12 April 2019

Rachel Phillips, Chair Psychology Board of Australia Level 7, 111 Bourke Street MELBOURNE VIC 3000

> By Email psychconsultation@ahpra.gov.au

Dear Ms Phillips,

CONSULTATION – NATIONAL PSYCHOLOGY EXAM: GUIDELINES REVIEW

Thank you for the opportunity to provide feedback on the *Consultation Paper 33: Review of the Guidelines for the National Psychology Exam* (Consultation Paper). I make this submission as a candidate of the Master of Clinical Psychology program at the Western Sydney University.

I understand the following:

- 1. That the purpose of the National Psychology Exam (**NPE**) is to ensure that only those whom are suitably trained and qualified to practise in a competent and ethical manner are registered as a psychologist in Australia (*Guidelines for the National Psychology Exam, January 2018*).
- 2. That the NPE is currently required to be passed by provisional psychologists undertaking the 4+2 or 5+1 internship program, individuals returning to practise as a psychologist after 10 years of absence, and individuals who are directed by the Board, a panel, or tribunal to sit the exam (*Guidelines for the National Psychology Exam*, *January 2018*).
- 3. That any reference to "higher degree pathways/programs" are those accredited by the Australian Psychology Accreditation Council (**APAC**), as the appointed accrediting authority for the psychology profession in Australia under section 43 of the *Health Practitioner Regulation National Law Act* (as enacted in each state).
- 4. That the higher degree exemption from sitting the NPE expires on 31 December 2019.

I agree with the Psychology Board of Australia's (the **Board**) rationale to permanently make the higher degree exemption from sitting the NPE (Consultation Paper, [25]). In an attempt to avoid reiterating the stakeholders' responses in relation to *Consultation Paper 25: On Ending*

the Higher Degree Exemption from Sitting the National Psychology Examination in 2015, I make the following comments:

- 1. As of 1 January 2019, APAC revised their Accreditation Standards for Psychology Programs in accordance with the International Declaration on Core Competence in Professional Psychology (**IDCP**).
- 2. As the Board is a signatory of the IDCP, there is clear understanding as to the standard of competence for all psychologists in Australia.
- 3. Since 2005, higher degree programs offered by various Australian universities and institutions have been strictly regulated by APAC. Further, universities and institutions are required to comply with their respective internal governance processes, such as quality assurances and course review processes.
- 4. Candidates of higher degree programs are provided with comprehensive training and are required to submit to multiple assessments of theoretical knowledge and clinical skills. I speak from personal experience as a candidate of such program that we are under scrutiny at all stages in multiple forms and by multiple people (such as lecturers, supervisors, and trainers). The NPE only assesses one element of the competencies, which is that of knowledge. It is therefore redundant to require graduates of accredited higher degree programs to submit to further knowledge-based assessment on top of those required to complete the higher degree.

Given the above, I agree that the Board should permanently exempt graduates of APAC accredited higher degree programs from sitting the NPE.

Please do not hesitate to contact me if you require anything further.

Yours Sincerely,

Andrew Wong Master of Clinical Psychology candidate