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The problem of psychologist certification: A comparative analysis of international experience

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Abstract. As the war in Ukraine poses a significant threat to national mental health, professional psychological support has become more crucial than ever for Ukrainians. The need to regulate the profession and establish a safe environment for consumers of psychological services has led to the implementation of psychologist licensing and certification. In Ukraine, this system is imperfect and requires optimisation, one of the ways to achieve which is to study and adapt the best international experience. In light of this, the aim of this article was to examine the characteristics of psychologist certification in the United States, Canada, the United Kingdom, the European Union, and China to identify prospects for developing the psychologist certification system in Ukraine. The methodological tools used included the dialectical method, as well as systemic, informational, theological, and functional approaches, which allowed for the presentation of the features of certification in the current conditions of professionalisation of psychological activities. It has been established that certification has historically been one of the methods for measuring competence in professional psychology. For this purpose, professional associations create voluntary certification systems. The features of the most developed psychologist certification systems (USA, Canada, and the United Kingdom) were examined, and an attempt was made to compare them with similar certification models in the European Union and China. Common requirements for psychologist certification in these countries were identified, including requirements for the content and duration of specialised education; requirements for supervised psychological practice; requirements for professional development in both practical and research areas; and requirements for the moral and ethical qualities of the psychologist. Conceptualising and measuring psychologist competence is an ongoing dynamic process as the field of psychological practice continues to evolve. The practical value of the results lies in their potential use to identify ways to improve the national psychologist certification system and the possibilities for transitioning from voluntary certification to mandatory certification

Keywords: professional qualification of psychologists; licensing; certification; psychological practice; system of psychological training; supervision

INTRODUCTION

The modern Ukrainian system for recognising the qualifications of scientific and pedagogical workers (the system of academic degrees and titles) is quite well developed. However, the grades of academic qualifications either cover only one, "university", stage of a professional

career (bachelor, master, specialist), or only one direction of a career – scientific achievements (candidate and doctor of science). The practical experience and achievements of a professional as a successful practitioner actually remain outside the academic framework

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of qualification recognition and are essentially beyond the control of the professional community. This problem is of particular importance in the confirmation and recognition of the qualifications of specialists of the psychological profile, since the level of consequences of unprofessional psychological activity is quite critical.

Qualification recognition is typically represented by a certification system. A certificate confirms a professional's qualifications, providing legitimacy for their professional activities and increasing their value in the labour market (Psychology certifications..., n.d.). Certification takes on particular importance due to the diversity of systems for obtaining basic professional knowledge and qualification recognition systems, as academic training is not always sufficient for qualification recognition. Licensing or certification of psychologists is aimed at protecting consumers from unsafe or low-quality goods and services. As an alternative to state regulation through the development of certification and licensing laws, nonstatutory certifying boards can also be created (Henderson & Hildreth, 1965; Dittmann, 2004).

In addition, the field of psychological practice continues to evolve and expand with new areas of focus. In particular, the issue of standardising online psychological counselling and the experience of counsellors, psychotherapists, and psychologists in obtaining online clinical supervision is growing in line with digital health trends (Ratcliffe & Kaluzeviciute-Moreton, 2023; Arzuyan *et al.*, 2023; Wong *et al.*, 2023).

Therefore, it becomes evident that there is a need to improve the national system for recognising the qualifications of practising psychologists, which complements the system of academic degrees, becomes obvious. Mentioned above confirms the relevance of studying foreign experience in the certification of psychologists to identify models for additional oversight of the practical activities of professional psychologists. It should be noted that in the future, the recognition of qualifications will increasingly be shifted from the state level of regulation to the professional associations themselves (so-called self-regulatory organisations), which should be directly interested in preventing low-qualified specialists from engaging in practical activities. For this purpose, professional associations create systems of voluntary certification. The most developed certification systems exist in the USA, Canada and the United Kingdom. Certification in these countries has already passed from voluntary to mandatory (Cherry, n.d.). Ukraine's active European integration into the European Union (EU) has led to the adoption of the European certification system for psychologists. For a comprehensive comparison of foreign experience, we also analysed the Chinese system for the certification of psychologists.

