

Re: Submission to the Psychology Board of Australia.
Public Consultation – Updating the competencies for General Registration

I have decided to place my submission as a reply to Question “**19. Do you have any other feedback or comments about the Draft professional competencies for psychologists?**”

To the Psychology Board of Australia

I am a General Registered Psychologist and a Psychology Board approved clinical supervisor. I have worked full time as a Psychologist since January 2004 as part of different mental health teams in NSW Public Health, where I have specialised in working with complex mental health presentations, from early psychosis to moderate to severe mental health within the challenging but also very rewarding area of perinatal and infant mental health.

I am writing this submission, because I have serious concerns about the current [Public consultation – Updating the competencies for general registration](#), and I am seeking an adjournment of this public consultation, until certain aspects of this consultation can be corrected. I am concerned that the Psychology Board of Australia (the Board) has chosen to outline the current competencies for the general registered psychologists, in an oversimplified manner that dumbs down the current competencies in a way that does not reflect the true breadth and depths that is part of the current competencies gain through the current 4+2 and the 5+1 study pathways for general registration as a psychologist in Australia. As a consequence, I believe that the Board’s current public consultation is misrepresenting the skills, knowledge and other attributes that are required to currently gain general registration as a psychologist in Australia.

It appears to me that in [Attachment E - Summary of proposed changes between the current and draft new competencies](#), the Board has chosen to outline the current competencies for the general registered psychologists, in a manner that completely fails to adequately describe the current competencies that is gained by those general registered psychologists choosing to complete the current 4+2 and the 5+1 study pathways required to gain general registration as a psychologists in Australia. As a consequence, I believe that the Board’s current public consultation is misrepresenting the skills, knowledge and other attributes that are currently required to gain general registration as a psychologist through the 4+2 and the 5+1 study pathways.

On page 4 (point e) of the [Consultation paper - Updated general registration competencies](#), the Board states how “psychologists, consumers and other stakeholders are often unclear about the required competencies for general registration and for the nine areas of practice endorsement”. On page 12 (point 40) of the [Consultation paper - Updated general registration competencies](#), the Board adds how “in the Draft professional competencies for psychologists we are proposing to adopt the term ‘threshold professional competency’ to improve clarity about our benchmarks, and to ensure psychologists and clients are aware of our expectations for professional competency”, and states how **the Board is “not proposing a higher (or lower) threshold”**.

But when you read through the descriptions of the current competencies of the 4+2 and 5+1 General Registered Psychologists, that is found outlined in the Board’s current standards and guidelines, and compare these to the description of the current competencies outlined in [Attachment E - Summary of proposed changes between the current and draft new competencies](#), you will see that what the Board is actually describing as the current competencies for general registration, is really a grossly oversimplified, minimal, considerably lowered, and very unsatisfactory version of the current competencies. And later when you look at the Board’s [Attachment D - Draft professional competencies for psychologists](#), and compare this to the current competencies, that we can find outlined in the Board’s current standards and guidelines (see documents (a, b and c) below) you will see that what the Board is proposing in [Attachment D - Draft professional competencies for psychologists](#), is in effect a substantial lowering of the threshold of the

competencies for the 4+2 and the 5+1 General Registered Psychologists, something that the Board is explicitly stating in this [Public consultation – Updating the competencies for general registration](#), that they would not be doing.

The above leaves me extremely concerned that this [Public consultation – Updating the competencies for general registration](#) is leading to grave misrepresentation and misinformation of the current competency requirements for the 4+2 and 5+1 General Registered Psychologists, and concerned about the degree of the changes that the Board is in fact proposing with their [Attachment D - Draft professional competencies for psychologists](#), and which the Psychology Board of Australia, is failing to clearly communicate to the public.

How does the Board define the term “Competencies”?

To understand the changes being proposed to the competencies of the 4+2 and the 5+1 General Registered Psychologists, it is important to see how the Board defines the term “competencies”. From [Attachment D - Draft professional competencies for psychologists](#), we learn that the **Board describes the term competencies as “the threshold or minimum level of competency required for both initial and continuing registration in a profession”** (page 10), and that this “threshold professional competency is a benchmark that describes the minimum professional knowledge, skills and other attributes necessary to practise as a registered psychologist in Australia” (page 5). The Board also clarifies that this competencies must be “demonstrated upon initial application to meet a registration standard, such as the general registration standard” (page 6), stating also on (page 6), that “[the national psychology exam](#) is used to help determine if an applicant for general registration meets the threshold competency”.

