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: psychonsultation@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 Clinical Psychology Association 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.

Your answer:

ACPA is in support of adopting the exam guidelines.

Aligning the guidelines with the updated 'Professional competencies for psychologists' will ensure registrants' competencies are in line with contemporary standards. The new exemption listed under '4. Exemptions', dot point number 3 will streamline the registration of internationally trained psychologists who have achieved qualifications equivalent to applicants completing the higher degree pathway in Australia. This level of qualification will provide sufficient protection of the public, while at the same time providing fairness within the system.

<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:

ACPA is in support of including the updated general registration competencies as outlined in the Professional competencies for psychologists into the draft exam guidelines. Aligning the guidelines with the updated 'Professional competencies for psychologists' will ensure registrants' competencies are in line with contemporary standards.

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:

ACPA is in support of adopting an exemption from sitting the exam for international applicants for general registration who hold a qualification that is substantially equivalent to a Board-approved fifth and sixth year qualification.

This exemption will streamline the registration of internationally trained psychologists who have achieved qualifications equivalent to applicants completing the higher degree pathway in Australia. This required level of qualification will provide sufficient protection of the public, while at the same time providing fairness within the system.

Furthermore, the required completion of the transitional program will ensure that applications meeting the exemption will acheive competencies relevant to the Australian context, specially ethical, legal and professional matters, and culturally safe and responsive clinical practice.

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:

ACPA does not believe there is any content that needs to be changed, deleted, or added into 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:

ACPA believes that the language and structure of the proposed draft exam guidelines is helpful, clear, relevant and workable. There does not appear to be any potential unintended consequences of the proposed 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:

ACPA supports the proposed transition and implementation plan.

Question 7: 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:

ACPA can see only positive impacts. A more streamlined process to register applicants with international qualifications, while at the same time ensuring that they meet equivalent qualification requirements to the higher degree pathway will boost the number of well-qualified psychologists in Australia at a time when there is a perceived high demand for high quality psychology services. This is positive for clients/consumers. Ensuring new registrants are well qualified to practice is positive for the reputation of the profession. Education providers will benefit who often seek to employ expert practitioner academics from overseas. Last, those applicants possessing the required international qualifications will benefit from lowered time and monetary costs to their registration process.

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:

Potential negative or unintended effects for Aboriginal and Torres Strait Islander Peoples or other priority groups in the community will be minimised by ensuring there is a robust transitional program for exempted applicants with the required international qualifications. A failure to properly ensure that registrants are fully competent in culturally safe and responsive clinical practice in the Australian context will pose an unacceptable risk of harm to these groups.

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:

ACPA does not believe that the proposed changes to the draft exam guidelines result in any adverse cost implications for practitioners, clients/consumers or other stakeholders.

Other

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

Your answer:

ACPA highlights a potential risk to the proposed exemption if the process to assess international qualifications as being substantially equivalent to a Board-approved fifth and sixth year qualification is not thorough, robust or valid. It is important that equivalence is demonstrated across coursework, placement, and research components. A watering down of the international qualification requirements will potentially lead to the registration of practitioners who do not possess the competencies for safe or effective practice.