Despite the wide range of such studies, international developments related to the challenges of the national present remain unexplored. Therefore, the aim of this article was to study and summarise inter-

national experience in the functioning of psychologist certification systems in order to identify promising areas for improving the national doctrine of psychologist certification. The research tasks were chosen according to the goal:

- ◆ to analyse the history of the introduction of psychologist certification in the USA, Canada, the United Kingdom, the EU and China;
- ◆ to establish typical requirements for the certification of psychologists in these countries;
- ◆ to characterise the developers of the system of training and certification of psychologists, identifying prospects for improving the national system of psychologist certification.

LITERATURE REVIEW

In recent years, research on this topic has been actively conducted in the international scientific community, confirming the need to optimise the psychologist certification system taking into account modern challenges. Thus, research on improving the system of testing and certification of professional psychologists who are engaged in specialised practice is constantly being conducted by scientists of the American Board of Professional Psychology. In particular, they are actively studying effective methods of motivating young psychologists to certification, highlighting the following advantages (Certification benefits for..., n.d.): 1. Board certification facilitates license mobility in most states. 2. Board certification distinguishes the young psychologist in the labour market. 3. Health insurance companies regularly inquire about board certification when applying for network participation. 4. Many hospitals inquire about board certification when applying for privileges. 5. Some academic and medical institutions require board certification for promotion and tenure. 6. Board-certified uniformed psychologists working at the Department of Defense or Public Health Service receive a monthly speciality pay bonus. 7. Renew the emphasis on lifelong learning and professional development.

In the context of the problems of this study, the historical aspect of the creation of the psychological profession through certification is also valuable, in particular, the criteria of competence, the specifics of coverage, the attitude to the types of coverage, the attitude to the types of employment and the bodies that can carry out certification (Bott, 1947). The author notes that there are several possible approaches to certification: the first is the licensing of psychologists, the legalisation of such a term as "certified psychologist" and the establishment of subspecialties in the existing structure, and the second is the control of standards by manipulating the education required for employment.

Noteworthy are the studies devoted to the consideration of the differentiated features of certification and licensing of psychologists (Certification benefits for..., n.d.). The authors rightly emphasise that certification

and licensing are professional qualifications, but they differ from each other. To engage in psychological practice, the Canadian Psychological Association requires you to have a license from a professional association of psychologists. Unlike licensing, certification is a specialised course that allows training in a specific area, such as counselling or rehabilitation. A license may give you the ability to work with patients, but certification allows you to treat different patients using specialised advanced techniques. At the same time, studying the experience of the American Board of Clinical Neuropsychology and the American Academy of Clinical Neuropsychology, the board certification (collective bodies) through American Board of Professional Psychology (ABPP) is considered (Cox, 2010). The ABPP board certification process involves several steps: credential verification, submission of practice samples, and an oral exam. These aspects of the process are similar for each speciality board. At the discretion of the speciality committee, a written exam (e.g., multiple choice) may also be included in the process. Currently, such exams include forensic psychology and clinical neuropsychology. On the other hand, the results of the qualitative characteristics of the ABPP board are interesting (Frost *et al.*, 2019). While ABPP specialists are found to be more diverse in certain aspects, particularly gender (female, 43% vs 34% in a previous survey), the majority remain non-Hispanic, White in race/ethnicity (87%), followed by only 3% Black, and 3% Latinx representation. Recognition as a specialist, work requirements, and professional expectations were the three main reasons for board certification. The three most popular themes related to the experience of specialists regarding diversity were (a) Need for active outreach and mentorship, (b) ABPP does a good job in terms of diversity, and (c) Making it more affordable.

