

Public consultation: Draft competencies for general registration

The Psychology Board of Australia is inviting comments on the *Draft professional competencies for psychologists*. The specific questions the Board is seeking feedback on are listed below. All questions are optional and you are welcome to respond to as many as are relevant or that you have a view on.

Please submit your feedback on this submission template by email to: psychconsultation@ahpra.gov.au by close of business **Tuesday 11 April 2023**.

Preferred option
<p>1. Are you in support of updating the professional competencies for general registration? Please provide a rationale for your view.</p>
<p>Your answer:</p> <p>While I personally don't see the need to update the competencies, I understand the rationale of ensuring the standards of our profession maintain relevant and as clear as possible. With this in mind I do not have a problem with updating the competencies as long as they:</p> <ul style="list-style-type: none"> - Provide a greater level of clarity to the profession - Don't become too complex, complicated and difficult to attain - Don't reduce the inclusiveness of the profession <p>It is this last point that I have significant concerns relating to the health and clinical centric nature of the proposed changes.</p>
Structure of the updated competencies
<p>2. Do you agree with approach to create a single document that lists all the professional competencies in one place?</p>
<p>Your answer:</p> <p>Yes.</p>
<p>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?</p>
<p>Your answer:</p> <p>No. While the proposed document clearly articulates the competencies, I find it hard to determine what the threshold for professional competence is by reading this document. That being said, I'm not sure that is the purpose of this document and trust that the education and accreditation system for the profession will ensure those progressing through the training continuum will ensure provisional psychologists and those on registrar programs meet the required standards to practice professionally.</p>

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?

Your answer:

Yes.

5. The Draft professional competencies for psychologists have been written at a high level. This aims to provide both sufficient information for clarity and direction, but also be flexible enough to be relevant to the diverse contexts where psychologists train and work. Did we get the balance right? Please provide a rationale for your view.

Your answer:

In general yes, in terms of clarity and direction. In terms of being relevant to diverse contexts where psychologists train and work, I feel like the proposed changes are a step backwards. The current list of competencies contain multiple references to organisational systems and the practice of organisational psychology. All references to the the practice of psychology within organisations, education systems and sports areas have been removed in the proposed competencies themselves. While they are written to be high level, they make several references to the practice of clinical psychology and health care.

For example competency 5.5 relating to psychological interventions, specifically calls out treating psychological disorders, but fails to mention anything related to increasing the performance of individuals, teams or organisations – which is one of the primary thrust of organisational, sports and performance psychologists.

Reading these competencies one could be forgiven for believing that the practice of psychology belongs solely in the clinical, counselling and health care domains. In this way they are highly relevant to health related settings, yet only marginally reflect the diverse range of context where psychologists train and work.

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?

Your answer:

Do I support the addition, yes. I think there are good efforts here to increase clarity.

Is the content on the mark? Again I have my reservations about it being too clinically centric. There are several key definitions that are not 'high level' enough to capture the breadth of psychological practice in Australia.

Across the new proposed competencies there is a significant shift highlighting the importance of culture. While I agree that culture is incredibly important to the practice of psychology, I am concerned with the prominence that culture finds amongst the competencies. Are we laying cultural sensitivity as the basis of our profession? Should we not be founding our profession on science, whilst promoting its practice with cultural responsiveness? I'm not sure the proposed competencies have the right balance in this regard.

Additionally, while there is much talk of culture throughout the proposed revision, it infers that culture pertains only to the ethnic and societal influences of an individual's heritage and upbringing. There are no references at all to organisational and workplace culture – again one of the primary areas of practice for organisational psychology. There is nothing within the revised competencies that provide any impetus or encouragement for psychologists seeking to develop 'cultural responsiveness' to understand organisational culture. Indeed this is a gap I have both observed and heard of time and again, where a psychologist with clinical and counselling training and experience seeks to practice within organisational settings, only to cause more harm than good. I can only see this becoming more common under the current proposed revision of the competencies.

The logic I'm sure is that the 'high level' definitions allow for flexible application which includes organisational settings. However when the undercurrent of connotations of the language used implies a health/clinical centric application of psychological practice, it is not self-evident nor clear that such flexible applications are to be made.

As an example of how some specific language in these definitions concern me:

Cultural responsiveness: The means by which we achieve, maintain and govern cultural safety. Cultural responsiveness is paying particular attention to social and cultural factors in managing the care of clients from all cultural backgrounds. It includes the ability to learn from and relate respectfully to people of your own culture as well as those from other cultures. Cultural responsiveness describes strengths-based, action-oriented and culturally capable approaches that facilitate increased access to affordable, available, appropriate and acceptable **healthcare**. It is an ongoing process that requires regular and deliberate reflexive practice to develop practitioner knowledge, skills and actions. It includes genuine dialogue to improve practice and client **health outcomes**. It is the responsibility of the health professional to deliver culturally responsive **healthcare**.

- **I like the idea of cultural responsiveness. Every psychologist should practice it. However, there is no way anyone reads this and naturally and easily associates cultural responsiveness with being responsive to organisational culture.**
- **As an organisational psychologist, I don't deliver 'healthcare'. I deliver psychological services that improve leadership, performance and organisational culture. The language in this definition fails to capture my professional practice.**

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?

Your answer:

I find the new structure of the draft competencies beneficial in seeking to provide workable clarity.

However much of the language used in the new proposed competencies does nothing to unify the profession. While they are obviously intent on promoting inclusivity and equity in relation to psychological practice, the draft competencies as written (unintentionally I'm sure) promote a lack of diversity in psychological practice and make psychologists with non-clinically oriented practices feel excluded.

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)?

Your answer:

Yes, I think this adaption of the competencies is sensible, comprehensive and clear.

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.

Your answer:

Yes, makes sense.

Although I do note that in competency 3.5 the word reflexively has been used – which is defined as: as a reflex, without conscious thought; automatically. This is the opposite to reflexivity as it is defined on page 18.

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.

Your answer:

I agree that First Nations people deserve a special place in Australian society. I believe AHPRA and associated bodies should promote the development of cultural competence within the First Nations context, providing plenty of professional development opportunities in this space.

However I question the need for a specific competency relating to psychological practice with Aboriginal and Torres Strait Islander people. It is arguable with population percentages and rates of immigration, the vast majority of psychologists are statistically more likely to practice with clients who are of Asian descent. It is a psychologist's professional impetus to be competent in and responsive to working with whichever cultural background and heritage they are working with.

From my perspective Aboriginal and Torres Strait Islander people should be called out specifically within the broader competency relating to working with diverse groups (updated Competency 8).

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.

Your answer:

Please see answer to question 10.

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?

Your answer:

Combine competencies 7 & 8. Reasoning above.

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?

Your answer:

Yes, as long as the appropriate consultation has be conducted and incorporated by then.

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?

Your answer:

Yes.

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?

Your answer:

No.

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.

Your answer:

There may be the unintended effect of reducing the professions competence to operate within organisational settings, which arguably is where much of the proactive, preventative work is done. With people spending a third of their life at work, psychological practice that enhances the quality of work experience and reduces psychological stressors becomes incredibly important to preventing and reducing the need for extensive clinical or health related psychological support. This is better for clients and relieves the pressure on a strained workforce.

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.

Your answer:

Not that I can see.

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.

Your answer:

Potentially forcing psychologists to pursue a broader range of personal development in order to meet additional competency requirements may result in them incurring extra cost.

Other

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

Your answer:

Overall a good draft. It can be improved.