“Threshold” Competencies are hence those skills and knowledge and other attributes, that are gained and demonstrated through different training pathways, like the 4+2 and 5+1 pathways (both consisting of six years). These pathways include extensive university study (4 or 5 years of formal psychology university study) which includes a supervised clinical placement, and after graduation from University, a further minimum 1 or 2 years of the internship program that consists of further supervised clinical placements, where candidates are also required to present multiple psychological assessment case reports and psychological intervention case reports, to their Board approved clinical supervisor and later to the Board for final approval. On page 6 of [Attachment D - Draft professional competencies for psychologists](#) the Board states that “when applying for general registration, an applicant must demonstrate that they meet the threshold professional competency by completing a Board-approved qualification for general registration, and any required supervised practice. The [National Psychology Examination](#) is used to help determine if an applicant for general registration meets the threshold competency for those doing the internship pathway”.

Why is the National Psychology Examination important to understand my concerns?

It is in the [National Psychology Exam Curriculum](#), where we find the core competencies that are currently required of the 4+2 and 5+1 General Registered Psychologists. It is important to take note that it is in the [National Psychology Exam Curriculum](#) where the Board currently is outlining very clearly, the current set of skills and knowledge that the 4+2 and 5+1 General Registered Psychologists must possess before they can apply for general registration as a psychologist in Australia.

Now, psychologists in Australia have a range of regulatory requirements with which they must comply. These requirements are set out in standards and guidelines provided by the Psychology Board of Australia and the Australian Health Practitioner Regulation Agency based on the Health Practitioner Regulation National Law. On page 12 of the [Consultation paper - Updated general registration competencies](#), the Board clarifies that:

*“The **current competencies** requirements for general registration are outlined in the following Board standards, guidelines, and documents:”*

- a. Provisional and general registration standards*
- b. Guidelines for the 4+2 internship program and Guidelines for the 5+1 internship program*
- c. Guidelines for the national psychology exam, and the [National Psychology Exam Curriculum](#)*

Note: Below I continue to refer to this set of documents as (a, b, and c) for brevity

And then on the first page of the [National Psychology Exam Curriculum](#), it clearly states that **“the examination assesses applied psychological knowledge, which forms a significant basis of competence in the profession”**.

And on the [National Psychology Examination](#) webpage, it states how **“the exam assess eight core competences through four exam curriculum domains (ethics, assessment, intervention and communication)”**

It is reasonable then to expect that the competencies assessed in the National Psychology Examination, would need to be identified as part of the Board’s definition of the current competencies of the General Registered Psychologist. **In the pages below, I will outline how this is not what the Board is doing in this [Public consultation – Updating the competencies for general registration](#).**

The Board is faced with the dilemma that not all General Registered Psychologists currently complete the same training, and hence that not all General Registered Psychologists are required to gain the same set of “skills and knowledge and other attributes”, like Mental Health Assessments and Mental Health Therapies, which are part of the current 4+2 and the 5+1 General Registered Psychologists competencies, but that are not part of the current competencies of all the other General Registered Psychologist’s study pathways. How the Board appears to have resolved this dilemma is disastrous to the 4+2 and the 5+1 General Registered Psychologists.

I will outline how there are important aspects of the current competencies of the 4+2 and 5+1 general registered psychologist, that while being a significant part of the current competencies, clearly outlined in the above documents (a, b and c), that these fundamental aspects that define the 4+2 and 5+1 general registered psychologists competencies, have been completely left out by the Board in their description of the current competencies of the general registered psychologists. This later invalidates the Board’s side by side comparison looking at the changes that are being proposed by the Board, making the [Attachment E - Summary of proposed changes between the current and draft new competencies](#), an unreliable document, but most seriously leading to...

...misinforming the public, and any other reader of this public consultation, about the actual changes being proposed in the of [Attachment D - Draft professional competencies for psychologists](#)

What should the Board be communicating in this Public Consultation?

