

Response to the Psychology Board of Australia Consultation

National psychology exam: Guidelines and candidate manual

May 2019

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The Australian Psychological Society (APS) welcomes the opportunity to contribute to the Psychology Board of Australia *Consultation on the national psychology exam: Guidelines and candidate manual*.

The APS is the peak national professional association for the psychology profession with over 24,000 members. The APS has had a longstanding role in setting national standards for psychology education and training and has close relationships with the schools and departments of psychology in Australia's higher education sector and with the Head of Department and School of Psychology Association (HoDSPA).

The APS response to the consultation paper is the same as its response to the preliminary consultation paper with one additional request for clarification in relation to the period of non-practice.

The APS has considered the two options described by the Psychology Board of Australia (the Board) in relation to the national psychology examination (the exam). In general, the APS supports option 2 and makes the following comments.

1. Higher degree exemption

This submission reaffirms the position of the APS on the exam. The APS has previously provided feedback to Consultation Papers pertaining to the exam (Paper 9 in 2011; Paper 18 in 2013; Paper 25 in 2015 and Paper 28 in 2017).

In prior submissions, the APS has consistently argued the exam is not necessary for graduates of the higher degree training pathways for psychologists. The APS therefore welcomes the decision by the Board to permanently exempt students undertaking higher degree programs accredited by the Australian Psychology Accreditation Council (APAC) from sitting the exam. This decision reflects the level of competence achieved through regulated tertiary pathways.

2. Ongoing impact for practitioners

While supporting the exemption, the APS reiterates the concerns raised in our previous submissions on the exam. These issues pertain to the content of the exam and the cost to provisional psychologists required to take the exam.

The APS has previously provided feedback to the Board on a number of matters of concern in relation to the assessment curriculum for the exam (see APS submission to consultation paper 24). Given the importance of the exam in ensuring the safety of the public in relation to non-regulated pathways, it is vital that the curriculum reflects best practice.

The APS also notes the decision by the Board not to increase the cost of the exam to applicants. This is pleasing but members report that it is still a significant barrier for many provisional psychologists, particularly those in rural and remote Australia, who receive no income or a very low salary to meet the exam costs and associated travel and accommodation.

3. Separating the Guidelines into a 'Guideline' and a 'Manual'

The APS supports the proposal to separate the existing Guidelines for the national psychology examination into two documents: a 'Guideline' (outlining Board policy related to the exam) and a 'Manual' (outlining the operational information for sitting the exam and including new information to improve clarity).

The proposal improves clarity for provisional psychologists and allows the manual to be an agile document that can be updated without delays associated with regulatory requirements. The APS notes that any future changes to the manual must only be taken following appropriate consultation with the profession.

4. Data security concerns

We flag concern with the choice of an American-based company to administer the exam. Given that the USA does not meet Australian standards for data security, we seek to understand the controls in place to meet and maintain the confidential personal information of our members (test candidates) and the integrity of the examination itself.

5. Clarity of Guidelines

It is unclear when a psychologist who is returning to psychology after a period of non-practice must sit the exam. The Guidelines state that "individuals intending to return to practice as psychologist who have not practised for more than 10 years' are required to pass the exam". The Guidelines also state that "individuals returning to practice after five years may be required to pass the exam".

Similarly, the policy for 'recency of practice requirements' stipulates that an applicant "who has not practised as a registered psychologist for at least 250 hours within the last 5 years before the date of application for registration, or renewal of registration, may be required to take remedial action" which includes passing the psychology exam.

Some clarification in the Guidelines about when an applicant needs to sit and pass the exam after 5 years of non-practice (as opposed to 10 years) would be helpful.

As a minor point, the APS recommends that in the new version of the Guidelines, the word "proctored" be replaced with the term "invigilated" or that "proctored" be included in the list of definitions.