

To the Australian Health Practitioner Regulation Agency

Serious fault: The justification for defining the competencies in a high level language.

This document is an addition to my submission to the public consultation regarding the proposed update to the competencies for general registration for psychology. These are important matters that need to be considered by AHPRA and the Psychology Board of Australia.

There are many aspects of the consultation that I feel were written and outlined in a relatively ambiguous manner, that to me would leave the reader of the Board's public consultation confused about how the Board actually understands terms like "scope of practice" and "competencies", which is further obscured by the Board's own justifications for their need to use a "high level" language or "high level" descriptions of the competencies, stating that this is somehow required to allow for a correlation of these competencies to the different work places where psychologists might be employed.

There is a major flaw with this explanation and justification for this high level language that I need to highlight in this annexed document. Competencies are not the same as "scope of practice". Competencies only reflect and guarantee a set of knowledge and skills and other attributes that each candidate needs to gain through a certain training pathway, before being granted general registration as a psychologist in Australia.

In describing the need to use a "high level" language to describe the competencies, the Board states on the Consultation paper - Updated general registration competencies, the following:

"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" page 13

"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" page 13

"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" page 13

And later on page 15, it adds that;

"c. 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" page 15

The above paragraphs taken from the consultation paper, contradicts not only the common-sense definition of what competencies should stand for, but massively confuses the reader about the definition that the Board themselves gives of the term competencies.

The Board needs to be clear about these terms, and communicate this also clearly to the public and to all other organizations, in a manner that leaves no confusions. The Board appears to be failing in clarifying and differentiating these terms, and in the process leading to confusion about what it is that the competencies should describe.

I have already outlined in my submission to the Board, how the Board themselves defines the term competencies, and have copied this here again to highlight what I am saying.

How does the Board define the term “Competencies”?

To understand the changes being proposed to the competencies of the 4+2 and the 5+1 General Registered Psychologists, it is important to see how the Board defines the term “competencies”. From [Attachment D - Draft professional competencies for psychologists](#), we learn that the **Board describes the term competencies as “the threshold or minimum level of competency required for both initial and continuing registration in a profession”** (page 10), and that this “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” (page 5). The Board also clarifies that this competencies must be “demonstrated upon initial application to meet a registration standard, such as the general registration standard” (page 6), stating also on (page 6), that “the national psychology exam is used to help determine if an applicant for general registration meets the threshold competency”.

“Threshold” Competencies are hence those skills and knowledge and other attributes, that are gained and demonstrated through different training pathways, like the 4+2 and 5+1 pathways (both consisting of six years). These pathways include extensive university study (4 or 5 years of formal psychology university study) which includes a supervised clinical placement, and after graduation from University, a further minimum 1 or 2 years of the internship program that consists of further supervised clinical placements, where candidates are also required to present multiple psychological assessments case reports and psychological intervention case reports, to their Board approved clinical supervisor and later to the Board for final approval. On page 6 of [Attachment D - Draft professional competencies for psychologists](#) the Board states that “when applying for general registration, an applicant must demonstrate that they meet the threshold professional competency by completing a Board-approved qualification for general registration, and any required supervised practice. The National Psychology Examination is used to help determine if an applicant for general registration meets the threshold competency for those doing the internship pathway”.

The Board states that in the context of the National Scheme, Competencies describes,

- 1) *“the threshold or minimum level of competency required for both initial and continuing registration in a profession”*
- 2) *“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”*
- 3) *“demonstrated upon initial application to meet a registration standard, such as the general registration standard”*
- 4) *“[the national psychology exam](#) is used to help determine if an applicant for general registration meets the threshold competency”*

Competencies are first achieved after completing a particular training pathway and in the case of the 4+2 and the 5+1, needing also to pass the National Psychology Examination.

There is nothing in the definition of the competencies that needs to reflect or needs to be made to fit with any role definition of any particular place of work, or needing to be generic enough to be able to fit into all

the different roles that psychologists will later occupy. There is also no mention of the developing and changing “scope of practice” that each psychologist will later pursue through further training or work history.

Competencies only reflect those skills and knowledge and other attributes that need to be acquired through a particular training pathway, to gain registration as a psychologist in Australia.

- This is what needs to be described in the competencies.
- Nothing more
- And definitely nothing less

It is confusing and misleading when the Board states that,

“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” page 13

It is confusing and misleading when the Board state that,

“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” page 13

It is confusing and misleading when the Board state that,

“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” page 13

It is confusing and misleading when the Board states that,

“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” page 15

The COMPETENCIES are **only those skills and knowledge and other attributes, that are gained and demonstrated through different training pathways, like the 4+2 and 5+1 pathways (both consisting of six years)**

Where psychologists might later choose to work or in what context, if in direct client care or in administrative roles, developing policies or educational programs, etc, is not a matter of the competencies, but rather more a matter of the scope of practice that each registered psychologist pursues in their chosen careers.

