

# **Public consultation**

10 February 2023

# Updated competencies for general registration

The Psychology Board of Australia (the Board) is releasing this public consultation paper to seek feedback on developing updated competencies for general registration.

#### **Providing feedback**

If you wish to provide **detailed feedback** please complete the feedback submission template at Attachment I and submit the form by email to: psychconsultation@ahpra.gov.au.

If you wish to provide **brief feedback** you can use the <u>online consultation survey</u>. This form is based on the 'questions for consideration' that are listed on page 23 of this consultation paper. The question format (mostly multiple choice) means there is minimal opportunity for written feedback.

The submission deadline is close of business Tuesday 11 April 2023.

#### **Publication of submissions**

The Board publishes submissions at our discretion. We generally publish submissions on our website to encourage discussion and inform the community and stakeholders. Please advise us if you do not want your submission published.

We will not place on our website, or make available to the public, submissions that contain offensive or defamatory comments or which are outside the scope of the subject of the consultation. Before publication, we may remove personally identifying information from submissions, including contact details.

We can accept submissions made in confidence. These submissions will not be published on the website or elsewhere. Submissions may be confidential because they include personal experiences or other sensitive information. Any request for access to a confidential submission will be determined in accordance with the *Freedom of Information Act 1982* (Cth), which has provisions designed to protect personal information and information given in confidence. Please let us know if you do not want us to publish your submission or want us to treat all or part of it as confidential.

Published submissions will include the names of the individuals and/or the organisations that made the submission unless confidentiality is requested.

#### **Next steps**

After public consultation closes, we will review and consider all feedback from this consultation before making decisions about the proposed professional competencies, and transition timeframes.

# Contents

Overview	3
Background	3
What are the professional competencies?	3
How are the professional competencies used in regulation?	
Board's review of the core competencies	4
Objectives of the review	4
Principles for reform	
Development of the updated competencies for general registration	6
Current competencies for general registration	8
Proposed changes	ç
Eight core competencies	
Embedding cultural safety into the competencies	
Strengthening inclusion	
Increased focus on professional reflexivity, deliberate practice and self-care	11
Threshold competencies	
One document	12
The competencies are holistic and high level	13
The drafting approach	
Options	16
Option 1 – Status quo	
Option 2 – Adopt the Draft professional competencies for psychologists	
Preferred option	
Estimated impacts of the updated competencies	17
Potential benefits of the preferred option	
Potential impacts of the preferred option	
Potential unintended consequences of the preferred option	
Timing and transition	19
Questions for consideration	23
Relevant sections of the National Law	25
Appropriate (within this decument)	25
Appendices (within this document)	
A: Changes affecting the regulatory context for the psychology profession	
B: Patient and consumer health and safety impact statement	
C: Statement of assessment	25
Attachments (separate attachments)	25
D: Draft professional competencies for psychologists	
E: Summary of proposed changes between the current and updated competencies for general	
registration	
F: Proposed changes to the Provisional registration standard	
G: Proposed changes to the General registration standard	
H: Proposed changes to the Guidelines for the 4+2 internship program	
I: Feedback submission template	25

#### **Overview**

1. The Psychology Board of Australia (the Board) is consulting on updating the competencies for general registration as a psychologist in Australia. We are seeking your feedback on whether to maintain the current competencies (option 1) or adopt updated competencies as outlined in the attached *Draft professional competencies for psychologists* (option 2). We are asking you to choose your preferred option and to answer specific questions about the proposed draft competencies (listed on page 23). This paper provides background and information about the proposed updated competencies.

#### **Background**

- In 2019, the Board started a comprehensive review of the existing professional competencies for psychologists in Australia as part of the <u>Education and training reform</u> (ETR) program of work. An overview of the Board's approach to reform can be found in our <u>Green paper</u>.
- 3. The purpose of the ETR program of work is to review and refresh the professional competencies to maintain their relevance as the threshold required for safe and effective contemporary psychology practice in Australia. The competencies for general registration will be reviewed first (this consultation), and then Area of practice endorsement (AoPE) competencies (future consultation).

#### What are the professional competencies?

4. Competencies are a set of benchmarks that describe the knowledge, skills, abilities, behaviours, values and other attributes needed to perform safely and effectively in a particular occupation. Professional competencies for psychologists are used variously by different groups, including educators, accreditation agencies, supervisors, employers, consumers, psychologists and psychology regulators.

#### How are the professional competencies used in regulation?

- 5. It is the Board's responsibility as the regulator to establish the benchmarks for safe and effective practice as a psychologist in Australia. Competencies provide the public with assurance that psychologists are trained to a consistent and acceptable level for safe and effective practice.
- 6. Competency thresholds are used to determine if individuals can demonstrate the required competencies for registration as a psychologist in Australia and as a benchmark for maintaining registration in a practitioner's scope of practice throughout their professional career. For example, the Board uses competencies for setting the benchmarks for Board-approved programs of study and internships (e.g., the 5+1 internship program) that lead to registration. The Board can refer to the competencies to evaluate a registrant whose level of competence to practise may pose a risk of harm to the public (e.g., based on a complaint or notification to the Board). Psychologists use the competencies to help plan their annual Continuing professional development (CPD) goals each year for renewal of their registration and to maintain knowledge and skills.
- 7. National competency thresholds are used across many health professions in the National Registration and Accreditation Scheme (the National Scheme) to ensure that only suitably trained and qualified people in the health profession are registered.<sup>1</sup>
- 8. Internationally, competency-based assessment is the accepted standard for regulatory oversight with registration boards, accreditation agencies and professional associations in many countries producing competency-based guidelines or benchmarks to support the safe and effective practice of psychology.

<sup>&</sup>lt;sup>1</sup> For example, there are: Professional capabilities for registered Aboriginal and Torres Strait Islander Health Practitioners, Professional capabilities for Chinese medicine practitioners, Professional capabilities for medical radiation practitioners, Standards of practice for midwives, registered nurses and enrolled nurses, Nurse practitioner standards of practice, Australian occupational therapy competency standards, Capabilities for osteopathic practice, Professional capabilities for registered paramedics, and the Physiotherapy practice thresholds in Australia and New Zealand.

#### Board's review of the core competencies

#### Objectives of the review

- 9. This review aims to ensure that the competencies for general registration continue to be an effective regulatory tool to ensure safe and effective psychology practice. The objectives are to:
  - a) Update the general registration competencies to ensure they remain relevant and consistent with current and future psychological practice.

The Board reviews the competencies regularly to ensure they are relevant to contemporary practice in the profession. The ETR program of work was initiated by the Board to review and improve the description of competency expectations for psychologists to ensure that the registration categories are being used effectively to promote safe practice both now and into the future.

b) Ensure the competencies are aligned with community (clients and employer) needs.

Since the National Scheme started in 2010 there have been significant changes to public health needs based on, for example, changing population demographics, heightened mental health needs arising from the COVID-19 pandemic, and an increasing focus on community wellbeing as part of the national mental health reform agenda. This review aims to ensure that all psychologists are properly trained and qualified to safely and effectively deliver services that are aligned with the changing public health needs.

 Ensure the competencies support the development of a flexible, sustainable and diverse workforce.

There have been significant changes to the context in which the Board does its work. This includes changes in legislation, accreditation, psychology training and employment preferences (see Appendix A). This review aims to ensure that the proposed updated competencies for registration are responsive to these changes, that they are useful for practitioners, are relevant for contemporary practice across the diversity of contexts where psychologists work, and support the development of a sustainable workforce.

d) Improve the alignment between the requirements for registration and the requirements for the accreditation of programs of study.

For the Board to use registration categories effectively, the competencies required for psychology training (graduate competencies) and the competencies required for registration must be aligned. This is an ongoing process of review, consultation, updating and synchronising the requirements, where the Australian Psychology Accreditation Council (APAC) develops the requirements for programs of study (for approval by the Board) and the Board sets the requirements for registration.

New <u>APAC Accreditation Standards for Psychology Programs</u> (APAC Standards) were published in 2019 and updated the graduate competencies for a Board-approved qualification.<sup>2</sup> For the first time the new APAC Standards outlined both *professional competencies* (for general registration) and *competencies for specialised area of practice* (relevant for AoPE). The focus of this consultation is improving the alignment of the graduate competencies with the core competencies required for general registration. Many of the proposed improvements to the Board's general registration competencies are already incorporated into the graduate competencies.

e) Ensure competencies for general registration and area of practice endorsement are set at the right level for each level of training.

Psychologists, consumers and other stakeholders are often unclear about the required competencies for general registration and for the nine areas of practice endorsement.<sup>3</sup> The ETR program of work aims to improve clarity about the competencies required and ensure that the competencies are set at the right level for each level of training.

<sup>&</sup>lt;sup>2</sup> See the APAC website for more information: <u>www.psychologycouncil.org.au.</u>

<sup>&</sup>lt;sup>3</sup> For more information about AoPE see: <a href="www.psychologyboard.gov.au/About/Education/Endorsement-meaning.aspx">www.psychologyboard.gov.au/Endorsement.aspx</a> and <a href="www.psychologyboard.gov.au/Endorsement.aspx">www.psychologyboard.gov.au/Endorsement.aspx</a>.

There are three registration categories for the psychology profession with each embracing general registration competencies as core:

- provisional psychologists are working towards meeting the general registration competencies
- **psychologists holding general registration** are continuing to meet the general registration competencies in the context of their scope of practice by doing regular CPD, and
- **non-practising psychologists** met the general registration competencies when they were practising and will need to meet them again should they wish to return to general registration.

Area of practice endorsement (AoPE) is not a separate registration category but rather a *notation on general registration*. An individual who wishes to hold an endorsement must hold general registration, have completed a postgraduate qualification approved for AoPE, and have successfully completed the relevant registrar program.

This consultation focuses on ensuring the updated competencies are at the threshold level for general registration. That is, the level of knowledge and skill expected of all psychologists. Updating the general registration competencies will help all those who need clarity about the competencies – such as the public, higher education providers, industry and psychologists.

# f) Ensure Australian competencies are properly aligned with international competency benchmarks.

The Board is committed to developing internationally recognised competencies for the psychology profession in Australia, particularly given the increasing globalisation of the health workforce. As part of this commitment we have adopted the <u>International declaration of core competencies in professional psychology</u> (the International Declaration). The aim of the International Declaration is to serve as the foundation for a coherent global system for equating psychology registration, accreditation and training, and conduct, at the time of entry into the profession.<sup>4</sup>

This means that it is beneficial to regularly review and revise the competencies for general registration and advanced training (AoPE) in Australia with international benchmarks. It is especially important to benchmark competencies from countries where there is the most international workforce mobility with Australia (that is, New Zealand, United Kingdom, and North America).

