

Thank you for providing the opportunity to provide a submission in regard to the proposed changes to the National Psychology Examination.

I have no feedback to provide regarding the proposal to separate the guidelines into a guideline and a manual. This is a minor administrative matter and does not require consultation with stakeholders.

I do not support the proposal for a permanent exemption from sitting the national psychology examination for those applicants for general registration who have completed an accredited higher degree at fifth and sixth year level for the following reasons:

1. The Board's rationale for making the exemption permanent is flawed.
 - a. At paragraph 25.a) of the Board's consultation paper, the Board argue that the public is adequately protected because new APAC accreditation standards have been developed that include specific domains on public safety. There are a number of problems with this argument.
 - i. Although the new APAC standards began on 1 January 2019, universities do not have to prove that they are complying with these standards until they seek re-accreditation when their existing accreditation is due to lapse. As accreditation is given for five years, some accredited degrees will not be required to meet this new accreditation standard until 2024. As such at this point in time and for potentially another five years, the Board cannot be certain that the graduates of higher degree programs demonstrate the required core competencies for registration.
 - ii. APAC accredits university degrees. Rather than assessing whether the graduates of a degree actually have the required competencies, APAC assesses whether university degrees have sufficient processes

in place to ensure that students only pass an accredited degree if all the required core competencies are met. As the APAC assessment of each accredited degree occurs only once every five years, there are insufficient grounds for the Board to be confident that every graduate has the required competencies for the public to be protected for the following reasons:

- i. The Board is relying too heavily on APAC and on the universities to meet responsibilities which clearly lie with the Board under section 3 of the *Health Practitioner Regulation National Law*.
 - ii. It is difficult to comprehend how the Board can have confidence that standards are being maintained in the five years between accreditation assessments.
 - iii. If the accreditation body decide that an accredited degree no longer meets the accreditation standards, there is no mechanism available to the Board to revoke the registration status of past graduates who were granted registration on the basis of completing a degree that did not meet the required standard.
 - iv. I would point out that in other jurisdictions such as the United States of America where the accreditation of psychology higher degrees is well-established, all state regulators require graduates of such degrees to pass an examination in order to be granted registration. The argument that a strong accreditation system will be enough to protect the public is not accepted by the regulators.
- b. At paragraph 25.b) the Board states that *“the adoption of the Declaration by both the Board and APAC means that all applicants for general registration,*

regardless of training pathway, are required to demonstrate the same core competencies for the safe practice of psychology in Australia. While the manner of demonstrating competencies may be different (completion of an internship and the exam, or completion of a six-year higher degree for example), the core competencies are now matched across pathways in Australia for the first time.” Unfortunately, this is not an argument for allowing a permanent exemption from the examination for accredited higher degree applicants for registration. By stating that all applicants for registration regardless of pathway are required to demonstrate the same competencies, the Board can only argue that either all applicants should be required to pass the examination or no applicants should be required to pass the examination.

- c. At paragraph 25.c), the Board states that its position is to reduce unnecessary regulation. Although this argument is difficult to understand, I think what is being argued here is that because the new APAC standards for higher degrees began in 2019 and there has been an adoption of the Declaration, requiring higher degree applicants to sit the examination would be unnecessary regulation. The problems with relying on the APAC standards are set out above in paragraph 1a. The first and over-riding principle for the Board should be the protection of the public, rather than some vague and unjustified neoliberal hand waving towards reducing regulatory burden.
- d. At paragraph 25.d), the Board states that the higher degree exemption has been in place since 2013 and no issues have been identified. This is quite an extraordinary statement for a profession that basis itself on the scientist-practitioner model. The 2013/14 AHPRA Annual Report states that there were 31,717 registered psychologists about whom 487 complaints were made. The 2017/18 AHPRA Annual Report states that there were 36,376 registered psychologists about whom 733 complaints were made. From the data, a 14% increase in the number of psychologists has been accompanied by a startling

50% increase in complaints. At this point in time, we do not know why the number of complaints has increased so dramatically. However, reducing regulatory requirements for registration within this context without providing meaningful data analysis would appear to be negligent. These figures are grounds for requiring all applicants for registration to complete the examination and strengthening the registration requirements until the Board has an understanding of the causes for the increase in complaint numbers.

- e. At paragraph 25.e), the Board states that *“a permanent exemption would remove the need to periodically consult on extending the exemption and would provide higher degree students, education providers and supervisors with clarity about the requirements for registration.”* Again, this is a rather odd argument. Requiring all higher degree applicants to complete the examination would also remove the need to periodically consult on extending the exemption and would provide clarity about the registration requirements.

2. The Board has not presented evidence to stakeholders that that applicants for general registration who have completed an accredited higher degree hold the core competencies required for general registration.

- a. If, as stated at paragraph 26, the exam *“is essential to ensure the core competencies for general registration have been demonstrated”*, the Board needs to present a far more convincing case that the accreditation system actually ensures that all accredited higher degree graduates hold these competencies. At this point, the public can only be confident that the university course is accredited once every five years.
- b. APACC does not actually assess the core competencies of any graduate. Rather APAC rely on documentation provided every five years by the universities contending that they adequately assess their graduates. As the universities value accreditation and do not wish to use scarce resources to

teach the national psychology examination curriculum, they will undoubtedly present very convincing cases to the accreditation body that their graduates meet the core competencies. However, neither the Board nor the accreditation body has actually formally assessed the graduates' core competencies. This is a gaping hole in the regulatory scheme.

3. Since the advent of Medicare in 2006, the psychology profession has been racked with division and discontent as a result of a perceived bias by professional bodies, government and regulators towards clinical psychologists. To grant a permanent exemption to higher degree graduates, including to clinical psychology graduates, without a substantial body of evidence demonstrating their assumed competence, displays a lack of political astuteness on the Board's part. This will be amplified by the fact that five of the eight practitioner members of the National Board have university affiliations, while the other three hold area of practice endorsements. Please note, I am not suggesting anything untoward is occurring, rather I am emphasising the importance of the perception of the Board within the current environment.

I propose that the Board end the exemption and require all accredited higher degree applicants applying for general registration to pass the National Psychology Examination. If after five years, every higher degree applicant has passed the examination, the Board will then have evidence to propose a permanent exemption.

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