

Public consultation

January 2025

Updating the guidelines for the national psychology exam

The Psychology Board of Australia (the Board) is seeking public feedback on updating the [Guidelines for the national psychology exam](#).

Providing feedback

If you wish to provide **detailed feedback** or are providing feedback on behalf of an organisation, please complete the feedback submission template at Attachment B and submit the form by email to: psychconsultation@ahpra.gov.au. The questions in the submission template are also listed on page 8 of this consultation paper

If you wish to provide **brief feedback** you can use the online consultation survey. This form is based on the 'questions for consideration' that are listed on page 8 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 **Monday 24 March 2025**.

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 These submissions will not be published on the website or elsewhere.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. A 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

We will review and consider all feedback from this consultation before making decisions about the updated exam guidelines.

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Overview

1. The Psychology Board of Australia (the Board) is consulting on updating the [Guidelines for the national psychology exam](#) (the exam guidelines). The Board regularly reviews its registration standards, guidelines, and policies to ensure their continued relevance in a dynamic regulatory environment. The exam guidelines were last reviewed in July 2019.
2. The purpose of the exam guidelines is to:
 - a. support the [General registration standard](#) by setting out the exam requirements
 - b. protect the public by ensuring that only those practitioners who are suitably trained and qualified to practise psychology in a competent and ethical manner are registered
 - c. assist the Board in the rigorous and responsive assessment of overseas-trained psychologists
 - d. provide information and guidance to candidates preparing for the exam.
3. The purpose of this review is to:
 - a. ensure the exam guidelines reference the recently updated competencies for general registration as a psychologist in Australia
 - b. propose introducing an exemption from sitting the exam for some internationally trained applicants for registration
 - c. generally update and refresh the exam guidelines in line with good regulatory practice.
4. We are seeking your feedback on whether to continue with the current exam guidelines, with no changes (option 1) or to refresh the exam guidelines as noted above (option 2). We are asking you to choose your preferred option and to answer specific questions about the proposed draft exam guidelines (listed on page 8). This paper provides background and information about the Board's proposal.

Background

General registration competencies

5. In 2023 the Board conducted a [public consultation](#) on updating the competencies for general registration. The new competencies have been approved by the Board and will come into effect on 1 December 2025. The Health Ministers have also approved the updated [Provisional and general registration standards](#) (removing the current competencies from the standards) to come into effect on the same date.
6. As part of the consultation on the competencies, the Board proposed a transition plan to incorporate the updated general registration competencies into other Board documents, such as the [Guidelines for the 5+1 internship](#) and the [Guidelines for the national psychology exam](#). The Board proposed the following plan regarding the exam:
 - To effectively transition to the updated general registration competencies a separate consultation would be required to incorporate the updated competencies into the exam guidelines (outlined in Table 2, p.21 of the [Consultation paper](#)).
 - The first exam incorporating the updated competencies would be scheduled for the first exam sitting after the [Professional Competencies for psychologists](#) come into effect - the February 2026 sitting of the exam.
7. Feedback from stakeholders during consultation on updating the general registration competencies overwhelmingly supported both proposals (see the [consultation report](#)).
8. The purpose of the current consultation is to update the exam guidelines in line with this agreed transition plan to promote a smooth changeover to the updated general registration competencies.

Internationally trained applicants for general registration

9. In 2023 Ms Robyn Kruk AO handed down the [Kruk review](#) making 28 recommendations to reform the registration process for internationally trained applicants for registration in Australia. While Ahpra and the National Boards are already engaging in reform to streamline processes (see statement in response to the Kruk review [here](#)), the review of the exam guidelines provides the Board with an opportunity to examine our regulatory thresholds for internationally trained psychologists to make sure they are clear, fair, and grounded in public safety.
10. Currently, internationally trained applicants for registration in Australia are required to pass the national psychology exam before being eligible for general registration¹. There are no exemptions, with all applicants being required to sit the exam, regardless of their qualification. The purpose of the current consultation is to consider introducing an exemption from this requirement for some internationally trained applicants.

