Consultation paper 15

Review of accreditation arrangements for the psychology profession

The National Boards for the first ten professions to enter the National Registration and Accreditation Scheme are currently reviewing their accreditation arrangements. This consultation paper seeks feedback on the National Board's review of accreditation arrangements for the psychology profession.

You are invited to provide any feedback in the consultation process for the review, which is about whether the existing arrangements established by Health Ministers should continue.

Please provide any feedback by email to accreditationreview@ahpra.gov.au by cob Friday 2 November 2012.

Psychology Board of Australia

GPO Box 9958 | Melbourne VIC 3001 | www.psychologyboard.gov.au

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Consultation paper

September 2012

Accreditation arrangements for the psychology profession

1. Preamble

The Health Practitioner Regulation National Law Act as in force in each state and territory (the National Law) requires National Boards to review the arrangements for the exercise of the accreditation functions no later than 30 June 2013.

These arrangements have been in place since before the commencement of the National Law and involve the appointment of an external Accreditation Council for each of the first ten professions to join the National Registration and Accreditation Scheme (the National Scheme) on 1 July 2010[1].

When Health Ministers appointed the first of the Accreditation Authorities, they indicated that the assignment of accreditation functions would be 'subject to the requirement to meet standards and criteria set by the national agency for the establishment, governance and operation of external accreditation bodies'.

The National Law provides that:

- *the National Board….. must decide whether an accreditation function for the health profession for which the Board is established is to be exercised by (a) an external accreditation entity; or (b) a committee established by the Board (s43), and*

- *the National Board must ensure the process for the review includes wide-ranging consultation about the arrangements for the exercise of the accreditation functions (s.253 (5)).*

Given that there are already arrangements in place, the review process will need to begin with an assessment of the way each Accreditation Authority has performed its functions. It will also need to take account of the differences in size of the health professions as well as in the volume and range of accreditation activities undertaken.

Note on terminology

There are a number of words used to describe the accreditation entities that have been appointed to exercise functions under the National Law. The National Law uses the words 'external accreditation entity' and 'accreditation authority', and these words are used in other documents referred to in this paper. However, more commonly these organisations are referred to as Accreditation Councils, and this term is generally used in this paper.

Review principles

The key principles guiding the approach to the review are set out below. The *Quality Framework for the Accreditation Function* (the Quality Framework), which outlines the benchmarks agreed to by the National Boards and Accreditation Authorities, is also a fundamental consideration in the review process.

The key principles include:

- an agreed and transparent process for the review

- an appropriate focus on the current accreditation arrangements

[1] 18 October 2010 in Western Australia

- an agreed cross-profession framework as outlined in this paper with the capacity to take differences between the professions into account
- weighing of relative risks, benefits and costs, and
- evaluation of the suitability of the process for future reviews required under the National Law.

Review process

The review commenced with the National Board writing to the Australian Psychology Accreditation Council (APAC) inviting them to indicate whether they wished to continue exercising accreditation functions, and if so, to provide a report to the National Board. The National Board has reviewed this report and formed a preliminary view about whether the current arrangements for the accreditation function are satisfactory, taking into account the Board's experience with APAC over the past two years. The Board is consulting about its preliminary view through this consultation paper.

2. History of the assignment and requirement for the review of the accreditation arrangements

Accreditation functions assigned

The Australian Psychology Accreditation Council (APAC) was assigned the accreditation function for the Psychology Board of Australia on 1 July 2010 by the Australian Health Ministers.

Currently, a quantum of funding is provided to APAC though an agreement with AHPRA on behalf of the Psychology Board of Australia for the provision of the following accreditation functions:

1. Development and review of accreditation standards, including advice about accreditation standards in accordance with sections 46 and 47 of the National Law.

2. Accreditation of programs of psychology study:
   a. accrediting programs of study as provided for in section 48 of the National Law
   b. monitoring programs of study as provided for in section 50 of the National Law
   c. submitting reports on programs of study, including monitoring
   d. advising the National Board if the accreditation authority refuses to accredit a program of study
   e. providing advice to the National Board about matters relating to accreditation of programs of study as required.

