

# 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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**11 July 2014**

## **Re: SECOND CONSULTATION DRAFT: ACCREDITATION STANDARD FOR PROGRAMS OF STUDY IN PSYCHOLOGY**

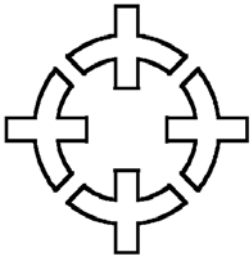
The Psychology Foundation of Australia is a grouping of research-oriented university Schools of Psychology that was created to promote high standards in the education of Psychologists and a scientific basis for professional practice. We thank APAC for the opportunity to provide feedback on the draft accreditation guidelines and also for making some alterations reflecting concerns raised in our response to the previous draft guidelines. We do, however, still have serious concerns regarding practicality, consistency and justifications for some of the current proposals and we hope our comments are useful to APAC in developing the final version of the guidelines.

The member schools of the Psychology Foundation are still of the view that it is extremely unwise to require more than a normal single major in Psychology to meet the Level 7 requirements. While many schools acknowledge that there is benefit in additional Psychological content and offer BPsychs or double majors to address this, the non-standard proportion proposed as a minimum (58%) will lead to insurmountable practical difficulties in implementing such programmes at many universities. This change is a significant increase for the majority of students, and as such is not a trivial alteration, but a major change with very substantial resource implications. The suggestion of offering non-accredited options to supplement the requirement does not obviate the difficulties created by leaving students with too little additional programme space to build a second major in another discipline. The role of Psychology as a hub science has greatly benefited other disciplines and enhanced our own. It is a retrograde step to reduce the possibility of such cross transfer in training. It is also the case that other disciplines are unlikely to support the need for Psychology schools to require more than a standard single major, given that it will be at their own cost. The argument could be mounted if there was critical content that level 7 students were currently missing. There is no compelling case provided other than to argue for pre-professional learning elements. Most students in Level 7 psychology programmes do not progress to being professional psychologists but are instead training in a fundamental scientific discipline which has a broad range of generic and, for a minority, a variety of professional outcomes. Pre-professional training is better left until students reach appropriate programmes at Level 8 and above, where it can be delivered to the correct students most efficiently.

The amendment which equates the Level 10 MPsych/PhD practicum requirement to that required in a Level 9 Masters degree is sensible and welcomed. However, the

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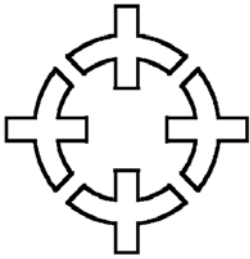
increase to 1200 hours, from 1000, and the requirement of 1500 hours for Level 10 Professional Doctorates is a very onerous addition and should only be introduced in response to a compelling case: one which has not been provided. Obtaining placement opportunities is a major challenge for all programmes and the introduction of more stringent requirements on supervisors, while desirable in many respects for the 4+2 and 5+1 training routes, has dramatically reduced such placement opportunities. The practical implication is that it will be extremely difficult to meet these specific requirements with current student numbers and this will provide a brake on any prospect of expanding programmes to meet future workforce needs. There needs to be a specific benefit to justify the additional hours. International benchmarking is noted and this would serve those students who wish to work overseas well, but in the context of ignoring those same international benchmarks when setting minimum training standards (4+2 and 5+1) seems rather arbitrary. A more compelling case should be provided in an evidence-based discipline. What extra things does APAC wish the students to gain from the additional time and is all of the extra time warranted for that gain in knowledge? Can we guarantee that this gain will occur simply by specifying additional hours or should a particular type of experience be mandated to justify the extra time? Those answers should be provided, and discussed, before the requirements are expanded.

Items 5.5.2 and 5.5.3 also raise some questions. If the “study undertaken in an Overseas Country where the study has been assessed as substantially comparable by APAC or an assessing authority recognised by APAC” then why should APAC place such a low limit on advanced standing or credit? Similarly, if an international student has completed placements in another country that “was of a closely comparable nature and duration to the Placement for which Credit is sought” (5.5.3 (ii)) but that did not occur “within an APAC-Accredited Program completed within the last two years” (5.5.3(i)), why would that experience not be counted? In both cases the guidelines require the potential repetition of learning/training which has already demonstrably occurred. Such repetition would be wasteful of resources and provide no additional enhancement of skills in the student. If the desire is to protect the public then there is no demonstrable benefit but there is a significant impediment for the students so affected.

The same point applies to 4.4.1, 4.4.2 and 4.4.4. It makes no sense to require students to repeat credit points that were already obtained in programmes that were either APAC accredited or deemed equivalent to an APAC accredited course. Universities may have local rules for credit transfer applying to particular degrees but APAC’s primary concern should only be about equivalence of the quality of training as this is what will determine the impact on the public. Superfluous repetition of training

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disadvantages the student for no gain and unnecessarily increases the training load on the universities and the profession.

We Thank APAC for the opportunity to provide input and reiterate that we view the issues listed above as impacting very significantly on the ability to educate Psychologists appropriately. We urge APAC to respond as we have suggested in order to ensure a viable set of training options.

On behalf of The Psychology Foundation

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