Proposed changes

11. The current exam guidelines are available on the [Board's website](#). The proposed *Draft guidelines for the national psychology exam* (draft exam guidelines) are at Attachment A.

Aligning exam guidelines with the updated general registration competencies

12. The Board proposes to remove the references to the current competencies for general registration, and reference the updated competencies as outlined in the [Professional competencies for psychologists](#).
13. This includes updating the terminology used in the exam guidelines and the definitions section to be in line with language used in the *Professional competencies for psychologists* (for example, replacing the term 'core competency' with 'threshold professional competency').
14. Aligning the exam guidelines with the updated general registration competencies will ensure that the exam assesses the contemporary competencies required for general registration and promotes safe and effective psychological practice. It is consistent with the agreed transition plan for a smooth changeover to the updated general registration competencies (see paragraph 5-8 for details on the transition plan).

Introducing an exemption from sitting the exam for some internationally trained applicants for general registration

15. The psychology workforce is primarily domestically trained. In the last five years (2019-2024) only 2.6% of applicants (309 people) for general registration for the first time were trained internationally. While our numbers of internationally qualified psychologists are small, we believe that introducing an exemption from sitting the exam for some internationally trained applicants will reduce red tape and support the growth of the psychology workforce.
16. The Board proposes that internationally trained applicants for general registration who have a qualification that is substantially equivalent or based on similar competencies to a Board-approved fifth and sixth year qualification (for example an Australian Masters degree) be exempt from passing the exam. The assessment of equivalence would be undertaken in the same way it is now – on a case by case basis in line with the National Scheme's [Quality Framework for Accreditation Function](#) (the Quality Framework).
17. This exemption would provide applicants with international qualifications parity with the exemption that already exists for applicants with Australian Board-approved post-graduate qualifications at the same (or higher) level of training. Applicants for general registration who studied in Australia and hold a Board-approved fifth and sixth year qualification are exempt from sitting the exam. The exam is not required for this group as the higher degree pathway is sufficiently regulated through accreditation processes.²
18. There would be no change for internationally trained applicants for general registration who do not hold a qualification that is substantially equivalent or based on similar competencies to a Board-approved fifth

¹ Note that applicants who have current registration and a current practising certificate from New Zealand can apply directly for general registration under the [Trans-Tasman Mutual Recognition Act 1997](#).

² The [Australian Psychology Accreditation Council](#) (APAC) is the [accreditation authority](#) responsible for accrediting education providers and programs of study for the psychology profession.

and sixth year qualification (for example, equivalent to an Australian 5+1 internship program). They would continue to be required to sit the exam, as they are now. This is in line with the requirement for domestically trained applicants for general registration whose qualifications include a component (i.e., the internship) that is not subject to accreditation processes.

19. It is proposed that applicants meeting this exemption will continue to be required to complete the [transitional program](#). The transitional program is required for international applicants who meet all the qualification and supervised practice requirements for general registration, except for the competencies specific to the Australian context. The transitional program requires individuals holding international psychology qualifications to demonstrate their competency in:
 - a. ethical, legal, and professional matters as relevant to the Australian context, including exercising professional reflexivity, purposeful and deliberate practice, and self-care
 - b. demonstrating a health equity and human rights approach when working with people from diverse groups relevant to the Australian context, and when working with Aboriginal and Torres Strait Islander Peoples, families, and communities.
20. Our proposed exemption would mean that the following applicants would be exempt from sitting the exam:
 - a. Applicants holding professional Masters (fifth and sixth year) or doctorate qualifications that are substantially equivalent or based on similar competencies to a Board-approved fifth and sixth year qualification.
21. Introducing this exemption is in line with the [Kruk review](#) recommendations to streamline the registration process for applicants with international qualifications. It will help us to register qualified psychologists more quickly and encourage internationally trained psychologists to work in Australia.
22. We think this proposal strikes a careful balance between prioritising public safety and improving fairness and flexibility for internationally trained psychologists. This proposal is considered to balance streamlining the application process without changing the minimum standards that ensure public safety by:
 - a. benchmarking the exemption from sitting the exam to a Board-approved fifth and sixth year qualification (substantially equivalent or based on similar competencies), to ensure that internationally trained psychologists meet minimum Australian professional standards
 - b. assessing internationally qualified applicants for registration using best-practice accreditation processes that are in line with the National Scheme's *Quality Framework*
 - c. continuing to require all internationally qualified applicants to complete the transitional program to ensure they are competent to deliver services in the Australian context
 - d. continuing to require applicants to pass the exam if they hold international qualifications that are not substantially equivalent or based on similar competencies to a Board-approved fifth and sixth year qualification.
23. In addition, the Board engages in continual quality assurance processes for our overseas assessment process. The assessment framework will be improved and updated over time in response to changes in assessment processes across the National Scheme as the Kruk recommendations are implemented, as well as any increase in applications received by the Board, should this exemption be approved after this public consultation process.

