

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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14 July 2015

Re: "Proposed Accreditation Standards for Psychology Programs: Consultation Paper June 2016"

The Psychology Foundation of Australia thanks APAC for the invitation to comment on the draft accreditation guidelines. We share the view that flexibility in course offerings has desirable effects. It allows institutions to capitalise on their respective strengths in producing curricula. For that reason it is sensible to create accreditation criteria that ensure minimum standards are met, leaving room for additional contributions where available.

This leads to a central question with regard to the draft accreditation guidelines. Is it the case that a student who successfully completes all components of an accredited programme can be confident that they will be allowed to register? This question returns to issues we have raised previously with regard to the National Psychology Examination. There is no reasonable case which would require students to complete an accredited sequence but then have registration being based on the outcome of an additional examination. So the flexibility being offered in the revised guidelines should not come at the cost of student certainty that adequate performance during the sequence will be sufficient to reach their goals. Neither should AOU's be subject to the substantial financial burden of accreditation that buys no guarantee they can give to their students with regard to the adequacy of their training for their chosen outcome. Assuming that successful completion of an accredited sequence does allow registration then it is important to consider whether the processes outlined lead to confidence in that outcome. It is also important that the accreditation requirements are not so restrictive that they preclude the efficient delivery of the variety of outcomes that the cohort of Psychology graduates pursue.

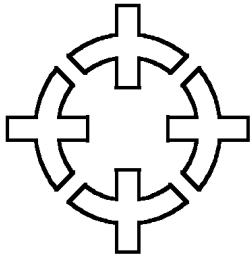
Specific responses to consultation questions:

Questions 1. Is there anything that is missing from the components of the proposed Accreditation Standards for Psychology Programs?

a) Given that Psychology is the evidence-based profession par excellence one problem with the accreditation guidelines is the lack of emphasis on knowledge and its role. Mention is certainly made of "high quality education" but there is also often the proviso of "required to practice as a profession". We agree that this is important, but it must not be narrowly defined mainly as a set of competencies such as interviewing, testing or classification skills. The most important competency learned at the

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undergraduate level is a thorough knowledge of the basic discipline and the resulting confidence to later apply that knowledge (e.g. learning, language, perception, social psychology, psychometrics etc.) in an applied setting. One would hope that this would complement being able to “identify psychological disorders using a recognised taxonomy”. (p17 3.5) Courses in health, psychopathology and organisational can be offered but should not crowd out the basic discipline subjects. (It is also true at a more advanced level that a thorough knowledge of the relevant literature is very important).

It seems unlikely that the necessary undergraduate discipline knowledge will be achieved with only a major in Psychology and yet the current guidelines express no opinion that additional Psychology would be desirable.

b) Honours year. Many of the competencies are what would be required of any professional person –ethical behaviour with good communication skills, a reasonable degree of self-examination and good office practices. These are important but we should recognise that what separates psychologists from other professionals they are likely to encounter is their knowledge domain and the research skills that allow them to critically evaluate claims for effective interventions (even sometimes those made by fellow professionals). This is very important for Public Safety which is a core (p.4) goal of accreditation. It is therefore critically important that the honours year which has been a source of the excellence and high reputation of Australian psychology for many years, be retained and not encroached upon to a significant degree by non-academic professional competencies most of which belong to later professional training.

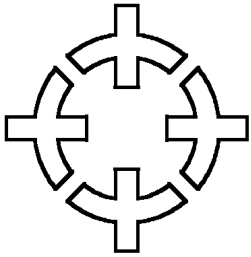
Note that on p. 9, public safety is equated with ethical and professional conduct plus “adequate education and training in professional skills and knowledge” No mention of basic discipline knowledge or critical skills.

The exit pathways listed on p. 15 suggest that the Honours degree will indeed be severely encroached upon by introductory professional training if these recommendations stand as described. It is still the view of the Psychology Foundation that substandard professional pathways (less than 2-year full time professional Masters degrees) which use the fourth year as professional training, should be eliminated as they fail to match both the international standards Australian Psychology has typically compared itself to and the expressed desire for high-quality education in all of the professional outcomes.

Given the excellence of our model of honours year plus two year masters professional training we should also be wary of changing our system just to align with overseas conventions unless there is a very good reason for doing so.

