

Professor Brin Grenyer, Chair
Psychology Board of Australia
psychconsultation@ahpra.gov.au

30 September 2015

Dear Professor Grenyer,

Re: Psychology Board of Australia Consultation Paper 25 *On ending the higher degree exemption from sitting the National Psychology Examination*

We write as academics involved in the delivery of accredited 5th and 6th Year Course Sequence psychology courses at the Australian College of Applied Psychology (ACAP) in response to the Psychology Board of Australia's (the Board) Consultation Paper 25 entitled *On ending the higher degree exemption from sitting the National Psychology Examination*. We thank the Board for the opportunity to provide feedback on this proposal. We are committed to the Board's mission to protect the public by ensuring high standards of education and training of people preparing to become registered psychologists, and have considered carefully the Board's suggestion that the exemption be removed for those prepared for registration through accredited 5th and 6th year courses. Following this consideration, we are not in agreement with the Board's stated, preferred position and would argue that the National Psychology Examination as currently configured is an inadequate way to meet the stated aims of the Board in contrast to the extensive and varying of assessment approaches used by higher education providers to ensure the competence of students completing their degrees. In relation to this, we would make the following points:

1. The Board provides the following as the rationale for ending the exemption, and we would like to address each of these:
 - a. **Establishing a comprehensive and integrated suite of quality control mechanism:** The nature of the proposal is that provisionally registered psychologists undertaking 5th and 6th Year accredited psychology courses would be undertaking an examination that assesses only one element of the competencies required by registered psychologists, that of knowledge of the discipline. This is much narrower than the existing assessment of individuals being prepared through the accredited 5th and 6th year psychology courses and therefore both insufficient as an entry assessment and duplicative of existing assessment of these students. We note that the 5th and 6th year psychology courses are accredited by the Australian Psychology Accreditation Council (APAC), and that as part of this accreditation APAC reviews all aspects of the assessments used in the programs, the assessment tasks, the marking criteria, and assessed examples of student work in each grade band. These assessments are designed to assess the key areas of preparation described in the APAC 2010 standards, and the eight core competencies described in the Psychology Board of Australia Guidelines. We believe this accredited process provides a much more extensive and integrated quality control mechanism than the 3.5 hour single format National Psychology Examination. While there may be a rationale for requiring those who have completed the 5+1 route to complete some further assessment of their competence following the completion of their internship year, given the exclusive focus of the examination process on

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the assessment of knowledge, which will have been undertaken comprehensively as part of the accredited 5th Year psychology course, this would seem unnecessary.

- b. **Providing for the protection of the public by ensuring that only practitioners who are suitably trained and qualified to practise in a competent and ethical manner are registered:** The National Psychology Examination provides only for assessment of the knowledge base underpinning practise, and while this is an important competency it is insufficient for the purposes of the protection of the public where lack of knowledge is often not the root cause of behaviour by psychologists that present a threat to the public. As noted above, the assessments embedded in the 5th and 6th year psychology programs use a variety of formats, including direct observation by multiple highly trained and expert internal and external supervisors to assess aspects of practice that directly affect public safety.
 - c. **Ensuring that the minimum standards for general registration in psychology are being demonstrated by all:** Higher education courses are highly regulated both in general (by TEQSA) and specifically in relation to their psychology content (by the Australian Psychology Accreditation Council). As the Board would know, being a member of the Australian Psychology Accreditation Council, the accreditation processes require that providers demonstrate their graduates will have met these requirements at the appropriate level. As outlined previously, while in principle some assessment conducted by the Board at the end of the internship year following completion of a 5th Year psychology course may have merit, in its current format (that being a test of knowledge only) this is unlikely to be sufficiently sensitive to detect candidates for registration who are likely to be a risk to the public and do not advance the extensive oversight that the existing processes provide.
 - d. **Facilitating the provision of high quality education and training of health practitioners:** We would agree that this is important, but are not persuaded that the imposition of the National Psychology Examination will serve to enhance existing education and training provided to those completing 5th and 6th Year accredited psychology courses. For those provisional psychologists undertaking the 4+2 route, who undergo no other objective test of their knowledge, the National Psychology Examination may provide a meaningful assessment, but significantly it does not assess any of the other competencies and so is arguably of limited benefit.
 - e. **Enabling the continuous development of a flexible, responsive and sustainable psychology workforce that meets the needs of the Australian public:** This is at odds with the Board's argument that changes in the higher education sector means that there will be more diversity, and thus it is unclear how this provides a basis for the removal of the exemption.
2. **Reforms in higher education:** The Board expresses concerns about the potential for such recent or anticipated reforms to impact adversely on the quality of students graduating from 5th and 6th Year accredited psychology courses. However we would argue that the most significant of these anticipated changes, that of the requirement for direct assessment of competency, is in fact an opportunity to improve quality. A consequence of this change will be that courses are accountable by demonstrating that they expressly assess competency rather than demonstrating only that content is delivered. In addition, the Board is well placed to influence this via its membership of Australian Psychology Accreditation Council and this route is the appropriate way in which to ensure that courses are designed and delivered with protection of the public in mind.
 3. **Impact on provisional psychologists undertaking 5th and 6th Year accredited psychology courses:** Individuals undertaking these courses make a very significant financial investment in their education, and rightly expect that they are getting a high quality preparation for practice as a psychologist. While the

costs of undertaking the exam may seem small to those of the profession making the decision about removing the exemption, it will almost certainly not be seen this way by these members of our profession. Apart from higher education costs, we draw the Board's attention to the extensive costs of supervision that graduates of 5th and 6th year programs undertake in completing Registrar programs for Area of Practice endorsement. It is our view that any additional imposition of costs on graduates of 5th and 6th year programs should not be undertaken unless there is clear evidence for the necessity of an additional cost, and we believe such evidence to date is lacking. In addition, given the low failure rates by existing candidates, and the likely even lower rates of failure by those undertaking the exam having completed a 5th and 6th Year accredited psychology program, it would be understandable that they would question why we would require this of them. Further, it is highly inequitable that under the Trans-Tasman Mutual Recognition arrangements, psychologists from New Zealand who have undertaken a similar accredited six year sequence in psychology are able to practice in Australia without undertaking the National Psychology Examination, when the Board has no influence over the content of their courses.

Finally, we thank the Board for opportunity to provide comments on this proposal and look forward to hearing about the outcome.

Yours sincerely,



A/Professor K Nicholson Perry



Professor Lynne Harris



A/Professor Tony Florio



Dr Ester Senderey