

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: NO. I am happy with the current professional competencies for psychologists. It has worked well for me and I don't see making changes will improve our roles, it may end up being more detrimental for registered psychologists in the future.</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: YES But only if this includes clinical psychologists as well.</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: NO – it seems to raise more questions. I am happy with the current competency as it is clear and not tied with ambiguity and how this will be interpreted down the track.</p>
<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?</p> <p>Your answer: I find this question puzzling? According to my knowledge, overseas psych boards are not as rigid as Australia and their qualifications are less than Australia's in terms of years attending university for registration/licencing as a psychologist. Also, I have</p>

<p>not come across a two-tier system in other countries whereas in Australia we have a two-tier system for psychologists?</p> <p>Does this mean that the board will be lowering standards to better align with international psychology regulators? And does this mean that the two-tier system will be removed?</p> <p>So if the above applies, I will vote YES. But if not, I will vote NO.</p>
<p>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.</p>
<p>Your answer: I feel the current professional competencies are adequate. It has suited me well. I am not sure why the re-writing or changing competencies when these have been working well with limited confusion. This current draft of changes is causing much anxiety, confusion and suspicion, as the wording with these changes are not as clear or transparent as the current competencies.</p>
<p>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?</p>
<p>Your answer: No – I find this section vague.</p>
<p>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?</p>
<p>Your answer: I feel the current list of competencies are adequate. I am not sure making changes to certain areas will be helpful in the long run.</p>
<p>Organisation of the updated competencies</p>
<p>8. The Draft professional competencies for psychologists propose to reorganise the eight core competencies.</p> <p>Are you in support of combining the current <i>Knowledge of the discipline</i> (Competency 1), and <i>Research and evaluation</i> (Competency 5) into a new competency: <i>Applies scientific knowledge of psychology to inform safe and effective practice</i> (updated Competency 1)?</p>
<p>Your answer: NO. This has worked well for me over the years and so with my colleagues. I am not sure why the changes, as I and I am sure many are already adhering to this competency. CPD and other training we undergo are already addressing the changes you are trying to implement? Why fix something that is not broken?</p>

<p>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.</p>
<p>Your answer: NO. I, and many psychologists are already doing this – it is called ongoing training, supervision and attending courses. This is already what psychologists are doing, so again, I am not sure why the change, the wording is also not clear...</p>
<p>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).</p> <p>Is there any content that needs to be clarified, added, amended or removed? Please provide details.</p>
<p>Your answer: I feel the existing competency is adequate. Again, psychologists upskill all the time, as part of their CPD, and having a separate competency identifying a different group including diverse groups, does not sit well with me. I work with Aboriginal and Torres Strait Islander communities and I work with new migrants facing challenges with cultural barriers, etc., and I am sure they do not want to be isolated as a special group of people needing specialist intervention by a specialist group of trained psychologists or health clinicians – if that is the case, health professionals can seek additional training in those areas, I don't think legislating it for all psychologists would work or is ideal.</p>
<p>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).</p> <p>Is there any content that needs to be clarified, added, amended or removed? Please provide details.</p>
<p>Your answer: I feel the existing competency is adequate. Again, psychologists upskill all the time, as part of their CPD, and having a separate competency identifying diverse groups, does not sit well with me. I work with migrants facing challenges with cultural barriers, etc., and I am sure they do not want to be isolated as a special group of people needing specialist intervention by a specialist group of trained psychologists or health clinicians – if that is the case, health professionals can seek additional training in those areas, I don't think legislating it for all psychologists would work or is ideal.</p>
<p>Competencies and their descriptors</p>

<p>12. The Draft professional competencies for psychologists outline eight updated core competencies:</p> <p>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.</p> <p>Do you suggest any changes to the eight core competencies and their descriptors? What would you like to see changed?</p>	<p>Your answer: I am happy with our current set of professional competencies. I have seen nothing here to suggest further changes.</p> <p>I would like our competencies to be left alone, as it has worked well for not only me, but for many of my colleagues as well.</p>
<p>Outcome of implementing the updated competencies</p>	
<p>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. <u>The estimated date of effect will be 1 December 2024.</u> 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.</p> <p>Are you in support of this transition and implementation plan?</p>	<p>Your answer: NO. I feel these changes will be onerous on registered psychologists, and I am not sure what will come out of these changes once implemented. How will they be reviewed and interpreted – in the future?</p>
<p>14. We have recommended changes to the <i>Provisional and General Registration standards</i> and the <i>Guidelines for the 4+2 internship program</i> 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?</p>	<p>Your answer: No. Again, I don't see how these changes will improve the role of registered psychologists.</p>
<p>15. The Board proposes a transition process and timeframe for updating board documents with the new competencies including the:</p> <ul style="list-style-type: none"> • <i>Guidelines for the 5+1 internship program</i> (separate consultation in 2023) • <i>Guidelines for the National Psychology Exam, and National psychology exam curriculum</i> (separate consultation in 2023/2024). 	

<p>Are there any comments you have on the proposed consultation plan and transition timeframes?</p>
<p>Your answer: I have no comment here, as it is assumed the changes will go ahead, regardless of the feedback from concerned psychologists.</p>
<p>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.</p>
<p>Your answer: YES. This is causing confusion, anxiety, and stress. Registered Psychologists believe they are once again scrutinized and their competencies and experience will be downgraded by these changes – as the wording is ambiguous to say the least.</p>
<p>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.</p>
<p>Your answer: I believe so. It is separating one group of people over another. I understand that people need to be trained up in this area if they wish to work with particular groups of people, but putting it in a competency, leaves it open for misinterpretation and may even lead to legal issues down the track.</p>
<p>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.</p>
<p>Your answer: Yes. It is already costing my time explaining this to our clients, stakeholders and management, time doing research on these changes, continued discussions re why these changes need to take place, and why registered psychologists are continually scrutinized, and changes made from under them. It is causing much distress among registered psychologists, as we are now anxious about our future. These changes are not open, transparent or clear, hence causing confusion.</p>
<p>Other</p>

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

Your answer: Yes. I believe that if there are any changes to be made, it should be made alongside clinical psychologists. I understand one has endorsement but that alone should not separate us as a body of psychologists.

I believe our existing professional competencies are adequate and have served me well. I hear the same from my colleagues. Not one of my colleagues thus far are in agreement with these changes.

Perhaps the Board should be more transparent with their wording of these changes – and not ambiguous as many are highlighting.