3. Assessment of overseas qualified practitioners

The Psychology Board of Australia has not required APAC to undertake this function.

4. Assessment of overseas assessing authorities

The Psychology Board of Australia does *not* require APAC to assess authorities in other countries who conduct examinations for registration in a Health Profession, or accredit programs of study relevant to registration in a Health Profession, to decide whether persons who successfully complete the examinations or programs of study conducted or accredited by the authorities have the knowledge, clinical skills and professional attributes necessary to practise the Health Profession in Australia. This applies to Domain 7 in Section 6 of this document.

The Board has however requested APAC submit a project plan for the assessment of overseas assessing authorities and undertake the project according to the project plan agreed with the Board. The Board has also requested that APAC provide advice to the Board about assessment of overseas assessing authorities as required.

Past history of accreditation functions prior to the National Scheme

Prior to the commencement of the National Scheme, APAC undertook accreditation functions for the profession of psychology. The accreditation standards developed by APAC prior to the National Scheme transition as the Psychology Board of Australia approved accreditation standards on 1 July 2010. All courses that were accredited by APAC prior to transition to the National Scheme were considered by the Psychology Board of Australia to be approved programs of study on 1 July 2010.

Background to accreditation under the National Law

National Boards and accreditation authorities (through the Forum of Australian Health Professions Councils) have developed a document which provides a background to accreditation under the National Law.

This is available at: www.healthprofessionscouncils.org.au/AHPRA-Reference-Accreditation-under-the-Health-Practitioner-Regulation-National-Law-Act.pdf.

The respective roles of the National Board, Accreditation Council and AHPRA

Section 42 of the National Law defines the accreditation function as:

(a) developing accreditation standards for approval by a National Board

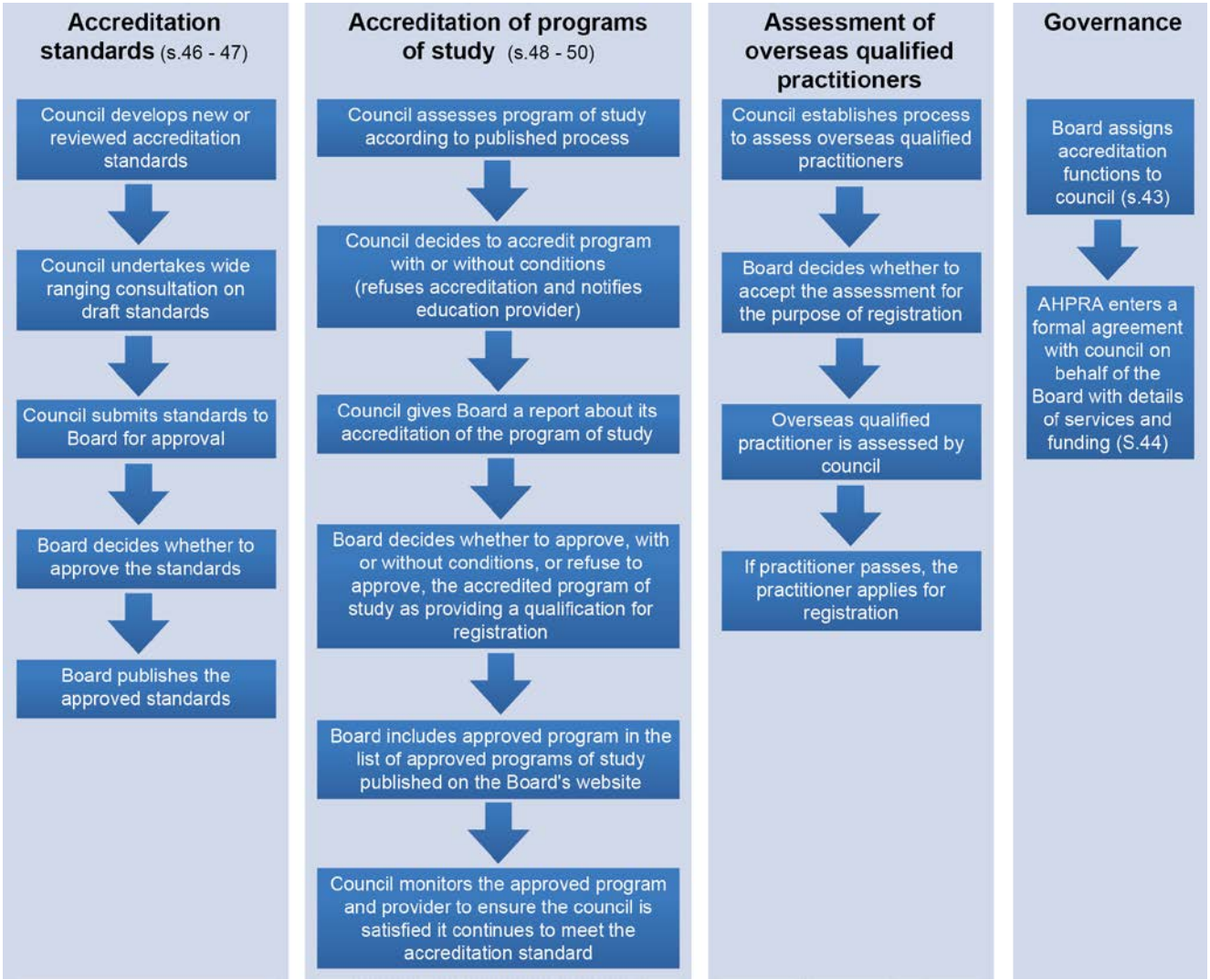
(b) assessing programs of study, and the education providers that provide the programs of study, to determine whether the programs meet approved accreditation standards,

