

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: Master of Professional Psychology Course Coordinator Network

Contact email:

☐ 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.
<p>Your answer:</p> <p>Yes, we, the MPPCCN, support updating the exam guidelines (Option 2). This is needed so that the new guidelines are consistent with the recently updated competencies for general registration.</p>
Question 2: Do you support including the updated general registration competencies as outlined in the Professional competencies for psychologists into the draft exam guidelines? Please provide a rationale for your view.
<p>Your answer:</p> <p>Yes, we support including the updated general registration competencies into the new exam guidelines. Similar to our previous response, this will ensure that the new exam guidelines are consistent with the recently updated competencies for general registration.</p>
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.
<p>Your answer:</p> <p>On the basis that there will be no change to the requirement that those who are internationally trained via a 5+1 pathway or equivalent sit the exam, we support the proposed change to exempt international applicants whose training is equivalent to the Australian combined 2-year masters (Level 3 & 4 combined) HDR pathway. This exemption seems to us to be fair and equitable and responds to workforce needs by expediting processes.</p> <p>We do wonder though whether the 3-month transitional program for international applicants is sufficient, particularly in the absence of the exam for those who will now be exempt, to be able to gain and demonstrate competencies that we assume are learnt and demonstrated in an Australian context, for example, those competencies relating to working with Aboriginal and Torres Strait Islander Peoples. We recommend/expect that the current transitional program requirements will be updated such that they align with the new competencies, including a focus on working with Aboriginal and Torres Strait Islander Peoples.</p>
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?
<p>Your answer:</p> <p>The content covered in the guidelines is sufficient and we do not recommend that any of the content be deleted or added.</p>

We note also that the general four curriculum domains (ethics, assessment, intervention, communication) remain appropriate. However, without having access to the updated full NPE curriculum it is difficult to give precise feedback regarding the content of the exam specifically. The new NPE curriculum and exam will of course need to be updated to reflect the new Code of Conduct and new competencies.

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:

Overall, the language used in the draft exam guidelines is clear.

We do have one recommendation about the use of the term “non-accredited pathway.” On p.3 of 13, under ‘Why is the Exam required,’ the guidelines state, “The 4+2 and 5+1 internship pathways are non-accredited pathways. They include one or two years of internship that are not regulated under the accreditation standards. Board-approved internship programs are conducted within the industry sector and not the education sector.” We are concerned about the use of “non-accredited pathways” in relation to the 5+1 pathway. We find this language confusing and misleading since the Master of Professional Psychology (MPP) programs are APAC accredited and form the 5th year of the 5+1 pathway to general registration. We recommend removing this wording and replacing it with more accurate terminology so that it is clear that MPP programs are accredited and that the 5+1 pathway is an approved pathway to general registration. Using language such as ‘non-accredited’ might inadvertently deter prospective students from pursuing general registration via the 5+1 pathway for fear that it will not lead to registration when it is labelled in this document as ‘non-accredited’. It may also confuse or unnecessarily cause alarm for those currently completing the 5+1 pathway.

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:

Although the proposed transition period of three months seems too brief, we understand the need to apply the new exam guidelines in the first exam scheduled following the new competencies coming into force.

We wonder though, what the timeframe will be for approving and publishing the new NPE guidelines, curriculum, and practice questions. There needs to be sufficient time for those preparing for the exam, and three months may not be sufficient.

We are concerned that it will be especially difficult for students who are currently completing their internships in 2025 to learn, achieve, implement and demonstrate threshold professional competency in the new competencies given that they only come into effect on 1/12/25. This cohort will have been trained in their 5th year on the previous competencies, and will have practiced during their +1 year internship under the old competencies also. They will therefore have had no/very little exposure to/opportunity to learn about and practice these.

To mitigate potentially adverse consequences for this group in particular, clear communication with all affected parties will be needed from the Board, in particular with provisional psychologists competing their 5th yr or +1 internship year currently in 2025.

Areas where there might be the greatest gaps for those caught in this transition period include:

Digital health practice, working with Aboriginal and Torres Strait Islander Peoples, families and communities, self-care, and some new terminology such as threshold professional competency and reflexivity.

Although we recognise that the onus is on the registered professional to stay on top of changes relevant to the profession, we recommend that the Board actively inform those especially affected by this transition (i.e., those completing their 5th and +1 yr of the 5+ 1 pathway in 2025) and perhaps offers professional development on some of the changes and the expectations.

Question 7: Are there specific impacts for higher education providers, accreditation agencies, international regulators, governments, 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:

We have already addressed this question in some other questions, particularly with regards to unintended consequences. Positively, these changes ensure that the psychology workforce has contemporary skills for a diverse Australian population.

Question 8: 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:

More broadly, we have concerns about the added pressure on Aboriginal educators and professionals to be supporting and educating providers to teach to and authentically address the competencies relating to working with Aboriginal and Torres Strait Islander Peoples. With regards to the exam, we wondered who will be writing the relevant sections of the exam and whether that will be adding pressure to a relatively small group of experts who are of Aboriginal and Torres Strait Islander backgrounds.

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:

1. It is possible that the NPE exemption for some international applicants has the unintended consequence of not sufficiently assessing some of the competencies since we will only rely on the transitional program to teach and assess these.

2. The timeframe for the exam transition implementation plan to reflect the new NPE Guidelines and the new Competencies may have incidental costs (some already discussed in our response to Question 6). HEPs are impacted adversely in that they are currently having to train students on the APS Code of Ethics since that is in force until the new PsyBA Code of Conduct comes into force on 1st of December 2025, and needing to consider the extent to which they also need to simultaneously teach the PsyBA Code of Conduct. Since HEP responses to this dilemma will be varied, with some HEPs only teaching the current Code and some also teaching the incoming Code, the resources of some HEPs will be additionally stretched, and students will have varying degrees of exposure and knowledge of the new Code. A similar dilemma applies to the new Competencies, which also come into force Dec 1, 2025. The impact on students/interns should not be underestimated and some responsibility should be borne by the PsyBA to mitigate some of this impact. For instance, students/interns who have had no or very little exposure/training regarding the new Code and new Competencies will have major gaps in their knowledge and skills. Upskilling in these will come at a considerable cost to their time and finances. Students who are already stretched (e.g., those from

marginalised, disadvantaged backgrounds) might be at the greatest risk of 'falling between the cracks' during this period of transition. As recommended in our response to Question 6 we recommend that the PsyBA offer relevant PD, particularly to those most likely to be affected during this period of transition to mitigate some of these concerns and assist interns to succeed in their NPE.

Other

Question 10: Do you have any other feedback or comments about the draft exam guidelines?

Your answer: