Attachment B



Public consultation: Draft guidelines for the national psychology exam

The Psychology Board of Australia (the Board) is seeking your feedback about our proposal to adopt the Draft guidelines for the national psychology exam (the draft exam guidelines). There are ten specific questions we would like you to address below. All questions are optional and you are welcome to respond to any that you find relevant, or that you have a view on.

Providing feedback

Please email your submission to: psychconsultation@ahpra.gov.au. The submission deadline is close of business on Monday 24 March 2025.

Initial questions: To help us better understand your situation and the context of your feedback, please provide us with some details about you.
Question A: Are you completing this submission on behalf of an organisation or as an individual?
☑ Organisation
Name of organisation: The Australian Association of Psychologists Incorporated Contact email: Click or tap here to enter text.
□ Individual
Name: Click or tap here to enter text.
Name of organisation: Click or tap here to enter text.
Contact email: Click or tap here to enter text.
Question B: If you are completing this submission as an individual, are you:
☐ A registered health practitioner?
Profession: Click or tap here to enter text.
□ A consumer / client?
☐ Other – please describe: Click or tap here to enter text.
□ Prefer not to say.

Questions for consideration – Updating the Guidelines for the national psychology exam

Preferred option

Question 1: Do you support updating the exam guidelines (Option 2)? Please provide a rationale for your view.

Your answer:

We support updating the National Psychology Exam guidelines, as these changes will help ensure the exam remains relevant and reflective of contemporary psychological practice. By refining the assessment process, this update will reduce unnecessary barriers for early career psychologists while maintaining high professional standards.

<u>Question 2:</u> Do you support including the updated general registration competencies as outlined in the <u>Professional competencies for psychologists</u> into the draft exam guidelines? Please provide a rationale for your view.

Your answer:

Yes, we support including the updated general registration competencies in the draft exam guidelines. Aligning the exam with these updated competencies ensures that assessment reflects current best practices and the evolving skill set required for psychologists entering the workforce. This integration will help create a more cohesive and relevant training pathway, better preparing early career psychologists to meet the needs of diverse clients and professional settings.

Question 3: Do you support an exemption from sitting the exam for international applicants for general registration who hold a qualification that is substantially equivalent, or based on similar competencies, to a Board-approved fifth and sixth year qualification? Please provide a rationale for your view.

Your answer:

We broadly support an exemption from sitting the exam for international applicants whose qualifications are substantially equivalent or based on similar competencies to a Board-approved fifth and sixth-year qualification. This approach can help streamline pathways for skilled psychologists to enter the Australian workforce while maintaining appropriate professional standards. However, we recommend regular evaluation of this exemption to ensure that it does not impact the overall standards of the profession and continues to align with best practices in psychological training and competency assessment.

Content of the draft exam guidelines

Question 4: Is there any content that needs to be changed, deleted, or added into the draft exam guidelines?
Your answer:
No.
Question 5: Is the language and structure of the proposed draft exam guidelines helpful, clear, relevant and workable? Are there any potential unintended consequences of the current wording?
Your answer:
It is helpful, clear, relevant and workable. We would further recommend a webinar about these changes as to disseminate the information widely. It may also be helpful to discuss reasonable adjustments when discussing examination failure. Many psychologists with disablilities are unaware that they can ask for reasonable adjustments if they have a recognised disability and this may prevent them from being able to complete the examination successully.
Although not addressed in this document we would also recommend a revision of the policy around communication of examination results be brought to pass. Those who fail the exam state that there is insufficient information provided to them about their failure and what areas they need to address to be able to successfully pass the exam on future sittings. Providing feedback that is useful to assist examinees to address areas they have insuffient knowledge will increase their chances of acquiring appropriate learning that will enable high quality service provision as well as increased chance of passing the exam.
Proposed implementation of the draft exam guidelines
Question 6: The Board proposes to publish the draft exam guidelines when they are approved, but to have a future date for when it comes into effect (1 December 2025), to allow enough time for exam candidates to prepare. The first exam including the updated professional competencies will not be until the February 2026 sitting of the exam. Do you support this transition and implementation plan?
Your answer:
We support the transition and implementation plan; however we acknowledge that some provisional psychologists with executive functioning challenges (for example) may experience unintended difficulties in adapting to the new guidelines. Changes to exam content and competencies require adjustments in study strategies, which can be particularly demanding for individuals who struggle with organisation, planning, and cognitive flexibility. Providing clear, early guidance and additional support such as structured study plans or accommodations will be essential to ensure that these candidates can navigate the transition successfully.
It may be useful to provide a higher level of direction for examinees about how the exam is structured and what they need to do in order to be successful in their study and preparation period.

<u>Question 7:</u> Are there specific impacts for higher education providers, accreditation agencies, international regulators, goverments, employers, psychologists, supervisors, exam candidates, clients/consumers or other stakeholders that the Board should be aware of, if the draft exam guidelines were to be approved? Please consider positive impacts and any potential negative or unintended effects in your answer.

Your answer:

Approving the draft exam guidelines will have several impacts across key stakeholders. Higher education providers and accreditation agencies may need to adjust curricula and training standards to align with updated competencies, ensuring graduates are adequately prepared. For international regulators and governments, clearer pathways for recognition may facilitate workforce mobility, but discrepancies in training standards could require ongoing evaluation. Employers, psychologists, and supervisors may benefit from a more consistently trained workforce, though supervisors may need to adapt their guidance to reflect changes in competency expectations. Exam candidates and clients may experience both benefits such as improved training relevance, and challenges, particularly if the transition period does not adequately support those with additional learning or accessibility needs.

<u>Question 8</u>: Would the proposed changes to the draft exam guidelines result in any potential negative or unintended effects for Aboriginal and Torres Strait Islander Peoples or other priority groups in the community? If so, please describe them.

Your answer:

The proposed changes to the draft exam guidelines could have unintended effects for Aboriginal and Torres Strait Islander Peoples and other priority groups if they do not adequately consider cultural competence and accessibility. If the exam framework does not integrate culturally safe practices or recognise diverse ways of knowing and learning, it may create additional barriers for Indigenous psychologists and those from underrepresented backgrounds. To prevent this, the Board should ensure that the updated competencies and exam structure support inclusivity, offer appropriate accommodations, and reflect the diverse needs of the Australian community.

A concern has been raised with AAPi as an association about past iterations of the exam content that were considered to be racially biased. Use of case studies that portrayed Aboriginal Australians or CALD peoples as perpetrators of domestic violence or child maltreatment were particularly distressing for some members who sought support. Ensuring content is reviewed by those with lived experience or who belong to minority groups is recommended.

Question 9: Would the proposed changes to the draft exam guidelines result in any adverse cost implications for practitioners, clients/consumers or other stakeholders? If yes, please describe.

Your answer:

The proposed changes to the draft exam guidelines could result in cost implications for various stakeholders, particularly if additional preparation materials, training, or support services are required for candidates to meet the updated competencies. Provisional psychologists may face increased financial pressure if they need to invest in new study resources or preparatory study groups to adapt to the revised exam structure. Higher education providers and supervisors may

guidelines. Clients and consumers could experience indirect cost impacts if delays in exam completion lead to workforce shortages or prolonged provisional registration periods. To mitigate these risks, the Board should consider accessible, cost-effective support options and clear transition pathways to reduce financial burdens on exam candidates and related stakeholders.
Other
Question 10: Do you have any other feedback or comments about the draft exam guidelines?
Your answer:
No.