

# THE PSYCHOLOGY FOUNDATION OF AUSTRALIA

(Incorporated in New South Wales)

c/o School of Psychology, University of New South Wales, Sydney 2052, NSW, Australia

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7<sup>th</sup> December 2012.

Submission to the Australian Psychology Accreditation Council

Re: Consultation Draft: Accreditation Standards for Programs of Study in Psychology

The Psychology Foundation of Australia welcomes the opportunity to make a written submission to the Australian Psychology Accreditation Council on the "Consultation Draft: Accreditation Standards for Programs of Study in Psychology". The Foundation is a grouping of research-oriented university Schools of Psychology that was created to promote rigorous and internationally competitive standards in the education of psychologists and a scientific basis for professional practice.

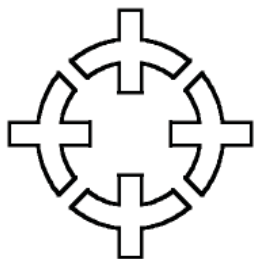
The new guidelines provide many routes to professional practise and while we understand that there has been a significant revision of the training environment as a result of the AQF and some improvements which flow from that framework, there are a number of general issues in the restructure of the accreditation guidelines that we believe represent a threat to the maintenance of acceptable standards in both the discipline and the various professional outcomes.

1. The new guidelines adopt the EuroPsy as an international benchmark. The advantage is that many European Countries, including the UK, are now signatories to that standard. However, it does not replace national standards and the EuroPsy minimum training requirement of a 3-year Bachelor's degree, plus two-year Master's, plus one year internship, is less than required in the UK and less than has been recommended in Australia by the APS and the Psychology Foundation.

In practise the new guidelines propose a more specialised undergraduate degree structure than the Bologna model, used by many European universities, envisages. In Psychology, as in science more generally, there is a need to systematically cover the fundamentals of a discipline which is difficult to achieve within the time constraints resulting from a broad undergraduate degree and so the expanded Psychology component proposed is a more adequate option. However, the new guidelines do require more training in Psychology than the minimum required in the previous guidelines and this will be an impediment to students wishing to also complete a major in a second, related, discipline. Such a desire is common and appropriate given Psychology's role as a hub science. The extra psychology requirement is also a serious difficulty for the delivery of the proposed courses at a substantial number of Australian universities where it will significantly exceed the quantity allowed in a single major. The Foundation members see it as

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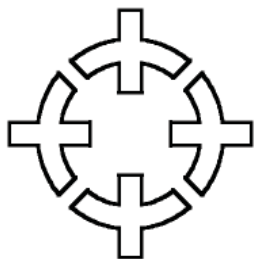
undesirable to require a course structure that cannot be implemented within the current degree requirements of a single major in most universities. Such a requirement will guarantee local administrative difficulties in many universities and exceeds the requirements that have been in place for many years. It is therefore necessary to determine whether the additional components are essential for an adequate training in the discipline of Psychology. In our view the requirements to include units delivering training in counselling and interviewing and to cover *the National Practice Standards for the Mental Health Workforce* (2002, Commonwealth Department of Health and Ageing) are inappropriate as a mandatory component of the undergraduate training (AQF level 7).

Most students who participate in AQF level 7 degrees do not proceed to work as Psychologists; many study only a component of the programme in conjunction with other degrees, while others do not wish to be part of the mental health workforce. The role of psychology as a hub science means that it underpins many other scientific disciplines and professional outcomes. Exposing these students to professional skills training encourages them to believe it would be appropriate for them to use those skills and yet professional registration explicitly forbids people with such low levels of training from doing so. No other component of the undergraduate curriculum is restricted in this manner. Similarly the understanding of *the National Practice Standards for the Mental Health Workforce* is only relevant to those who will work in cognate areas. It is far more efficient to teach only those students who are also receiving the appropriate professional skills training. For these reasons we believe it is not only wasteful of undergraduate teaching time to deliver the topics in an AQF level 7 degree but that it is likely to lead to undesirable outcomes. Such topics should be left to postgraduate training unless a particular university has specific skills that would allow them to address the theoretical underpinnings of counselling and interviewing and thus treat it as an academic topic rather than a vocational skills training unit.

