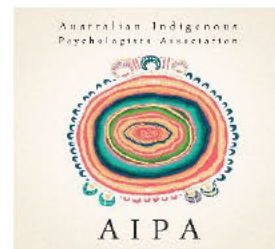




AIPEP
Australian Indigenous
Psychology Education Project



25 March 2025

Australian Health Practitioner Regulation Agency
National Boards
GPO Box 9958
Melbourne, VIC 3001

RE: Public Consultation – Draft guidelines for the national psychology exam.

The Australian Indigenous Psychology Education Project (AIPEP) and the Australian Indigenous Psychologists Association (AIPA) are pleased to present this joint submission on the **Draft guidelines for the National Psychology Exam**. AIPEP and AIPA support the concerted steps towards supporting a stronger, competent, and progressive psychological workforce that benefits all Australians.

AIPEP and AIPA would like to acknowledge the significant work that has been done by the Australian Health Practitioner Regulation Agency (Ahpra) and Psychology Board Australia (PsyBA, the Board). We agree with the proposed changes to enhance the National Psychology Exam to align with upcoming changes in the Professional Competencies for Psychologists and the Code of Conduct. This change is an importance piece of the ongoing reforms required to empower Aboriginal and Torres Strait Islander peoples, and rightfully shifts the responsibility of Cultural Safety to the psychology workforce rather than burdening Aboriginal and Torres Strait Islander peoples and communities.

AIPEP and AIPA have provided detailed feedback in the attached questionnaire. Notably We recommend:

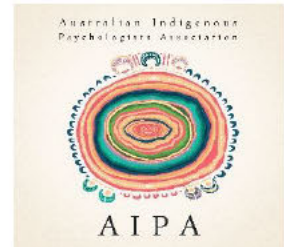
1. That both the National Psychology Exam and the guidelines have a strong emphasis on Cultural Safety that underpins all Professional Competencies for Psychologists, and the Code of Conduct.
2. That the National Psychology Exam is retained for International applicants.
3. That the Board engages in further consultation and reform work relating to the Transitional program for International applicants, specifically ensuring the robustness of regulatory scaffolding regarding Cultural Safety with Aboriginal and Torres Strait Islander peoples, families and communities.
4. We recommend ongoing consultation and working relationships with Aboriginal and Torres Strait Islander groups in psychology regarding the implementation of PsyBA reforms.

Australian Indigenous Psychology Education Project (AIPEP):

AIPEP is an innovative Aboriginal-led project pioneering the way in transforming and decolonising higher education psychology across Australia. AIPEP aims to transform psychology higher education and psychology workforce by decolonising and Indigenising psychology curricula and increasing Aboriginal and Torres Strait Islander student participation in psychology education and graduation



AIPEP
Australian Indigenous
Psychology Education Project



into the psychology workforce, supporting Indigenous psychologists, and working in partnership with workforce stakeholders. AIPEP works in close partnership with the Australian Indigenous Psychologists Association (AIPA). AIPEP has established a national Community of Practice to support and empower Higher Education Providers (HEPs) transform psychology education and better meet the needs of Aboriginal and Torres Strait Islander students. Currently, 34 higher education providers (HEPs) have joined the Community of Practice, which is 80% of HEPs that offer APAC-accredited psychology courses. AIPEP has led significant psychology workforce capacity building initiatives including the [AIPEP workforce capability framework](#) and [Listening More](#) suite of resources. AIPEP is more than pleased to discuss this submission further via [REDACTED]

[Australian Indigenous Psychologists Association \(AIPA\):](#)

AIPA is dedicated to promoting the equitable participation of Aboriginal and Torres Strait Islander people within the psychology profession in Australia. AIPA serves as a national voice for Indigenous psychologists, providing representation and support for both professionals and students in the field. The association is committed to improving the social and emotional well-being and mental health of Aboriginal and Torres Strait Islander peoples by advocating for culturally sensitive, accessible, and responsive psychological care. AIPA also engages in research and policy development to address the unique mental health needs of Indigenous communities. AIPA offers a [Cultural Responsiveness Training \(CRT\) Program](#) for Ahpra-registered psychologists, enhancing cultural safety and awareness. This evidence-based program builds skills in understanding Aboriginal and Torres Strait Islander well-being, mental health, and cultural identity, addressing historical and contemporary issues. It provides practical strategies for culturally safe practice and encourages self-reflection to improve engagement with Indigenous clients and communities. AIPA is more than pleased to discuss this submission further via [REDACTED].