Comparisons with international accreditation and regulation standards are complex. This is because accreditation and regulation standards vary widely across countries. Keeping this complexity in mind, a benchmarking review of the competencies required by international regulators shows that the Australian competencies require some updating and realignment (see Paragraph 13a). For example, some competencies required for endorsement in Australia are core competencies in other countries (that is, the equivalent of general registration) and some AoPE competencies in Australia are not well aligned with similar competencies required for specialisation internationally.

#### g) Review and refresh our approach to writing the competencies.

The field of competency development is evolving in pursuit of better ways to capture and convey the knowledge, skills and attributes required of different professionals, including psychologists.

This review updates the language and structure of the psychology general registration competencies to ensure alignment with new developments in good practice competency development and the formats used by international psychology regulators. The review also aims to ensure the competencies remain relevant across the diverse contexts where psychologists work, and that the proposed competencies have enough detail to be useful and measurable.

<sup>&</sup>lt;sup>4</sup> For more information on the International Declaration see the International Project on Competence in Psychology (IPCP): <a href="https://www.psykologforeningen.no/foreningen/english/ipcp">www.psykologforeningen.no/foreningen/english/ipcp</a>.

#### **Principles for reform**

- 10. We developed five principles to inform our approach to the review process:
  - a. **Principle 1: Competencies are to be written within a regulatory framework.** This means the focus is on setting the minimum threshold competency necessary to practise effectively and safety as a psychologist in Australia.
  - b. **Principle 2: Competency descriptions for general registration should be clarified and strengthened**. General registration competencies are *core competencies* that all psychologists should be able to demonstrate irrespective of where they work. Clients should expect a minimum standard level of care from any psychologist they access.
  - c. Principle 3: Community access and need are at the centre. Any review of professional competencies should ensure that the Australian community has sustainable access to the full range of psychological services required.
  - d. **Principle 4: Supporting workforce supply**. The aim is to ensure the workforce is qualified to practise in a competent and ethical manner. The development of clearer descriptions of the competencies needed for general registration will improve understanding of the competencies, support diversity in the psychology workforce, and ensure community access to the range of services they need.
  - e. **Principle 5: Developing a streamlined competency model that produces a clearer definition of a psychologist in Australia.** The public, higher education providers, industry and psychologists need to be clear about what knowledge and skills are *core competencies* expected of all psychologists (general registration).

## Development of the updated competencies for general registration

11. The development of the updated competencies for general registration is founded on an evidence-informed and consultative process, and has broadly involved the following steps:

#### Desktop research and review

- 12. This step involved review of the Board's existing professional competencies against current national and international standards, policy and legislative developments and developments within the profession. It included review of the following:
  - 2019 APAC Standards
  - International Declaration
  - international competency benchmarks for psychology regulation
  - competency frameworks used by other health professions in the National Scheme
  - the contextual factors and complexities that affect the regulation of psychologists in Australia
  - Board's standards, codes and guidelines that outline professional competencies for safe practice, noting the policy review process for updating professional competencies listed across several documents.

## Seeking expert advice

- 13. In this step we commissioned external independent consultants and appointed an expert advisory group to review and develop the initial draft of updated professional competencies for psychologists. This included:
  - a. **Competency mapping** Independent consultants with expertise in education, accreditation, higher education reforms and competency writing were appointed to objectively and impartially review our current competencies, and to map them against international comparisons and the APAC Standards. The aim was to identify any improvements that could be made to the competencies.
  - b. **Psychology specific advice** A Psychology Expert Reference Group (PERG) was appointed to work alongside the consultants and provide advice on competencies for general registration. PERG members were selected for their expertise in training and supervising provisional psychologists, and in psychology regulation and psychology accreditation. The PERG met six times in 2020 and held its

final meeting in December 2020. <u>Communiques</u> about the group's work can be accessed on our website.

c. **Seeking advice from Aboriginal and Torres Strait Islander Peoples** – Australian governments have committed to a new <u>National Agreement on Closing the Gap (the National Agreement)</u>. The National Agreement states that it is 'underpinned by the belief that when Aboriginal and Torres Strait Islander Peoples have a genuine say in the design and delivery of policies, programs and services that affect them, better life outcomes are achieved.'

We have engaged several Aboriginal and Torres Strait Islander individuals and groups to provide feedback during development of the updated professional competencies for psychologists to ensure that they adequately demonstrate the competencies for culturally safe care. To date, we have consulted with the National Scheme's Aboriginal and Torres Strait Islander Health Strategy Group (the Strategy Group), the Australian Indigenous Psychology Association (AIPA), the Indigenous Allied Health Association (IAHA), as well as several psychologists with expertise in cultural competency. We will continue to consult closely with Aboriginal and Torres Strait Islander Peoples throughout the consultation process.

#### Preliminary consultation

14. Next, in 2021 and 2022, we conducted preliminary consultations on the draft updated competencies with a targeted group of key stakeholders, including regulatory stakeholders, professional associations, Aboriginal and Torres Strait Islander groups, and consumer groups.

#### **Board** approval

15. We have incorporated the expert advice and feedback from prelimitary consultations and approved a draft of the updated professional competencies for public consultation.

#### **Current competencies for general registration**

16. There are currently eight core competencies that an individual must demonstrate before being eligible for general registration. Psychological knowledge and skill are gained through a combination of completing formal accredited qualifications and supervised practice. These eight core competencies are:

C1: Competency 1	Knowledge of the discipline
C2: Competency 2	Ethical, legal and professional matters
C3: Competency 3	Psychological assessment and measurement
C4: Competency 4	Intervention strategies
C5: Competency 5	Research and evaluation
C6: Competency 6	Communication and interpersonal relationships
C7: Competency 7	Working with people from diverse groups
C8: Competency 8	Practice across the lifespan

- 17. The minimum number of years of training needed to achieve these core competencies and to become a psychologist in Australia is six years. The minimum requirements for general registration are detailed in the Board's <u>General registration standard</u> and include multiple pathways to registration:
  - 4+2 internship pathway a four-year accredited sequence of study followed by a two-year Boardapproved internship (this pathway closed to new applications on 30 June 2022)<sup>5</sup>
  - **5+1 internship pathway** a five-year accredited sequence of study followed by a one-year Board-approved internship
  - **Higher degree pathway** a post-graduate qualification at the fifth and sixth year (or higher)
  - Overseas pathway an overseas qualification assessed by the Board as substantially equivalent.
- 18. The eight core competencies are the same irrespective of pathway choice. Assessment of each competency is mandatory. A diagram of the domestic training pathways to general registration as a psychologist is published on the Board's website.
- 19. The competency requirements for provisional and general registration are outlined in the <u>provisional and general registration standards</u>. These competency requirements are explained in more detail for the Board-approved internship (the +2 and +1) in the <u>Guidelines for the 4+2 internship program</u> and the <u>Guidelines for the 5+1 internship program</u>.

<sup>&</sup>lt;sup>5</sup> For information on the retirement of the 4+2 internship pathway to general registration see: <a href="https://www.psychologyboard.gov.au/Registration/Provisional/Retirement-of-4-2-internship">www.psychologyboard.gov.au/Registration/Provisional/Retirement-of-4-2-internship</a>.

#### **Proposed changes**

- 20. The Draft professional competencies for psychologists are at Attachment D. A comparison between the current competencies and proposed updated competencies, including specific changes and updates for each of the eight core competencies can be found at Attachment E.
- 21. The key proposed changes to the competencies are outlined below.

#### Eight core competencies

- 22. Eight updated general registration competencies are proposed. This is the same number of competencies that we currently have, but the competencies have been reorganised, improved and given new competency titles, as follows:
  - a. The current general competencies *Knowledge of the discipline* (Competency 1), and *Research and evaluation* (Competency 5), have been combined in an updated competency: *Applies scientific knowledge of psychology to inform safe and effective practice* (updated Competency 1).
  - b. The current Competency 2: *Ethical, legal and professional matters* has been expanded into two competencies and now includes information from other Board documents into the updated Competency 3: *Exercises professional reflexivity, deliberate practice and self-care*.
  - c. The current Competency 7: Working with people from diverse groups has been expanded into two competencies: Demonstrates a health equity and human rights approach when working with Aboriginal and Torres Strait Islander Peoples, families and communities (updated Competency 7) and Demonstrates a health equity and human rights approach when working with people from diverse groups (updated Competency 8).
  - d. The current Competency 8: Working across the lifespan is both a standalone competency and integrated into all the other seven competencies. The updated competencies propose to remove working across the lifespan as a standalone competency and keep it integrated within all the eight updated competencies instead.
  - e. The following current competencies for general registration have been reviewed and updated: Competency 3: *Psychological assessment and measurement*, Competency 4: *Intervention strategies*, and Competency 6: *Communication and interpersonal relationships*.