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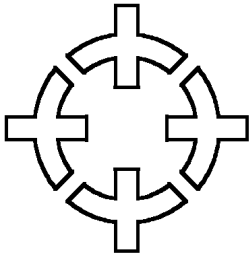
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- c) The guidelines have eliminated any mention of an Honours research thesis. We see this as a very substantial downgrading of the research training needed to enter postgraduate research programmes and with it also an undermining of the scientist-practitioner training model for professional practise. Given the significant need for further research in professional settings to ensure generation of appropriate knowledge and translation of that knowledge to practise, we see this as a retrograde step.
- d) Given that knowledge and research skills are so important it is critical that the undergraduate and honours programs are of a high standard. This means that the APAC inspectors should have a high degree of competence. They are to be experts (p. 32) but how will they be chosen? What expertise and position within the discipline/profession will they be expected to have? Will there be additional specialists to assess masters programs as used to be the case for APS accreditation?
- e) The ability to deliver a high quality education and to ensure that individual graduates meet the required standards to protect the public, depends on adequate resourcing. A major factor in ensuring appropriately intensive training is the staff student ratio. The current guidelines do not mention this aspect of resourcing and yet they propose tuition, not only in traditional areas of the discipline, which require laboratory /tutorial experience to deliver, but also in pre-professional skills such as interviewing. Many schools carry very large undergraduate, Honours and Masters/PhD cohorts and need adequate staffing levels to be able to undertake to deliver a quality programme. These will not be guaranteed in the current university environment if APAC fails to mention the need for adequate staffing.
- f) The treatment of placement experiences deviates from the desire to be evidence and competency based in formulating the guidelines. Instead of a listing of the skills that have been shown to be critical and that therefore need to be developed and exhibited to meet the standards, the guidelines, instead, list the number of hours of placement that the student is expected to undertake. No justification is provided to indicate that the number of hours is either sufficient or possibly excessive but that aspect of training does set a stringent limit on the number of students that can be educated by most training programmes. For this reason it would seem to be critical that this aspect of training does not take more of the valuable supervisory resource than necessary. A listing of required skills could drive refinement of the training models and allow termination of this phase at an earlier stage. These would seem to be desirable outcomes.
- g) The current accreditation standards allow for up to 30% of placement supervision to be provided by supervisors who do not meet all accreditation requirements,

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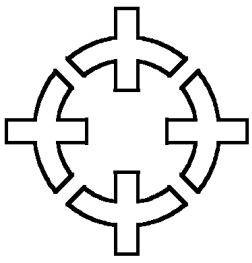
provided a fully qualified staff member from the university takes responsibility for those placements in conjunction with the placement agencies (this is Standard 5.3.24 of June 2010). This allowance is often crucial, because of a shortage of fully qualified supervisors, especially in the smaller specialities like organisational and health psychology, to run viable programs. So this allowance needs to stay in the accreditation standard. The current draft does not include it. Therefore we request the addition of a rule that is similar to current Standard 5.3.24, to be added to the new standards.

Question 8. Definition of terms.

- a) The definition of AOU does not make clear whether this needs to a School of Psychology, nor whether an institution may be allowed to have more than one AOU through which programmes may be accredited. It is our view that Schools of Psychology should be the single AOU and should oversee the delivery of accredited Psychology programmes in an institution. It is those schools that will have the broadest view of how to efficiently deliver the range of possible programmes to ensure students do not limit the breadth of their career prospects unnecessarily.
- b) The relationship between the various levels of psychology training and the definition of levels of educational training comes too late in the document. A table showing this relationship should be specified early.
- c) **Benchmarking:** There is no definition of what constitutes an adequate or sufficient benchmark. The statement on p. 38 requiring benchmarking against "... standards for programmes delivering equivalent learning outcomes by HEPs" is too vague. Should the benchmarking be against the highest standards or those that meet the minimum requirement? Presumably the process is only of value to the accreditation process if the benchmarks are of a sufficient and uniform standard. Otherwise there will need to be a process of determining whether the benchmarks are adequate. If a common benchmark is proposed then this seems to be equivalent to, and a parallel process for, the accreditation inspection itself. It seems likely that the drafters of the accreditation guidelines had in mind what would be an acceptable benchmark, since the process is only of value if the benchmark is worthy, and therefore this detail should be explicit. There should also be a clear explanation of the ways in which this process is different to APAC accreditation.
- d) There is frequent reference to the need for cultural competence with "Aboriginal and Torres Strait Islander cultures". There is no recognition of the large variety of cultures encompassed by this term nor is there an indication of what would be sufficient cultural competence.

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e) On p.38 there is a requirement of active staff involvement in research but the definition of active involvement varies across institutions and, often, faculties within institutions. What standard will be applied here? The easiest definition may be those staff member's home institution but then very different standards will be applied across schools and so no uniformity of expectation is conveyed by this requirement.

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