Refreshing the document

24. The Board proposes to refresh and streamline the exam guidelines in several ways:
 - a. Clarifying the importance of consistency in decision maker in the *Policy and procedure for candidates who fail the national psychology exam three times* (Attachment A of the exam guidelines), in line with current operational practice.
 - i. Our current practice is that when a candidate fails the exam three times, the board or committee that has requested passing the exam also makes the decision about approving additional exams. This provides consistency in decision making. Updating

the policy will make this operational practice clearer to candidates and decision makers.

- b. Removing content from the guideline that is obsolete as it is explained in the *Professional competencies for psychologists* (for example the eight competencies), the candidate manual (for example exam fee, pass grade, and test centres), or is historical information that is no longer needed
- c. Conducting a plain English review.
- d. Streamlining content and add subheadings to improve clarity.
- e. Updating the document to the Board's current logo and fonts.

Options

Option 1 – Status quo

25. Option 1 proposes to continue with the current *Guidelines for the national psychology exam* (the exam guidelines), last updated in 2019, with no changes.
26. While available information suggests that the current exam guidelines are working reasonably well, several developments have provided the opportunity to update and refresh them. As noted above they include the:
 - a. recently updated competencies for general registration as a psychologist in Australia
 - b. [Kruk review](#) recommendations to reform the registration process for internationally trained applicants for registration in Australia.
27. Maintaining the current exam guidelines would mean the exam assesses outdated competencies for general registration, making it progressively less relevant and contemporary.

Option 2 – Update the guidelines for the national psychology exam

28. Option 2 proposes to adopt the *Draft guidelines for the national psychology exam* (the draft exam guidelines) at Attachment A. Option 2 proposes to:
 - a. include the recently updated competencies for general registration as a psychologist in Australia into the exam guidelines to ensure that the exam assesses the contemporary competencies
 - b. introduce an exemption from sitting the exam for internationally trained applicants for general registration who hold qualifications that are substantially equivalent or based on similar competencies to a Board-approved fifth and sixth year qualification
 - c. generally update and refresh the exam guidelines in line with good regulatory practice.

Preferred option

29. The Board prefers Option 2.

Estimated impacts of the proposed changes

Potential benefits of the preferred option

30. We anticipate that the proposed draft exam guidelines will have the following benefits:
 - a. It will ensure the exam assesses the contemporary competencies required for general registration and promotes safe and effective psychological practice now and into the future.
 - b. It will promote a smooth changeover to the updated general registration competencies that is consistent with the transition plan supported by stakeholders during the consultation on updating the competencies.

- c. It will ensure the exam and the competencies for general registration are aligned, providing all stakeholders with consistent and clear guidance about the Board's expectations of the threshold professional competencies necessary for a registered psychologist in Australia.
- d. It will streamline the registration process for internationally trained applicants for general registration who hold qualifications that are substantially equivalent or based on similar competencies to a Board-approved fifth and sixth year qualification. Existing accreditation and regulatory processes will be used to maintain the minimum standards that ensure public safety.
- e. It will provide an improved, simplified and easier to read guideline document for stakeholders.

