

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
1. Are you in support of updating the professional competencies for general registration? Please provide a rationale for your view.
Your answer: Yes, it provides an opportunity to realign the competencies to reflect changes in the discipline and practice, including a privileging the needs of Aboriginal and Torres Strait Islander and diverse communities via cultural safety and culturally responsive approaches.
Structure of the updated competencies
2. Do you agree with approach to create a single document that lists all the professional competencies in one place?
Your answer: Yes, this eases access to relevant information.
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?
Your answer: Yes. We appreciate clear definitions for early career practitioners, ie completing training and, if required, successful completion of the exam, and for ongoing registration. Suggestions for self-assessment measures to ensure standardisation would be appreciated.
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?
Your answer: Yes. We appreciate the holistic approach that highlights the intertwining of knowledges, skills, attitudes and practices and the use of action verbs to clarify meaning and expectation. We also appreciate the inclusion of human rights, and social, cultural and political determinants of health.

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:

There appears to be some circularity in the competency descriptors. For example, in order to fulfill competency 3.1 that the practitioner “understands the parameters underpinning professional competence”. Perhaps it would be more useful for practitioners to be able to articulate their knowledge, skills and other attributes necessary to practice (as per p5 definition of ‘competency’). We might also interpret this as requiring regular self-assessment against the professional competencies in 3.1. If this is this case, further clarity in the wording is required.

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:

The preamble and definitions sections are useful. We appreciate the articulation of culturally safe practice in the context of critical reflexivity. This makes a more clear delineation between cultural safety as identified by Aboriginal and Torres Strait Islanders persons, and cultural responsiveness in the context of working with people from diverse groups. We appreciate the inclusion of the diverse range of groups and communities, including age and gender.

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:

Although there is reference to the new competencies not being clinically focused (ie encompass research), this is still a narrow definition of 'client' (p 10 of the draft competencies). Perhaps a more broad term could be adopted to indicate those who engage in the discipline, and not just the practice of psychology, such as research participants etc. We do not advocate for the term 'consumer'.

3.5 “Engages with reflection and reflexively with disciplinary knowledge and professional practice” should perhaps read “Engages in reflection and with reflexivity...” rather than “reflectively”.

Otherwise, useful wording might be “3.8 Engages in self-reflection and critical self-reflexivity with disciplinary knowledge and professional practice.”

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, this blend allows for various ways to operationalise research into the knowledge of the discipline, including understanding philosophical and theoretical perspectives that underpin practice and research.

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:

There is discrepancy in this document, were the competency described Q9 and Q12 are worded differently – professional reflexivity is not professional self-reflection. Otherwise, we support the need for review of own practice and identifying areas to improve (self-reflection) and also self-reflexivity (self and practice in broader social, political and cultural context).

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:

We would urge the inclusion of a competency similar to 8.4 e.g. add to 7.8 “recognises the impact of one’s own values, beliefs, experience, positionality and cultural identity on practice and demonstrates on ongoing commitment to providing culturally safe practice.”
This makes more explicit the underpinning tenets of 7.3 ‘culturally safe care’.

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:

Critical self-reflexivity is key to this work. This seems to be well articulated in the new competency.

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 wording of Competency 3 differs across documents. (see above: Exercises professional reflexivity, deliberate practice and self-care).

We advocate for focusing on critical self-reflexivity rather than reflection, as it takes into account social, historical, cultural impacts upon health and practice.

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:

Yes, this would certainly be beneficial when curriculum planning.

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:

Yes, it establishes a common set of core competencies and importantly the threshold all provisional psychologists should be attempting to attain.

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:

A transition process for 5+1 internship programs together with separate consultation would assist with curriculum development and appropriate mapping to the new competencies.

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:

There needs to be clear alignment and articulation between the new competencies and APAC guidelines. Clear articulation will support employers to understand competencies of psychologists and clarify roles. Further, Board approved supervisors will require upskilling.

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:

While it is appreciated that the intent of the professional competencies is to enhance cultural responsiveness and importantly cultural safety, it is hoped that consultation has been undertaken with Aboriginal and Torres Strait Islander peoples and representatives from other diverse groups in order to answer this question.

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:

It is difficult to answer this question as it is not clear how those with current general registration would be assessed to determine if they meet the threshold standards outlined in the new competencies. This difficulty flags the importance of ensuring that there is clear articulation of the knowledge and skills required to meet the threshold competencies and how they are to be demonstrated and assessed holistically. Should that be articulated, there may be short-term costs to board approved supervisors, educators, and provisionally registered psychologist in adjusting curriculum/assessments to ensure threshold competencies are being attained, however it is not anticipated that there should be adverse cost implications to clients. We support an expectation that is no change for those already registered, apart from the usual 12-month expectation of linking professional development plan to the newly articulated competencies.

Other

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

Your answer:

We thank the Board for their work on developing the new competencies to ensure the safety of clients and the development of critically self-reflexive psychologists.