#### Embedding cultural safety into the competencies

- 23. The Draft professional competencies for psychologists emphasise culturally safe care. Culturally safe practice is the ongoing critical reflection of health practitioner knowledge, skills, attitudes, practising behaviours and power differentials in delivering safe, accessible and responsive healthcare free of racism. Cultural safety is determined by Aboriginal and Torres Strait Islander individuals, families and communities.
- 24. We are committed to embedding cultural safety into the health system. In June 2018 we signed the Aboriginal and Torres Strait Islander health strategy statement of intent (the Statement of Intent). In February 2020 the Board, along with the other registered health professions in the National Scheme endorsed the National Scheme's Aboriginal and Torres Strait Islander health and cultural safety strategy 2020–2025 (the Health Strategy). These documents explain the role we all share in ensuring client safety for Aboriginal and Torres Strait Islander Peoples in Australia's health system. The Statement of Intent highlights the commitment to achieve equity in health outcomes between Aboriginal and Torres Strait Islander Peoples and other Australians and to close the gap by 2031.
- 25. More recently there have been changes to the National Law to recognise cultural safety as a guiding prinicple and objective. The <a href="Health Practitioner Regulation National Law and Other Legislation">Health Practitioner Regulation National Law and Other Legislation</a>
  <a href="Amendment Bill 2022">Amendment Bill 2022</a> (the Bill) passed in the Queensland Parliament in October 2022, and includes a new guiding prinicple:

The National Scheme is to ensure the development of a culturally safe and respectful health workforce that:

- i. is responsive to Aboriginal and Torres Strait Islander Peoples, and their health; and
- ii. contributes to the elimination of racisim in the provision of health services.6
- 26. This means that practitioners, regulators, accreditation authories, educators and employers are now working within the same principle and towards the same objective. It also means that all psychologists practising in Australia, irrespective of their own cultural background or work context, need to actively work towards providing positive health outcomes for Indigenous people. Psychologists are very likely to encounter Aboriginal and Torres Strait Islander clients over the course of a career. While some psychologists, such as those who work in schools, health departments, family services, or Aboriginal controlled health services are highly likely to work with First Nations Peoples, all psychologists working in Australia must have the knowledge and skills to work with our First Nations Peoples. The Board's competencies for general registration outline the expectations for safe and effective psychological practice when working with Aboriginal and Torres Strait Islander clients.
- 27. The competency mapping project (outlined in para. 13a) showed that the current general registration competencies are not aligned with the Statement of Intent, the Health Strategy, nor with the emphasis that other health professions in the National Scheme place on cultural safety. The current Competency 7 Working with people from diverse groups, is too brief and does not provide enough information, guidance or clarity about our requirements when working with Aboriginal and Torres Strait Islander Peoples, families and communities. The proposed updates provide additional detail about our competency expectations.
- 28. In addition, there is a gap between the Board's current competencies and international competency standards in this area (for example, the competencies required by the New Zealand Psychologists Board for culturally safe care). The knowledge and skills needed to work with Aboriginal and Torres Strait Islander clients has been a requirement in Australia since the publication of the current competencies in 2010 and have been embedded into the APAC Standards for psychology qualifications since 2019, There is strong agreement however, from educators, regulators, Aboriginal and Torres Strait Islander psychologists, and consumer groups, that the current *Working with diverse groups* competency needs to be reworked and updated.
- 29. There are two proposed core competencies focusing on working with people from diverse groups. While both competencies focus on being culturally responsive, one (Competency 7) focuses specifically on working with Aboriginal and Torres Strait Islander Peoples, their families and communities.
- 30. The proposed competencies use the definition of cultural safety outlined in the Health Strategy. This definition was developed in partnership with the <a href="National Health Leadership Forum">National Health Leadership Forum</a> following extensive consultation with key stakeholders including: National Boards, accreditation authorities, Aboriginal and Torres Strait Islander Peoples, professional associations, education providers, individual practitioners and health consumers. The consultation report is published on the Ahpra website on the <a href="Past consultations">Past consultations</a> page.

#### Strengthening inclusion

31. The Draft professional competencies for psychologists place an emphasis on sensitivity and respect when working with people who identify with a variety of social identity groups and cultural backgrounds.

32. Whether psychologists work as practitioners, educators, managers or researchers, all psychologists interact with people from diverse walks of life, people who have varying backgounds, perspectives, experiences and preferences. While we aim to understand clients, to affirm and appreciate their stories and to encourage them to bring their whole selves and all their identities to their interactions with psychologists, we can always learn ways to be more inclusive, and to better recognise our priviledged and powerful position as psychologists.

<sup>&</sup>lt;sup>6</sup> For more information about the updates to the National Law see Ahpra's media release

<sup>&</sup>lt;sup>7</sup> There is considerable national data outlining the social and emotional wellbeing needs of First Nations Peoples where referral to a psychologist would be appropriate. See: the <u>National Aboriginal and Torres Strait Island Health Survey (2019)</u>. In addition, working with Aboriginal and Torres Strait Islander clients is not reserved for psychologists who work in remote or very remote areas. The 2021 <u>Australian Census</u> showed that most First Nations people live in capital cities.

- 33. The competency mapping project showed that the current *Working with people from diverse groups* competency does not adequately address the kinds of diversity in the Australian community, nor the kinds of clients, colleagues and others that a psychologist is likely to encounter in their day-to-day work. Further, the current competency does not provide sufficient direction about how psychologists might safely and effectively work (within our scope of practice) with individuals, organisations and/or communitites, particularly those who are societally marginalised, to improve their wellbeing and psychological health.
- 34. The proposed competency on working with people from diverse groups (Competency 8) has been expanded and improved to include:
  - a. An emphasis on the importance of person-centred research, assessment and treatment, and actively working together towards providing positive health and mental health outcomes for people from all social identity groups and cultural backgrounds.
  - b. An expanded and more inclusive list (not exhaustive) of diversity areas (17 rather than the current five areas listed).8
  - c. Specific inclusion of migrants and refugees, their families and communities.
  - d. An emphasis on the importance of developing an understanding of the ways that different forms of diversity intersect with each other (for example, when a male refugee client is seeking help from a female Australian psychologist).
  - e. A clear focus on the psychologist's responsibility to understand the history and cultural biases of psychology and its effects on diverse groups, to recognise their own personal background and how to interact with people who are different to the practitioner, and to exercise self-reflection and critical evaluation of their own practice.
  - f. Deliberate inclusion of the term 'cultural responsiveness' rather than 'cultural competence' to highlight the importance of practitioners engaging in ongoing learning.

#### Increased focus on professional reflexivity, deliberate practice and self-care

- 35. The Draft professional competencies for psychologists place a greater focus on practitioners exercising professional reflection and reflexivity, deliberate practice and managing their wellbeing and self-care. These are all essential components of practising professionally and safely and in a sustainable way (see updated Competency 3).
- 36. To some extent these competencies are embraced by the description of the current *Ethical, legal and professional matters* competency. However, this description does not provide sufficient detail about our requirements for direction or clarity of meaning. The proposed Competency 3 expands and more clearly addresses our expectations about 'professional matters'.
- 37. Reflection and reflexivity, deliberate practice and self-care are competencies already established within the profession but are not clearly explained in the current competencies and instead are noted in other Board documents. For example, the <u>Guidelines for continuing professional development</u> encourage deliberate practice when developing a CPD learning plan, and the <u>exam curriculum</u> (see Professional issues pp. 4–5). outlines the importance of professional self-management, self-reflection, self-assessment, self-care and adhering to the <u>Code of ethics</u>.
- 38. The competency mapping project showed that international psychology regulators are becoming more explicit about addressing self-care, deliberate practice and reflexivity in their competency standards for safe and effective practice. In addition, the challenges psychologists have faced in caring for themselves, their familes and their clients as a result of the COVID-19 pandemic highlight the importance of self-care in supporting wellbeing and safe and effective practice. As a result, this competency has been intentionally strengthened.

Public consultation – Updated general registration competencies/February 2023

<sup>&</sup>lt;sup>8</sup> We have broadly matched this expanded list with the <u>American Psychological Association Equity, Diversity and Inclusive language guidelines.</u>

#### **Threshold competencies**

- 39. Since the National Scheme started in 2010 psychologists have been required to demonstrate competence by completing a Board-approved qualification for registration and meeting the requirements for general registration (at the point of first application for general registration), and completing 30 hours of CPD each year (to maintain/renew registration). Psychologists have also been required to practise within their scope of practice, and to maintain competence through recency of practice.
- 40. In the Draft professional competencies for psychologists we are proposing to adopt the term 'threshold professional competency' to improve clarity about our benchmarks, and to ensure psychologists and clients are aware of our expectations for professional competency. We are not proposing a higher (or lower) threshold.
- 41. The term 'threshold professional competency' is a benchmark that describes the minimum professional knowledge, skills and other attributes necessary to practise as a registered psychologist in Australia. This is based on the premise that competency can be described on a continuum. The threshold represents the point on the continuum at which the minimum acceptable level of competence is reached to practise safely and effectively as a psychologist. The use of the words 'safe and effective practice' is considered important to ensure competencies are relevant in the regulatory context.
- 42. The term 'threshold professional competency' is used across several other professions regulated in the National Scheme. By aligning with the wording used by other Board's in the National Scheme we are making it easier for psychologists who work in multi-disciplinary teams to communicate professional benchmarks with colleagues and making it easier for clients to understand the competency benchmarks of their various health professionals.
- 43. Just as is the case now, we propose that threshold professional competence must be demonstrated upon initial application to meet the general registration standard, and psychologists will need to maintain at least the threshold level of competency in all areas pertinent to their individual scope of practice throughout their career. Maintaining the currency of skills and knowledge is proposed to be achieved in the same way that it is now through supervision and reflective practice, CPD, and work experience (including meeting the Recency of practice registration standard).

#### One document

#### Improving understanding

- 44. Currently, the competency requirements for general registration are outlined in the following Board standards, guidelines, and documents:
  - a. Provisional and general registration standards
  - b. Guidelines for the 4+2 internship program and Guidelines for the 5+1 internship program
  - c. Guidelines for the national psychology exam, and the National psychology exam curriculum.
- 45. Our approach with the Draft professional competencies for psychologists is to create a single document that lists all the competencies in one place. This is in line with the approach used by other health practitioner boards in the National Scheme. It has the advantage of improving clarity and readability of the requirements for general registration. The one document approach is expected to improve the usefulness of the competencies by making it easier for clients and psychologists to understand the knowledge and skills expected of psychologists. In addition, publishing the competencies in one place will make it easier for psychologists to self-assess against the competencies and plan their annual CPD goals each year for renewal of their registration.
- 46. Various international psychology regulators have now moved to a single document to outline competencies for registration, with some, such as New Zealand and the United Kingdom, including competencies for both general registration and AoPE (or their equivalents) in the same document.<sup>10</sup> It is

<sup>&</sup>lt;sup>9</sup> For example, see Professional capabilities for registered Aboriginal and Torres Strait Islander Health Practitioners, Professional capabilities for Chinese medicine practitioners, Professional capabilities for medical radiation practitioners, Capabilities for osteopathic practice, Professional capabilities for registered paramedics, and the Physiotherapy practice thresholds in Australia and New Zealand.
<sup>10</sup> See <a href="https://psychologistsboard.org.nz/forms-guidelines/">https://psychologistsboard.org.nz/forms-guidelines/</a> and www.hcpc-uk.org/standards/standards-of-proficiency/practitioner-

<sup>&</sup>lt;sup>10</sup> See <a href="https://psychologistsboard.org.nz/forms-guidelines/">https://psychologistsboard.org.nz/forms-guidelines/</a> and <a href="https://psychologistsboard.org.nz/forms-guidelines/">www.hcpc-uk.org/standards/standards-of-proficiency/practitioner-psychologists/</a>.

anticipated that once reviewed, the professional competencies for AoPE (currently listed in the <u>Area of practice endorsement registration standard</u>) will be included in this document too.

