

Response from the Department of Psychology, Macquarie University to

Consultation paper 25: Consultation on ending the higher degree exemption from sitting the National Psychology Examination

2 October 2015

In brief we submit that:

- 1) the timing of the consultation paper and the review is difficult given soon to be released revision of APAC standards and the consideration of specialist titles, and**
- 2) the consultation paper does not meet the COAG Principles for Best Practice Regulation in that it has not provided an adequate assessment of the costs of the proposal are reasonable in relation to the benefits to be achieved.**

The following material details our submission

1. The timing of the consultation paper in relation to revised APAC standards

We are concerned that a major revision of the Australian Psychology Accreditation Council standards for accreditation is due in the near future. As the Board is aware this revision is wide reaching and will very likely place greater emphasis on competencies. It is likely that changes to the higher education pathway as a result of changes to the accreditation standards will have a major impact on the quality of those completing the higher education pathway to registration. We recommend that the Board consider delaying the consideration of the NPE in the higher education pathway at least until the impact of the changes in accreditation standards are assessed

2. Assessment of the costs of the proposal and benefits to be achieved

The Board is required to consider the COAG Principles for Best Practice Regulation. In particular principle D *Whether the overall costs of the proposal to members of the public and/or registrants and/or governments are reasonable in relation to the benefits to be achieved.*

The proposed benefit of the NPE for the higher degree pathway

While the Consultation paper has asserted the benefit of the NPE in protecting the public there is no argument made or evidence presented in the paper that the NPE will provide additional benefit in protecting the public over the comprehensive assessments undertaken in the higher degree pathway. Below we assert that the NPE cannot provide additional information to protect the public because it is a brief single mode assessment task conducted on a single occasion compared to the breadth, frequency, and duration of assessment within the higher degree pathway. In addition, the NPE does not have the same arduous quality assurance processes as assessment in the higher degree pathway.

The consultation paper asserts that the NPE will offer additional information for protecting the public over and above that obtained from assessment processes in the higher degree pathway. But no evidence for this is provided in the consultation paper. We submit that when the number, breadth, and duration of different assessment tasks conducted over the course of the higher degree pathway is taken into account it is very unlikely that the NPE will offer additional information over and above that already obtained.

The consultation paper lists the use of licensing exams in North America as evidence in support of requiring the NPE for the higher degree pathway. The North American higher education sector is considerably more diverse and has different quality assurance processes so that mere fact that US states require exams does not in itself provide evidence that the NPE would provide the additional protection to the public that the consultation paper asserts. Other jurisdictions such as the UK with more similar higher education sectors to our own do not require an exam.

The processes for the quality assurance of the NPE are less rigorous than required for the assessments within the higher degree pathway. We thank our colleagues who are members of the NPE Committee of the Psychology Board of Australia for their work to ensure the quality of the NPE. By co-opting senior academic psychologists with experience in the teaching and evaluation of psychology training to the NPE committee the board has set up an internal quality assurance process for the NPE that has many similarities to the quality assurance processes within psychology departments in Australia. Qualifications subsumed within the higher degree pathway and their component assessments are also subject to university and external quality assurance processes. University review processes undertaken at levels above psychology departments ensure equity, diversity and quality of assessment against standards across disciplines. Higher degree providers are also subject to the Tertiary Education Quality and Standards Agency (TEQSA) assessing the standards in the Australian Qualifications Framework. In addition the board is well aware that all higher degree pathway providers are required to achieve accreditation from the Australian Psychology Accreditation Council (APAC). We submit that if the NPE is expected to provide additional information to the assessments conducted within the higher degree pathway it should also be subject to multiple external levels of review by agencies such as TEQSA and APAC.

The consultation paper says that *Whilst accreditation assures quality of programs, it is constrained in its ability to regulate or oversee individuals within those programs*. We argue that this does not adequately consider that there are a number of standards (APAC and AQF) that relate to the selection and assessment of individuals within those programs and thus accreditation and quality assurance processes do ensure the quality of individuals. In particular we draw the board's attention to standards that relate to the selection of individuals for the higher degree pathway including their academic qualifications and a mandatory interview for suitability. Our point here is that The NPE cannot reasonably be expected to provide additional information about competency over and above the more numerous, more diverse and more extensive assessment conducted in the higher degree pathway.

The case for the need for additional protections for the public

The consultation paper shows rates of complaint and de-registration against professions that AHPRA regulates. These are clearly of concern yet the consultation paper makes no case for how the NPE will reduce these concerns. We recommend the board undertake a more comprehensive review of the psychologists who have been the subject of complaints or de-registration. The relevant state bodies investigating the detail of those individual complaints are in the best position to indicate how to prevent the specific problems. In addition profiling may be appropriate. From what we understand male gender, solo practice, and senior experienced practitioners undertaking care of more complex cases

represent some known risks. It is not clear how the NPE, a three hour exam, will reduce these risks.

The costs of the NPE in the higher degree pathway

The consultation paper asserts that the costs of requiring the NPE within the higher degree pathway will be small. The direct monetary cost of the NPE is clear. We are concerned with indirect costs that may be associated with the NPE. Our experience as teachers of postgraduate psychology over the past 20 years has been that as further costs and administrative burdens are placed on the psychology profession the diversity of the profession decreases. Fewer students from socioeconomically and culturally diverse backgrounds have been able to study postgraduate psychology over the past 20 years. In addition we see no additional benefit for the NPE.

Fairness and Equity of the NPE

The consultation paper says *The Board believes that it is particularly inequitable to have some Australian-trained provisional psychologists required to demonstrate competence through sitting the exam and others who do not. A single national standard met by all applicants is the fairest and most consistent approach.* We agree that requiring all provisional psychologists to pass the NPE before registration is consistent. Fairness and equity, however, require more than simple consistency. Compared to provisional psychologists in the 4+2 and 5+1 pathways those in the higher degree pathway complete a larger number of more diverse assessments befitting their higher academic qualifications. On that basis we argue it would be unfair and inequitable for them to be required to complete the NPE.

3. Conclusion

We recommend that the status quo remain regarding the National Psychology Exam and the higher degree pathway to registration as a psychologist.

If the board decides to implement the NPE we recommend a trial period of two years in which the NPE could be expected to have reduced the rate and seriousness of complaints and the rate of de-registration in order to demonstrate the benefits of requiring the NPE for the higher degree pathway.

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