Potential impacts of the preferred option

A streamlined process for internationally trained psychologists

- 31. While the number of internationally trained psychologists in our workforce is small, we estimate around half of all international applicants for registration as a psychologist will no longer be required to sit the exam if the proposed exemption is introduced. These applicants will enjoy a streamlined registration process with reduced regulatory hurdles, cost and time required for registration.

Becoming familiar with the changes

- 32. Psychologists, supervisors, educators and exam candidates will need to become familiar with the draft exam guidelines and an exam that includes the updated competencies for general registration. Incorporating the general registration competencies into the exam will result in updates to the [exam resources](#), including the [curriculum](#), the exam [candidate manual](#), the recommended exam [reading list](#), and the exam items.

Supporting transition for stakeholders

- 33. To support a smooth implementation of the draft exam guidelines (if approved), the Board plans for them to come into effect on 1 December 2025. This will allow a transition period for exam candidates and others to become familiar with the changes, particularly the change to incorporate the updated competencies for general registration into the exam.
- 34. As proposed in our [public consultation](#) on the updated competencies for general registration in 2023, the first exam incorporating the updated competencies would be scheduled for the first exam sitting after the competencies come into effect. This means that the first exam including the updated competencies will not be until the February 2026 sitting of the exam. This will give candidates several months to familiarise themselves with the changes.
- 35. An advance copy of the [Professional Competencies for psychologists](#) has already been published. We encourage psychologists and provisional psychologists to become familiar with and self-assess against the updated competencies in anticipation of them coming into effect. We have developed and published resources including [fact sheets](#), [FAQs](#), and [a self-assessment tool](#) to support this change.

Potential unintended consequences of the preferred option

- 36. The Board will undertake wide-ranging public consultation with higher education providers, accreditation agencies, international regulators, governments, employers, psychologists, supervisors, exam candidates, and consumers to gather feedback about the proposed changes.
- 37. Any unintended impacts of the proposed draft exam guidelines raised during consultation will be considered and actions will be taken to mitigate any potential consequences for stakeholders including exam candidates, healthcare users, Aboriginal and Torres Strait Islander Peoples and other priority groups in the community.
- 38. The Patient and Consumer Health and Safety Impact Statement at Appendix A has more information about the Board's assessment of the potential effects of the proposed draft exam guidelines.
- 39. The Board's statement of assessment against Ahpra's procedures for the development of registration standards, codes and guidelines, and principles for best practice regulation (Appendix B) provides

more information about the Board's view that the preferred option to update the exam is the best option for protection of the public.

Questions for consideration

40. We are seeking your feedback on the development of the *Draft guidelines for the national psychology exam* (draft exam guidelines).

Specific questions the Board would like you to address are below.

Preferred option
1. Do you support updating the exam guidelines (Option 2)? Please provide a rationale for your view.
2. Do you support including the updated general registration competencies as outlined in the Professional competencies for psychologists into the draft exam guidelines ? Please provide a rationale for your view.
3. Do you support an exemption from sitting the exam for international applicants for general registration who hold a qualification that is substantially equivalent or based on similar competencies to a Board-approved fifth and sixth year qualification? Please provide a rationale for your view.
Content of the draft exam guidelines
4. Is there any content that needs to be changed, deleted, or added into the draft exam guidelines ?
5. Is the language and structure of the proposed draft exam guidelines helpful, clear, relevant and workable? Are there any potential unintended consequences of the current wording?
Proposed implementation of the draft exam guidelines
6. The Board proposes to publish the draft exam guidelines when they are approved, but to have a future date for when it comes into effect (1 December 2025) to allow enough time for exam candidates to prepare. The first exam including the updated professional competencies will not be until the February 2026 sitting of the exam. Do you support this transition and implementation plan?
7. Are there specific impacts for higher education providers, accreditation agencies, international regulators, governments, employers, psychologists, supervisors, exam candidates, clients/consumers or other stakeholders that the Board should be aware of, if the draft exam guidelines were to be approved? Please consider positive impacts and any potential negative or unintended effects in your answer.
8. Would the proposed changes to the draft exam guidelines result in any potential negative or unintended effects for Aboriginal and Torres Strait Islander Peoples or other priority groups in the community? If so, please describe them.
9. Would the proposed changes to the draft exam guidelines result in any adverse cost implications for practitioners, clients/consumers or other stakeholders? If yes, please describe.
Other
10. Do you have any other feedback or comments about the draft exam guidelines ?