The Board needs to make sure that they accurately and effectively describe the Current 4+2 and 5+1 Registration Competencies to the public, to the different relevant agencies, to the other professional bodies, as well as to the psychology professionals, to avoid misrepresentation or misinformation of the skills and knowledge and other attributes required under the current legislation, and that are part of the current 4+2 and 5+1 training pathways. The public have a right to trust the expertise and [ethics](#) of the Psychology Board of Australia, but when there are discrepancies, or omissions, like in the current public consultation, in the information or the way this information is communicated to the above sectors of the population, then this become a matter of serious public concern, that must be urgently addressed.

How are the current competencies described in the documents (a, b, and c)?

Now, from the above documents (a, b and c), it is only a simple task to make a short and clear summary of what the Board is outlining in these documents as the current 4+2 and 5+1 General Registration Competencies. Any intelligent person that carefully examines the above documents (a, b, and c) can easily confirm the definitions of the two competencies which are presented below. These are two core competencies that all 4+2 and 5+1 Registered Psychologists must currently demonstrate at the time of initial registration, and that demand considerable work and time to master, and that forms a major part of the requirements of the internship of supervised clinical practice that the 4+2 and 5+1 general registered psychologists need to complete and be tested for through the [National Psychology Examination](#) before gaining general registration as a psychologist in Australia.

CURRENT Competency 3: CONDUCT PSYCHOLOGICAL ASSESSMENTS COMPETENCY

This focuses on skills and knowledge in conducting evidence-based psychological assessment, and applying this knowledge to problem formulation. Formulation is the generation and testing of hypotheses leading to a dynamic psychological understanding of a client's presentation. The focus is on understanding the general principles of assessment including, the process of selecting an appropriate test for a designated purpose, test administration, assessing a test's psychometric properties (reliability and validity) and making valid inferences from the assessment (test interpretation and reporting).

- 1) Understanding of issues in test selection, use, interpretation, acceptability and appropriateness
 - a. Application and limitations of tests
 - b. Cultural responsiveness in testing diverse groups
 - c. Ability to score tests and interpret results
- 2) Knowledge and understanding of the application of forms of assessment including:
 - a. Interview techniques (structured and unstructured)
 - b. Systematic behavioural observation
 - c. Psychometric assessment
 - d. Goal-setting based on client's needs
- 3) Ability to appropriately administer, score and interpret psychological tests, including:
 - a) Intelligence scales
 - b) Adaptive and educational assessments
 - c) Memory
 - d) Vocational
 - e) Personality
 - f) Clinical and mental health tests
- 4) Knowledge and application of interview assessments
 - a) A systematic history-taking approach
 - b) The Mental Status Examination
 - c) Risk assessment of suicide, self-harm and harm to others (acute and chronic)
 - d) Parental and family functioning
 - e) Diagnostic classification systems (including current versions of DSM and ICD)
 - f) Setting and monitoring goals measures (including goal attainment scaling)
- 5) Knowledge of the DSM definitions, diagnostic criteria and essential features of all mental disorders to make a diagnosis. Understanding the limitations of diagnostic systems and issues of differential diagnosis and alternative models of psychopathology

CURRENT Competency 4: CONDUCT PSYCHOLOGICAL INTERVENTIONS COMPETENCY

Knowledge of different modes of treatment, including individual, couple, family, group, organisational, or community interventions. Interventions across a broad spectrum of functioning, from mental health problems through to interventions focused on positive wellbeing and organisational effectiveness. Ability to link the diagnosis, formulation and the intervention chosen. Have good understanding of how to develop or plan evidence-based preventative, developmental, remedial interventions or other services. Knowledge of how to evaluate the impact of professional services.

- 1) Uses diagnosis, formulation, and client preferences to develop intervention plans.
- 2) Knowledge of evidence-based counselling skills and their application in service delivery, including:
 - a. Cultural responsiveness in providing interventions to diverse groups
 - b. Establishing therapeutic relationships and therapeutic alliance
 - c. Listening skills
 - d. Responding skills including supportive and expressive techniques, empathic responding; reflection; questioning (including Socratic questioning); summarising skills
 - e. Problem resolution and change-based strategies
 - f. Monitoring progress (using quantitative and qualitative approaches), and
 - g. Managing endings of therapeutic relationships
- 3) Knowledge of evidence-based interventions, and their application, relevant to practice across the lifespan, and cultural contexts, including:
 - a) Contemporary theories and models of treatment
 - b) Cognitive and behavioural