#### Reviewing the competencies

47. We recognise that a set of competency benchmarks can never be comprehensive or complete. They are always a work-in-progress and need to be periodically reviewed. The documents listing the current competencies for general registration each have a different review timeline, making it challenging to synchronise improvements to the competencies or to engage in broader reform (see Table 1). An additional aim of the one document approach is to support a sustainable and simple policy review process by removing the need to continually synchronise the competency requirements in different documents. It will make it easier to review and update the competencies in the future.

Table 1: Review timeframes for Board documents that refer to the core competencies

Document	Last reviewed
Guidelines for the 5+1 internship program	2013
General registration standard	2016
Guidelines for the 4+2 internship program	2017
Provisional registration standard	2017
National psychology exam curriculum	2018
Guidelines for the national psychology exam	2019

#### The competencies are holistic and high level

48. The current competencies for general registration are written at a high level (so they are applicable to all contexts where psychologists work) and are used holistically (the competencies are not standalone but are interconnected and overlap). In the Draft professional competencies for psychologists we have made improvements to this approach and are being more explicit about writing the competencies at a high (or macro) level and taking a holistic approach.

## High level format

- 49. Psychologists work in different settings, including direct and indirect client care, management, administration, accreditation, policy, regulation, research and teaching, and across a diversity of contexts in public and private sectors. The Board's definition of practice in the Recency of practice registration standard addresses the diverse contexts where psychologists work. The purpose of high-level competencies is to clearly describe the requirement at a macro level to allow the flexibility required for psychologists (and their employers) to articulate the competencies across the variety of practice contexts and settings where psychological work is carried out.
- 50. One problem with the current competencies is that while they are high level, they either provide too little information to explain our requirements (such as Competency 2: Ethical, legal and professional matters where the competency title and descriptor are virtually the same), or the competency descriptor contains detailed lists that are primarily relevant to psychological practice in only one work setting such as direct client care (see Competency 4: Intervention strategies). In the Draft professional competencies for psychologists the competencies have been improved to better balance providing both succinct and sufficient information. We want to specify enough information to provide clarity and direction but avoid providing so much detail that extensive lists would be required to cover the competency descriptions in each of the diverse contexts where psychologists work.

#### A holistic view

51. While the eight core competencies are arranged thematically, they are not standalone, but are interconnected, overlap, and cannot be acquired or attained in a linear or isolated manner. The Draft professional competencies for psychologists are designed to be used holistically as this reflects the nature of providing safe and effective psychological services. That is, a psychologist is expected to draw on and smoothly and effectively integrate the eight core competencies in their professional work. For example, when conducting a psychological assessment (Competency 4), it must be conducted using scientific knowledge of testing (Competency 1). Test selection, administration, scoring/norms and interpretation must be based on understanding of diversity, such as age and culture (Competencies 7 and 8). The

- testing must be conducted professionally and ethically (Competencies 2 and 3), with results reported effectively and sensitively (Competency 6).
- 52. Using a holistic approach to writing the competencies also means that the competency descriptors can be streamlined. This means, for example, that *effective communication* does not need to be mentioned in C1 (communicating research results), C4 (assessment), or C5 (intervention) in addition to C6 (communicating effectively and appropriately).
- 53. We have made two allowances to this streamlined writing approach in the Draft professional competencies for psychologists to help psychologists and other stakeholders to understand the updated competencies, including our intended meaning and expectations, and to facilitate a smooth transition to the updated competencies, as follows:
  - a. To help with understanding the updated Competency 7 (working with Aboriginal and Torres Strait Islander Peoples, families, and communities), we have included reference to cutural safety in all eight competencies. This provides additional guidance about how psychologists are expected to integrate cultural safety into practice.
  - b. The Draft professional competencies for psychologists propose to remove *Working across the lifespan* (current Competency 8) as a standalone competency. To help practitioners to understand that practice across the lifespan remains a core knowledge and skill for psychologists the terms 'lifespan' and 'age' are specifically used in several of the updated competencies (Competencies 4, 5 and 8).

#### The drafting approach

#### Competency framework

- 54. During this review we needed to determine a competency framework to be used. The competency frameworks currently used by both the Board and international psychology regulators generally use a framework based on *clusters of key competencies*. For example, focusing on key behaviours (following legal and ethical standards, professional behaviours, maintaining relationships) and the application of knowledge and skills in specific areas (evidence-based practice, assessment, interventions, research).
- 55. Other competency frameworks cluster around the *key roles* performed by the health practitioner (e.g. communicator, leader, health advocate). Some other health professions regulated by the National Scheme have framed their competency (or capability) statements using the CanMEDS model.<sup>11</sup> This model was developed in 1996 by the Royal College of Physicians and Surgeons of Canada and is a common competency framework for medicine and some other healthcare professions around the world. The CanMEDS framework has not been employed nationally or internationally (to our knowledge) for developing competency benchmarks by psychology regulators.
- 56. We decided to focus on developing the updated Australian competencies for general registration using a framework based on *clusters of key competencies*. This allows us to better align the Australian competencies with international psychology benchmarks. We decided not to change our competency framework at this time, as it would distract from the broader program of work being done through the ETR program of work and add complexity. In this consultation we want the ETR agenda of reviewing and refreshing the competency requirements to be at the centre of the review. In addition, the proposal to develop one document for the general registration competencies will require a transition period (see paragraph 44–46 and 90–103) and provides a sufficient program of work for this consultation.
- 57. This means that our updated competency framework is modelled on those of the International Declaration and regulators from countries where there is the most international psychology workforce mobility with Australia. However, we have been mindful to ensure that key capabilities relating to all seven CanMEDS roles have been considered and included, as relevant, in our updated competencies.
- 58. Following the approach used in the International Declaration we use the terminology of 'competencies' and 'descriptors'. The **core competency or competency title** refers to the broad key area of practice and

<sup>&</sup>lt;sup>11</sup> See: <a href="http://canmeds.royalcollege.ca/">http://canmeds.royalcollege.ca/</a> and Frank JR, Snell L, Sherbino J, editors. <a href="CanMEDS 2015 Physician competency framework">CanMEDS 2015 Physician competency framework</a>. Ottawa: Royal College of Physicians and Surgeons of Canada available from <a href="http://canmeds.royalcollege.ca/uploads/en/framework/CanMEDS%202015%20Framework EN Reduced.pdf">http://canmeds.royalcollege.ca/uploads/en/framework/CanMEDS%202015%20Framework EN Reduced.pdf</a>. Accessed 13 December 2021.

essential characteristics of safe and competent psychologists in Australia. The **descriptors** outline the key features of competent practice across a range of contexts, situations, varied complexity and uncertainty. Descriptors also detail the minimum knowledge, skills, abilities, behaviours, values, and other attributes required to enable an individual to practise safely and effectively in the profession.

#### Addition of a preamble and definition section

- 59. In line with good practice in competency development, a preamble and definition section have been included in the Draft professional competencies for psychologists to clarify meaning and help readability. The definitions have been developed based on those in the Board's standards and guidelines, the APAC Standards, and the International Declaration.
- 60. A preamble has been added to:
  - a. outline the purpose, legislative context and regulatory use of the competencies
  - b. highlight key features and changes
  - emphasise that the competencies are high level and need to be understood and articulated within the diversity of professional contexts and settings where psychologists work
  - d. highlight the synchronicity between the core competencies (they are not standalone and should be viewed holistically), and
  - e. provide other background information.

#### How we write the competencies

61. We have updated our approach to drafting the competencies for general registration to be better aligned with the structure and language used by international regulators and accreditation authorities. Specifically, the competencies have been written to ensure they are easier to measure, and action verbs are used in the title and their descriptions. For example, 'Practises ethically and professionally' replaces the current 'Ethical, legal and professional matters'.

#### **Options**

#### Option 1 - Status quo

- 62. Option 1 proposes to continue with the current competencies for general registration published in 2010.
- 63. This means that we would continue to use the current competencies when approving programs of study and internship programs, assessing applications for initial registration, and making decisions about notifications (complaints). Psychologists would continue to self-assess against the 2010 competencies when determining their CPD needs when they renew their registration each year.
- 64. In keeping with good regulatory practice, the current competencies are due for review. While available information suggests that the current competencies for general registration are working reasonably well, several developments have provided the opportunity to update and refresh the competencies. They include:
  - a. Changes to the National Law committing practitioners, regulators, accreditation authories, educators and employers to work intentionally towards ensuring client safety for Aboriginal and Torres Strait Islander Peoples in Australia's health system
  - b. Publication of the International Declaration
  - c. Publication of new APAC Standards
  - d. Various changes effecting the regulatory context for the psychology profession (Appendix A).
- 65. Maintaining the current competencies for general registration would mean opportunities for improvement to the competencies would be missed, and the competencies could become progressively less contemporary and relevant.

#### Option 2 - Adopt the Draft professional competencies for psychologists

- 66. Option 2 proposes to update the competencies for general registration taking account of the changes in the regulatory environment since 2010 and adopt the Draft professional competencies for psychologists at Attachment D.
- 67. Adopting the proposed Draft professional competencies for psychologists will ensure that competencies for general registration continue to be relevant, contemporary, based on the best available evidence and aligned with international best practice. It will capture the opportunities that would be missed in Option 1.
- 68. Contemporary professional competencies will provide consumers, educators, accreditation agencies, international regulators, employers, supervisors and professional bodies with clear guidance about our expectations of the threshold professional competencies necessary to practise safely and effectively as a registered psychologist in Australia.
- 69. Creating a single document that lists all the professional competencies will improve clarity, readability and usefulness of the competencies. It will make it easier for psychologists and stakeholders to understand the knowledge, skills and attributes that are expected of a registered psychologist. Publishing the competencies in one document will align with other Boards in the National Scheme and make it easier to review and update the competencies in the future.
- 70. Amending and expanding the competencies on working with diverse groups to specifically address cultural safety, cultural responsiveness and inclusion (Competencies 7 and 8) will support the importance of safe and effective care with Aboriginal and Torres Strait Islander Peoples and other priority groups within the community.
- 71. Placing a greater emphasis on professional reflexivity, deliberate practice and self-care in the competency document (updated Competency 3) will support the development of a flexible, sustainable, healthy and effective workforce.

