

01 October 2015

Re: Consultation Paper 25: Consultation on ending the higher degree exemption from sitting the National Psychology Examination.

To the Psychology Board of Australia:

We would like to make a submission to the Psychology Board of Australia in relation to Consultation paper 25: Consultation on ending the higher degree exemption from sitting the National Psychology Examination.

Most Universities and specifically staff in the professional programs at La Trobe University, would endorse the expressed statement by the Psychology Board to protect the public and the profession by ensuring that the standards for training have met the highest level and that the trainees have all uniformly attained these standards. We share the Board's interest in maximising the likelihood that practitioners are "safe and competent". The logic of requiring a single national exam rests on a belief that passing a single examination will "demonstrate" the practitioner is "safe and competent", and that the APAC accreditation system and university academic standards are inferior in ensuring this standard.

The risk therefore is that by the Psychology Board through enforcing additional assessment of postgraduate trainees via an exam may not provide the desired outcomes.

The Psychology Board of Australia has proposed a number of points that will be discussed below.

1. *The National Psychology Examination marks an important contribution to ensuring a consistent professional standard of psychologists nationally.*

*The exam is a 3 ½ hour case study exam where psychological knowledge is assessed with an emphasis on ethical behaviour and behaviour and the integration of knowledge and skills.*

The assumption underlying this point appears to be that a single 3½ hour exam (no matter how high the quality of the exam) will provide enough additional information, after postgraduate training, to ensure safe practices in ethical and professional behaviour in the workplace.

We would like the Australian Psychology Board to consider:

The absence of evidence that the national exam can validly "demonstrate" that a practitioner is "safe and competent". Assessment of risk and future behaviour is notoriously difficult. The Board has not demonstrated on what basis the exam can be expected to have predictive power. For a profession claiming to be evidence-based this is a disappointing stance by the regulatory body.

Absence of evidence that the national exam is a superior safeguard to the status quo mechanism of accreditation. A key argument advanced by the consultation paper is that an exam is superior to accreditation because accreditation focuses on *courses* and exams test *individuals*. This represents faulty logic. Accreditation of courses involves close attention to the nature, variety and appropriateness of assessment of competencies. Accreditation is not attained unless standards of appropriate assessment applied to all students are met. All postgraduate students have to pass all areas of competency so individual competencies are thoroughly assessed.

Moreover a one-off exam is highly unlikely to enable the Psychology Board of Australia to identify those psychologists who are, at some point in their career, at risk of acting inappropriately with a client.

This argument suggests that a one-off exam enables assessment of clinical, ethical and professional competency for the remainder of the psychologist's career and provides a means of predicting future violations with clients.

The proposition that an exam can provide the degree of sophisticated information and predictive power is unrealistic. There are some areas of competency that can be assessed by such an exam but the Psychology Board presents no support for their views that knowledge of unethical practices and knowledge of good clinical judgement assessed by an exam results in improved behaviour in clinical practice. Indeed, I would contend that the overwhelming majority of psychologists that engage in unethical behaviour are aware that their behaviour is unethical; this does not prevent their actions.

An example of the limitations of knowledge of ethical rules versus actual practice was highlighted in an American Psychological Association paper.

[http://www.nxtbook.com/nxtbooks/apa/monitor\\_201204/index.php?startid=74#/70](http://www.nxtbook.com/nxtbooks/apa/monitor_201204/index.php?startid=74#/70)

Exams test knowledge; they are not good tools for assessing practice in the actual world.

The ongoing education of registered psychologists now established by the Psychology Board of Australia is a high standard where evaluation of practices can be implemented to ensure safe and effective practices from clinicians.

**SUGGESTION:** the Board could consider peer workplace assessment (where health of a psychologist, stress levels and work practices are regularly reviewed by peers and supervisors). This process would need to be implemented in private practices as well as government settings. This process would provide a more reliable indicator of problematic behaviour and would enable early identification of psychologists having difficulties that have been demonstrated to result in poor practices.

## 2. *A growing regulatory risk.*

It is not clear what evidence the Board is relying upon to make the statement that in the education sector changes have led to the undermining of training. Without substantiating evidence this claim is slanderous and damning of those involved in delivering this training. The statement elaborates further by stating that there is a rise in online training in the postgraduate area BUT this must only apply to coursework because all postgraduate training psychologists are still expected to be supervised in placement with an endorsed supervisor for a minimum of 1000 hours and 400 face to face hours. The training required is rigorous and there are multiple opportunities to provide feedback to trainees and correct inappropriate behaviour, or counsel the student to leave the profession. This appears to be far superior and more effective than relying on an exam as a final hurdle.

3. *Accreditation- an important qualify assurance mechanism.*

One of the major requirements of the Australian Psychology Accreditation Council (APAC) is to ensure uniformity of courses. Despite the large number of courses in Australia they are reviewed regularly (i.e., every 5 years) and very high standards are adhered to. The documentation and checking of courses, from the perspective of providers of postgraduate training, appears rigorous. It is not clear why the Psychology Board has found APAC standards, which include ongoing assessment of all individual's in the training programs, unacceptable as the final benchmark for providing postgraduates with their qualifications. The logical extension of this is that accreditation is a costly but deficient process. Again, where is the evidence to support this contention?

An obvious alternative to this extension of the exam to postgraduates is to identify with APAC any deficiencies in the accreditation system (e.g., around core competencies in the training of psychologists) and foster an agreed national solution. If the exam is intended to prompt better training and assessment of future practitioners, the greatest opportunity to specify this would be via accreditation.

4. *Removing the exemption for the higher degree pathway.*

The Board has suggested that even though graduates in postgraduate training programs have spent two to four years being assessed via coursework, placement, feedback from multiple supervisors and research, that this is not sufficient. The postgraduates have submitted exams, essays, evaluated research and had to be observed in their practice. The multiple assessments have occurred throughout the degree and a further exam appears unnecessary and costly.

*Overall we would like to fully support the requirement that Psychologists have the highest level of training and that they continue to be monitored and assessed throughout their careers to provide a strong guarantee to the public that they are dealing with someone who is of the highest standard. We do not believe an exam will add anything further to postgraduate training.*

Yours Sincerely,

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