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 Psychological Society 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:

Overall, the APS is supportive of updating the exam guidelines. Our responses to the questions below provide the context for our support and any concerns or recommendations for further consideration.

Question 2: 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 - it is logical, reasonable and practicable that the exam guidelines align with the updated general registration competencies. This will ensure that the National Psychology Exam reflects minimum knowledge, skills, abilities, behaviours, values, and other attributes required for a psychologist to practise safely and effectively.

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:

The APS supports adopting this exemption, noting that the assessment of appropriateness for registration of international applicants who hold a qualification that is substantially equivalent to a Board-approved fifth and sixth year qualification will be aligned with the current assessment of equivalence process. As outlined on page 4 of the consultation document, only 2.6% of applicants for general registration were trained internationally between 2019-2024. The exemption will result in fewer international applicants being required to sit the exam.

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:

The APS notes the change on Page 6 of the draft exam guidelines under the heading 'Exam Failure'. Specifically, this previously stated:

"Candidates who fail the exam on their first or second attempt can re-sit the exam after completing a further three-month period of supervised practice as a psychologist or provisional psychologist."

This now states:

"Candidates who fail the exam on their first or second attempt can re-sit the exam in the next exam period."

The APS supports the removal of the reference to the "three-month period" on the basis that the exam is scheduled approximately every 3 months, which makes this phrase in the guidelines somewhat redundant.

However, the APS is concerned that removing the reference to completing "a period of supervised practice", may have unintended consequences. For example, whilst a minimum of 80 hours of supervision is required for a provisional psychologist during the internship period, frequency of supervision can be determined by the supervisor and may vary according to the needs of the provisional psychologist and their practice context. Once the minimum of 80 hours is completed, there is a risk that supervision may become less frequent.

The APS suggests that the draft exam guidelines would be strengthened if they reinforced the importance of supervision for candidates who fail the exam. Specifically, supervision should not only remain regular and frequent between a failed exam and the next exam attempt, but also be targeted to the specific curriculum domains that were failed in the exam. The intent would be to increase the candidate's knowledge and practice competency in these areas before the next exam attempt. For this measure to be successful, however, timely feedback would be required from the Psychology Board of Australia to provide relevant information to the candidate's about their exam performance.

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 language and structure of the proposed draft exam guidelines is helpful, clear, relevant and workable.

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:

The APS supports the transition and implementation plan. It is important for candidates who are undertaking the first exam to include the updated professional competencies to have enough time to prepare. Exam candidates will need to have knowledge of the new competencies via professional development and/or university educaton to allow a seamless transition from the internship program (as a provisional psychologist), to successfully complete the exam and practice as a registered psychologist.

Many provisional psychologists who undertake the internship program in 2025 will be aiming to sit the exam in Feb 2026 (or later). However, these candidates may not have adequate knowledge of the new competencies having completed the Master of Professional Psychology (MPP) in 2024 or prior. Consideration may need to be given to whether these candidates are disadvantaged due to any additional work required to ensure they have knowledge of, and practice in, the updated professional competencies.

The Board will also need to consider candidates who fail the exam prior to February 2026, and whether they will be required to resit the exam that includes the updated professional competencies – potentially placing them at a disadvantage.

<u>Question 7:</u> 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:

There is likely to be specific impacts on many, if not all, of the stakeholders outlined above in Question 7 if the draft exam guidelines were to be approved. The APS recommends the Board undertake targeted consultation with stakeholders to better understand any positive, negative, and unintended effects. In addition, the APS suggests adding peak bodies/representative associations to the list of stakeholders who will potentially be impacted as we have a role in supporting our members to prepare for the updated exam guidelines.

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:

The APS is not aware of any potential negative or unintended effects for Aboriginal and Torres Strait Islander Peoples or other priority groups in the community that may result from the proposed changes to the draft exam guidelines.

The APS would expect the changes to the draft exam guidelines to potentially have positive effects for these groups, given a key purpose of the update is to align the exam guidelines with the new professional competencies for psychologists, which include a greater focus on Aboriginal and Torres Strait Islander Peoples and/or other priority groups with a focus on cultural safety, i.e., Competency 7: Demonstrates a health equity and human rights approach when working with people from diverse groups, and Competency 8: Demonstrates a health equity and human rights approach when working with Aboriginal and Torres Strait Islander Peoples, families and communities.

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 possibly result in adverse cost implications for provisional psychologists who fail the exam on their first and/or second attempt and require additional supervision to ensure adequate knowledge of the updated competencies.

Other

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

Your answer:

No further feedback or comments.