Given the detailed issues at hand, certain researchers emphasize the organizational and methodological challenges associated with broadening the application of accumulated psychological expertise. This includes integrating psychological practices into the organizational cultures of sports entities, enhancing professional identity, and developing methods for certifying psychologists' competencies (Sly *et al.*, 2020; Shevchuk & Vlasiuk, 2022; Quartiroli *et al.*, 2022).

A significant theoretical basis for the elaboration of this topic is the article of S. Kononenko, V. Savchenko, L. Kononenko "Problems and prospects of development of standardisation and certification processes in Ukraine in the context of Eurointegration", which thoroughly examines the directions for the development of standardisation and certification processes in the context of European integration, as well as the impact of standardisation and certification on the quality of services (Kononenko *et al.*, 2023). The authors primarily emphasise the need to align domestic legislation with European norms in the context of European integration.

Today, psychological practice in Ukraine is determined by the conditions of martial law. Therefore, the provision of qualified psychological assistance and services to the population is one of the most important places in the system of preserving, maintaining and preventing the psychological health of the nation. The relevance in Ukraine of the problem of standardisation of the quality of psychological services and certification of practising psychologists is confirmed by the research of Ukrainian scientists (Larionov & Matsehora, 2019; Lefterov, 2022). In particular, according to S. Larionov & Ya. Matsehora (2019), the development of a separate Regulation "On the Certification of Psychologists" for regulatory and legal support of certification is inappropriate. It is important to normatively establish the benefits that certified psychologists will receive (Kim *et al.*, 2022). Additionally, the authors justify the most optimal way for departmental psychologists to integrate into the broader professional community and create an association of psychologists from law enforcement agencies, which can become part of a nationwide structure, such as the National Psychological Association of Ukraine, under associated membership terms. V. Lefterov (2022) notes that the certification of practising psychologists should ensure that real professionals – psychologists – receive the appropriate licenses and access to psychological practice.

MATERIALS AND METHODS

A fundamental component of the methodological toolkit was the dialectical method, which made it possible to study the cause-effect relationship between the legislative intent to protect the general health, safety and well-being of citizens and the introduction of psychologist certification, its differentiation processes and integration in different countries. This is especially relevant in the variability of the construction of the Ukrainian strategy for recognising the qualifications of psychologists. The systemic approach made it possible to analyse the object of research through the components of the system and their interconnections within a specific foreign country, to identify typical requirements for the certification of psychologists both in voluntary and mandatory forms. The importance of taking into account the standards of professional activity in psychology for the certification of a specialist was substantiated based on a teleological approach.

The study of the essence of certification in the current conditions of professionalisation of psychological activity also involved the application of an informational approach, capable of presenting the comprehensiveness of a fully-fledged regulation system of psychological practice through the prism of certification of psychological tools and standards for providing psychological services.

Since the certification of psychologists constitutes a process of synchronising the provision of professional

standards at the level of higher educational institutions and professional societies to achieve the set goal, it was appropriate to apply the functional approach. This approach can reflect the dynamics of the studied object, which is implemented in a synchronic context.

RESULTS AND DISCUSSION

The doctrine of qualification confirmation for psychologists in the USA and Canada. The development of psychology as a profession in the United States and Canada was accompanied by government regulation. In particular, during the 1960s and 1970s, regulatory statutes were adopted by the legislatures of half of the states and six Canadian provinces. Connecticut became the first state to pass such legislation in 1945, followed by Virginia in 1946 and Kentucky in 1948. Since 1977, the profession of psychology has been regulated by statute in all states and the District of Columbia. Since 1982, in Canada, almost all provinces, except Newfoundland and Prince Edward Island, have legislated the activity of psychologists. The purpose of such legal regulation of psychologists' activities is to legislatively protect the general health, safety, and well-being of citizens. In addition, in these countries, there is an initial system of training psychologists, which includes specialised educational programs in schools and colleges and then allows obtaining an academic degree in universities. At the same time, an academic degree in psychological sciences does not grant the right to practice. All psychologists whose activities are related to the direct provision of psychological services to the population (Direct Services) are subject to the requirement of licensing and certification. However, psychologists who are engaged in research in government organisations, agencies, colleges or universities are exempt from licensing by the laws of some states and provinces.

