved a certain level of skill and knowledge. Would we trust secondary schools to impartially administer and mark these exams and assessments without bias, given for example the financial benefits of schools achieving good results to attract more students? We need to ask ourselves the same about postgraduate psychology courses and whether students across all institutions are being graded to the same level and standard (without bias or influence)? There have also been concerns raised recently about university’s passing students (particularly international students) who have not achieved the required academic standard. This has been shown to be influenced by the financial incentives or enrolling and passing international students. Similar incentives apply for passing students in postgraduate programs who will continue paying high course fees to the university.

If the majority of the profession works in clinical practice, I believe that content relevant to this type of work should be covered in all registration pathways and higher degree programs as stipulated by the professional competencies in the APAC (2019) Accreditation Standards for Psychology Programs.

The NPE would ensure this consistent standard is applied, reduce the variability of content knowledge within higher degree programs, and would better protect the public in accessing psychological services.

If the NPE exemption is permanently extended to the higher degree pathway, the central purpose of the exam will be entirely redundant. The Board will not be able to guarantee a minimum level of applied professional knowledge of psychology, and it will have failed in its duty to protect the public by ensuring a consistent professional standard of applied knowledge and competence of psychologists nationally.
Proposal to separate the guidelines into two documents

I support the Boards proposal to separate the guidelines into two documents, one policy document (a revised guideline) and one operational document (a new manual for candidates enrolled to sit the exam) as detailed.

Thank you for taking the time to consider this submission.

Sincerely

Karen Donnelly
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Reference