Relevant sections of the National Law

41. Psychologists in Australia practise in a regulatory framework established by the [Health Practitioner Regulation National Law](#) (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 exams are used across the health professions in the National Registration and Accreditation Scheme (the National Scheme) to ensure that only suitably qualified and competent people in the health profession are registered.
42. Relevant sections of the National Law for this review include:
 - a. Section 3 (Objectives and guiding principles)
 - b. Sections 38-40 (Registration standards, codes and guidelines), and
 - c. Sections 52–54 (General registration).

Appendices (within this document)

A: Patient and consumer health and safety impact statement

B: Statement of assessment: Board's statement of assessment against Ahpra's *Procedures for the development of registration standards, codes and guidelines*, and principles for best practice regulation

Attachments (separate attachments)

A: Draft guidelines for the national psychology exam

B: Feedback submission template

Appendix A: National Boards Patient and consumer health and safety impact assessment

January 2025

Assessment purpose

The National Boards Patient and Consumer Health and Safety Impact Assessment³ explains the impact of a proposed registration standard, code or guideline on the health and safety of the public, particularly those vulnerable to harm in the community. This includes those subject to stigma or discrimination in health care, and/or experiencing health disadvantage, as well as Aboriginal and Torres Strait Islander Peoples.

The four key components considered in the Assessment are:

1. The potential impact of the registration standard, code or guideline on the health and safety of clients and consumers, particularly those vulnerable to harm in the community, including approaches to mitigate any potential negative or unintended effects.
2. The potential impact of the registration standard, code or guideline 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 clients and consumers particularly those vulnerable to harm in 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 Assessment aligns with the [National Scheme's Aboriginal and Torres Strait Islander Health and Cultural Safety Strategy 2020-2025](#) , [National Scheme engagement strategy 2020-2025](#) , [the National Scheme Strategy 2020-25](#) and reflects key aspects of the Ahpra [Procedures for the development of registration standards, codes, guidelines and accreditation standards](#).

Below is our assessment of the impact of proposal to update the [Guidelines for the national psychology exam](#) (the exam guidelines) on the health and safety of clients and consumers, particularly those vulnerable to harm in the community and Aboriginal and Torres Strait Islander Peoples.

1. How will the proposal to update the exam guidelines impact on client and consumer health and safety, particularly those vulnerable to harm in the community? What are the actions that have been taken to address or prevent this?

The Psychology Board of Australia (the Board) has carefully considered the impacts the proposed *Draft guidelines for the national psychology exam* (draft exam guidelines) could have on client and consumer health and safety, particularly on vulnerable members of the community, in order to propose a preferred option for consultation. The proposal has been carefully considered based on the best available evidence, best practice approaches, and monitoring the impact of the current exam guidelines.

³ This assessment 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.

Our proposal was informed by advice from Aboriginal and Torres Strait Islander psychologists and psychology groups, and international benchmarks for ensuring cultural safety, health equity and a human rights approach to working with diverse groups in psychology practice.

The proposal to include the updated competencies for general registration into the exam guidelines was informed by stakeholder feedback during a previous consultation process (see [past consultations](#)) where the inclusion of contemporary competencies for working with diverse client groups, vulnerable people, and improving cultural safety was supported.