Psychological practice without a license is prohibited in the territory of these countries. Violations of the legal requirements result in administrative penalties in the form of fines. The admission of professional psychologists to practice is separately regulated by the laws of each state and the District of Columbia, as well as by the legislation of eight Canadian provinces.

The following are the most typical requirements for mandatory certification of a psychologist:

1. *Possession of a specialised education.* Licensing psychologists for private practice in most states of the USA and Canada requires holding a doctoral degree in psychological sciences. Such a degree can be obtained from accredited educational institutions with an appropriate curriculum.

2. *Possession of work experience.* A mandatory requirement is 1-2 years of supervised work experience in institutions and organisations approved by the state professional board. In many US states, supervised work experience is required immediately after obtaining a doctoral degree (Wong *et al.*, 2023).

3. *Passing exams successfully.* All applicants for certification must pass the Examination for Professional Practice in Psychology (EPPP). It is recommended to take the exam at the place of future work (practice), in fact – in the same state. Its content is determined based on the results of analytical reviews of psychological practice in the United States and Canada. Practice reviews are initiated by the Association of State and Provincial Psychology Boards (ASPPB). As already mentioned, this organisation was created in 1961 to ensure the licensing of psychologists' activities. One of the tasks of the Association is to develop the EPPP exam, which is used by the relevant Licensing Boards for the licensing and certification of specialists. The results are recorded in the ASPPB database and can be obtained by a specialist upon request in case of opening a practice in another state. To simplify the specialist's accreditation procedure in case of moving to another state, the "Certificate of Professional Qualification in Psychology" (CPQ) was created. However, this certificate is also not recognised by all states, and in this case, the specialist is forced to obtain the EPPP exam results upon request.

The exam consists of more than 200 questions covering the following topics: methods and tools of psychological research; interpretation and report writing; selection and development of instruments, designing plans based on diagnostic results, monitoring dynamics; knowledge of general psychological literature and ability to apply it in practice; experimental design; professional ethical and legal constraints in psychologists' activities (confidentiality, adherence to professional standards, etc.).

4. *Administrative requirements.* Depending on the legislation of states and provinces, requirements may vary concerning age, citizenship tenure, place of residence, and moral-ethical standards.

5. *Possibility of re-examination.* According to the laws of states and provinces, terms for re-examination are set from 1 to 3 years.

In addition to mandatory certification, psychologists can also obtain speciality certification of their proficiency level in a specific field of practice (specialisation). This function is carried out by the ABPP. Incidentally, this is also required by the laws of some states.

ABPP is the only organisation to which the American Psychological Association (APA) refers psychologists for official recognition of their professionalism. Candidates for ABPP certification must hold a doctoral degree in psychology (PsyD), documented post-doctoral training, 5 years of practical experience, receive positive reviews of their professional activities, and achieve positive results on the Examination for Professional Practice in Psychology.

The list of professional specialities for which ABPP-certified specialists includes: clinical psychology, clinical health psychology, clinical neuropsychology, counselling psychology, family psychology, behavioural

psychology, forensic psychology, group psychology, psychoanalysis in psychology, rehabilitation psychology, school psychology, clinical child and adolescent psychology, organisational psychology, and consulting (Guiney & Newman, 2024).

English doctrine of psychologist certification. The system for training and certifying psychologists in the United Kingdom also has a long history. The fundamental requirement for professionalisation as a psychologist is having a bachelor's degree. Upon completing a bachelor's degree, specialisation in a specific area of psychology becomes possible. The professional development of a psychologist in the UK consists of three levels:

1. Practical experience as a psychologist's assistant, gaining professional experience (during this period, a bachelor's degree holder cannot be called a psychologist).

