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Dear Updating ANZSCO team

Australian Psychological Society Submission to the ANZSCO Comprehensive Review: Consultation Round 2

The Australian Psychological Society (APS) welcomes the opportunity to provide a submission to the ANZSCO Comprehensive Review. The APS is the leading professional body for psychologists in Australia. We are dedicated to advancing the scientific discipline and ethical practice of psychology and work to realise the full human potential of individuals, organisations and their communities through the application of psychological science and knowledge.

Our submission provides specific recommendations in relation to the psychologist occupations identified in the Medical, Nursing and Other Health Care Services focus area in consultation round 2.

The current position

Psychologists are currently located in unit group 2723 of ANZSCO and are classified into 5 occupations:

- 272311 Clinical Psychologist
- 272312 Educational Psychologist
- 272313 Organisational Psychologist
- 272314 Psychotherapist
- 272399 Psychologists nec

Specialisations are attached to clinical psychologist, and additional occupations are included in the psychologist nec group. All occupations within the 2723 unit group are at ANZSCO Skill Level 1.

APS recommendations

Recommendation 1: A single occupation for psychologists with specialisations

The APS recommends that the five psychologist occupations (excluding psychotherapist) be combined into a single occupation of 'psychologist'. This occupation should have the following specialisations, reflecting the Psychology Board of Australia's (PsyBA) nine Areas of Practice Endorsement (AoPE):<sup>1</sup>

- Clinical neuropsychologist
- Clinical psychologist
- Community psychologist
- Counselling psychologist

- Educational and developmental psychologist
- Forensic psychologist
- Health psychologist
- Organisational psychologist
- Sport and exercise psychologist

The rationale for this recommendation is based on the following considerations:

- With the exception of 272314 psychotherapist (see Recommendation 3 below), the current occupations in unit group 2723 appear to follow a regulatory-led classification of psychologists. There is partial alignment between ANZSCO and AoPEs, which represent advance study and supervised training in a field of professional psychology. From a regulatory perspective, however, some AoPEs (e.g., forensic psychologist, health psychologist and neuropsychologist) are inaccurately described in ANZSCO as specialisations of clinical psychology. Other AoPE-based occupations, like counselling psychologist and sport psychologist are incorrectly located under 272399 psychologists nec. The current ANZSCO position therefore requires change to eliminate confusion and misalignment.
- While following a regulatory-led classification has some merit, in practice it is often difficult to distinguish the work of psychologists in different AoPEs based on unique tasks as required by the ANZSCO model. For example, a psychologist who has an AoPE in sports and exercise psychology may be performing similar *tasks* to a psychologist with an AoPE in clinical psychology (such as conducting psychological assessments or providing psychological interventions). Moreover, the majority (58.3%) of psychologists in Australia do not have an AoPE.<sup>2</sup> The work of these psychologists, who would currently be categorised into 272399 psychologists nec by default, would not be readily distinguished from other psychologist occupations in ANZSCO at the task-based level. Ultimately, there is a large common substrate of tasks performed by Australian psychologists – all of whom must have general registration with PsyBA. The APS believes that it is preferable to recognise the high level of skill and expertise across all registered psychologists through a single occupation, while recognising advanced study and training as specialisations within the ANZSCO model.
- ANZSCO is used by the APS in its role as the national assessing authority for overseas academic qualifications in psychology. The APS does not anticipate any adverse effects and believes that these suggested changes will streamline the assessment process.

#### Recommendation 2: Psychologists as health professionals

The APS recommends that the psychologists unit group be placed under the health professionals sub-major group (25), alongside other professions such as occupational therapists (2524) and physiotherapists (2525). This change would recognise that psychologists are registered health practitioners regulated by PsyBA.

#### Recommendation 3: Psychologists are distinct from psychotherapists

The APS recommends the removal of 272314 psychotherapist from the psychologist unit group. The title of 'psychologist' is protected under the *Health Practitioner Regulation National Law* (the National Law), meaning that only those who hold PsyBA registration can refer to themselves as a psychologist.<sup>3</sup>

A psychologist may work as a psychotherapist, but relatively few psychotherapists are psychologists. Psychotherapists are not regulated by PsyBA or another government body. As 'psychotherapist' is therefore not a protected title, there is also considerable variation in the ANZSCO skill level of psychotherapists. The APS therefore recommends that the occupation of psychotherapist be moved to another unit group to make it abundantly clear that psychologists in ANZSCO refer only to PsyBA registered psychologists, consistent with the National Law.

#### Recommendation 4: Increasing the skill level description for psychologists

Consequent on Recommendation 3 above, the APS recommends that the ANZSCO Skill Level description for the psychologist unit group be revised upwards to recognise the high level of postgraduate training and supervised practice that is required for PsyBA registration.

Subject to further discussion with the ANZSCO Review team, the APS proposes the following skill level description:

Occupations in this unit group have a level of skill commensurate with a bachelor degree and a higher qualification, and one to two years supervised psychological practice. In some instances at least five years advanced study and training are also required (ANZSCO Skill Level 1).

Recommendation 5: Addition of psychological scientist as an occupation

The APS recommends the addition of an occupation of 'psychological scientist'. This would recognise the distinct role and contribution of psychological scientists alongside other scientist and researcher occupations currently in ANZSCO. A psychological scientist is distinct from a psychologist in that a psychological scientist is primarily involved in research or another scholarly undertaking in a field of psychology, rather than primarily working as a registered health professional. Psychological scientists have tertiary training in psychology (i.e., ANZSCO Skill Level 1) and may often have higher qualifications (e.g., a PhD). The APS suggests that unit group 2724 may be an appropriate location for this occupation.

Thank you again for the opportunity to provide a submission to the ANZSCO Comprehensive Review. If any further information is required from the APS, I would be happy to be contacted through our National Office on (03) 8662 3300 or by email at: [z.burgess@psychology.org.au](mailto:z.burgess@psychology.org.au)

Yours sincerely

Dr Zena Burgess, FAPS FAICD  
Chief Executive Officer

## References

1. Psychology Board of Australia. (2019). *Endorsement*. <https://www.psychologyboard.gov.au/endorsement.aspx>
2. Psychology Board of Australia. (2023). *Statistics*. <https://www.psychologyboard.gov.au/About/Statistics.aspx>
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<https://www.psychologyboard.gov.au/About/Education/Title-and-scope.aspx>