The proposal for an exemption for sitting the exam for some internationally trained applicants for general registration was informed by recommendations from the [Kruk review](#) to streamline the application process for internationally trained applicants as one way to support the growth of the psychology workforce and improve consumers' access and choice to psychological services.

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

2. How will National Boards engage with clients and consumers, particularly those vulnerable to harm in the community during consultation?

In line with our [consultation processes](#) the Board is undertaking wide-ranging consultation. We will engage with client and consumer bodies, the Consumer Advisory Council, Aboriginal and Torres Strait Islander Peoples, peak bodies and other relevant organisations and the community to get input and views from people vulnerable to harm in the community.

3. What might be the unintended impacts for clients and consumers, particularly people vulnerable to harm in the community? How will these be addressed?

The Board has carefully considered what the unintended impacts of the draft exam guidelines might be. Consulting with relevant organisations and those vulnerable to harm in the community will help us to identify any other potential impacts. We will fully consider and take actions to address any potential negative for clients 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?

The Board has carefully considered any potential impact of the proposed draft exam guidelines on Aboriginal and Torres Strait Islander Peoples and how the impact compared to non-Aboriginal and Torres Strait Islander Peoples might be different in order to put forward the proposed option for feedback as outlined in the consultation paper.

The proposed draft exam guidelines align with the recently published [Professional competencies for psychologists](#) that set the competencies for safe and effective practice as a psychologist in Australia. The professional competencies make cultural safety and working respectfully and effectively with a diverse range of clients a critical component of safe and effective health care. These improvements to the competencies expected of all psychologists holding general registration is expected to positively impact Aboriginal and Torres Strait Islander Peoples, families and communities, as well as clients from other priority groups in the community.

Further engagement through consultation will help us identify other potential impacts of the proposed changes and help us to meet our responsibilities to protect client safety and health care quality for Aboriginal and Torres Strait Islander Peoples.

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

The Board is committed to the National Scheme's [Aboriginal and Torres Strait Islander health and cultural safety strategy 2020-2025](#) <https://www.psychologyboard.gov.au/Standards-and-Guidelines/Registration-Standards.aspx> which focuses on achieving client safety for Aboriginal and Torres Strait Islander Peoples as the norm, and the inextricably linked elements of clinical and cultural safety.

As part of our consultation process, we have tried to find the best way to meaningfully engage with Aboriginal and Torres Strait Islander Peoples. The Board regularly meets with Aboriginal and Torres Strait Islander peak bodies for psychology, including the Australian Indigenous Psychology Association and the Australian Indigenous Psychology Education Project, to seek their views and partner together to ensure client safety. These stakeholders in particular have provided feedback about the improved cultural safety competencies, that we propose will be assessed by the exam and are outlined in the draft exam guidelines.

We are continuing to engage with Aboriginal and Torres Strait Islander organisations and stakeholders throughout this consultation process, including the National Scheme's Aboriginal and Torres Strait Islander Health Strategy Group, and the Psychology Board of Australia Health Strategy Group, to get further input from Aboriginal and Torres Strait Islander Peoples about our proposals.

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

In developing our proposals, the Board has carefully considered what might be any unintended impacts of the draft exam guidelines on Aboriginal and Torres Strait Islander Peoples.

Continuing to engage with relevant organisations and Aboriginal and Torres Strait Islander Peoples will help us to identify any other potential impacts of updating the exam guidelines. We will consider and take actions to address any other potential negative 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 Board's work in keeping the public safe is ensuring that all standards, codes and guidelines are regularly reviewed. The Board will monitor and regularly review the draft exam guidelines to check they are working as intended, if they are approved.

Appendix B: Statement of assessment against Ahpra's procedures for the development of registration standards, codes, and guidelines

January 2025

Proposed Draft guidelines for the national psychology exam

Introduction

Section 25 of the Health Practitioner Regulation National Law as in force in each state and territory (the National Law) requires Australian Health Practitioner Regulation Agency (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.