2. Continuing education to obtain a Master of Science in Psychology degree, defending a doctoral dissertation to earn a Doctor of Psychology (PsyD) or Doctor of Philosophy (PhD) in Psychology.

3. Achieving Chartered Psychologist status and practising independently. It should be noted that in the United Kingdom, working as a psychologist is not permitted without obtaining Chartered Psychologist status.

Chartered Psychologist status can be obtained in the following areas of psychological practice: psychological counselling, health psychology, forensic psychology, psychology in educational settings, clinical psychology, and occupational psychology.

To achieve Chartered Psychologist status, the requirements are:

- 1) Holding a second-level education degree (Master's degree or Doctorate).

- 2) Having work experience in a chosen area of specialisation.

- 3) Have supervised work experience.

- 4) Complete continuing professional development courses.

Unlike many European countries, the UK has opted not to legislate the practice of psychotherapy, leaving psychologists in an interesting situation. On one hand, there are no restrictions on practising psychotherapy regardless of experience or education. On the other hand, career advancement is not possible without membership in one of the self-regulating professional bodies such as The British Association for Counselling and Psychotherapy (BACP), The UK Council for Psychotherapy (UKCP), or The National Counselling Society (NCS).

European doctrine of psychologist certification. In Europe, there have been significant transformations in the content and methods of delivering psychological services since the 1990s. Prior to the European Union's formation, psychology training programs and practice conditions were influenced by each country's educational traditions, employment structures, government involvement, and languages. However, with the establishment of the EU's common internal market in 1993, there was

a substantial increase in the mobility of psychology professionals and the seamless transfer of psychological services across borders. The Bologna Declaration of 1999 further enhanced educational mobility, reshaping the university education system and creating the European Higher Education Area. Additionally, regulations by the European Commission in the 2000s continued to drive these changes forward. Consequently, in September 2005, Directive 2005/36/EC was adopted, establishing a regulatory framework for psychological activities across the 27 EU member states, holding profound implications for both psychologists and their clients.

EU legal initiatives have enabled psychologists to obtain education and practice anywhere within the EU. Additionally, it has also become possible for recipients of psychological services to access competent psychologists in any location within the EU. To ensure the quality of psychological services provided by European professionals, frameworks and standards have been created in the field of psychology for European countries. In 1990, the European Federation of Professional Psychologists Associations (EFPPA) adopted a set of Optimal Standards for the Profession of Psychology (EFPPA, 1990), which outlined the requirements for the content and scope of academic education and levels of professional training for psychologists. The European Network of Organizational and Work Psychologists (ENOP) developed a curriculum structure and minimum standards for these areas of psychology (ENOP, 1998). A team of European psychologists adopted a comparable strategy to develop a framework for academic education and professional training for psychologists in Europe, aligning with the EU's Leonardo da Vinci program (Lunt, 2000; Lunt, 2002ab). A framework for education and training for Psychologists in Europe (EuroPsyT) was adopted by the European Federation of Psychologists Associations in 2001 (Lunt *et al.*, 2001ab). The current tasks of developing Professional Standards in the field of practical psychology are to develop competencies that can be assessed as a common outcome of academic education and professional training, rather than being limited to the completion of an academic training program.

Today, the alignment of academic qualifications at the national level is assessed by the National Academic Recognition Information Centres (NARIC), which operate within the European Network of Information Centres (ENIC) at the European level. A significant advantage of the European psychologist certification model, which allows for a more transparent assessment of compliance with standards and improves the quality of professional services for clients, is the combination of the specifics of educational programs with the specification of competencies of professional psychologists, which are defined in European Certificate in Psychology (EuroPsy). To ensure compliance with various forms of academic education and professional training for psychologists, the EFPA EuroPsy regulation distinguishes

between internships and independent professional activities, the fields of practice in which psychologists work, and the differences in the training and specialization of psychologists (Kim *et al.*, 2022).