#### **Preferred option**

72. The Board prefers Option 2.

#### Estimated impacts of the updated competencies

- 73. We have carefully considered the possible consequences of updating the competencies for general registration, inlcuding the effect on:
  - a. Psychological practice and client safety
  - b. Knowledge and awareness
  - c. Regulatory effectiveness
  - d. Cost.
- 74. We estimate that the impacts on psychologists, industry and other stakeholders, arising from the changes outlined in the proposed updated competencies will be positive.

#### Potential benefits of the preferred option

#### Psychological practice and client safety

- 75. We expect that the proposed updates will help in the development of an increasingly sophisticated and culturally responsive psychology workforce. The proposed professional competencies include expanded guidance on Aboriginal and Torres Strait Islander health and cultural safety, cultural responsiveness, and working safely with people from diverse groups, including culturally and linguistically diverse groups (CALD). The proposed changes include more information about our expectations that psychologists respect the diverse cultures, beliefs, gender identities, sexualities and experiences of people and adopt practices that respect diversity, avoid bias, discrimination and racism. This complements psychologists' existing legal obligation not to unlawfully discriminate against an individual on the basis of race, colour, belief, gender identity, sexuality or experiences or any other specified grounds.
- 76. It is expected that these improvements will benefit client and consumer health and safety. Our aim is that it will improve the effectiveness of care with clients from diverse backgrounds, where interactions with a psychologist are experienced as safe, and culture and identity are respected. These changes are expected to result in meaningful and lasting improvements.
- 77. We have proposed a transition plan to ensure there is a culturally safe implementation of the updated competencies (see paragraphs 90–103).

#### Knowledge and awareness

- 78. The improvements to the Draft professional competencies for psychologists are designed to clarify some areas of uncertainty, and improve awareness of our expectations for safe and effective practice. The following improvements are expected to make it easier for psychologists, clients, and the community to understand what knowledge and skills are expected of a registered psychologist:
  - **Improving clarity** by providing both succinct and sufficient information to explain the competencies (for example, introducing threshold competencies, updating the drafting approach)
  - **Improving awareness** of the core competencies for general registration that are already established within the profession but are not clearly explained in the current competencies and instead are noted in other Board documents (for example, self-reflection, reflexivity, deliberate practice, self-care; see paragraph 35–38)
  - Improving understanding about the knowledge and skills expected of a registered psychologist by
    placing all the competencies for general psychologists in one document
  - Clarifying meaning and improving readability by including a preamble and definitions section to the professional competency documents.

#### Regulatory effectiveness

79. The proposed Draft professional competencies for psychologists do not introduce a new regulatory requirement or change the amount of regulation for the psychology profession. Instead, they

- incorporate both good practice and meaningful improvements to the existing competencies for general registration.
- 80. Clearer expectations about the core competency requirements for psychologists across the training pathways and registration categories is expected to have positive impacts for the public, higher education providers, industry, funding bodies and psychologists.
- 81. Better aligning and articulating the general registration competencies with Australian accreditation standards and international benchmarks for psychology training and registration will help improve the effectiveness of our regulatory categories, align psychology training and competency development more effectively with registration categories, and promote safer and more consistent knowledge and skills for psychology international workforce mobility.

## Potential impacts of the preferred option

#### Becoming familiar with the changes

- 82. Psychologists, supervisors, and training providers will need to become familiar with the improvements to the proposed competencies, particularly Competency 3 (Exercises professional reflexivity, deliberate practice and self-care), Competency 7 (Demonstrates a health equity and human rights approach when working with Aboriginal and Torres Strait Islander Peoples, families and communities) and Competency 8 (Demonstrates a health equity and human rights approach when working with people from diverse groups).
- 83. While many psychologists, training providers and supervisors will already be demonstrating these competencies (or teaching them) as a matter of course in their day-to-day work, others will need to focus intentionally on integrating the skills and knowledge for these competencies into their practice and deepen their understanding. It is expected that becoming familiar with the updated competencies will be primarily subsumed within existing processes. Practitioners can do any CPD that is needed relevant to their scope of practice as part of their existing annual CPD requirement. Training providers can use their existing quality assurance processes to review their units of study and make any necessary updates.
- 84. Given the benefit to Aboriginal and Torres Strait Islander Peoples and other priority groups in the community by the improvement to Competencies 7 and 8, we expect the benefits of adopting the updated competencies will significantly outweigh the costs, which are likely to be modest in comparison.
- 85. Similarly, the enhancement to Competency 3 is expected to support psychologists to practise professionally and safely in a sustainable way where the benefits to psychologists, their families and clients are expected to outweigh any costs.

# Potential unintended consequences of the preferred option

- 86. We will undertake wide-ranging public consultation with higher education providers, employers, supervisors, psychologists, the psychology profession and client safety, consumer and Aboriginal and Torres Strait Islander organisations to gather feedback about the proposed changes.
- 87. Any unintended impacts of the proposed Draft professional competencies for psychologists raised during consultation will be considered and action will be taken to mitigate any potential consequences for, healthcare users, Aboriginal and Torres Strait Islander Peoples and vulnerable members of the community, and psychologists.
- 88. The Patient and Consumer Health and Safety Impact Statement at Appendix B has more information about our assessment of the potential effects of the proposed Draft professional competencies for psychologists.
- 89. Our statement of assessment against Ahpra's procedures for the development of registration standards, codes and guidelines, and principles for best practice regulation (Appendix C) provides more information about our view that the preferred option to update the competencies is the best option for protection of the public.

#### Timing and transition

#### Supporting transition for stakeholders

- 90. To support a smooth implementation of the Draft professional competencies for psychologists (if approved), we plan to set a future date for implementation to allow a transition period for psychologists, employers, supervisors, and others to become familiar with the changes.
- 91. We propose that the Draft professional competencies for psychologists would be published when approved, but not take effect until a later date. The estimated date of effect will be 1 December 2024. This coincides with the annual renewal date for general registration to make it easier for psychologists to plan their CPD. This will allow enough lead time to support the following transition tasks:
  - a. APAC will need to develop and initiate any additional processes to support higher education providers to integrate the updated competencies. This may involve making changes to the APAC Rules for accreditation, changes to site visits or updating the graduate outcomes. Since many of the proposed improvements to the Board's general registration competencies are already incorporated into the graduate competencies (in the 2019 update to the APAC Standards) these changes are expected to be minimal.
  - b. Higher education providers (HEPs) will need to make changes to teach the updated competencies to their students. While HEPs are already subject to the new APAC Standards they will need to meet any updated processes or changes implemented by APAC. APAC will continue to work with HEP's to ensure the Board's competencies and the graduate competencies align. It is expected that enhancements to units of study will be primarily subsumed within the usual quality assurance processes when revising course content, and the usual APAC course re-accreditation processes addressing broader departmental policies and procedures.
    - We are aware that work is already underway to support the development and training of a culturally responsive psychology workforce. For example, the Australian Indigenous Psychology Education Project (AIPEP) has developed a community of practice with the Heads of Departments and Schools of Psychology Association (HODSPA) in Australia to improve culturally safe education and to progress work on de-colonising the psychology curriculum. Heads of Schools from over 29 universities have been involved. In addition, AIPEP and APAC have formed a Cultural Responsiveness Working Party to better operationalise the current APAC Standards on cultural responsiveness. This work will also support the integration of the proposed Competencies 7 and 8.
  - Provisional psychologists will need to familiarise themselves with the updated professional competencies in preparation for applying for general registration.
    - All provisional psychologists who apply for general registration after the updated competencies come into effect will need to meet the updated competencies - either through their higher degree training or through an internship program. When the updated competencies come into effect, board-approved programs of study and the national psychology exam will be based on the updated competencies and supervisors will assess intern performance against the updated competencies instead of the current ones.
    - Provisional psychologists who transition to general registration before the updated competencies come into effect will need to develop these competencies by undertaking relevant CPD. All psychologists holding general registration are required to do 30 hours of CPD each year to maintain registration. Developing these competencies would be included in individual outcomefocused learning plans.12
  - d. Practitioners who currently hold general registration will need to self-assess against the updated professional competencies when published, and if necessary, undertake relevant CPD.
    - Instead of self-assessing against the current competencies when developing a CPD learning plan each year, psychologists will self-assess against the updated competencies. Self-assessment involves psychologists evaluating their own professional knowledge, skills and attributes and identifying whether they meet, don't meet, or exceed each of the eight (updated) core

<sup>&</sup>lt;sup>12</sup> See the Continuing professional development standard for more information on CPD requirements.

- competencies as relevant to their scope of practice. Feedback from peers, supervisors or the workplace could be sought as part of the self-assessment process.
- ii. Some psychologists will find that they already meet most, if not all, the updated competencies as relevant to their scope of practice, while others will identify areas where competency development is needed. Any training can be done as part of the 30 hours of CPD that all psychologists complete each year to maintain registration.
- iii. The Draft professional competencies for psychologists address how experienced psychologists can meet and maintain threshold professional competency.
- e. **Professional bodies** for psychology and education providers can develop CPD courses to help psychologists who need training to develop their skills, or to support accreditation and training providers to improve their processes, policies and training content. This will be most relevant regarding the competencies that have had the most change (Competencies 3, 7 and 8).
- f. Finally, the transition period will allow **all other stakeholders** enough time to familiarise themselves with the updated competencies. For example, this will allow industry and employers to articulate the high-level competencies into their specific work contexts.
- 92. Our plan is that the current core competencies for general registration will continue to be used until the updated competencies take effect. Table 2 outlines the proposed publication and transition timeframes.

#### Working collaboratively towards success

- 93. We are committed to ensuring a smooth transition to the updated competencies (if approved) and that the change process itself is culturally safe.
- 94. We are aware that, although updating the competencies for general registration is the Board's responsibility under the National Law, many aspects of implementing the updated competencies are the responsibility of other bodies. For example, we are not involved in developing CPD courses, reviewing and developing the content for higher degree training, or for assessing higher education providers against accreditation standards.
- 95. To ensure both smooth and culturally safe implementation for aspects of the reform that are the responsibility of other bodies, we have intentionally worked closely with key stakeholders from the start. As well as working closely with Aboriginal and Torres Strait Islander Peoples on cultural safety throughout the development of the competencies (see paragraph 13c), we have formed two working groups to work with us throughout the consultation process to ensure a smooth and successful transition to the updated competencies.
- 96. The Board's Education and Training Reform Implementation Working Group (ETRIWG) focuses on transition for the **future psychology workforce**. It has membership from the Board, APAC, HODSPA and Aboriginal and Torres Strait Islander psychology groups. The focus of this group is to work on ways to incorporate the updated competencies into both accreditation documents and processes, as well as curriculum design for higher education providers.
- 97. The Board's Professional Associations Stakeholder Working Group (PASWG) focuses on transition for the **current psychology workforce**. It has membership from the Board, psychology professional bodies and Aboriginal and Torres Strait Islander psychology groups. The focus of this group is on identifying and developing CPD opportunities for psychologists and to provide guidance on how psychologists can self-assess against the updated competencies and identify if there are any areas where competency development is needed. This group also provides a forum for engagement between the Board and representatives of the psychology profession about each step in the ETR program of work, including consultation, providing feedback, and transition.