The Ahpra *Procedures for the development of registration standards, codes, and guidelines* (2023) is available at on the [Ahpra Resources webpage](#)

Context – issue or problem statement

It is good regulatory practice to review registration standards, codes, and guidelines on a planned, regular basis to test their workability, clarity, and continued relevance. The Psychology Board of Australia (the Board) is proposing revisions to the [Guidelines for the National psychology exam](#) (the exam guidelines) that have been in effect since 2019 and are therefore due for review.

The current exam guidelines need refreshing as they do not examine the Board's recently updated competencies for general registration (they examine competencies that are no longer contemporary). In addition, the current exam guidelines do not permit applicants for general registration holding international qualifications an exemption from sitting the exam when their qualifications are assessed as equivalent (or exceed) the requirements for general registration required for domestic applicants.

Assessment

Below is the Psychology Board of Australia's (the Board) assessment of updating the exam guidelines, taking account of the Ahpra procedures.

1. Describe how the proposal

- 1.1 takes into account the paramount principle, objectives and guiding principles in the National Law⁴
- 1.2 draws on available evidence, including regulatory approaches by health practitioner regulators in countries with comparable health systems

The Board's proposal takes into account the National Scheme's paramount principle of protecting the public and maintaining public confidence in the safety of services provided by health practitioners, by ensuring that the exam assesses the contemporary competencies required for general registration to promote safe and effective psychological practice.

The proposal is considered to balance streamlining the application process for internationally qualified psychologists without changing the minimum standards that ensure public safety (see paragraph 22). The proposal will facilitate the rigorous and responsive assessment of overseas-trained by benchmarking the exemption from sitting the exam to a Board-approved qualification. Internationally qualified applicants for registration will be assessed using currently existing best-practice accreditation processes that are in line with the National Scheme's [Quality Framework for Accreditation Function](#).

⁴ See section 3 and section 3A of the National Law

The draft exam guidelines also support the National Scheme to operate in a transparent, accountable, efficient, effective and fair way by removing unnecessary regulatory barriers faced by some internationally qualified psychologists. The exemption (if approved) is expected to reduce the hurdles, cost, and time for eligible applicants with international qualifications. This will help the Board to register qualified psychologists more quickly.

In addition, it is hoped that this will encourage internationally trained psychologists to work in Australia and enable the continuous development of a flexible, responsive, and sustainable Australian psychology workforce. The Board has drawn from the available evidence from assessing international qualifications to inform the review.

2. Outline steps that been taken to:

- achieve greater consistency within the National Scheme (for example, by adopting any available template, guidance or good practice approaches used by National Scheme bodies)
- meet the wide-ranging consultation requirements of the National Law

The Board has been informed by changes in the National Law to recognise cultural safety as an objective and guiding principle when proposing to include updated cultural competencies into the exam. The Board has also been informed by the recommendations of the [Kruk review](#) to streamline the registration process for applicants with international qualifications.

The National Law requires wide-ranging consultation on the proposed standards, codes, and guidelines. The Board held preliminary consultation for six weeks between 19 August and 30 September, and feedback has been incorporated into the proposal that is released for public consultation.

The Board will now ensure that there is the opportunity for broader public comment via 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 via the Board's electronic newsletter and meetings with key stakeholders.

The Board will consider the feedback it receives when finalising the exam guidelines.

3. Address the following principles:

- a. whether the proposal is the best option for achieving the proposal's stated purpose and protection of the public

The Board's consultation paper includes two options.

Option 1 proposes to continue with the current exam guidelines. Option 1 (status quo) does not enable the Board to ensure that the exam remains fit for purpose and contemporary.

Option 2 is to make a range of changes to support good regulatory practice, including incorporating the updated *Professional competencies for psychologists* and introducing an exam exemption for some internationally trained applicants.

The Board considers that this proposal is the best option to ensure the exam assesses the contemporary competencies required for safe and effective psychology practice, and to streamline the registration process for internationally trained applicants for general registration in line with the Kruk review recommendations.