EuroPsy enhances the mobility of psychologists and ensures access to quality psychological services across the EU. It sets a standard for basic-level psychological practice, focusing on internships and independent professional activities within one or two practice areas. However, the Basic EuroPsy Certificate is not a license to practice and does not replace national licensing regulations or EFPA rules on EuroPsy. Specialist Certificates are available to certify advanced competence and knowledge in specific fields of psychology. Currently, specialist certificates have been developed in the fields of psychotherapy, occupational psychology, and organisational psychology. The development of the new *Specialist EuroPsy Certificate* will most likely continue to be based on the *Basic EuroPsy Certificate*. In some countries, specialist qualifications or additional training are a mandatory condition for the implementation of individual tasks in the professional activity of a psychologist. Such tasks in the development of the professional development institute in the future may lead to certain restrictions on the conditions, levels, and tasks for confirming qualifications by holders of the Basic EuroPsy Certificate, as well as on conducting independent professional activities. Each EU country will determine this independently but in accordance with the EFPA's EuroPsy regulations adopted in that country.

The EuroPsy framework is guided by several principles aimed at advancing the provision of high-quality psychological services across Europe. It ensures universal access to competent and qualified psychologists, supports their mobility throughout Europe based on recognized qualifications, and safeguards consumers from unqualified practitioners. The certification process emphasizes specialized education, confirmed competence through supervised practice, and adherence to European and national ethical standards. It promotes fairness by avoiding bias based on educational or professional background, prioritizing quality services. Additionally, it mandates continuous professional development and respects existing national standards for psychologists.

In addition, the EuroPsy is designed to ensure a standard of academic education and professional training. In this sense, the goal of EuroPsy is to establish a single standard of competence in all countries where it operates and to promote the free employment of psychologists in the EU countries, as well as in other countries that have adopted this standard.

To qualify for EuroPsy certification, applicants must meet several standard criteria. This includes completing a nationally accredited psychology program at a university or equivalent institution, spanning at least five years of full-time study and totaling 300 ECTS credits.

This education must align with the EuroPsy framework detailed in Appendix II (EuroPsy is a European standard..., n.d.). Additionally, candidates must have undergone supervised practice as a practicing psychologist for a minimum of one year full-time (or equivalent), with their performance evaluated by supervisors (refer to Appendix I and Appendix V). Lastly, applicants are required to submit a written commitment to the National Awarding Committee, pledging adherence to professional conduct principles and ethical guidelines set forth by their National Psychological Association.

Based on the results of the verification of the submitted information, the individual is entered into the Register and receives the EuroPsy Certificate or receives a refusal. The Certificate is valid for 7 years and requires revalidation.

To maintain EuroPsy registration, psychologists must meet two main criteria. Firstly, they must demonstrate enhanced professional competence through documented hours of practice and participation in continuing education, as detailed in Appendix VI. Secondly, they must submit a written commitment to uphold professional conduct standards to the National Awarding Committee. A Registered EuroPsy Psychologist is authorized for independent practice within their specified field as indicated in their Registration Details, assuming no restrictions from national regulations in their country of practice. These standards apply universally in countries where EFPA's Associate Members have adopted EuroPsy and adhere to these regulations.

The Chinese certification doctrine for psychologists. The Chinese Psychological Association first began accrediting psychologists for its official members relatively recently, in October 2008. Candidates for accreditation had to meet the following requirements:

- 1) have at least 8 years (inclusive) of professional experience in the field of psychology;
- 2) have been a professor of psychology for over 8 years (inclusive);
- 3) candidates had to prepare representative high-level works or have a scientific publication in professional psychology journals, and it must be among the top three first prize winners or the top two-second prize winners or national awards.