#### **Updating Board documents**

98. Any updates to the competencies for general registration will require revision of the Board's standards and guidelines where the current competencies are listed.

- 99. For the Draft professional competencies for psychologists to take effect the current competencies need to be removed from the <u>Provisional and general registration standards</u>. It is recommended that these changes be made as part of this consultation (see Attachment F and G for proposed changes).
- 100. It is recommended that updating the <u>Guidelines for the 4+2 internship program</u> to include the updated competencies is part of the current consultation (see Attachment H for proposed changes). These changes are minimal, and no other updates need to be made to the 4+2 guidelines as this pathway is being retired.<sup>13</sup>
- 101. The <u>Guidelines for the 5+1 internship</u> are currently being reviewed through a separate consultation process that includes a broader revision of this pathway in line with our usual periodic review of all standards and guidelines. It is recommended that removing the current competencies and referencing the updated competencies be included in this separate 5+1 consultation.
- 102. It is recommended that a separate consultation process on the <u>Guidelines for the national psychology exam</u> and the <u>National psychology exam curriculum</u> be carried out in 2023–24. This is a large piece of work as the guidelines, curriculum, exam items, and exam resources will all need to be revised to incorporate the updated competencies for general registration. Resources to support exam preparation include: The Brief orientation to the exam, Recommended reading list, Sample exam questions, and Practice exam.
- 103. The tasks, timeframes, consultation process and proposed approach for updating these documents is outlined in Table 2.

Table 2: Transition tasks and timeframes for updating Board documents

Document	Task	Consultation	Timeframe
Professional competencies for psychologists	Develop updated general registration competencies.	Purpose of this consultation.	Publish when approved.  Estimated date of effect: 1 December 2024.
Provisional registration standard	Remove reference to the current core competencies for general registration.  Edit the definitions section of the standard to remove unecessary and outdated information.  No new content to be added to standard.	Changes recommended as part of this consultation. See Attachment F.	Publish when approved.
General registration standard	Remove reference to the current core competencies for general registration.  Edit the definitions section of the standard to remove unecessary and outdated information.  No new content to be added to standard.	Changes recommended as part of this consultation. See Attachment G.	Publish when approved.

<sup>&</sup>lt;sup>13</sup> For information on the retirement of the 4+2 internship pathway to general registration see: <a href="https://www.psychologyboard.gov.au/Registration/Provisional/Retirement-of-4-2-internship.aspx">www.psychologyboard.gov.au/Registration/Provisional/Retirement-of-4-2-internship.aspx</a>.

Document	Task	Consultation	Timeframe
Guidelines for the 4+2 internship program	This pathway is being retired. Remove reference to the current core competencies for general registration and replace with updated competencies. No other changes to be made.	Changes recommended as part of this consultation. See Attachment H.	Publish when approved.  All 4+2 interns applying for general registration after the date of effect of the updated competencies will need to meet the updated competencies.
Guidelines for the 5+1 internship program	These guidelines are currently being reviewed. Remove current competencies and reference updated competencies as part of this review.	Separate 5+1 consultation process being carried out in 2022-2023.	Publish when approved.  All 5+1 interns applying for general registration after the date of effect of the updated competencies will need to meet the updated competencies.
Guidelines for the national psychology exam  National psychology exam curriculum  Resources to support exam preparation (e.g. A brief orientation to the exam, Recommended reading list, Sample exam questions, Practice exam).	National psychology exam (and exam resources) will need to be updated to incorporate the updated competencies for general registration.	Separate consultation process on the exam guidelines and resources to be carried out in 2023–2024.	Publish when approved.  First exam incorporating updated competencies to be scheduled for the first exam sitting after the revised professional competencies for psychologists come into effect.

#### **Questions for consideration**

104. We are seeking your feedback on the development of the Draft professional competencies for psychologists.

Specific questions we would like you to address are below.

#### **Preferred option**

1. Are you in support of updating the professional competencies for general registration? Please provide a rationale for your view.

#### Structure of the updated competencies

- 2. Do you agree with approach to create a single document that lists all the professional competencies in one place?
- 3. The term 'threshold professional competency' has been introduced to describe the minimum professional competency necessary to practise safely and effectively as a registered psychologist in Australia.

Do the Draft professional competencies sufficiently describe the threshold level of professional competency required to safely practise as a psychologist in a range of contexts and situations?

4. We have improved our approach to drafting the competencies to better align with international psychology regulators, to emphasise that the competencies are interconnected (holistic approach) and to improve how we write the competencies (e.g. using action verbs).

#### Do you agree with the updated drafting approach?

5. The Draft professional competencies for psychologists have been written at a high (macro) level aimed to provide sufficient information for clarity and direction, but flexible enough to be made operational in the diverse contexts and situations where psychologists train and work.

Did we get the balance right? Please provide a rationale for your view.

6. The Draft professional competencies for psychologists include a preamble (p.3-10) and definition section (p. 16-19).

Do you support this addition? Is the content clear, relevant and complete?

7. Is the language and structure of the Draft professional competencies for psychologists helpful, clear, relevant and workable? Are there any potential unintended consequences of the current wording?

# Organisation of the updated competencies

8. The Draft professional competencies for psychologists propose to reorganise the eight core competencies.

Are you in support of combining the current *Knowledge of the discipline* (Competency 1), and *Research and evaluation* (Competency 5) into a new competency: *Applies scientific knowledge of psychology to inform safe and effective practice* (updated Competency 1)?

9. The Draft professional competencies for psychologists propose to place an intentional focus on professional reflexivity, deliberate practice and self-care (updated Competency 3).

Do you support this proposal? Please explain why.

10. The Draft professional competencies for psychologists include amended and expanded core competencies on Aboriginal and Torres Strait Islander health and cultural safety (updated Competency 7).

Is there any content that needs to be clarified, added, amended or removed? Please provide details.

11. The Draft professional competencies for psychologists include an expanded core competency on working with people from diverse groups, including demonstrating cultural responsiveness (updated Competency 8).

Is there any content that needs to be clarified, added, amended or removed? Please provide details.

## **Competencies and their descriptors**

**12.** The Draft professional competencies for psychologists outline eight updated core competencies:

Competency 1: Applies scientific knowledge of psychology to inform safe and effective practice

Competency 2: Practices ethically and professionally

Competency 3: Exercises professional self-reflection and deliberate practice

Competency 4: Conducts psychological assessments

Competency 5: Conducts psychological interventions

Competency 6: Communicates and relates to others effectively and appropriately

Competency 7: Demonstrates a health equity and human rights approach when working with

Aboriginal and Torres Strait Islander Peoples, families and communities

Competency 8: Demonstrates a health equity and human rights approach when working with people from diverse groups.

Do you suggest any changes to the eight core competencies and their descriptors? What would you like to see changed?

#### Outcome of implementing the updated competencies

13. We propose that an advanced copy of the professional competencies for psychologists would be published when approved, but not take effect until a later date. The estimated date of effect will be 1 December 2024. This coincides with the annual renewal date for general registration to make it easier for psychologists to plan their CPD and and for stakeholders to prepare to meet the updated competencies.

#### Are you in support of this transition and implementation plan?

14. We have recommended changes to the *Provisional and General Registration standards* and the *Guidelines for the 4+2 internship program* to remove reference to the current core competencies for general registration and replace with the updated competencies (see Attachments F, G, and H).

## Are you in support of these changes?

- 15. The Board proposes a transition process and timeframe for updating board documents with the new competencies including the:
  - Guidelines for the 5+1 internship program (separate consultation in 2023)
  - Guidelines for the National Psychology Exam, and National psychology exam curriculum (separate consultation in 2023/2024).

Are there any comments you have on the proposed consultation plan and transition timeframes?

16. Are there specific impacts for practitioners, higher degree providers, employers, clients/consumers, governments or other stakeholders that we should be aware of, if the Draft professional competencies for psychologists were to be adopted? Please consider both positive impacts and any potential negative or unintended effects in your answer.

- 17. Would the proposed changes to the Draft professional competencies for psychologists 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.
- 18. Would the proposed changes to the Draft professional competencies for psychologists result in any adverse cost implications for practitioners, patients/clients/consumers or other stakeholders? If yes, please describe.

#### Other

19. Do you have any other feedback or comments about the Draft professional competencies for psychologists?

#### Relevant sections of the National Law

- 105. Psychologists in Australia practise in a regulatory framework established by the <a href="Health Practitioner Regulation National Law">Health Practitioner Regulation National Law</a>, as in force in each state and territory (the National Law). The Board has powers under the National Law to develop standards, codes and guidelines about the eligibility of individuals for registration in the psychology profession. National competency-based benchmarks are used across the health professions in the National Scheme to ensure that only suitably qualified and competent people in the health profession are registered.
- 106. Relevant sections of the National Law for this review include: Section 3 (Objectives and guiding principles); Sections 38–40 (Registration standards, codes and guidelines); and Sections 52–54 (General registration).