Option 2 is considered by the Board as being the best option for addressing the issues identified in our consultation paper. This option is expected to:

- ensure that the exam assesses the contemporary competencies required for general registration
- protect the public by making clear the threshold competency standards for safe and effective practice expected of psychologists

- promote a smooth changeover to the updated general registration competencies, consistent with the transition plan supported by stakeholders during the consultation on updating the competencies (see paragraph 5-8)
- ensure the exam and the competencies for general registration are aligned, providing all stakeholders with consistent and clear guidance about the Board's expectations of the threshold professional competencies necessary for a registered psychologist in Australia
- streamline the registration process for internationally trained applicants for general registration who hold qualifications that are substantially equivalent or based on similar competencies to a Board-approved fifth and sixth year qualification, while using existing accreditation and regulatory processes to maintain the minimum standards that ensure public safety
- provide an improved, simplified and easier to read guideline document for stakeholders.

Option 2 is the Board's preferred option.

b. whether the proposal results in an unnecessary restriction of competition among health practitioners

The proposal is unlikely to restrict competition amongst psychologists. By including contemporary competencies into the exam curriculum, the Board is proposing to align the exam with other regulatory requirements already in place for all psychologists. These updated competencies are already described in the [General registration standard](#) and the [Professional competencies for psychologists](#).

The proposal to introduce an exemption for some internationally trained psychologists is unlikely to restrict competition amongst psychologists as our numbers of overseas applications for registration are small (psychologists in Australia are primarily domestically trained), and there is evidence of a national workforce shortage in psychology⁵.

The Board does not expect this proposal will affect the levels of competition among health practitioners registered by the 15 National Boards in the National Scheme. Professional competencies are used across all the health professions, and many professions have their own examination processes.

c. whether the proposal results in an unnecessary restriction of consumer choice

The Board considers that including contemporary competencies into the proposed draft exam guidelines is unlikely to restrict consumer choice as all psychologists are required to demonstrate contemporary competencies for safe and effective psychological practice.

By streamlining the registration process for international applicants for registration the proposal has the potential to increase the number of psychologists, and may improve consumer access to psychological services.

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

The Board has considered the potential costs associated with updating the exam guidelines during the development of this consultation paper to members of the public, health practitioners and governments, and concluded that the likely costs are minimal, including in relation to the potential benefits of the proposal (see paragraph 30).

The Board does not consider this proposal will have more than a minor impact, because of the following:

- There are no costs to the public from the proposed changes.

⁵ For more information see the [National Mental Health Workforce Strategy 2022-2032](#).

- The costs for candidates preparing for the exam remain the same as they are now. Aligning the exam with the updated general registration competencies alters what candidates study for the exam, not how much study is required. The fee to sit the exam will not change.
- We anticipate the costs for internationally qualified applicants for general registration that meet the exam exemption would be less than the current cost (if the proposal is approved).
- There will be some costs for Ahpra and the Board to update the exam items and resources. These costs are included in the business as usual costs for running the exam and conducting regular quality assurance processes in line with best-practice exam design and delivery.

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, and

The Board is committed to a plain English approach that will help psychologists and the public understand the exam requirements.

The Board has avoided using professional jargon in the proposed draft exam guidelines to promote ease of understanding, and we have refreshed and updated the guideline to improve clarity.

f. whether the Board has procedures in place to ensure that the proposed standard remains relevant and effective over time.

The Board has procedures in place to support a review of the exam guidelines at least every five years as it is good regulatory practice to do so.

However, the Board may choose to review the exam guidelines earlier, in response to any issues which arise, or new evidence which emerges to ensure its continued relevance and workability.

4. Closing statement

Feedback on any regulatory impacts identified during the consultation process and/or in developing the proposal will be provided to the Board to inform decision-making.

The Board has completed a **patient health and safety impact statement** for consultation and will provide a patient and safety impact assessment (if the proposal is approved).