(c) assessing authorities in other countries who conduct examinations for registration in a health profession, or accredit programs of study relevant to registration in a health profession, to decide whether persons who successfully complete the examinations or programs of study conducted or accredited by the authorities have the knowledge, clinical skills and professional attributes necessary to practise the profession in Australia; or

(d) overseeing the assessment of the knowledge, clinical skills and professional attributes of overseas qualified health practitioners who are seeking registration in a health profession under this Law and whose qualifications are not approved qualifications for the health profession; or

(e) making recommendations and giving advice to a national board about a matter referred to in paragraph (a), (b), (c) or (d).

The following diagram describes the respective roles of the National Board, Accreditation Council and AHPRA.



3. Scope of the National Board review

Options open to the Board

The following options are open to the Board:

1. continue the existing arrangements of assigning accreditation functions to the Council
2. appoint an alternative external accreditation entity, where an entity with the appropriate skills, expertise and infrastructure exists and is willing to take on the role
3. establish an accreditation committee of the National Board

A combination of some of the above options may also be possible.

4. Consultation process

Making a submission

Section 6 of this consultation paper sets out each domain of the Quality Framework and refers to the evidence that the National Board has considered in forming its view about how the current accreditation arrangements are working. Information provided by the accreditation council describing how it has undertaken the accreditation functions is attached and referenced for each domain.

There are spaces for comments throughout the paper.

To make a submission:

1. please save a copy of this document on your local computer,

2. complete your comments in the spaces provided,

3. save the document with your name and the name or acronym of the council in the document name and

4. email the document to accreditationreview@ahpra.gov.au by close of business Friday 2 November 2012.

How submissions will be handled

As part of the consultation process, AHPRA will acknowledge submissions received.

Submissions will generally be published unless you request otherwise. The Board publishes submissions on its website to encourage discussion and inform the community and stakeholders.

However, the Board will not place on its website, or make available to the public, submissions that contain offensive or defamatory comments or which are outside the scope of reference. Before publication, the Board may remove personally-identifying information from submissions, including contact details.

The views expressed in the submissions are those of the individuals or organisations who submit them and their publication does not imply any acceptance of, or agreement with, these views by the Board.

The Board also accepts submissions made in confidence. These submissions will not be published on the website or elsewhere. Submissions may be confidential because they include personal experiences or other sensitive information. Any request for access to a confidential submission will be determined in accordance with the *Freedom of Information Act 1982* (Cth), which has provisions designed to protect personal information and information given in confidence. Please let the Board know if you do not want us to publish your submission, or want us to treat all or part of it as confidential.