On December 28, 2023, the "Standards of the Chinese Psychological Association and the Institute of Psychology of the Chinese Academy of Sciences" (Official website of the Institute..., n.d.) were officially released for evaluating the levels of psychological consultants (hereinafter referred to as the "Standards"). Its purpose is to strengthen the professionalism, standardisation and professionalisation of the psychological consultant team and promote the healthy development of China's psychological consulting industry. According to the "Standards", psychological consultants are divided into four levels from low to high: assistant psychological consultant, third-level psychological consultant,

second-level psychological consultant, and first-level psychological consultant, and define the job content and requirements, application conditions and training courses for psychological consultants of different levels. The evaluation of the level of psychological consultants in accordance with the requirements of the "Standards" is jointly conducted by representatives of the Chinese Psychological Association and the Institute of Psychology of the Chinese Academy of Sciences.

It should be noted that to apply for the third level of psychological consultant, candidates are not required to have a bachelor's degree or higher in psychology. It is sufficient to hold an assistant psychological consultant certificate for at least 2 years, completed at least 80 hours of continuing education courses in psychological counselling over the past 2 years (including at least 12 hours of professional ethics courses); or a professional qualification certificate for a social worker, jointly issued by the Ministry of Human Resources and Social Security and the Ministry of Civil Affairs. The only additional requirement for this category of candidates is to complete all courses for the training of third-level psychological consultants. Or candidates who have a bachelor's degree or higher in psychology, education, social work, psychiatry and other specialties in domestic and foreign institutions of higher education recognised by the national education administration, and have completed all courses for third-level psychological consultants. If these courses were taken in a foreign institution, the candidate is exempt from taking them again.

To apply for a second-level psychological consultant, individuals must hold a bachelor's degree or higher and have obtained a third-level psychological consultant certificate for at least 3 years; a second-level professional qualification certificate; or have graduated from a domestic or foreign higher education institution recognized by the national education administration with a master's degree in clinical psychology, counselling psychology, or psychiatry. All candidates must have completed at least 360 hours of counselling in the last 3 years and have received supervision totalling at least 120 hours (including at least 40 hours of individual supervision), and completed all second-level psychological consultant courses. Additionally, candidates must have completed at least 120 hours of psychological counselling in continuing education courses over the last three years, including at least 18 hours of professional ethics courses (Wong *et al.*, 2023).

Candidates for a first-level psychological consultant must have held a second-level psychological consultant certificate for over 5 years; possess a national psychological consultant certificate, a second-level professional qualification certificate, and a second-level psychological consultant certificate for at least 4 years. They must also complete all first-level psychological consultant courses and participate in at least

120 hours of psychological counselling in continuing education courses over the last three years (including at least 18 hours of practical courses in professional ethics). Compared to previous levels, the requirements for a first-level psychological consultant include active scientific research activities, specifically publications on psychological research findings in official journals or at national psychological conferences within the last 5 years. Requirements for practical professional experience and supervision are also increased. Specifically, candidates must have confirmed at least 720 hours of psychological counselling in the last 3 years. Supervision must total at least 120 hours (including 40 hours of individual supervision). Continuing education courses in psychological counselling (including professional ethics of psychological counselling) are required without specifying the volume.

CONCLUSIONS

Based on the foregoing, the author concludes that in all analysed countries, the basis for certifying a specialist is the standards of professional activity in psychology. However, for comprehensive regulation of psychological practice, certification of professional psychological instruments and standards for general requirements for psychological practice are also necessary. These requirements pertain to the process of delivering psychological services itself.

It has been found that the highest level of development of the psychologist certification system is in the USA, Canada, and the UK due to the long history of regulation of psychologists' professional activity. Such legislation has been regulating the profession of a psychologist in all states of America and the District of Columbia for over eighty-five years, and for almost 45 years in all Canadian provinces, with the exception of Newfoundland and Prince Edward Island. The "youngest" is the Chinese psychologist certification system, which was created only in 2008.

Typical requirements for psychologist certification in the USA and Canada include specialised education, licensure for private practice in most states and provinces requiring a doctoral degree in psychology; one or two years of supervised experience; passing examinations; depending on state and provincial laws, requirements may vary regarding age, citizenship status, residency, moral and ethical standards; re-examination periods range from 1 to 3 years.

