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Dear Ms Phillips and the PsyBA Board,

Thank you for the opportunity to contribute to this consultation. We would like to highlight that the views contained within this submission are our own as psychologists and do not necessarily reflect the views of our employer, Monash University (where we are Lecturers, Nicholas is the course leader of the 4th year program and Shane is the deputy course leader of the 5th year program) or the APS (where Nicholas is part of the panel reviewing the APS Code of Ethics and Shane in a Journal Editor). Our submission is directly related to your 3rd question: *Are you in support of making the higher degree exemption from sitting the exam, permanent?*

We are a very strong proponent of the national psychology exam, a final summative assessment before registration is an important and powerful tool in preparation to becoming a psychologist. We are of the very strong belief that if the national exam is to exist, it should be a requirement for all provisionally registered psychologists before moving to full registration. This consultation is a very rare chance to bring some much needed unity to the field of psychology. If the national exam is a final summative hurdle that provisional psychologists, from every training pathway must pass, it serves two valuable purposes. Primarily it will serve as a gatekeeper for the competencies of all individuals wanting to become psychologists, regardless of their training pathway. Its secondary purpose is to create common task and achievement, which overtime, will build a sense of community and collegial understanding through a shared experience and set of core competencies for all psychologists.

We can well understand the board's view that the changes to the APAC regulations will have a substantial impact on the quality of University training. However, these changes will impact equally on the 5th year of study for those students undertaking the 5+1 pathway. This would suggest that if the new APAC framework is driving the decision to remove the exemption, then the benefits gained would also be present for all students in 5th year regardless of their pathway in the 6th year. Further supporting this perspective is that all 5th years (within a 5+1 structure) are now master programs. The AQF (Australian Qualification Framework) requirements on training providers will be the same for the master programs whether it is a one or two year course. This means contact hours, assessment requirements and qualifications of teaching staff are equivalent between the university component of 5+1 and two year masters programs. This means that the 6th component of each training pathway may need to be considered. However, as provisional psychologists in the 5+1 program can undertake the exam as soon as their supervision plan has been approved, the +1 year cannot be highlighted as the key feature driving the need for a 5+1 student to take the exam. Despite this, if the 6th year is considered for both programs there is still a very weak argument that this is a critical factor for only one group of provisional psychologists be required to undertake the exam.

In all courses that we have had any exposure to, the 6th year of a two year masters has been made up of a research task, two case studies, and placement. In a +1 internship, provisional psychologists are required to complete four case studies (submitting two to the PsyBA), and complete their supervised internship. The implication is therefore that the research task is equivalent to the national exam from the perspective of assessing professional competence, which seems difficult to justify. Especially given content of the exam is very closely aligned to the foundational material covered in year five (and can be sat at the beginning of the internship). Additionally, from our experience and discussion with many supervisors who are involved in both university supervision in the 6th year and the internship year in the 5+1, their view is that there is greater regulation in the internship year. So again, there seems to be little support for the exemption of only two year masters students from the exam.

The board is the only group within psychology able to take a systemic approach to the assessment of competencies for the whole of the profession. From our perspective, requiring all provisional psychologists to pass the national exam is an extremely positive step for the profession. There are so many long term benefits to students, the profession, and the public in having the variety of training pathways culminating in a final exam. Psychology would join the many other professions with completion exams. In a time when there are moves to increase the number of assessments before entry in university courses (e.g., primary and secondary teaching courses) it would seem to be a strange time to remove an assessment that could potentially protect the public. As a profession how could we support that and would it lead to increased governmental scrutiny? From our perspective the only group that would benefit from the permanent exemption are the universities that would need to modify their programs to ensure that all students in two year masters programs graduate with the core (professional) competencies. As the new APAC standards require these professional competencies to form the foundation for building towards the competencies in specialised areas of practice, they need to be included in two year programs of study. So under the new APAC requirements this change will have to occur. We cannot allow the concerns around some students failing the exam, to lead to an outcome where we simply remove the need for them to sit the exam. The two year masters course will need to adapt, but that will be necessitated by the new APAC standards. Now is the time to support and encourage those changes to be meaningful in all two year masters courses through implementing the exam as a final summative assessment for all students.

Given the above, we can see that there is potentially a weak argument for the removal of the requirement for the exam for both the 5+1 and the two year masters pathways. But to remove it for only one group would seem arbitrary and unjustified. It also suggests that the students, supervisors and educators in the 5+1 pathway are in some way less competent in their endeavours. Our profession needs all the unifying structures it can be afforded, and few in the field seem capable of putting aside their differing priorities to achieve this. We would implore the board to take a strong stand and make the courageous and unifying decision to require all provisional psychologists to pass the national psychology exam before they gain the privilege of becoming a psychologist.

Thank you again for the opportunity to contribute to this process.

Sincerely,

Nicholas Gamble & Shane Costello