28 September 2015

Psychology Board of Australia

To Whom It May Concern:

*Re: Consultation paper 25: Ending the higher degree exemption from sitting the National Psychology Examination*

As a group of Master of Psychology (Educational and Developmental) students at the Queensland University of Technology, we submit this letter in response to a request for consultation on the proposal to end the higher degree exemption from sitting the National Psychology Examination.

We are aware that this exemption expires in June 2016, and it is our strong belief that that Option 1 (maintaining the status quo), as outlined in the Board’s Consultation Paper (25), be undertaken. Our reasons are as follows:

1. By way of the ongoing assessments for renewal of accreditation for our degree by APAC, our course meets the minimum standards required by the Board. Our graduates have already been examined and assessed as meeting minimum standard across the full range of competencies required for general registration as a psychologist. As accreditation standards are modified, students already enrolled in the Masters program fulfill the requirements as they are being updated including administrative tasks to document evidence of competency (record keeping, storage, obtaining approval from supervisors).
2. A decision to undertake this expensive and difficult degree is in no small way influenced by the university’s statement that successful completion of the course will qualify the applicant for general registration as a psychologist.
3. Examination fees proposed increase the financial burden on students in addition to course fees and materials, practicum travel costs, provisional registration and professional membership. Many of the activities students are required to complete for accreditation are unpaid and involve out-of-pocket expenses which are not reimbursed.
4. If the Board requires yet further proof, other than being awarded a higher degree in professional psychology, that an applicant for general registration meets the “minimum standard” required, it begs the question as to why APAC exists in the first place? Has the Board lost confidence in the ability of APAC to adequately ensure courses are of a consistent standard? If this is the case, an investigation into the role and efficacy of APAC must be undertaken.
5. Given the fact that Australia has an ageing population, and the likelihood that our population is also set to increase by virtue of the vast numbers of displaced foreign nationals seeking refuge in Australia (many of whom, as survivors of war and trauma, are in urgent need of psychological intervention), it is logical to expect that the demand for psychologists is set to increase in the very near future.
6. By placing the unnecessary duplication, cost and burden that is the National Psychology Exam on higher degree graduates, the Board is making the career of “Psychologist” extremely unattractive to potential students. This is likely to impact upon enrolment numbers in psychology courses (and ultimately upon the number of graduates) and will thereby affect the ability of both government and private sectors to provide adequate psychological services to those in need.
7. It is also worthwhile noting that the overall guiding principle of the National Law (Section 3A) is that the “health and safety of the public are paramount”. In our view, the examination will not provide any added public safety over and above that which is provided through the successful completion of the Master’s degree – with the current APAC regulated standards for accreditation. Deterring future psychologists from entering the profession, and thereby creating a shortage of registered psychologists, is a threat to the psychological health and well-being of the general population.

We therefore submit that the status quo should be maintained in order to continue the exemption, and we recommend that the role and adequacy of APAC be investigated prior to any alteration or ending of the exemption.

Sincerely,

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