

## 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](mailto: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: Australian Pharmacy Council

Contact email: [REDACTED]

☐ 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
<p><b>Question 1:</b> Do you support updating the exam guidelines (Option 2)? Please provide a rationale for your view.</p>
<p><b>Your answer:</b></p> <p>The Australian Pharmacy Council (APC) supports updating the exam guidelines (option 2). It is noted that the proposed changes include adding the updated competencies for general registration as a psychologist in Australia. APC supports ensuring the guidelines remain contemporary and fit for purpose.</p> <p>The updated guidelines will align with recommendation 9 from the ‘Independent review of overseas health practitioner regulatory settings’.<sup>1</sup> Introducing an expedited pathway for overseas trained psychologists with substantially equivalent qualifications will support overseas trained psychologists to join the Australian workforce quicker.</p>
<p><b>Question 2:</b> Do you support including the updated general registration competencies as outlined in the <a href="#">Professional competencies for psychologists</a> into the draft exam guidelines? Please provide a rationale for your view.</p>
<p><b>Your answer:</b></p> <p>APC supports including the revised Professional competencies for psychologists in the draft exam guidelines. Transparency around the changed competencies, due for implementation from 1 December 2025, will support overseas trained practitioners to plan their journey to registration in Australia.</p>
<p><b>Question 3:</b> 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>
<p><b>Your answer:</b></p> <p>APC supports the adoption of the proposed new exemption from sitting the exam for applicants who have completed the higher degree pathway and for the international applicants with substantially equivalent qualifications.</p>

<sup>1</sup> Kruk R. 2023. Overseas Health Practitioner Regulatory Settings Review - Final Report, 2023. Accessed 03-Sept-2024 at <https://www.regulatoryreform.gov.au/news-and-events/2023-12-06-final-report-independent-review-overseas-health-practitioner-regulatory-settings>

The new exemptions will continue to align with the requirements set out in the National Law Section 42<sup>2</sup>, and support the findings of the 'Independent review of overseas health practitioner regulatory settings'.

Further, we recognise that international applicants will be required to undertake the transitional program. The transitional program will be critical in ensuring that internationally qualified psychologists demonstrate their competence in cultural safety, ethical, legal, and professional attributes as relevant to the Australian context.

#### 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:**

We have nothing further to add to the draft exam guidelines.

**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:**

The layout of the updated exam guidelines is logical. The draft guidelines are clear, relevant and workable. We note the expansion of the definitions to include current psychology terminology – the added definitions will help provide clarity and easy usage of the guidelines.

#### 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:**

APC supports the proposed date for publishing the transition and implementation plan for the exam guidelines. This approach will align the effect date (1 December 2025) for both the updated exam guidelines and the threshold professional competencies for psychologists, allow sufficient time for exams to be updated, and for candidates to prepare. APC recently transitioned between 2 exams for overseas trained pharmacists and our transition plan of 9 months allowed time for candidates to sit the 'old' KAPS exam prior to the 'new' OPRA<sup>TM</sup> exam. See here [APC announces re-designed KAPS exam | Australian Pharmacy Council](#)

<sup>2</sup> Queensland Government. 2009. Health Practitioner Regulation National Law Act 2009. Accessed 05-September-2024 at [https://classic.austlii.edu.au/au/legis/act/consol\\_act/hprml428/s52.html](https://classic.austlii.edu.au/au/legis/act/consol_act/hprml428/s52.html)

<p><b>Question 7:</b> 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.</p>
<p><b>Your answer:</b></p> <p>All changes can have positive or unintended effects. The following are some of the potential effects that the Board may want to consider when adopting the new guidelines.</p> <p><b>Potential positive impacts:</b></p> <ul style="list-style-type: none"> <li>• easier for overseas trained psychologists to gain registration to practice in Australia</li> <li>• positive growth of the psychology workforce – filling workforce gaps quicker</li> <li>• increase in preparedness of candidates for practice in the Australian setting</li> <li>• accessibility and availability of psychology services.</li> </ul> <p><b>Potential negative effects:</b></p> <ul style="list-style-type: none"> <li>• inconsistency of how internationally qualified psychologists' qualifications and experiences are assessed may lead to candidate confusion</li> <li>• increased workload for the Board/Ahpra as a result of an increase of applications from internationally trained psychologists</li> <li>• loss of opportunity to assess/evaluate applicants' knowledge gaps</li> <li>• an influx of internationally trained postgraduates with qualifications that may be more academic/research based and impractical, without an increase in the number of practising psychologists.</li> </ul>
<p><b>Question 8:</b> 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.</p>
<p><b>Your answer:</b></p> <p>APC notes that the removal the of exam requires those candidates to complete a transitional program. It is unclear how candidates in the transitional program will demonstrate competency of their health equity and human rights approach with Aboriginal and Torres Strait Islander Peoples and other priority groups. It is important that Aboriginal and Torres Strait Island peoples are included can input into, and guide, the development and delivery of competency assessments in this area.</p>



**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:**

Likely overseas trained practitioners who are exempt from sitting the exam will have a reduced overall cost for their registration journey though not paying an exam fee. The cost of the transition program is, however, unclear.

An increase in overseas practitioners who are able to register via a shortened pathway could be expected to increase the Australian workforce and offer greater choice when accessing a practitioner.

**Other**

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

**Your answer:**

The consultation does not provide much detail about how the Board will assess the equivalence of qualifications.

We understand that currently the volume of overseas trained psychologists seeking to practice in Australia is low. While assessing these applicants' qualifications on a case-by-case basis may be manageable at this stage this may soon become problematic when the number of applicants potentially grows with the removal of the exam requirement.

Our recommendation is for the Board to consider seeking support from the Australian Psychology Accreditation Council (APAC) to perform this function. As the national accrediting authority for the psychology profession, APAC is best placed to determine equivalence of qualifications obtained overseas as they will have existing frameworks that will ensure that this process is efficient, consistent and transparent.

APC thanks the Psychology Board for providing the opportunity for us to review and offer feedback on the proposed changes to the guidelines for the national psychology exam.