- c) Psychodynamic and interpersonal
 - d) Family systems, and humanistic approaches
 - e) Solution-focused techniques and motivational interviewing
 - f) Psycho-education
 - g) Narrative therapy (including as applied for clients of Aboriginal and Torres Strait Islander descent)
 - h) Cognitive-behavioural approaches including behaviour modification, exposure (in vivo and imaginal techniques), behavioural activation (activity scheduling), cognitive interventions, acceptance strategies, self-management, relapse prevention; progressive muscle relaxation, breathing retraining, and skills training (problem-solving, anger management, social skills, assertiveness, stress management, mindfulness, parenting).
- 4) Knowledge of psychopharmacology, drug classification, pharmacokinetics and pharmacodynamics.
 - 5) Uses evaluation results to review and revise interventions as necessary.
 - 6) Evidence-based practice, including understanding of how to use research to inform delivery of assessment and interventions, generating evidence to evaluate practices, and understanding any limitations of evidence to inform practice.

THE ABOVE DESCRIPTION OF THESE TWO CURRENT COMPETENCIES TAKEN FROM THE BOARD'S OWN DOCUMENTS (A, B AND C) ARE VERY CLEAR AND CORRECTLY IDENTIFIES THE 4+2 & 5+1 GENERAL REGISTERED PSYCHOLOGISTS, COMPETENCIES, AS PROFESSIONALS WITH BROAD KNOWLEDGE AND SKILLS IN CLINICAL PSYCHOLOGY INCLUDING MENTAL HEALTH ASSESSMENTS AND IN THE PSYCHOLOGICAL AND MENTAL HEALTH TREATMENTS OF THESE CONDITIONS. THE IRONY HERE IS THAT WHILE NOT HOLDING AN ENDORSEMENT IN CLINICAL PSYCHOLOGY, THE SKILLS AND KNOWLEDGE OUTLINED IN THE CURRICULUM OF THE NATIONAL PSYCHOLOGY EXAMINATION, ARE OF A CLINICAL PSYCHOLOGY NATURE, CURRENTLY REQUIRED TO GAIN GENERAL REGISTRATION

How are the current competencies described in the Board's Public consultation – Updating the competencies for general registration?

These are found on [Attachment E - Summary of proposed changes between the current and draft new competencies](#). Below I have copied the same set of two competencies, for clarity of comparison to that set of competencies outlined by the documents (a, b, and c) above.

Current Competency 3: Psychological assessment and measurement: "The use of appropriate psychometric tools that enable description, conceptualisation, and prediction of relevant aspects of a client's functioning, behaviour, and personality (note: the client may be an organisation, group or individual)" (from page 4 of Attachment E)

Current Competency 4: Intervention strategies: "Activities that promote, restore, sustain or enhance cognitive functioning, emotional adjustment and a sense of wellbeing in individuals or groups of clients through: (from page 5 of Attachment E)

- Preventative
- Developmental, or
- Remedial services, and/or in groups or organisations, restoring or enhancing group and/or organisational functioning"

THE DESCRIPTION THAT THE BOARD IS OFFERING HERE IS NOT ONLY WRONG, BUT GRAVELY MISLEADING TO THE PUBLIC, AS IT DOES NOT FAITHFULLY DESCRIBE THE CURRENT COMPETENCIES OF THE 4+2 OR THE 5+1 PSYCHOLOGISTS THAT IS CLEARLY FOUND IN DOCUMENTS (A, B, AND C)

The reasons why the Board has chosen to describe the current competencies for general registration in the [Public consultation – Updating the competencies for general registration](#) in this way, is very problematic to say the least. But it is true to say that these descriptions significantly fail to clarify the essence of what are the current core threshold competencies required to gain General Registration as a Psychologist through the 4+2 or the 5+1 study pathways.

What the Board is offering to the public in their wording of the above two competencies in this Current Public Consultation, does not reflect the above competencies taken from documents (a, b, and c). In my view, it would be fair to say that the above descriptions offered by the Board will result in misleading the public and anyone else that reads the public consultation

Looking at the two sets of definition, one taken from the documents (a, b, and c) where the Board states that we can find the current competencies, and comparing these to the definitions that the Board offers in [Attachment E - Summary of proposed changes between the current and draft new competencies](#), we clearly see a significant contradiction, that might lead some to question if it is just “psychologists, consumers and other stakeholders” that are often unclear about the required competencies for general registration, as the Board claims in the [Public consultation – Updating the competencies for general registration](#), or if it is also the Psychology Board of Australia themselves who are unclear about these competencies.

