



22 May 2013

Professor Brin Grenyer
Chair, Psychology Board of Australia
PO Box 16085
Collins Street West
Melbourne VIC 8007

Dear Professor Grenyer

Re: Response to Consultation Paper 18: Guidelines for the National Psychology Examination

The Institute of Private Practising Psychologists (IPPP) puts forward the following points (not presented in order of priority) for consideration in relation to the proposed Guidelines for the National Psychology Examination:

- 1. The IPPP acknowledges that the examination is a major contributor to ensuring a consistent professional standard of psychologists nationally but submits that the significance of its contribution in so doing should not be over-stated.**

Page 2 of the Consultation Paper makes the following claims:

- (a) "The National Psychology Examination ensures a consistent professional standard of psychologists nationally."*
- (b) The examination will assess applied psychological knowledge which is the basis of competence in the profession. Importantly, the examination will demonstrate that internship training has produced a practitioner with an appropriate level of applied professional knowledge and competence, which will better protect the public."*

The IPPP accepts that the examination will play an important role in ensuring a consistent professional standard for psychologists nationally, across the varied pathways towards achieving generalist registration. However, given that it is



questionable to claim that “*an appropriate level of ... competence*”¹ can be assessed by an examination of knowledge, we suggest that the assertions made about the examination are thus inflated. Further, the claim that the “*examination will assess applied psychological knowledge which is the² basis of competence in the profession*” is a similar exaggeration. The curriculum cannot feasibly assess more than a significant and representative sampling of *applied psychological knowledge* and to suggest anything more is an over-statement.

The IPPP therefore proposes that future descriptions of the purpose of the National Psychology Examination be amended to the following or something similar:

The National Psychology Examination will make an important contribution to ensuring a consistent professional standard of psychologists nationally. Passing the examination will be required in order to gain general registration.

The examination will assess applied psychological knowledge which is a significant basis of competence in the profession. Importantly, the examination will assist to demonstrate that internship training has produced a practitioner with an appropriate level of applied professional knowledge and competence, which will better protect the public.

- 2. The Psychology Board of Australia has identified four examination domains it considers are essential in relation to general registration. The IPPP recommends that within the specified domains, the competencies on which interned psychologist trainees are assessed should be identical to those being taught in higher level degree courses.**

Although we acknowledge that the examination curriculum has already been approved by the Psychology Board of Australia, the IPPP still considers it important to make the point that there must be harmonisation of the examination curriculum and the relevant APAC accredited postgraduate curricula. There has been no information provided that makes transparent the process by which such harmonisation has been planned to date, and thereafter how this will be monitored and quality assured into the future. The statement that there will be a review of the examination curriculum in 2015 does not adequately address this matter.

- 3. There is a lack of clarity regarding transition arrangements as set out in the consultation paper and it is vital that this be addressed in the very near future.**

The Consultation Paper is unclear as to whether provisionally registered psychologists applying for general registration from 1 July 2013 who are currently undertaking 4+2 or 5+1 pathways to registration, or who are returning to practice, must sit the examination or not. The consensus of the IPPP after reading this section of the Consultation Paper is

¹ Text underlined by IPPP for emphasis.

² Text underlined by IPPP for emphasis.



that this group of psychologists is not required to sit the examination but may choose to. We ask that this be clarified as a matter of urgency.

The two sections from the Consultation Paper that lead to this confusion are reproduced below:

- (a) *“These groups are able to sit the examination from 1 July 2013, but are not required to show evidence of passing the examination until 1 July 2014 in order to obtain general registration. This period of grace will allow an additional one-year period prior to the exam becoming a requirement for registration. This additional year will allow registrants a further year to prepare for the examination.”*
- (b) *“Therefore, registrants who are eligible to apply for general registration prior to 1 July 2014 are not required to sit the national examination.”*

4. The IPPP asks for further information about the examination timetable.

The IPPP seeks information from the Psychology Board of Australia as to how it will address equitable timetabling of examinations Australia wide, given that there is not equivalence in population and student numbers across all States and Territories. Will smaller States be guaranteed the same opportunity as larger States with respect to the frequency of the examination schedule?

5. The IPPP commends the Psychology Board of Australia for setting the examination fee at an affordable rate but suggests that transparency in how the fee will be set is important.

We suggest the Psychology Board of Australia should publish how this fee is to be determined (e.g., how does it compare to fees for examinations within other professions) and the basis upon which any future increases will occur (e.g., CPI increase).

6. The IPPP requests the Psychology Board of Australia considers the implications of the review it will conduct in 2016 in relation to exemption from sitting the examination.

The IPPP acknowledges that it is the Psychology Board of Australia’s intent in 2016 to review the current exemption of graduates of accredited six-year professional Masters, Doctorate or combined Masters/PhD programs leading to an Area of Practice Endorsement from sitting the examination. However we urge the Psychology Board of Australia to consider the uncertainty that this generates for all individuals who enter one of these programs from now until the time of the review, who are not scheduled to complete their program and apply for general registration prior to the specified date of 30 June 2016. We suggest that the Board needs to act now to address this matter and to give certainty to these individuals that they will be given additional transition arrangements.



7. The IPPP takes this opportunity to raise the issue of on-going quality assurance in relation to the examination.

As the regulating body of the profession it is important for the Psychology Board of Australia to impose rigorous standards of practice on all of its activities. Just as individual practitioners are now coming to grips with assessing whether what we do has the intended effect, and how we might measure outcomes from our practice, we suggest that similar reflections about quality assurance and outcomes should be considered in all future reviews of the examination and its associated processes. Put simply, how do we know that the examination is examining well and that perceived measures that have been put in place to address issues, such as equity, are doing what is intended?



The IPPP trusts that the content of this submission will receive due consideration by the Psychology Board of Australia. We would also be pleased to have an audience with the Board to discuss the detail of this correspondence, should this be deemed useful.

Yours sincerely

Denise Keenan, PhD

President, IPPP

For and on behalf of the Executive Committee and membership

Please contact the President direct:

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