

## 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](mailto:psychconsultation@ahpra.gov.au) by close of business **Tuesday 11 April 2023**.

<b>Preferred option</b>
<b>1. Are you in support of updating the professional competencies for general registration? Please provide a rationale for your view.</b>
<p><b>Your answer:</b></p> <p>Yes, we support updating the professional competency standards for general registration. We support any efforts to improve or clarify the level of competence of Australian Psychologists, updating the competencies to be more contemporary, relevant and clear. We consider that any efforts in this regard will improve the public's confidence in the standard of care provided to the public. This clarification reassures the public that the minimum standard they can expect is set at a high standard for all psychologists. These competencies and associated documents should be regularly reviewed to ensure they reflect contemporary practice in psychology.</p>
<b>Structure of the updated competencies</b>
<b>2. Do you agree with approach to create a single document that lists all the professional competencies in one place?</b>
<p><b>Your answer:</b></p> <p>Yes, we agree that a one document approach is best.</p>
<b>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?</b>
<p><b>Your answer:</b></p> <p>No, we would prefer further detail to be included such as case studies to further illustrate what is meant by threshold levels of competence and how this would relate in real terms to professional practice. In the current format many psychologists have expressed confusion over what is required of them, particularly when they do not work in one area of competence within their current professional role and do not consider that they will work in this area in the future. In the current format it would be easy to misinterpret the</p>

standards and believe something more is required. Given the large number of changes it is important to break down the information into manageable pieces with action points clearly articulated so that those assessing their competence against the standard are able to do so without overwhelm, clearly identifying where they need to set goals for their learning plans.

**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:**

The approach to better align the competencies to international standards is appreciated and increases the international standing of Australian Psychologists. The updated drafting using action verbs is appropriate.

**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:**

Providing some case studies would enrich this so that it is easier for individual psychologists to conceptualise and adequately assess their own level of competence and required areas for professional development. The information in its current format may be too abstract without the use of examples and may also be open to misinterpretation.

**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, we support this addition. We would like some more detail to be provided around threshold competence, scope of practice and how these standards relate to other standards such as to area of practice endorsement standards. These terms have been confusing for some during this consultation period. The use of examples and case studies would enhance understanding in this area.

**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:**

Some of the competencies have been misinterpreted by some members as they have not been explicit enough about the breadth of competence that psychologists have.

We are concerned that the competencies may unintentionally be used incorrectly in reviewing practitioners in the case of a complaint for example. Rather than focussing on the competencies required in the individual's workplace, the assessors may

unintentionally assess their competencies across the whole of the standard and think they are not meeting them. It has been reported a number of times through calls to our professional advisory service that the investigation of complaints drifted from the reported breach to other unrelated areas of practice that did not have bearing on the complaint. While we cannot comment on the validity of these reports, we would like to see assessors trained to a high level in the new competencies and what is meant by threshold competence and scope of practice to prevent this from occurring.

It may be useful to specify exactly what is meant by reflective practice and provide working models and examples of what this would look like in practice. Information about how this looks in action would be positive such as the requirement to review practice at renewal each year and direct learning plan activities toward areas that need updating as well as the need for regular peer supervision to address gaps in competence.

Particularly with regard to cultural responsiveness and competence across the lifespan, examples of what would be regarded as recent training and development in this area would be a useful guide to include.

Without clear definitions of the requirements of reflective practice there is a risk that the practitioner will aim their development activities at the wrong level, either undershooting or overshooting where their ongoing training should be directed. The goal should be a continual assessment of self against peers as well as continual drive to update knowledge and skills at an appropriate level given the scope of practice of an individual.

The wording of some sections needs to be improved to ensure clarity for a diverse range of stakeholders including non-psychologists. Some of the wording is highly clinical and health oriented and may not adequately reflect the work that is done by psychologists not working in clinical settings such as organisations. This is particularly relevant regarding competencies 7 and 8 which refer to health equity.

### 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, we support this

**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:**

Yes. We believe this to be an essential component of practice. Professional reflexivity, deliberate practice and self-care should also be part of any ongoing supervision that a psychologist receives. Registered supervisors are trained in reflective practice. Further definitions of this, links to literature, and examples would help clarify this area of competence for psychologists.

**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 prefer to defer to Aboriginal and Torres Strait Islander Psychologists in regard to this question and ask that they be consulted in depth regarding this competency.

Some examples of what training would be appropriate may be beneficial to include in the preamble section ie social and emotional wellbeing framework, links to respected journals or articles, etc.

It is worth noting that psychology training pathways are not particularly culturally safe for Aboriginal and Torres Strait Islander students. It is important that consultation occurs with students about their experiences of university training and changes made so that they can be retained within the workforce. Without further inclusion and prioritising Aboriginal and Torres Strait Islander voices within our own profession we cannot be deemed to meet the goal of cultural safety and competence.

**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:**

We again refer to the diverse groups that may be impacted by this competency and ask that consultation be conducted directly with these groups. We do agree that this is an important area of competence for all psychologists in order to improve outcomes for members of all these groups.

**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:**

Competency 2 – 2.8 relates directly to competency 3 so some reference to this needs to be made. It maintains competence as a psychologist by engaging in regular reflective practice and addressing knowledge gaps/ Maintains competence as a psychologist – refer to competency 3 for further detail.