However, due to the nature of this review, while there may be a request not to publish a submission publicly, the National Board will provide all submissions to the Accreditation Council.

The National Board may choose to consult with key stakeholders individually in addition to the National Board's broader consultation processes published at http://www.ahpra.gov.au/Legislation-and-Publications/AHPRA-Publications.aspx

If you would like further information about any aspects of the consultation process, please contact Dr Jillian Bull, Executive Officer, Psychology at jillianbull@ahpra.gov.au.

5. Your submission

Name of person or organisation making the submission: The Australian Clinical Psychology Association (ACPA)

Contact person: Dr Judy Hyde

Telephone:

Email:

Information about you

❖ Are you responding as a/an (please tick all that apply)

- [ ] Education provider
- [x] Peak professional organisation
- [ ] Health consumer
- [ ] Community member
- [ ] Employer
- [ ] Government eg Health Department
- [ ] Government agency
- [ ] Health Workforce Australia
- [ ] TEQSA
- [ ] ASQA/State based VET sector regulatory authority
- [ ] Individual practitioner
- [ ] HODSPA
- [ ] Other –please specify

❖ What experience have you had with the accreditation council? (please tick all that apply)

Education Providers -

- [ ] The Council has undertaken an accreditation assessment of one or more of our education programs since the introduction of the National Scheme
- [ ] The Council undertook an accreditation assessment of one or more of our education programs before the introduction of the National Scheme
- [ ] We are currently planning for, or undergoing, an accreditation assessment on one or more of our education programs
- [ ] We are new to the accreditation process
- [ ] We have been through an accreditation process previously with a different accreditation body

❖ Stage of accreditation assessment (if you are currently involved in an accreditation process)

- ☐ Nearing completion
- ☐ Half way
- ☐ Just commenced
- ☐ Intention to apply submitted
- ☐ Planning and preparation underway
- ☐ Have sought information or advice from the Council

❖ Overseas qualified practitioner:

- ☐ Assessment completed
- ☐ Assessment nearing completion
- ☐ Assessment just commencing
- ☐ Have sought information or advice from the Council

❖ Other stakeholders

- ☐ Have sought information or advice from the Council on other matters
- ☐ Council has consulted with us/me on Accreditation Standards, policy or individual accreditation assessments
- ☐ Involved Council activities eg accreditation or assessment processes
- ☑ Little or no direct engagement with Council
- ☐ Other – please specify

Review of Accreditation Council against the Quality Framework for the Accreditation Function

5.1 Governance (Domain 1):

The Accreditation Council effectively governs itself and demonstrates competence and professionalism in the performance of its accreditation role

Attributes

- The Accreditation Council is a legally constituted body and registered as a business entity.
- The Accreditation Council's governance and management structures give priority to its accreditation function relative to other activities (or relative to its importance).
- The Accreditation Council is able to demonstrate business stability, including financial viability.
- The Accreditation Council's accounts meet relevant Australian accounting and financial reporting standards.
- There is a transparent process for selection of the governing body.
- The Accreditation Council's governance arrangements provide for input from stakeholders including input from the community, education providers and the profession/s.
- The Accreditation Council's governance arrangements comply with the National Law and other applicable legislative requirements.

Governance – Accreditation Council submission

The evidence that the Board has taken into account in forming its preliminary view about governance is primarily at p. 4-7 of the *APAC Submission to the Review of Arrangements for the Accreditation Functions* published on the Board's website at *www.psychologyboard.gov.au*).

❖ Comments

While the Accreditation Council complies with the first four of these attributes, ACPA agrees with APAC's submission that there remains significant work to be undertaken. Specifically, the following issues need to be addressed:

• There is a transparent process for selection of the governing body.We believe that APAC does not meet this standard.

We agree with the APAC submission in that there is no evident selection criteria for Directors, and no limit to the terms served by Directors, thereby risking the creation of a stagnant body with vested interests and a lack of knowledge, skills, and proper representation necessary for the Board to function well. The dominance of the APS in APAC is of particular concern as APAC was initially established in part due to to concerns about the capacity for the APS to adequaltely carry out accreditation functions.