It should also be noted that many of our members have undergraduate units containing large numbers of students (several hundred in some cases) and the student-intensive teaching that is required to adequately deliver professional skills training poses considerable challenges. The current funding model does not nearly approach the level required to employ the number of teaching staff that would be required to deliver these units adequately. Such teaching is also underfunded at the postgraduate level but at least at that point, smaller numbers are taught; it is essential that the students learn the skills, and placing it at that level minimises the financial loss, in addition to it being the first point at which all students are required to have the skills.

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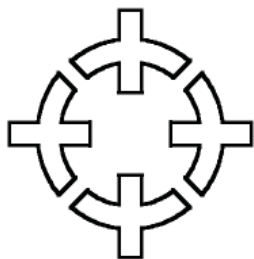
Overall, The Foundation members are not convinced that the nominated material is of sufficient value to a basic training in the discipline of Psychology to warrant the difficulties created by exceeding the amount of material that will fit into a single major. We recommend against the mandatory inclusion of such material and also against the expansion of the minimum amount of material that will suffice for an accredited sequence.

2. A second general issue is the obfuscation of the delivery of an Honours year. The new guidelines do include a significant thesis component in the fourth year of every programme but many members were unclear that this was the case. It is unhelpful to hide the similarity in the proposed manner. The diagram on the final page of the consultation paper adds significantly to this lack of clarity. The Honours year has considerable strengths as an undergraduate structure that delivers excellent depth, in comparison to the US or Bologna models and at least equivalent to the more focused 3 year UK Honours programmes. By the end of Honours, Australian students have a little less breadth than the Bologna or US (where some of that breadth is often of marginal academic merit) models, but more breadth than in the UK. The Honours degree also provides excellent research training in the Honours year that is superior to all 3 alternatives discussed above. Furthermore, it instantiates essential research skill training that is required for an evidence-based profession. The structure allows both coursework and research and is therefore an ideal, and time-efficient, preparation for both research and professional PG training and we strongly suggest it remains visible and is retained in its current form in all programmes leading to professional psychology outcomes.

The current Honours year also serves a critical role in selecting students appropriate for postgraduate training. Two criteria are significant and will remain so. The first is whether the students have the academic competence to complete postgraduate training (an H2A for Honours, or better) and the second is whether they have the personal attributes to work in professional settings. In the proposed guidelines students can enter some postgraduate streams leading to professional outcomes prior to knowing the answer to either of the questions. We assume APAC recognises the impracticality of interviewing several hundred applicants prior to determining eligibility of entry to a Master's programme commencing with fourth year. This will lead to less efficient delivery of training and a rather difficult decision point mid-degree at which some students will be excluded on the grounds of unsuitability for professional practise rather than on academic performance in the degree. It seems unlikely that most universities would accept alterations of enrolments on such grounds and given that the Honours year is intended to be

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included as the first year of all programmes we believe it is better to retain the separate degree for selection purposes as well.

3. The consultation paper does not provide critical background information to allow us to assess the adequacy of the proposed degree structures with confidence. The document *APAC Standards for Programs of Study Supporting the Development of an Area of Practice Endorsement* does not exist and yet it will specify the critical components that must be included in programmes to achieve specialist registration. Clearly it is not possible to know whether all of the critical components can be fitted into a particular degree structure without knowing what those components are required to be. Given this, the comments on structure must assume that there is no substantial escalation of requirements over those currently expected for such registration.