yours sincerely,

[REDACTED]

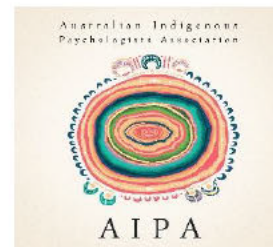
Belle Selkirk
Australian Indigenous Psychology Education
Project (AIPEP)

[REDACTED]

Vanessa Edwige
Board Chair, Australian Indigenous
Psychologists Association (AIPA)



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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 organization/s:

Australian Indigenous Psychology Education Project (AIPEP) and Australian Indigenous Psychologists Association (AIPA)

Contact email: [redacted] on behalf of AIPEP and AIPA

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:

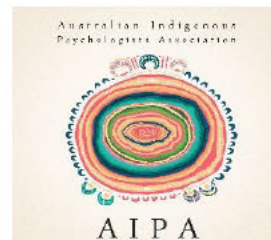
Yes, AIPEP and AIPA supports updating the National Exam guidelines to **align exam guidelines with the updated general registration competencies**. From our perspective, this will ensure those sitting the exam will be required to demonstrate minimum threshold competency that relates to cultural safety (as defined by National Law) and working with Aboriginal and Torres Strait Islander peoples. These changes would only serve to benefit Aboriginal and Torres Strait Islander peoples, families, and communities.

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.

Your answer:



AIPEP
Australian Indigenous
Psychology Education Project



Yes, AIPEP and AIPA supports including the updated general registration competencies as outlined in the Professional competencies for psychologists into the draft exam guidelines. In particular, the enhancements relating to Cultural Safety (e.g., Principle 2 in the Code of Conduct), and its embedding throughout the Competencies as well as the inclusion of Competency 8 and interrelated Competencies, are critical changes that will improve the quality of psychological care for Aboriginal and Torres Strait Islander peoples.

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:

AIPEP and AIPA appreciate the Board's efforts to streamline processes for International applicants. We appreciate the Boards work in determining substantial equivalence in International applicants qualifications. While we support streamlining processes, there are some very important considerations that we have outlined below:

Ahpra and PsyBA have rightfully recognised that the lived experience of Aboriginal and Torres Strait Islander peoples is unique and understanding the particular Australian context of colonisation, including its ongoing harms which continue to impact their psychological care, health, mental health, and wellbeing must be understood to an expected minimum threshold as outlined by the updated Professional Competencies for Psychologists and Code of Conduct. Additionally, Aboriginal and Torres Strait Islander psychological perspectives in theory and practice must also be learned and knowledge and competency assessed as per the updated Professional Competencies for Psychologists.

Given the nuances of Cultural Safety in the Australian context (which focuses on the unique lived experiences, histories and identities of Aboriginal and Torres Strait Islander peoples, families and communities), it is quite unlikely that an international psychology program would have adequately covered the relevant knowledge and skills specifically relating to Cultural Safety with Aboriginal and Torres Strait Islander peoples which underpins each Professional Competency for Psychologists, as well as Principle 2 in the Code of Conduct. On this basis, it will be challenging for the Board to conclude substantial equivalence in international qualifications in relation to Cultural Safety with Aboriginal and Torres Strait Islander peoples.

The Board recognised this shortfall in the National Psychology Exam consultation paper noting that the Transitional program is designed to capture "competencies specific to the Australian context" specifically "a. ethical, legal, and professional matters as relevant to the Australian context, including exercising professional reflexivity, purposeful and deliberate practice, and self-care and b. demonstrating a health equity and human rights approach when working with people from diverse groups relevant to the Australian context, and when working with Aboriginal and Torres Strait Islander Peoples, families, and communities." While we recognise the importance of this program for International applicants, it is uncertain whether the Transitional program (in its current form) is robust enough to ensure International applicants have the necessary knowledge and skills in Cultural Safety as it relates to the Australian context, including the lived experiences, histories and diverse identities of Aboriginal and Torres Strait Islander peoples, families and communities. Our concern is that the essential learning in Cultural Safety cannot be sufficiently covered in the Transitional program alone.

