

Undersigned Master of Organisational Psychology Students
c/o Nick Ford

School of Applied Psychology
Level 4 Psychology Building (M24)
Griffith University Messines Ridge Road
MT GRAVATT QLD 4122

psychconsultation@ahpra.gov.au

Psychology Board of Australia
Australian Health Practitioner Regulation Agency
GPO Box 9958
MELBOURNE VIC 3001

Friday, 11 April 2019

To Whom it May Concern:

Consultation – Review of the Guidelines for the national psychology exam

I am writing to provide my thoughts on the Psychology Board of Australia's (the Board's) consultation paper regarding the Guidelines for the national psychology examination (the Exam). My apologies for providing this feedback after the initial cut-off date of Friday, 31 March 2019.

I am a firm believer in psychological assessment and the need for psychologists to be held to consistently high standards of performance and professionalism. I passionately believe such standards serve to protect the public and safeguard their warranted trust in our profession. I appreciate the care and deep thought that continues to be invested in the development of our professional standards and their effective and fair enforcement.

I support the Psychology Board of Australia's proposal to make permanent the higher education exemption from sitting the exam.

My reasoning is that:

1. Higher education psychology programs currently conduct a great deal of specialised and ongoing assessment that targets psychological competencies, in manners both specific to areas of practice and universal to all psychologists. The Australian Psychological Accreditation Council (APAC) accredits these programs regularly to ensure that all graduates consistently meet a high standard of performance across these competencies and can evidence their competence.

The 2019 APAC standards have been established in line with the Health Practitioner Regulation National Law (including the Procedures for development of accreditation standards), the COAG principles for Best Practice Regulation, and the standards developed by the Forum of Health Professions Accreditation Councils. As such, I believe the current APAC standards will be sufficiently thorough and effective in providing a high and consistent standard of psychologist, equal to those pursuing the 4+2 or 5+1 pathways.

2. Higher education programs include between 1,000 and 1,500 hours of supervised practice. The supervision of this practice must be conducted by accredited supervisors, with a majority of individual supervision, and students' performance is measured against universal psychological competencies.
3. Any changes to these assessment and supervision processes must weigh the additional level of protection offered by such changes against the resources required for their implementation.

4. I do not believe the Exam adds incremental validity or protection to the public and profession, over and above the existing APAC standards.
5. Mandating the Exam for graduates of accredited higher education programs presents an additional demand upon the resources of tertiary institutions (who will be obliged to support their students to prepare for the national psychology exam), as well as increased student workloads and an additional stressor.
6. The current processes already require significant effort, time, and administrative encumbrance which falls upon both students and tertiary institutions. At present, I know of no students, nor tertiary institutions, that have an excess of resources to meet increased demands. As such, any change would require a redistribution of existing resources, which would inevitably disadvantage other processes and educational outcomes.
7. Further, to mandate the Exam for graduates of APAC-accredited higher education programs could be seen to suggest a deficiency in the existing assessment and supervisory processes; in which case, I believe it would be more efficient and effective to address such a deficiency through amendments to the APAC standards or supervisory accreditation requirements.
8. Therefore, I support the Board's proposal to make permanent the higher education exemption from sitting the Exam, on the basis that I believe:
 - a. it would not add incremental validity or protection to the public and the profession over and above the existing APAC standards; and
 - b. it would place an unjustifiable burden upon tertiary institutions and students.

Should you wish to discuss any of the above in detail, please don't hesitate to contact me. Thank you for the opportunity to comment upon this proposal.

Kind regards,

The Undersigned, Master of Occupational Psychology Students of Griffith University


Principal Contact, Nick Ford

Date

11/04/2019.


Kfir Levin

Date

11.04.19


Nick Lewins

Date

11/04/2019


Leigh Borrell

Date

11.04.19.

Wing Yan Winny Yip

Date

11 - Apr - 2019

Jaeger Wood

Date

11 - 4 - 19

CHRISTOPHER MCCARTHY

Date

11/4/2019

Date

11/04/2019

Liam Clements

Date

11-4-19

JASON DEAN

Date

11/4/19

Alison Martin

Date

11-4-19

Gemma Dziurka

Date

11 - 04 - 19

ANNA READ

Date

11 Apr 19

Date

11/4/19

Vanessa Moran


Date

11/4/19

Zach

Date


11/14/19

 Carlin Patt


11/4/19
Date


LARA GARDINO


11/4/2019
Date


Nick Blander-Keetz

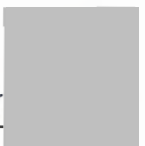
11/04/2019
Date

Carmen Walters 

11.04.2019
Date

Briony Kent 

11.04.2019
Date

Thomas Downs-Andrews 

11.04.19
Date

 JESSICA BROTHERHOOD


11.04.2019
Date

 Jasmin Shevell

11-4-2019
Date


MONIQUE BOCK

11 April 2019
Date

JASON SPEDDING 

11/04/2019
Date

Daniell Barrett 

11/04/2019
Date

Mitchell Raper 

11/4/19
Date