It is surprising to read on page 4 of [Attachment E - Summary of proposed changes between the current and draft new competencies](#), in the column used to identify the “changes made” to the current competencies, when we look at Competency 3 - Psychological assessment and measurement; where the Board states how the proposed updated competencies offers an “**expanded competency description**”, and that the current competency “description is truncated and does not provide enough information for clarity of meaning”, when in reality, it is the Board’s own choice of definition of the current competencies that is clearly truncated and completely unsatisfactory. If the Board had chosen to correctly described the current competencies as they are in the documents (a, b, and c), then the version of the draft proposed competencies, and in fact the whole process of this Public Consultation, would have been more reliable and faithful to the current standards outlined by the Psychology Board of Australia. And in this way, we would have a draft competency document that reflected accurately the current competencies required to gain General Registered as a Psychologists in Australia.

When we read carefully the entire documents referred to in point (a, b, and c), and see what the current competencies for general registered psychology really are, we realise that the Board is actually making major changes in the proposed draft competencies for the 4+2 and the 5+1 psychologists. And we then realise that these changes are in effect not being openly communicated to the public. The problem is precisely how the Board is choosing to define the current competencies in the [Public consultation – Updating the competencies for general registration](#). This makes the process of comparing the differences between the current competencies and the draft proposed competencies in [Attachment E - Summary of proposed changes between the current and draft new competencies](#), a futile task, because we are being told by the Board to compare the proposed draft competencies with a wrongly described current competencies.

In fact it is misleading when on page 12 (point 40) of the [Consultation paper - Updated general registration competencies](#), the Board states that “in the Draft professional competencies for psychologists we are proposing to adopt the term ‘threshold professional competency’ to improve clarity about our benchmarks, and to ensure psychologists and clients are aware of our expectations for professional competency”, and later adds that the Board is “not proposing a higher (or lower) threshold”.

From the above it is very clear that the Board is not helping to clarify the current competency structure, and that in fact the Board is failing to communicate important aspects of these competencies. In fact what the Board is achieving through this Public Consultation, is offering a definition of competency for the 4+2 and the 5+1, that ends up lowering the threshold of the competencies required to gain general registration as a psychologist in Australia.

The Draft Competencies proposed by the Board, fails to identify the 4+2 and the 5+1 General Registered Psychologists as professionals with broad knowledge and skills in mental health assessments and in the psychological therapies, even when these are currently a core part of their pathways of study. In fact, these competencies have been removed from the proposed definition in the Draft Competencies, even though these are clearly outlined in the documents (a, b, and c). What the Board has essentially done with the [Public consultation – Updating the competencies for general registration](#), is to lower the “threshold” of competence that will be required to gain General Registration as a Psychologist in Australia, even when this is not what the Board admits to be doing.

This current public consultation ends up being misleading and confusing, all but to the already well informed reader that is able to spot the above errors and contradictions. The inexperienced reader would need to review complex and lengthy Psychology Board standards, guidelines and other document, to correctly identify the changes to the competencies that the Board is proposing in this [Public consultation – Updating the competencies for general registration](#).

The Board should now suspend the current public consultation, dismiss those who have clearly failed in their mandate to draft a clear and accurate public consultation, and start over with more consultation and more oversight. We all need to rethink this important review in a truly consultative manner, making sure we are faithful to the current competencies that are already outlined in the Board's standards, guidelines, and other documents, and being faithful about the intentions of the review.

The Board needs to make sure that they accurately and effectively describe the Current 4+2 and 5+1 Registration Competencies to the public, to the different relevant agencies, to the other professional bodies, as well as to the psychology professionals, to avoid misrepresentation or misinformation of the skills and knowledge and other attributes required under the current legislation, and that are part of the current 4+2 and 5+1 training pathways. The public have a right to trust the expertise and [ethics](#) of the Psychology Board of Australia, but when there are discrepancies, or omissions, like in the current public consultation, in the information or the way this information is communicated to the above sectors of the population, then this become a matter of serious public concern, that must be urgently addressed.

Sincerely

Pablo Bianchi

General Registered Psychologist