#### **Appendices (within this document)**

- A: Changes affecting the regulatory context for the psychology profession
- B: Patient and consumer health and safety impact statement
- C: Statement of assessment

#### **Attachments (separate attachments)**

- D: Draft professional competencies for psychologists
- E: Summary of proposed changes between the current and updated competencies for general registration
- F: Proposed changes to the Provisional registration standard
- G: Proposed changes to the General registration standard
- H: Proposed changes to the Guidelines for the 4+2 internship program
- I: Feedback submission template

# Appendix A: Changes affecting the regulatory context for the psychology profession

Area	Example of change
Accreditation	Australian Psychology Accreditation Council (APAC) published new standards for psychology programs in January 2019. <sup>14</sup>
	Health Ministers commissioned an Independent Accreditation Systems Review (the Woods Review) in 2016. The final report published in October 2018 made recommendations to reform the accreditation systems for regulated health professions in Australia. 15
Psychology work and employment context	There has been a shift from psychologists working mostly in the public sector to more psychologists working in the private sector. Over 45 per cent of psychologists now report that they work either full-time or part-time in private practice. <sup>16</sup>
context	The COVID-19 pandemic has led to an increased need for mental health services in Australia, placing pressure on both the private and public workforce.
Inquiries	Various inquiries and reports have identified a need for workforce reform to support improved community access to appropriate care. For example, the Productivity Commission Mental Health Report. <sup>17</sup>
Funding of universities	The announcement of the Job-ready graduates package by the Department of Education, Skills and Employment (DESE, June 2020) overhauled the fee structures for undergraduate degrees and created changes to the funding of univeristies affecting psychology training and workforce. 18
Legislation	The introduction of new legislation and ammendments to current legislation that have affected the practice of psychologists, both across the nation, and in specific jurisdictions.
	For example, there have been changes to the National Law to recognise cultural safety as a guiding prinicple and objective. The <u>Health Practitioner Regulation National Law and Other Legislation Amendment Bill 2022</u> and there have been <u>legislative amendments</u> to the National Law regarding mandatory reporting and statutory offences. <sup>19</sup>
	There have been changes to the mandatory reporting of child abuse, and new legislation about voluntary assisted dying in several states. <sup>20</sup> <sup>21</sup>

www.sahealth.sa.gov.au/wps/wcm/connect/public+content/sa+health+internet/services/primary+and+specialised+services/voluntary +assisted+dying/voluntary+assisted+dying+in+south+australia; Tasmania: www.health.tas.gov.au/health-topics/voluntary-assisteddying; Victoria: www.health.vic.gov.au/patient-care/voluntary-assisted-dying and Western Australia: ww2.health.wa.gov.au/voluntaryassisteddying.

<sup>&</sup>lt;sup>14</sup> See <u>www.psychologycouncil.org.au</u>

<sup>&</sup>lt;sup>15</sup> See https://apo.org.au/node/235651

<sup>&</sup>lt;sup>16</sup> See Australian Institute of Health and Welfare reports on mental health workforce: www.aihw.gov.au/reports-data.

<sup>&</sup>lt;sup>17</sup> See <a href="https://www.pc.gov.au/inquiries/completed/mental-health#report">www.pc.gov.au/inquiries/completed/mental-health#report</a>
<a href="https://www.education.gov.au/job-ready">www.education.gov.au/job-ready</a>

<sup>&</sup>lt;sup>19</sup> For more information about the updates to the National Law see Ahpra's media release. For legislative amendments see:

www.ahpra.gov.au/About-Ahpra/What-We-Do/Legislation.

20 For information on mandatory reporting of child abuse see: <a href="https://aifs.gov.au/resources/resource-sheets/mandatory-reporting-">https://aifs.gov.au/resources/resource-sheets/mandatory-reporting-</a>

child-abuse-and-neglect.

21 For information on voluntary assisted dying see New South Wales: <a href="https://www.health.nsw.gov.au/voluntary-assisted-dying/Pages/default.aspx">www.health.qld.gov.au/system-governance/legislation/voluntary-assisted-dying-act</a>; South

# Appendix B: National Boards' Patient and consumer health and safety impact statement

#### February 2023

Statement purpose

The National Boards' Patient and Consumer Health and Safety Impact Statement (the statement) explains the potential impacts of a proposed registration standard, code or guideline on the health and safety of the public, vulnerable members of the community and Aboriginal and Torres Strait Islander Peoples.<sup>22</sup>

The four key components considered in the statement are:

- 1. The potential impact of the proposed Draft professional competencies for psychologists on the health and safety of patients and consumers particularly vulnerable members of the community including approaches to mitigate any potential negative or unintended effects.
- 2. The potential impact of the proposed Draft professional competencies for psychologists on the health and safety of Aboriginal and Torres Strait Islander Peoples including approaches to mitigate any potential negative or unintended effects.
- 3. Engagement with patients and consumers, particularly vulnerable members of the community about the proposal.
- 4. Engagement with Aboriginal and Torres Strait Islander Peoples about the proposal.

The National Boards' Patient and Consumer Health and Safety Impact Statement aligns with the National Scheme's <u>Aboriginal and Torres Strait Islander health and cultural safety strategy 2020–2025</u>, the <u>National Scheme strategy 2020–25</u> and reflect key aspects of the revised consultation process in the <u>Procedures for developing registration standards</u>, codes and guidelines and accreditation standards.

Below is our initial assessment of the potential impact of the proposed Draft professional competencies for psychologists on the health and safety of patients and consumers, particularly vulnerable members of the community, and Aboriginal and Torres Strait Islander Peoples. This assessment will be updated after consultation feedback.

1. How will this proposal impact on patient and consumer health and safety, particularly vulnerable members of the community? Will the impact be different for vulnerable members compared to the general public?

The Board has carefully considered the impacts the proposed Draft professional competencies for psychologists could have on patients' and consumers' health and safety, particularly on vulnerable members of the community when proposing a preferred option for consultation.

A primary goal of the proposed Draft professional competencies for psychologists is to review and refresh the professional competencies to maintain their relevance to the expectations of threshold competencies required for safe and effective contemporary psychology practice in Australia. It is expected that improving the competencies for general registration will have a positive impact on patient and consumer health and safety.

<sup>&</sup>lt;sup>22</sup> This statement has been developed by Ahpra and the National Boards in accordance with section 25(c) and 35(c) of the Health Practitioner Regulation National Law, as in force in each state and territory (the National Law). Section 25(c) requires Ahpra to establish procedures for ensuring that the National Registration and Accreditation Scheme (the National Scheme) operates in accordance with good regulatory practice. Section 35(c) assigns the National Boards functions to develop or approve standards, codes and guidelines for the health profession including the development of registration standards for approval by the Ministerial Council and that provide guidance to health practitioners registered in the profession. Section 40 of the National Law requires National Boards to ensure that there is wide-ranging consultation during the development of a registration standard, code, or guideline.

The following changes to the general registration competencies are expected to benefit both the general public and priority groups within the community:

- Strengthening the competencies for general registration by improving the description of competency expectations for psychologists will ensure that the registration categories are being used effectively to promote a consistent level of training and safe practice.
- Introducing the term 'threshold professional competency' will more effectively describe the minimum professional competency necessary to practise safely and effectively as a registered psychologist in Australia.
- Updating the competencies requried of the psychology workforce will ensure the competencies are contemporary, aligned with updated Australian accreditation standards and international best practice and aligned with changing public and consumer health needs.
- Listing all the competencies in one document will improve clarity, readability and usefulness of the
  competencies and as a result, improve stakeholder understanding of what knowledge and skills are
  expected of a registered psychologist.
- Amending and expanding the competencies on Aboriginal and Torres Strait Islander health and cultural safety (updated Competency 7) using the agreed definition of cultural safety within the National Scheme will encourage the development of an increasingly sophisticated and culturally responsive psychology workforce and ensure that client safety for First Nations Peoples is the norm.
- Amending and expanding the competencies on working with clients identitying with diverse social identity groups (updated Competency 8) will actively work towards providing positive health and mental health outcomes for priority groups within the community.

The proposed Draft professional competencies for psychologists are based on best available evidence, best practice approaches for national and international regulation of psychologists and monitoring of the current competencies for general registration.

Our engagement through consultation will help us to better understand possible outcomes and meet our responsibilities to protect patient safety and healthcare quality.

2. How will consultation engage with patients and consumers, particularly vulnerable members of the community?

In line with our <u>consultation processes</u> we will carry out wide-ranging consultation. We will engage with patient and consumer bodies, the Consumer Advisory Council, Aboriginal and Torres Strait Islander Peoples, peak bodies and other relevant organisations to get input and views from clients and consumers and priority groups within the community.

3. What might be the unintended impacts for patients and consumers particularly vulnerable members of the community? How will these be addressed?

We have carefully considered what the unintended impacts of the proposed Draft professional competencies for psychologists might be. Consulting with relevant organisations and prority groups within the community will help us to identify any other potential consequences. We will fully consider and take actions to address any unintended effects for patients and consumers that may be raised during consultation, particularly for vulnerable members of the community.

4. How will this proposal impact on Aboriginal and Torres Strait Islander Peoples? How will the impact be different for Aboriginal and Torres Strait Islander Peoples compared to non-Aboriginal and Torres Strait Islander Peoples?

We have carefully considered any potential impact of the proposed Draft professional competencies for psychologists on Aboriginal and Torres Strait Islander Peoples and how the impact compared to non-Aboriginal and Torres Strait Islander Peoples might be different to put forward the proposed option for feedback in the consultation paper.

The proposed Draft professional competencies for psychologists set the competencies for safe and effective practice as a psychologist in Australia. All psychologists, including Aboriginal and Torres Strait Islander psychologists and non-Aboriginal and Torres Strait Islander psychologists would be required to meet the updated competencies. Most of the improvements do not propose significant changes to the current competencies expected of psychologists, but primarily reflect existing good practice within the profession, clarify some areas of uncertainty, and improve awareness of and access to the competencies (see paragraphs 73–81).

The proposed Draft professional competencies for psychologists make cultural safety a critical component of safe and effective healthcare (see paragraphs 23–30). Culturally safe practice is the ongoing critical reflection of health practitioner knowledge, skills, attitudes, practising behaviours and power differentials in delivering safe, accessible and responsive healthcare free of racism. Cultural safety is determined by Aboriginal and Torres Strait Islander individuals, families and communities. All psychologists have a role in ensuring client safety for Aboriginal and Torres Strait Islander Peoples in Australia's health system. It is expected that the updated competencies will have a positive impact on Aboriginal and Torres Strait Islander client and consumer health and safety by encouraging culturally safe and respectful practice.

We believe that the preferred option outlined in this consultation paper will promote the health and cultural safety of Aboriginal and Torres Strait Islander Peoples without creating disproportionate burden on registered practitioners. Further engagement through consultation will identify other potential impacts of the proposed changes and help us to meet our responsibilities to protect patient safety and healthcare quality for Aboriginal and Torres Strait Islander Peoples.

# 5. How will consultation about this proposal engage Aboriginal and Torres Strait Islander Peoples?

The National Boards have committed to the <u>National Scheme's Aboriginal and Torres Strait Islander</u> <u>health and cultural safety strategy 2020–2025</u> which focuses on achieving patient safety for Aboriginal and Torres Islander Peoples as the norm, and the inextricably linked elements of clinical and cultural safety.