Competency 3 – It would be appropriate to mention engaging in regular peer supervision to enhance reflective capacity.

Area 3.7 (Monitors and manages self-care to sustain professional functioning and wellbeing) may need more expanding. There is a fear within the psychology community that to be open about health, mental health challenges, disability and to actively monitor this means that they would be exposed to complaint and labelled an impaired practitioner. Although the board has changed the way it communicates around this issue the fear has been embedded for many years. There are currently strong discriminatory practices within many facets of psychology that actively exclude those with disabilities. These need to be addressed openly when rolling out this new registration standard. Providing case examples in the preamble would be helpful in practitioner understanding.

4.4 – using dot points makes this list seem exhaustive. Using the wording – Administers a range of culturally safe assessment methods to assess (list not exhaustive):

There could be some expansion of competency 4 and 5 to include area such as physical health focussed psychology and interventions.

**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. We support a transition plan of sufficient length to allow practitioners to prepare and understand the changes and to begin to practise what is required before implementation. There are significant changes proposed and psychologists will need to be educated in depth about the new requirements. This will take time. Psychologists are under a significant pressure currently due to global pandemic, workforce demand and the effect that this has had on the community. Too short a time frame will put unnecessary stress on these already stretched psychologists, particularly when learning plans and professional development will need to be completed and some of these learning opportunities are difficult or costly to source. AAPi would also appreciate having time to tailor our professional development opportunities to fill any identified gaps in the training of psychologists in Australia.

**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 is in the interests of the profession for the updated competencies to apply to all.

**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:**

National Psychology Exam curriculum and other associated information will need to be released to provisional psychologists with enough time for them to have adequate time to study for their examinations prior to applying for general registration.

**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:**

**15. Are there specific impacts for practitioners, higher degree providers, employers, clients/consumers, governments or other stakeholders that the Board should be aware of, if**

**the Draft professional competency standards were to be adopted? Please consider positive impacts and any potential negative or unintended effects in your answer.**

Alignment with the registration renewal period is positive and would allow for the Board to communicate with all registered psychologists during a key period of interaction. If this date in 2024 is used, a grace period for psychologist may need to be instituted so that practitioners are able to plan for and institute their individualised education plans to enable them to meet competence. There may be many practitioners that have concerns about the way the standard is changing and need further clarification about what their requirements are. Lead up activities and increased communication in the year prior would be of benefit.

Self-assessment resources would be useful to provide to psychologists to assist with self-assessment and reflective practice required to meet this standard.

Universities also may need additional time to put required training and evaluation into place.

Peak bodies such as AAPI would benefit from being able to roll out training opportunities before the expected release date, up to a year in advance. This will increase the likelihood of psychologists meeting competence quickly and will assist members with their self-assessment requirements. For those psychologists who are not members of one of the peak bodies, additional communication from the board will be required with opportunities for training and development disseminated.

Simplifying competency standards to one place will make finding and understanding them more effective. However, it may mean that those outside the profession do not understand the meanings of the competencies, because they are, of necessity, succinct in their wording. Due to this, definitions about self-reflective practice and cultural competence need to be explicated with examples somewhere to guide both assessors and investigators. Wherever possible there should be research that justifies an approach to a competency stated.

An unintended negative impact may be that people who apply the competency standards to a practitioner misapply them. The idea here is similar to how lawyers look at legislation. To interpret legislation the objects of the law are articulated in the legislation and the intention of the parliament (spirit of the law) need to be taken into account. The intention of the parliament is found in the readings of the Bill. In the same way, someone who interprets the competencies needs to be able to interpret them using clearly articulated objectives by the Board and the equivalent of the reading of the Bill. This would need to be some kind of explicated statement about how each of the guidelines is anticipated to benefit the clients.

That the endorsement competencies are not released at the same time as this document makes it extremely difficult to judge it on its own merits as it has the potential to be greatly impacted by the area of practice endorsement competencies document. Without this detail it is difficult to envision how the standards will be implemented and what the likely consequences are that need to be managed.

**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:**

We have had feedback from some senior members of these communities that they are “over-consulted” and experiencing burnout as much of the work is expected to be unpaid. It should not be up to the members of these communities to provide all the education for the profession and ownership of this education needs to be taken up by some organisations rather than expected from members of these marginalised communities.

**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:**

For practitioners who may need to upskill in a competence area the costs might be onerous. This will depend on the providers of the training.

There could be cost implications for clients if the practitioner needs to pass on the costs of their upskilling across their fees.

There will be cost implications for member associations in terms of the time of employees to inform members and to provide educational opportunities.

There are likely to be cost implications for higher education.

**Other**

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

**Your answer:**

It is worth noting that it has been shown through yearly surveys and reports that there is a relatively low level of confidence in Ahpra and the Psychology Board from psychologists. Significant work will need to go into managing this mistrust, particularly with those practitioners who already feel maligned by the registration body. It is likely that the introduction of these standards will result in a fear response on the behalf of practitioners and practitioners who are fearful do not make effective learners or gather information effectively. It is often reported that psychologists experience anxiety responses simply from receiving email communication from the Board. As peak bodies we can certainly support and educate members but there are many psychologists who are not members of any peak bodies or who are disengaged from their peak bodies. Information dissemination in ways that are productive and engaging needs to be a focus prior to these standards being rolled out nationally.