

Public consultation: Draft competencies for general registration

The Psychology Board of Australia is inviting comments on the *Draft professional competencies for psychologists*. The specific questions the Board is seeking feedback on are listed below. All questions are optional and you are welcome to respond to as many as are relevant or that you have a view on.

Please submit your feedback on this submission template by email to: psychconsultation@ahpra.gov.au by close of business **Tuesday 11 April 2023**.

Preferred option
<p>1. Are you in support of updating the professional competencies for general registration? Please provide a rationale for your view.</p>
<p>Your answer: Absolutely! The original competencies were established at a time when the Board was still developing its mandate and, while well done at the time, suffered from the rush to establish multiple guidelines, trajectories for training and standards, while managing the complexities of the professional upheaval where power and responsibility for professional standards switched from the Australian Psychological Society to the Psychology Board. Given the demands, the professional competencies were well done, but it is now more than 12 years on and it is time for an update and greater clarification and development of the current basic competencies required for practice.</p>
Structure of the updated competencies
<p>2. Do you agree with approach to create a single document that lists all the professional competencies in one place?</p>
<p>Your answer: Yes. This simplifies access for the psychologist, the public, patients/clients, and for employers. It is a clear setting of the benchmarks for practice as a psychologist.</p>
<p>3. The term 'threshold professional competency' has been introduced to describe the minimum professional competency necessary to practise safely and effectively as a registered psychologist in Australia. Do the Draft professional competencies sufficiently describe the threshold level of professional competency required to safely practise as a psychologist in a range of contexts and situations?</p>
<p>Your answer: They do indeed. This has been a very worthwhile and well executed project. The competencies are described clearly, sufficiently and in adequate detail to make explicit their goals.</p>
<p>4. We have improved our approach to drafting the competencies to better align with international psychology regulators, to emphasise that the competencies are interconnected (holistic approach) and to improve how we write the competencies (e.g. using action verbs). Do you agree with the updated drafting approach?</p>
<p>Your answer: Yes, this allows for greater international alignment for the profession and improves international workforce mobility.</p>

5. The Draft professional competencies for psychologists have been written at a high level. This aims to provide both sufficient information for clarity and direction, but also be flexible enough to be relevant to the diverse contexts where psychologists train and work. Did we get the balance right? Please provide a rationale for your view.

Your answer: I believe the balance is right.

6. The Draft professional competencies for psychologists include a preamble (p. 3-10) and definition section (p. 16-19). Do you support this addition? Is the content clear, relevant and complete?

Your answer: Yes.

7. Is the language and structure of the Draft professional competencies for psychologists helpful, clear, relevant and workable? Are there any potential unintended consequences of the current wording?

Your answer: Yes

Organisation of the updated competencies

8. The Draft professional competencies for psychologists propose to reorganise the eight core competencies.

Are you in support of combining the current *Knowledge of the discipline* (Competency 1), and *Research and evaluation* (Competency 5) into a new competency: *Applies scientific knowledge of psychology to inform safe and effective practice* (updated Competency 1)?

Your answer: Yes.

9. The Draft professional competencies for psychologists propose to place an intentional focus on professional reflexivity, deliberate practice and self-care (updated Competency 3). Do you support this proposal? Please explain why.

Your answer: I believe 'deliberate practice' is mis-placed here. 'Deliberate practice' focusses on skills development via systematic repetition. This level and type of learning belongs in training, not in practice. All relevant skills need to be acquired during training to the point they are adaptable to new applications while learning during practice should build on these skills to provide depth and breadth of learning and application. The basic skills need to have been mastered via 'deliberate practice', prior to registration.

Other than this, the competencies focussing on professional reflexivity and self-care are very important. Reflective practice is an essential competency for development as a psychologist and self-care is protective of both the practitioner and the patient/client.

Reflective practice is at the core of professional development and the psychologist's understanding of the work and its impacts. It guides the work itself, and personal professional development. Making use of supervision requires this core competency and the work remains stale and mechanical without it, leaving the patient/client being treated in a mechanised manner without understanding and adaption to their particular circumstances and needs.

Psychologists, and other 'helping professionals', are very frequently driven to help, putting the person of the psychologist aside to focus entirely on the work. This leads to poor

decision-making and burn out, and can lead to negative feelings about those one is trying to assist.

10. The Draft professional competencies for psychologists include amended and expanded core competencies on Aboriginal and Torres Strait Islander health and cultural safety (updated Competency 7).

Is there any content that needs to be clarified, added, amended or removed? Please provide details.

Your answer: While bringing weight to the principles underlying working with Aboriginal and Torres Strait Islander Peoples by listing this competency as Competency 7, it is misplaced.

