



26.05.2013

Dear Psychology Board of Australia,

Re: Consultation Paper 18: Guidelines for the National Psychology Exam

The ACSP sent a submission to the Board in 2011 outlining serious concerns about exams being used to legitimize lower training pathways as adequate training to practice professionally in any area of psychology. As stated in our previous submission:

“A Board regulated exam being offered to undergraduates to allow their entrance into full professional practice in Psychology is not offered in any other country. Such a process would further entrench the undergraduate training as being legitimate in the eyes of the Ministers and State public service departments, and further maintain Australian standards not meeting international training standards. We do not feel that an exam held by the Board, no matter how well intentioned and rigorous, equates to or can replace, two extra years of university training, examinations, tutorials, essay writing and university examined supervised practice.” Pg 1.

This concern has not been addressed by the Board.

Further, the Boards addition of yet another pathway of training to professional practice – 5 plus 1 pathway, takes the minimalist approach by accepting the next lowest standards in the OECD as our own and adding on an exam to legitimize it. We now have **five different training pathways** into professional practice, with NO DIFFERENTIATION between any level in terms of what a psychologist can **actually** do or practice. These are: 4 plus 2, 5 plus 1, 6 years and no supervision, 6 plus 2, and Doctorate/PhD pathways. In fact it appears that the Boards most restrictive ruling is on post graduate endorsed psychologists who are not permitted to practice in a specialist area which they are not endorsed in. However, **ALL** generalists are able to practice in **ANY** specialist (endorsed) area, but just can't use the titles. Not only are multiple training levels confusing to the general public and to employers, it also sends a message to decision-makers indicating that generalists can do the same work (if they pass an exam) as endorsed professionals. This could readily have the industrial consequences whereby generalists, who would be cheaper to employ, may lead to the down grading of employment positions and remuneration.

This concern has not been addressed by the Board.

Our last submission also raised serious concerns about the exams focus and content potentially leading to a narrowing of the profession to mental health oriented training programs, as other specialist areas of our profession have minimal focus in the exam and would require students to learn a lot of additional information outside of their particular specialist area in order to pass the exam. At the very least, separate exam sections should be developed for each of the different specialist areas so that students undertaking exams are



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being tested on knowledge relating to each area – especially if they will be permitted after passing to work in ANY field of our profession.

This concern has not been addressed by the Board.

The ACSP believes that this whole exam process is deeply flawed. Rather than further commenting on the exam process, we wish **to register a protest with the Board** regarding your lack of proper engagement in the consultation process as you have not dealt with any concerns raised by our and many other submissions regarding these issues.

Jillian Horton
President of the *Australian College of Specialist Psychologists*