



20 October 2015

Professor Brin Grenyer, Chair
Psychology Board of Australia

Dear Professor Grenyer

Response to Consultation Paper 25: Public consultation on ending the higher degree exemption from sitting the National Psychology Exam

Please find a response from Curtin University's higher degree programs in Counselling Psychology and Clinical Psychology regarding the Psychology Board of Australia (the Board) Consultation Paper 25: Consultation on ending the higher degree exemption from sitting the National Psychology Exam.

The Board has proposed two options with regard to the exemption of higher degree students: Option one is to continue with the higher degree exemption for a further three years. Option two is to end the exemption for higher degree students from sitting the National Psychology Exam. The Board has outlined that the preferred option is option two, with effect from 1st July, 2017.

We disagree with the Board's proposal of option two as the preferred course of action. We would suggest that option one is more suitable (higher degree exemption from sitting the National Psychology Exam for another three years). Furthermore, the Board has failed to consider an additional option, which would involve removing the requirement for post-graduate students to sit the exam entirely. We believe that this option should be considered.

While we believe it is vital that the psychology profession should have minimum standards and processes in place to protect the public and the profession, we do not believe that the National Psychology Exam for higher degree students is an equitable way to demonstrate competence and minimum standards. In many ways, the training, research, assessment and supervised practice that higher degree students engage in during their Master's/PhD/Doctorate training all assess competence, ensure minimum standards and protect the public. We have outlined a general response, as well as a response specific to some of the points in the consultation paper below:

Higher degree students are carefully selected for suitability at the application and interview stage for post-graduate Counselling Psychology and Clinical Psychology programs. Their experience and training is taken into account, and only those with relevant skills and knowledge will be accepted onto post-graduate programs. They are taught and evaluated by academic staff and field supervisors (throughout the minimum two years on the program). The academic staff teaching on higher degree programs are highly qualified and have clinical, teaching and research experience. In addition to a minimum of two years in postgraduate training, students complete a registrar program, which consists of further supervised practice.

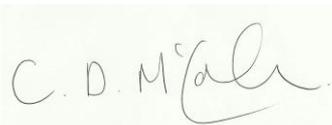
Point 25: Each university program ensures consistent professional standards for psychologists. Post-graduate programs in Counselling and Clinical Psychology contain units and assessments on ethical knowledge and behaviour and the integration of knowledge and skills. Further to this, post-graduate students conduct research in applied areas. These academic units are delivered and assessed by numerous highly experienced psychologists. In addition to this, all programs contain a placement element where students will be assessed within supervised practice by a number of different external and internal Board-approved supervisors during their training.

Point 29: All post-graduate programs are assessed at the accrediting stage by the Australian Psychology Accreditation Council (APAC), and are only given accreditation if they meet the required standards. APAC's mission, as described on the APAC website, is to "protect the public by conducting accreditation activities that ensure graduates of accredited programs receive a high quality education and are well equipped to employ their psychological knowledge and skills in the community. This includes, where relevant, being sufficiently qualified and competent to meet the registration requirements of the Psychology Board of Australia". This would suggest that there is a minimum standard that all accredited post-graduate programs will meet. Therefore, the exam is duplicating this process, at a cost to the student.

Point 37: Students training on higher degree programs are assessed by numerous qualified and experienced psychologists. We believe the assessors are more likely to pick up on areas where competence is lacking and identify supportive opportunities that will help the student to work on those areas. It is likely that experienced psychologists assessing the students are better able to gauge competence than an online exam. It is also possible that a student could pass an exam yet still not be competent and appropriately qualified for general registration. We believe that this is made less likely through a rigorous higher degree program.

We understand that the purpose of the National Psychology Exam is to ensure a consistent professional standard for psychologists nationally, and to guarantee an appropriate level of applied knowledge and competence, and ultimately protect the public. However, we wish to highlight the fact that this is already achieved through extensive program accreditation requirements, assessment methods and supervised practice in higher degree programs. We believe that higher degree students should remain exempt from sitting the National Psychology Exam.

Yours sincerely

A handwritten signature in black ink on a light green background. The signature reads "C. D. McCabe" in a cursive style.

Dr. Catriona Davis-McCabe
Senior Lecturer in Counselling Psychology

On behalf of the academic staff of the Master of Psychology programs (Counselling and Clinical) at Curtin University.