

To the Board,

I have recently taken the time to read the Consultation paper 25: Consultation on ending the higher degree exemption from sitting the National Psychology Examination, and would like to make a submission for your consultation. This submission is provided from my perspective as a provisional psychologist currently undertaking a Masters of Organisational Psychology.

I share the Board's concern for the consistency of quality competency standards displayed by new registrants entering the profession. I also commend the Board for reviewing the registration process to ensure the effectiveness of its quality assurance mechanisms. I do however have concerns that requiring graduates of the higher degree training (Masters, Doctorate, or combined Masters/PhD qualification that leads to an area of endorsement) to sit the National Psychology Examination may not be the best approach.

My concerns are based on the following two premises:

1. That concerns relating to the quality of outcomes in higher degree graduates seems to be a program accreditation issue;
2. The National Psychology Examination does not assess a prospective registrant's competency in delivering psychological services; and
3. Sitting the National Psychology Examination is another hurdle that will prevent graduates from seeking registration and entering the profession as a psychologist.

These concerns are discussed in further detail below.

### **1. That concerns relating to the quality of outcomes in higher degree graduates seems to be a program accreditation issue.**

While I think that the pursuit of ensuring the quality of new general registrants entering the profession is a worthy goal, I am concerned that using the National Psychology Examination as a quality assurance mechanism for higher degree graduates is an inefficient use of resources, for both the regulatory body and for aspiring general registrants who have completed the higher degree pathway. My view is that such an approach is like placing a bandaid on a wound, without trying to heal the wound itself. Or in a psychological analogy, trying to change a client's behaviour without first understanding and addressing the core beliefs from which the behaviour in question emanates.

In paragraph 4 of Consultation paper 25 it states,

*'Recent reforms in the higher education sector however are leading to greater differentiation between institutions in the types and format and specialised focus of their programs. The Board is of the view that this diversity is perpetuating an additional risk to the regulation of psychologists from this training pathway.'*

While this concern is elaborated further in paragraph 29 which states,

*'Recent reforms in the higher education sector are leading to greater differentiation between institutions in the types and format of their programs. Some universities and private educational providers are investing heavily in online and distance teaching, some are concentrating effort in smaller face-to-face classes of high quality, while others are focusing on postgraduate and research outcomes.'*

While I agree that such changes in the higher education sector provide a legitimate concern for the profession, I see this as a program accreditation issue. Every higher degree program is required to meet and produce outcomes that are aligned with the standards of the Board and for general registration in order to maintain their accreditation with APAC. If programs are maintaining these standards, and therefore their accreditation, it is expected that the graduates of these programs will have been assessed and deemed competent against the nine areas of

competency required for registration in Australia. Should there be questions about the quality of outcomes in graduates and their competency, the program from which they have graduated should and its accreditation should be reviewed to ensure that they program is maintaining the required standards. Should there be systemic concerns across all the higher degree programs and the quality of their graduates, then I believe the accreditation process and requirements should be reviewed. The accreditation of programs is to ensure the quality of the outcomes they produce in graduates and that those who choose to undertake the higher degree pathway are trained to meet the competencies required for registration. If the program accreditation process works as intended, there should be no need for graduates of higher degree programs to sit the National Psychology Examination, as in order to graduate from the relevant higher degree program, graduates have already been assessed as meeting the standards for competence and registration. As stated in paragraph 16 of Consultation paper 25, the current exemption in question *'reflects the Board's view that the internal examination and assessment processes in these accredited degree programs currently meet the Board's standards for general registration.'* As such, requiring prospective general registrants who have undertaken the higher degree pathway to sit the National Psychology Examination is an unnecessary allocation of resources for both regulators and prospective general registrants.

## **2. The National Psychology Examination does not assess a prospective registrant's competency in delivering psychological services.**

In paragraph 43 of Consultation paper 25, the Board outlines its support for multiple methods of assessment in order to ascertain the competence of provisional psychologists for the purposes of registration. It also states that the National Psychology Examination is *'one measure of competence among other assessments necessary to assist the Board in ensuring an adequate assessment of the minimum standard of practice expected of general psychologists is achieved.'*

An examination may provide a valid assessment of an individual's knowledge of the profession, its values and the theory that informs it, however it cannot assess what may be argued as more important, the areas of competency that relate to the provision of psychological services. While a provisional psychologist may possess and articulate the knowledge required to pass an examination, if they cannot apply that knowledge and provide psychological services with professionalism, integrity, empathy and in accordance with ethical guidelines, then that individual presents a great risk, not only to those receiving psychological services from them, but also to the psychological profession and its reputation. It is my understanding that for those undertaking higher degree pathways, the assessment of competencies related to the provision of psychological services is being left to the higher degree program providers. If the assessments of such competencies by the higher degree providers can be relied upon to ensure the quality of service provision, why not the assessment of the competencies covered by the National Psychology Examination?

If the Board feels that the competencies of higher degree graduates should be assessed prior to receiving general registration, then it would seem appropriate that all competencies, in particular those related to the provision of psychological services, be assessed. This would mean that in addition to the National Psychology Examination, prospective general registrants should be assessed through role-play, observation and other methods in order to *'assist the Board in ensuring an adequate assessment of the minimum standard of practice expected of general psychologists is achieved'* (Paragraph 43).

## **3. Sitting the National Psychology Examination is another hurdle that will prevent graduates from seeking registration and entering the profession as a psychologist.**

This concern relates particularly to the organisational psychology area of endorsement. Increasingly, the College of Organisational Psychologists is finding it difficult to encourage

general registrants to gain endorsement and remain registered as psychologists. Within the industry, organisational psychologists are often competing against 'organisational consultants' who proclaim to provide very similar if not the same services but are not bound by the restrictions of registration. Additionally, many companies and organisations do not see the benefit of employing a consultant who is registered and endorsed over one who is not. As such there is no financial incentive for those entering the profession to remain registered or gain endorsement. These are issues which I am sure the Board is currently aware. As someone entering the profession, I have been exposed to strong proponents of those who are both registered and endorsed, as well as those who operate within the industry unbound by the guidelines of registration. I am also aware of individuals who are undertaking the higher degree pathway in order to gain the skill set organisational psychology provides, with no intention of gaining registration. A significant reason for these individuals choosing this course of action is the number of hurdles to gaining and maintaining registration and endorsement. The implementation of the National Psychology Examination for those completing the higher degree pathway is seen by many individuals as another hurdle dissuading them from pursuing registration and a career as a psychologist.

It is my belief that as a profession, psychology as a whole should be working not only to maintain the quality of its professionals and the services they provide, but also to make the profession of psychology as attractive as possible for prospective registrants and those considering a career as a psychologist. The implementation of '*multiple quality control mechanisms*' should be done in a carefully considered way that promotes psychology as an attractive career option, not one where the focus is perceived to be on meeting and maintaining registration requirements.

I trust this submission will be given due consideration by the Board and inform the consultation regarding the removal of the exemption requiring higher degree graduates to sit the National Psychological Examination in order to gain general registration.

Thank you for the opportunity to provide this submission.

Regards,

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Provisional Psychologist