In the United Kingdom, the professional development of a psychologist consists of three levels: 1) assistant psychologist; 2) continuing education to obtain a Master of Science in Psychology, defending a doctoral dissertation to obtain a Doctor of Psychology (PsyD) or Doctor of Philosophy (PhD) degree, and 3) Chartered Psychologist certification and independent practice. A somewhat similar career development structure for consultant psychologists has been established in China.

According to the “Standards”, consultant psychologists are divided into four levels from low to high: assistant consultant psychologist, consultant psychologist level three, consultant psychologist level two, and consultant psychologist level one, defining the job content, requirements, document submission conditions, and educational courses for psychologists of different levels.

It has been established that typical requirements for a certified psychologist in the EU include: possession of a university diploma in psychology obtained through at least 5 years of full-time study; a minimum of one year of supervised practice (integrated into or supplementary to the university education program); and a signed pledge to adhere to the European Ethical Code for Psychologists.

In addition, an important aspect of the psychologist certification system is the characteristics of its developers in the mentioned countries. Thus, in the USA and Canada, such a developer is the EPPP, which is used by the relevant Licensing Boards for licensing and certifying specialists. As already mentioned, in the UK, career advancement for a psychologist is possible only

on condition of membership in one of the professional organizations – BACP, UKCP or NCS. For EU countries, there is the EFPPA, which has adopted a set of Optimal Standards for Psychology as a profession, which includes requirements for the academic education and professional training of psychologists.

Further research is needed to identify optimal directions for improving the national psychologist certification system, define its typological requirements, and explore the possibilities of transitioning from voluntary to mandatory certification. Also worthy of attention is the study of international experience in the certification of professional psychological instruments and standards of general requirements for psychological practice, which will ensure its comprehensive regulation.

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CONFLICT OF INTEREST

None

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Проблема сертифікації психологів: порівняльний аналіз міжнародного досвіду

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Анотація. Оскільки війна стала серйозною загрозою для національного ментального здоров'я, професійна психологічна допомога стала, як ніколи, актуальною для українців. Необхідність регуляції професії та створення безпечного середовища для споживачів психологічних послуг обумовили запровадження ліцензування та сертифікації психологів. В Україні ця система є недосконалою і потребує оптимізації, одним із джерел якої є вивчення та адаптація найкращого міжнародного досвіду. З огляду на зазначене, метою статті стало вивчення особливостей сертифікації психологів у США, Канаді, Великобританії, Європейському Союзі та Китаї для виявлення перспектив розвитку системи сертифікації психологів в Україні. Основу методологічного інструментарію становив діалектичний метод, а також системний, інформаційний, теологічний та функціональний підходи, завдяки яким вдалося представити особливості сертифікації в сучасних умовах професіоналізації психологічної діяльності. Встановлено, що сертифікація історично була одним із методів вимірювання компетентності в професійній психології. З цією метою професійними товариствами створюються системи добровільної сертифікації. Розглянуто особливості найбільш розвинутих систем сертифікації психологів (США, Канада і Великобританія) та зроблена спроба порівняти їх із аналогічними моделями сертифікації в Європейському Союзі та Китаї. Встановлено типові вимоги до сертифікації психологів у зазначених країнах, серед яких: вимоги до змісту та тривалості спеціальної освіти; вимоги до психологічної практики під супервізією; вимоги до підвищення кваліфікації, як в практичному так і у науково-дослідному напрямках та вимоги до морально-етичних якостей психолога. Оскільки сфера психологічної практики продовжує розвиватися, концептуалізація та вимірювання компетентності психолога є постійним динамічним процесом. Практична цінність результатів полягає в тому, що їх може бути використано для визначення шляхів удосконалення національної системи сертифікації психологів та можливостей переходу від добровільної сертифікації до обов'язкової

Ключові слова: професійна кваліфікація психологів; ліцензування; сертифікація; психологічна практика; система підготовки психологів; супервізія