In developing the proposed Draft professional competencies for psychologists, we have engaged with Aboriginal and Torres Strait Islander Peoples, including the National Scheme's Aboriginal and Torres Strait Islander Health Strategy Group (the Strategy Group), the Australian Indigenous Psychology Association (AIPA), the Indigenous Allied Health Association (IAHA), as well as several eminent individual Aboriginal and Torres Strait Islander psychologists to seek guidance about Aboriginal and Torres Strait Islander health and cultural safety relevant to the proposed Draft professional competencies for psychologists (see paragraph 13c). We are continuing to engage with Aboriginal and Torres Strait Islander organisations and stakeholders throughout this consultation process to get further input from Aboriginal and Torres Strait Islander Peoples.

# 6. What might be the unintended impacts for Aboriginal and Torres Strait Islander Peoples? How will these be addressed?

We have worked closely with Aboriginal and Torres Strait Islander Peoples on cultural safety throughout the development of the Draft professional competencies for psychologists (see paragraph 13c), and have taken advice and carefully considered what might be any unintended impacts of the updated competencies on Aboriginal and Torres Strait Islander Peoples (see answer to Question 5 above).

In particular, we have worked with key stakeholders from the start of the program of work to ensure that mechanisms are in place to support culturally safe implementation and transition to the approved updated competencies, supervisors and higher education providers. We have formed two working groups to engage with us throughout the consultation process to address any concerns when they arise and to ensure a smooth and successful transition to the updated competencies (if approved) (see paragraph 90–103).

Continuing to engage with relevant peak bodies and Aboriginal and Torres Strait Islander Peoples will help us to identify any other unintended impacts. We will consider and take actions to address any other unintended impacts for Aboriginal and Torres Strait Islander Peoples that may be raised during consultation.

## 7 How will the impact of this proposal be actively monitored and evaluated?

Part of the Board's work in keeping the public safe is ensuring that all standards, codes and guidelines are regularly reviewed. If approved, we will monitor and regularly review the proposed Draft professional competencies for psychologists to check they are working as intended. The proposal to create one document that lists all the professional competencies for psychology registration will make it easier to review and update the competencies in the future.

# Appendix C: Statement of assessment – Board's statement of assessment against Ahpra's Procedures for the development of registration standards, codes and guidelines

## February 2023

Proposed Draft professional competencies for psychologists

The Australian Health Practitioner Regulation Agency (Ahpra) has <u>Procedures for the development of registration standards, codes and guidelines</u>. These procedures have been developed by Ahpra in accordance with Section 25 of the Health Practitioner Regulation National Law, as in force in each state and territory (the National Law), which requires Ahpra to establish procedures for the purpose of ensuring that the National Registration and Accreditation Scheme (the National Scheme) operates in accordance with good regulatory practice.

Below is the Board's assessment of the proposal to update the competencies for general registration against the three elements outlined in the Ahpra procedures.

1. The proposal takes into account the National Scheme's objectives and guiding principles set out in Section 3 of the National Law and draws on available evidence, including regulatory approaches by health practitioner regulators in countries with comparable health systems

#### National Boards' assessment

We consider that the proposed Draft professional competencies for psychologists meets the objectives and guiding principles of the National Law, including the National Law amendments in the <a href="Health">Health</a> Practitioner Regulation National Law and Other Legislation Amendment Bill 2022.

The proposal considers the National Scheme's paramount objective of protecting the public by setting out the threshold competencies for safe and effective practice expected to be demonstrated by psychologists with general registration to ensure that only those who practise competently and ethically are registered.

In line with the new objective and guiding principle to the National Law and the <u>National Scheme's</u> <u>Aboriginal and Torres Strait Islander health and cultural safety strategy 2020–2025</u> (the Health Strategy) the Draft professional competencies for psychologists places an emphasis on culturally safe care to ensure patient safety for Aboriginal and Torres Strait Islander Peoples in Australia's health system.

The proposal considers the National Scheme's objective to facilitate the provision of high-quality education and training of health practitioners by setting out the threshold competencies expected of psychologists with general registration, and helping those who train, supervise and assess psychologists to be clear about what knowledge, skills and attributes are needed by psychologists to be safe and effective practitioners.

The Draft professional competencies for psychologists also support the National Scheme to operate in a transparent, accountable, efficient, effective and fair way. The proposal for one document that lists all the professional competencies will make the comptencies easier to find and improve stakeholder understanding of what knowledge and skills are expected of a registered psychologist. It will also streamline the policy review process, making future reviews of the competencies more efficient and effective.

The Board has reviewed existing evidence to inform the draft professional competencies for psychologists and aligned the proposal with national and international competency benchmarks, such as the International Declaration of core competencies in psychology and the APAC standards for psychology programs in Australia.

#### 2. The consultation requirements of the National Law are met

#### National Board's assessment

The National Law requires wide-ranging consultation on proposed codes and guidelines. The National Law also requires National Boards to consult each other on matters of shared interest. Preliminary consultation held during 2022 was the first step in the consultation process in accordance with the <a href="Consultation process of National Boards">Consultation process of National Boards</a>. This feedback has been incorporated into the draft competencies.

We are now ensuring that there is the opportunity for broader public comment through an eight-week public consultation. This includes publishing a consultation paper on the Board's website and informing health practitioners and the community of the review through the Board's electronic newsletter and meetings with key stakeholders.

We will consider the feedback we receive when finalising the Draft professional competencies for psychologists.

#### 3. The proposal takes into account the principles set out in the Ahpra procedures

#### **National Board's assessment**

In developing the Draft professional competencies for psychologists, we have considered the procedures for good regulatory practice.

We have taken care not to propose unnecessary regulatory burdens that would create unjustified costs for the profession or the community.

We make the following assessment specific to each of the principles expressed in the Ahpra procedures.

# A. Whether the proposal is the best option for achieving the proposal's stated purpose and protection of the public

#### National Board's assessment

The purpose of the Education and Training Reform (ETR) program of work is to review and refresh the professional competencies to maintain their relevance to the expectations of threshold competencies required for safe and effective contemporary psychology practice in Australia. We consider that the preferred option in our proposal is the best option for achieving public safety, high quality and professional practice, and regulatory effectiveness.

Adopting the proposed Draft professional competencies for psychologists would:

- protect the public by making clear the 'threshold professional competency' for safe and effective practice expected of psychologists
- provide additional guidance and clarity for psychologists, employers, training providers, and the public
  about our expectations for safe and effective practice as a registered psychologist in Australia across
  the diverse contexts in which psychologists work. The expanded content of the eight core
  competencies, the proposal to publish all competencies in one document, the addition of a preamble
  and definition section to the competency document, all improve the clarity, readability and usefulness
  of the competencies
- ensure the competencies for general registration are current and relevant to the contemporary role
  and scope of psychology practice by aligning the competencies with best available evidence, updated
  accreditation standards and international benchmarks for best practice, and
- place a much-needed emphasis on the competencies for working with diverse groups, providing safe and effective care with priority groups within the community, and working in a culturally safe way with Aboriginal and Torres Strait Islander Peoples, families and communities.

# B. Whether the proposal results in an unnecessary restriction of competition among health practitioners

#### National Board's assessment

The proposal is unlikely to restrict competition as the proposed Draft professional competencies for psychologists would apply to all psychologists holding general registration, and all provisional psychologists as they train and prepare to apply for general registration.

More broadly we consider that this proposal is not expected to affect the levels of competition among health practitioners registered by the 15 National Boards in the National Scheme. National competency-based benchmarks are used across all the health professions in the National Scheme to ensure that only suitably qualified and competent people in the health profession are registered. The revision of the psychology competencies supports the aim of ensuring all health practitioners (including psychologists) have the knowledge, skills and attributes for safe and effective practice.

#### C. Whether the proposal results in an unnecessary restriction of consumer choice

## National Board's assessment

We consider that the proposed Draft professional competencies for psychologists will not result in any unnecessary restrictions of consumer choice as the competencies would apply to all psychologists holding general registration.

The proposal has the potential to improve consumers' understanding and confidence that all psychologists with general registration have the knowledge, skills and attributes to practise safely and effectively.

# D. Whether the overall costs of the proposal to members of the public and/or registrants and/or governments are reasonable in relation to the benefits to be achieved

#### National Board's assessment

We have considered the overall costs of the proposed Draft professional competencies for psychologists to members of the public, health practitioners and governments, and concluded that the likely costs are minimal.

Most of the suggested improvements do not propose significant changes to the current competencies expected psychologists, but primarily reflect existing good practice within the profession and clarify some areas of uncertainty (see paragraph 73–81).

Given the benefit to Aboriginal and Torres Strait Islander Peoples and other vulnerable members of the community by the improvement to Competency 7 and 8, we expect that the benefits of adopting the updated professional competencies will significantly outweigh the costs, which are likely to be modest in comparison (see paragraph 82–85). There are no costs to the public from the proposed changes.

If approved, the proposed Draft professional competencies for psychologists will provide psychologists with clear, consistent evidence-based and internationally benchmarked competencies that underpin safe, ethical and effective practice. This benefit outweighs any minimal costs related to psychologists and other stakeholders needing to become familiar with the updated competencies.

E. Whether the proposal's requirements are clearly stated using plain language to reduce uncertainty, enable the public to understand the requirements, and enable understanding and compliance by registrants

#### National Board's assessment

We are committed to a plain English approach that will help psychologists and the public understand the competencies expected of psychologists.

We have avoided using professional jargon in the proposed Draft professional competencies for psychologists to promote ease of understanding and we have included a preamble and definitions section to make the competencies easier to understand.

# F. Whether the National Boards have procedures in place to ensure the proposed registration standard, code or guideline remains relevant and effective over time

#### National Board's assessment

We will review the Draft professional competencies for psychologists at least every five years, including an assessment against the objectives and guiding principles in the National Law and the principles for best practice regulation.

The proposal to create one document that lists all the professional competencies for psychology registration will make it easier to review and update the competencies in the future.

We may choose to review the Draft professional competencies for psychologists earlier, in response to any issues which arise, or new evidence which emerges to ensure its continued relevance and workability. This may include, for example incorporating the professional competenciess for AoPE that are currently listed in the <a href="Area of practice endorsement registration standard">Area of practice endorsement registration standard</a> into the Draft professional competencies for psychologists (if approved) after reviewing and consulting on the AoPE competencies as part of the education and training reform program of work.