



Frans Verstraten
Head of School & Professor
McCaughey Chair of Psychology
Faculty of Science
School of Psychology

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TO
PSYCHOLOGY BOARD OF AUSTRALIA
A/O PROFESSOR BRIN GRENYER,
CHAIR, PSYCHOLOGY BOARD OF AUSTRALIA.

RE: Consultation on ending the higher degree exemption from sitting the National Psychology Examination.

Dear Professor Grenyer,

The School of Psychology, University of Sydney appreciates the opportunity to respond to the Board's proposal to end the higher degree exemption from sitting the National Psychology Examination. While we acknowledge that it is the Board's responsibility to ensure that all psychologists meet an appropriate standard of practice, the School of Psychology believes that one appropriate mechanism for ensuring standards is the completion of accredited postgraduate training in clinical psychology. If the Board has legitimate concerns about the regulation and accreditation process, then it would seem that tightening up the accreditation process would be a preferable alternative to having postgraduate qualified psychologists complete a national examination in addition to the substantial examination processes that they have already completed in order to qualify for the award of their degree. Postgraduate students in clinical psychology already typically carry a financial burden from completing their training, and the requirement to complete the national examination will add substantially to their burden, despite the fact that they have already completed the highest level of training that is nationally available as a clinical psychologist. **Hence, The School of Psychology at the University of Sydney strongly supports Option One, to maintain the status quo and continue the exemption of higher degree qualified psychologists from sitting the national examination.**

The School of Psychology believes that there are a number of reasons that the status quo should be supported:

1. All clinical psychology-training programs undergo extensive accreditation processes, and are required to provide specific content and assessment of that content in order to pass accreditation. This is very different to those who qualify without postgraduate training, where programs of study and assessments of competency are less consistent. If the Board is concerned about diversity in program outcomes for postgraduate training, there is already an accreditation process that could be utilized to ensure quality and breadth of content and



competency based assessments. It is likely that these assessments will be more thorough than a national examination would be, as they occur over a two year period and assess a range of competencies over that time.

2. We support the Board's focus on ensuring suitably trained and qualified psychologists to provide better protection of the public. However, we believe that the route to achieving this is not through requiring postgraduate qualified psychologists to complete an examination, but rather encouraging more psychologists to undertake postgraduate qualifications. To add an examination to the requirements is unlikely to encourage more psychologists to seek postgraduate qualifications, in fact, it could potentially dissuade individuals from undertaking the training.
3. It appears that the Board will allow New Zealand postgraduate trained psychologists to continue to be exempt from the examination. Not only is this inequitable to Australian trained clinical psychologists. We are unaware of any evidence to suggest that a six year period of study including postgraduate training in clinical psychology is in any way superior to an accredited six year period of study in Australia. New Zealand does not have a national examination, and therefore, it is ludicrous to exempt New Zealand qualified clinical psychologists, but not Australian qualified clinical psychologists.
4. Except for North America, where state-based examinations are required for the practice of clinical psychology in that state due largely to different laws between states that pertain to the practice of clinical psychology, we are unaware of other jurisdictions in which examinations are conducted for clinical psychologists who are appropriately trained at a post-graduate level.

In summary, while we share the aims of ensuring that psychologists in Australia reach a minimum standard of competence in order to protect the public, we do not believe that requiring postgraduate trained clinical psychologists (with the highest level of training and qualification) is necessary nor desirable. We agree that those who train through unaccredited pathways, qualify overseas or are returning to practice after a significant absence must demonstrate their competence to practice through some form of assessment, such as the National Examination. However, to require this of psychologists who have undertaken two years' full-time postgraduate study, with multiple assessments will only add to the burden and discourage more people from undertaking a higher level of training in clinical psychology.

The majority of Australian Health Professions Regulation Boards do not impose national examinations on registrants other than those trained overseas, those who are required to demonstrate competency due to failures leading to notifications, and those returning to practice after a substantial period of absence.

Yours,

Frans A.J. Verstraten, PhD
Professor and Head of School.