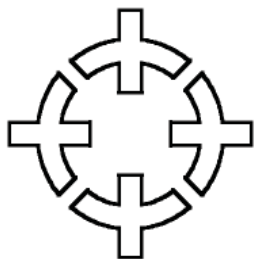
4. The Psychology Foundation of Australia has for its entire existence, held the view that the minimum acceptable standard for professional practise is a three year undergraduate degree, followed by Honours and a two year specialised Master's degree. This level is inferior to the minimum standards in the UK and the USA (who often reject comparability) and we do not believe that training programmes of lower standard are in the best interests of either the Australian community or the profession. This has, of course, also been the view of the Australian Psychological Society for many decades. We are aware that state registration boards have registered students with only four years of academic training plus two years of supervised practise. The proposed 5+1 route is superior to this lower standard but it is still a regressive step on the standard we believe to be the minimum acceptable to ensure students with high intellectual competence and adequate professional skills training service the needs of the community. Most of our members have no intention of offering such a programme and we believe it should be eliminated as a route to the profession as a matter of urgency.

5. The new standards obfuscate the distinction between the DPpsych and the MPpsych/PhD. Previous discussion of alternative postgraduate structures have separated these two training options and we believe they should be indicated as separate streams with only the latter leading to graduates appropriately trained to take on teaching & research roles in university training programmes. Students need to be informed of the latter point so that they can make sensible career training choices: highlighting the difference between these two routes signals that they have different functions.

6. There are a number of requirements that seem arbitrary and contradictory.

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A significant example relates to placement which is already a bottleneck for the provision of training places. On Page 18 - 5.5.14 The Program of Study requires each student to successfully complete a total of no less than 1200 hours of logged supervised Client Contact and Client-related Activities which are integrated into the program's practica and skills training components.

Extending the required training hours to 1200 is onerous and is not supported by an evidence base. Since 1000 hours has been adequate to this point, what is the evidence base indicating that an extra 200 hours is required? There is no explanation as to what the extra 200 hours has to provide which is not already provided within existing MPsyg training models?

Note, that providing 1000 hours is already sufficiently difficult within current constraints on the mental health work force. Increasing this requirement may make training even less viable. It also substantially exceeds the requirement in other allied health professions and we are not aware of any evidence to support the view that this is essential.

To extend this example, in the Level 9 degree (proposed Extended Masters), there will be 2 years in which to conduct 1200 hours of placement. Under the existing model, students undertake 1000 hours during their two years of study.

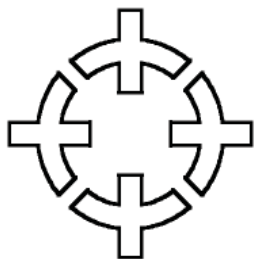
If an extra 200 hours is required, this will be at a cost of a loss of taught content. What content is intended to be removed? Is the marginal gain from the extra 200 hours supervision sufficient to warrant loss of other content?

The requirements for the Level 10 DPsych are even more problematic. The DPsych allows the same 2 years for clinical training (with 2 years for research) but, also requires 1500 hours of placement, at an even greater cost to taught content. This finds us in the paradoxical situation of conferring a level 10 (therefore higher) degree on trainees with less taught content in their degree! A strong pedagogical case is needed here to support the implicit assertion that extra supervised practise is more informative than coursework. It seems likely that it will, instead, be a less efficient mode for information delivery.

A second example of an explicit requirement without adequate explanation is given on p. 20, 5.6.4 where programmes are required to include three specific types of examination procedure (written examinations, viva voce examination and observed structured clinical examinations) but there is no indication of why only these three options are listed or in which particular circumstance they are deemed to be the most appropriate type of assessment. It would be better to indicate the

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type of content that is required to be taught and to then require institutions to explain how that learning has been adequately assessed.

We strongly urge APAC to be guided by these comments in revising the current draft guidelines so that the quality and efficiency of the training, in Australia, in both the discipline and its professional outcomes can be maintained at an internationally acceptable level in the future.

Signed on behalf of the members of the Psychology Foundation of Australia.

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