What the competencies must outline are **only those skills and knowledge and other attributes, that are gained and demonstrated through different training pathways, like the 4+2 and 5+1 pathways (both consisting of six years)**”

So here I am again back to the arguments that I have outlined in my original submission to the Psychology Board. When we look at the current training pathways of the 4+2 and the 5+1 general registered psychologist, and the definition used in this public consultation for the current competencies for general registration, and we latter look at the documents that I have referred to as documents (a, b, and c) in my original submission to the Board, it is evident that what the Board has chosen to present to the public as the current competencies for general registration, clearly does not reflect the **skills and knowledge and other attributes, that are gained and demonstrated through the current training pathways, like the 4+2 and 5+1 pathways**. While the definition of current competencies that the Board is offering is part of what is written down in the set of documents (a, b and c), this definition by itself does not present a complete picture of the competencies that we can find in the set of documents (a, b, and c). This definition of the current competences used by the Board, is at best a truncated version of the complete real current definition, and at worst it is a definition that is misleading and misrepresenting the skills and knowledge and other attributes that currently are required before the 4+2 and the 5+1 candidate can gain general registration as a psychologist in Australia.

And when later we look at the Draft proposed competencies, we can see very clearly that this definition of the Draft competencies, is actually lowering the threshold competencies for the 4+2 and 5+1 general registered psychologists, precisely what the Board states in the consultation paper that they would not do.

I will say it one more time, because I have already heard many times this argument about the competencies needing to be written in a “high level”, and have copied above the Board’s reasoning for the competencies needing to be written in this “high level” format. But the definition that the Board themselves gives of the term “competencies”, that I have also copied above, does not require this “high level”, because competencies must **only describe the skills and knowledge and other attributes, that are gained and demonstrated through different training pathways, like the 4+2 and 5+1 pathways in order to gain registration as a psychologist in Australia**.

Serious fault: Breaches to the current Psychology Ethical Code

The concerns that I have raised in my submission to the Board, were strongly supported by solid arguments with clear evidence for what I was claiming. These concerns are an indication of serious issues within the Psychology Board. That the Board with its expertise can produce written documents with so many inconsistencies and serious errors, does not only speak of the consultation itself being misleading, but raises a series of other important questions about these experts who are making the big decisions about the whole of an important sector of the health professionals in Australia. This public consultation speaks very bad about these decision makers. Decisions that in the end will affect the greater population. That a panel of experts (the Psychology Board of Australia) can write and argue for these changes with faulty arguments, that are also misleading and misrepresenting, is indicative that maybe the psychology profession is not being administered impartially or in the best interest of the public. Mine are serious concerns. If the Board’s task is to protect the public, then ethics and transparency and accountability should be values held as paramount. While the Board and AHPRA have independence on this matters, they also should be accountable to the public. The public expects and deserves ethical conduct and transparency. The Board described this update as a minor update, when it is actually a move towards a mayor structural reform of the profession, that is completely hidden from all stakeholders and the public at large. The Board must be accountable to someone. And in my view, this should be mainly to the public and all stakeholders.

Of importance is also understanding how all psychologists are bound by an ethical code. The Board currently accepts the APS ethical code as a template of ethical behaviours and practice. Amongst a broad range of clauses, the APS Code of Ethics state the following three clauses that are very relevant to my concerns about the Board’s public consultation:

A.2.4. When psychologists in the course of their professional activities are required to review or comment on the qualifications, competencies or work of a colleague in psychology or another profession, they do this in an objective and respectful manner.

C.2.5. Psychologists take reasonable steps to correct any misconceptions held by a client about the psychologist's professional competencies.

C.2.2. Psychologists take reasonable steps to correct any misrepresentation made by them or about them in their professional capacity within a reasonable time after becoming aware of the misrepresentation.

This update in the manner that it has been published and argued for and justified and explained in the public consultation - fails to be transparent and fails to comply with several ethical standards, specially of importance is that value of specifically avoiding misrepresentation regarding the competencies of psychologists, which is clearly transgressed in this public consultation as I have demonstrated.

The consultation misleads the general public and confuses, offers multiple misconceptions to current clients and future clients, regarding what are the current competencies that the 4+2 and the 5+1 general registered psychologists are required to demonstrate (through their study pathways) to gain registration as psychologists in Australia. Mental Health Diagnosis and Therapies are important services that many people seek, but if they are now to read the last public consultation, these consumers would not find it noted that both the 4+2 and the 5+1 general registered psychologists are required to have this skills and knowledge, the competencies to diagnose or to treat all mental health conditions (noted in the Curriculum of the National Psychology Examination)

What "reasonable steps" as stated in C.2.5 will the Board take now "to correct any misconceptions held" as stated in C.2.5, to correct the misrepresentations and misleading arguments presented to the general public and anyone else that reads the public consultation proposing to update the competencies of the general registered psychologist?

Will the Board now "take reasonable steps to correct any misrepresentation made by them... in their professional capacity within a reasonable time after becoming aware of the misrepresentation? C.2.2

Kind Regards
Pablo Bianchi
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