

Public Consultation: Ending the higher degree exemption from sitting the National Psychology Examination

Thank you for the opportunity to provide feedback on Consultation Paper 25.

I unequivocally support option 1 over option 2. Furthermore, the exemption should be permanently made.

I do not agree with the Psychology Board of Australia's view that all higher degree psychology students should be made to sit the National Psychology Exam (NPE) in their final year in addition to their studies. Some years ago the Exam was designed and introduced as a regulatory process for the 4+2 pathway to registration – it was built for a particular purpose that did not include assessment of tertiary learning. It is not correct to now use the same tool to measure content covered in different learning pathways – each of the pathways should be respected as valuable and unique pathways of their own merit, all ending up with the same outcome: registration. This diversity should be celebrated as an indicator of flexibility, not interpreted as a lack of quality or a sign of inconsistency in standards.

Reason given by the Board for ending the exemption	A response to each reason given
1. Establishing a comprehensive and integrated suite of quality control mechanisms	The Universities already provide a comparable quality control mechanism to the NPE (in fact a more thorough one, with multiple assessments, observations and assignments to base their decisions on). The Psychology Board, as part of APAC, accredits Universities to perform this vital role.
2. Providing for the protection of the public by ensuring that only practitioners who are suitably trained and qualified to practise in a competent and ethical manner are registered	The Board has presented no data or evidence that those who seek registration via the postgraduate studies route are dangerous to the public and thus need additional assessment opportunities to be built into the registration process. The Board continues to interpret the notion of protecting the public as considering 'the public' as an individual person rather than a broader range of 'publics' that are served by psychologists – namely teams, sporting groups, government agencies, companies and associations, etc. In particular, no data have been provided for the specialist psychology areas, i.e. those that typically require higher degrees. It would be helpful if the Board could release the specifics of how many notifications, complaints and investigations have been required in each of the specialist areas. A large number of these would lend weight to the Board's argument that registration without the NPE is dangerous.
3. Ensuring that the minimum standards for general registration in psychology are being demonstrated by all	Graduates from accredited post-graduate programs have already passed the requisite knowledge and skills training approved by APAC. A further Board-run examination is redundant. The postgraduate studies route to registration requires over two years of full-time study plus 1000 hours of supervised placements. This provides ample opportunity for assessors within the university context to ensure minimum standards are being met. If indeed this is an exercise by the Board to philosophically define new minimum standards for the profession of psychology, then an open dialogue on this topic within the psychology community should be completed prior to any administrative or policy changes regarding assessment. Key stakeholders including the professional association (APS) and practising psychologists outside the healthcare system would need to be included in such dialogue.
4. Facilitating the provision of	Requiring higher degree students to complete an additional

<p>high quality education and training of health practitioners</p>	<p>knowledge-related assessment is not directly going to boost the quality of their education and actual practice as psychologists. Indeed, a little knowledge can be a dangerous thing, if every registered psychologist thinks they can conduct clinical work simply on the basis of their studies for the NPE. Specialists without clinical training are ethically bound by the Code of Conduct to not work in areas beyond their expertise. In Consultation Paper #25 the Board has not provided sufficient rationale as to why the Code of Conduct is not working in this regard (assuming this is a driver for adding the NPE to the workload of higher degree students).</p>
<p>5. Enabling the continuous development of a flexible, responsive and sustainable psychology workforce that meets the needs of the Australian public.</p>	<p>Requiring higher degree students to complete the examination is an additional step and burden in terms of financial cost, opportunity cost, and the loss of specialist training knowledge and skills (as Uni courses will have to replace specialist content with general Exam material). This is not flexible, or responsive to the diversity of psychology or the broad range of stakeholders in the community we serve. The public that is served by organisational psychologists is going to be worse off, as the Masters graduates of the future will know less about the specialty and so provide less impactful solutions to the business challenges faced by Australian organisations and their workforces. The addition of the NPE certainly does not make the specialty areas any more sustainable as a part of the psychology workforce of the future, rather it will have the opposite effect.</p>

The higher degree exemption must continue, permanently. In this way we can ensure ongoing high quality specialist training and education for the psychologists of the future, which in turn will result in ongoing high quality contributions to the range of publics we serve. This will ultimately enhance our Australian economy and society.

Yours sincerely

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Organisational Psychology is the science of people at work. Organisational psychologists specialise in analysing organisations and their people, and devising strategies to recruit, motivate, develop, change and inspire.