Aboriginal and Torres Strait Islander Peoples are included in Competency 8 as a specific subset of diverse peoples. They are specifically referred to within the Competency (8.3). The general competencies for working with diverse peoples should precede the specific expanded competencies related to Aboriginal and Torres Strait Islander Peoples. The current order makes for awkward reading.

Recommendation: Switch the order of Competencies 7 and 8. This will allow the reader to move from general principles (for all diverse groups, including Aboriginal and Torres Strait Islander Peoples, to specific principles for working with Aboriginal and Torres Strait Islander Peoples. This will improve readability.

11. The Draft professional competencies for psychologists include an expanded core competency on working with people from diverse groups, including demonstrating cultural responsiveness (updated Competency 8).

Is there any content that needs to be clarified, added, amended or removed? Please provide details.

Your answer: See above comment for Competency 7.

Competencies and their descriptors

12. The Draft professional competencies for psychologists outline eight updated core competencies:

Competency 1: Applies scientific knowledge of psychology to inform safe and effective practice

Competency 2: Practices ethically and professionally

Competency 3: Exercises professional self-reflection and deliberate practice

Competency 4: Conducts psychological assessments

Competency 5: Conducts psychological interventions

Competency 6: Communicates and relates to others effectively and appropriately

Competency 7: Demonstrates a health equity and human rights approach when working with Aboriginal and Torres Strait Islander Peoples, families and communities

Competency 8: Demonstrates a health equity and human rights approach when working with people from diverse groups.

Do you suggest any changes to the eight core competencies and their descriptors? What would you like to see changed?

Your answer: The draft core competencies are well described.

The only things I would like to see is the removal of 'deliberate practice' from ongoing development as this is a training approach, and the exchange of placement of Competencies 7 & 8, as per above.

Outcome of implementing the updated competencies

13. We propose that an advanced copy of the professional competencies for psychologists would be published when approved, but not take effect until a later date. The estimated date of effect will be 1 December 2024. This coincides with the annual renewal date for general registration to make it easier for psychologists to plan their CPD and and for stakeholders to prepare to meet the updated competencies.

Are you in support of this transition and implementation plan?

Your answer: I accept the logic, but it must be made clear that all psychologists must meet these competencies by this date to ensure upskilling in the areas currently not within the repertoire of a particular psychologist.

14. We have recommended changes to the *Provisional and General Registration standards* and the *Guidelines for the 4+2 internship program* to remove reference to the current core competencies for general registration and replace with the updated competencies (see Attachments F, G, and H). Are you in support of these changes?

Your answer: Absolutely! The public deserves better.

15. The Board proposes a transition process and timeframe for updating board documents with the new competencies including the:

- *Guidelines for the 5+1 internship program* (separate consultation in 2023)
- *Guidelines for the National Psychology Exam, and National psychology exam curriculum* (separate consultation in 2023/2024).

Are there any comments you have on the proposed consultation plan and transition timeframes?

Your answer: There is an imperative developing in relation to the definition of specialised areas of psychology as Government moves to implement a disease-based model (i.e. the eating disorders model) that does not incorporate levels of training and expertise. The current nine areas of practice endorsement are not fit for purpose, and the profession needs to lead the development of specialisations based on training, not political expediency, as is currently occurring.

Any delay to the Psychology Board taking on this restructure is likely to lead to an increased number of psychologists being grandfathered into specialised recognition with weaker qualifications. As we have seen, this leads to a divided profession at war with itself. It is important to not exacerbate this outcome with delays.

I appreciate the enormity of the task in defining the future directions for specialisations in psychology, but I am concerned that any delay will undermine the profession and public confidence in the standards of training and levels of expertise of psychologists going forward.

16. Are there specific impacts for practitioners, higher degree providers, employers, clients/consumers, governments or other stakeholders that we should be aware of, if the Draft professional competencies for psychologists were to be adopted? Please consider both positive impacts and any potential negative or unintended effects in your answer.

Your answer: Should the draft competencies be implemented greater clarity would be provided regarding basic benchmark standards for registration to practitioners, higher degree providers, employers, clients/patients, governments and other stakeholders. I see this as helpful, with no negative consequences I am aware of, other than updating of paperwork for some of these interests.

17. Would the proposed changes to the Draft professional competencies for psychologists 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.

Your answer: Not that I am aware of.

18. Would the proposed changes to the Draft professional competencies for psychologists result in any adverse cost implications for practitioners, patients/clients/consumers or other stakeholders? If yes, please describe.

Your answer: I am unable to think of any.

Other

19. Do you have any other feedback or comments about the Draft professional competencies for psychologists?

Your answer: A job very professionally and extremely well done! Congratulations!