As outlined in the consultation paper, "The exam is one regulatory tool used to ensure that all applicants for general registration have obtained a minimum level of applied professional knowledge of psychology". Similarly, the Transitional program is one regulatory tool to ensure



minimum threshold of competencies. We would like to see a firmer stance from the Board in ensuring regulatory safeguards in Cultural Safety competencies for International applicants. Retaining both regulatory tools (the exam and transitional program) is therefore important.

In conclusion, it is vital that International applicants meet minimum threshold (and beyond) in working in culturally safe ways with Aboriginal and Torres Strait Islander peoples. It is our position that failure to do this would risk culturally unsafe psychological practices Aboriginal and Torres Strait Islander peoples. Therefore, we recommend:

1. The National psychology Exam is retained for International applicants as it relates to culturally safe psychological practices with Aboriginal and Torres Strait Islander peoples.
2. PsyBA engages in further consultation and reform work relating to the Transitional program, specifically ensuring the robustness of regulatory scaffolding regarding Cultural Safety with Aboriginal and Torres Strait Islander peoples, families and communities.

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:

AIPEP and AIPA recommends the National Psychology Exam has a strong emphasis on Cultural Safety that underpins all all Professional Competencies for Psychologists, and the Code of Conduct. This should be reflected strongly in the guidelines as well as the exam itself.

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:

\Yes, the language and structure is clear and we do not see any potential unintended consequences of the current wording.

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:

Yes. This aligns well with the timing of when the professional competencies come into effect and the lead time gives examinees adequate time to prepare. Any concerns raised in stakeholder engagement can be mitigated through educational resources such as PsyBA Factsheets.

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:

AIPEP and AIPA believes there will be positive impact by updating the National Psychology Exam to align with the Professional Competencies for Psychologists and Code of Conduct.



With regards to the proposed exemption for International applicants, should this change be implemented, there is a potential negative on Aboriginal and Torres Strait Islander clients- as outlined in question 8. There is also a potential impact on Indigenous psychologists who are Board approved supervisors. There is the potential for additional requests and load in supervising International applicants in the Transitional Program who have not completed prior learning in Cultural Safety with Aboriginal and Torres Strait Islander peoples. This potential negative impact can be mitigated through retaining the exam, ensuring a robust Transitional program emphasising Cultural safety, as well as other multilayered learning opportunities provided by Ahpra, PsyBA, and professional bodies.

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:

As highlighted in our response to question 3, the decision to make exempt 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, may have negative consequences for Aboriginal and Torres Strait Islander peoples who receive their psychological services. As we previously outlined, the lived experience of Aboriginal and Torres Strait Islander peoples is unique and understanding the particular Australian context of colonisation, including its ongoing harms which continue to impact their psychological care, must be understood to an expected minimum threshold as outlined by the updated Professional practice standards. Additionally, Aboriginal and Torres Strait Islander psychological perspectives in theory and practice must also be learned and knowledge and competency assessed as per the updated Professional Competencies for Psychologists and Code of Conduct. Failure to hold International applicants to the same standards of assessment specific to working with Aboriginal and Torres Strait Islander clients would risk culturally unsafe psychological practices.

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:

See our response to questions 3 and 8.

There may be adverse consequences for an International applicant, who was exempt from sitting the National Psychology Exam, go on to practice as a Registered Psychologist unwittingly in culturally unsafe ways, this can have an impact on the individual practitioner (i.e., notifications and complaints) as well as Aboriginal and Torres Strait Islander peoples, families, and communities. This potential negative impact can be mitigated through retaining the exam, ensuring a robust Transitional program emphasising Cultural safety, as well as other multilayered learning opportunities provided by Ahpra, PsyBA, and professional bodies.

Other

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

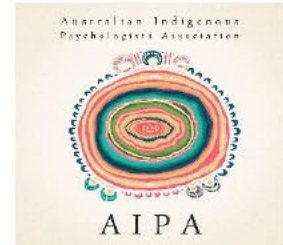
Your answer:

AIPEP and AIPA recommend the National Psychology Exam has a strong emphasis on Cultural Safety that underpins all Professional Competencies for Psychologists, and the Code of Conduct.

We recommend ongoing consultation and working relationships with Aboriginal and Torres Strait Islander groups in psychology regarding the implementation of PsyBA reforms. This ongoing



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partnership is essential in ensuring the reforms in cultural safety accurately and meaningfully align with the diverse needs and identities of Aboriginal and Torres Strait Islander peoples, families and communities.

We thank you for the opportunity to provide feedback on the revised National Psychology Exam guidelines.