• The Accreditation Council's governance arrangements provide for input from stakeholders including input from the community, education providers and the profession/s. We believe that APAC does not meet this standard. As the Accreditation Council is dominated by a single professional body that represents an amalgum of psychologists and does not differentiate the interests of those with accredited professional training from those without this training, the profession of psychology is not properly represented. As the bulk of APS membership comprises psychologists without accredited professional training, the structure of the APAC Board limits input from stakeholders who have professional training in psychology that most complies with the Psychology Board of Australia (PsyBA) and international standards.

• The Accreditation Council's governance arrangements comply with the National Law and other applicable legislative requirements We believe that APAC does not meet this standard..The National Law requires independence of the accrediting body. It is apparent this is not the case. This will be addressed below.

5.2 Independence (Domain 2):

The Accreditation Council carries out its accreditation operations independently

Attributes

- Decision making processes are independent and there is no evidence that any area of the community, including government, higher education institutions, business, industry and professional associations - has undue influence.

- There are clear procedures for identifying and managing conflicts of interest.

Independence – Accreditation Council submission

The evidence that the Board has taken into account in forming its preliminary view about independence is primarily at p. 8-10 of the *APAC Submission to the Review of Arrangements for the Accreditation Functions* published on the Board's website at www.psychologyboard.gov.au.

❖ Comments

• Decision making processes are independent and there is no evidence that any area of the community, including government, higher education institutions, business, industry and professional associations - has undue influence. We agree with APAC and the PsyBA that APAC does not meet this standard.

Indeed, the APS itself sees APAC as part of its own functioning. In its submission to the Senate Inquiry into Commonwealth Funding and Administration of Mental Health Services, the APS stated: "The APS has responsibility for setting professional practice standards for psychologists, providing ongoing professional development, and accrediting university psychology training programs across Australia" (August, 2011, p.5). The accrediting funtion to which it refers is that of APAC, not the APS.This must be addressed.

The fact that APAC has a sole member (the APS) that dominates representation on the APAC Board gives this single body undue influence over all APAC activities and impedes the capacity for risk management.

The APS has appointed its own Directors to the Board. These Directors have an inbuilt conflict of interest as they have primary legal responsibility to two organisations, which is not viable. This particular conflict of interest is exemplified by the APS constitution which states that Directors appointed by the APS are to "represent" the APS, not APAC. Given the concerns about the limits set by self-disclosure of Directors of potential conflicts of interest and lack of provision of consequences for Directors who breach the Code of Conduct or confidentiality of APAC business, this is a serious flaw in the management of APAC.

APAC's representation of interests of the profession is also inadequate. APS does not represent the interests of the entire profession of psychology. Other professional associations exist within the profession, largely to represent specialist areas (e.g. ACPA and ICP represent clinical psychologists who meet the PsyBA standards for endorsement; Australian College of Specialist Psychologists). These associations all hold different standards for professional training to the APS. Dominance of the APS in APAC is of particular concern to other professional associations who hold professional standards which are in keeping with international accreditation standards. This exemplifies the concerns the profession has regarding the capacity of APS to oversee accreditation.

While it may have suited APAC to share premises with the APS in the past, it is essential that APAC operate independently in terms of its entire management and location.

• There are clear procedures for identifying and managing conflicts of interest. While there are procedures in place, we do not believe they are adequate, therefore, we believe that APAC does not meet this standard.

We are concerned that there is no objective scrutiny of Directors' conflicts of interest. Identification of conflict is based solely on the individual Director's judgement. This is unacceptable.

5.3 Operational Management (Domain 3):

The Accreditation Council effectively manages its resources to carry out its accreditation function

Attributes

- The Accreditation Council manages the human and financial resources to achieve objectives in relation to its accreditation function.
- There are effective systems for monitoring and improving the authority's accreditation processes, and identification and management of risk.
- The authority can operate efficiently and effectively nationally.
- There are robust systems for managing information and contemporaneous records, including ensuring confidentiality.
- In setting its fee structures, the Accreditation Council balances the requirements of the principles of the National Law and efficient business processes.

Operational management – Accreditation Council submission

The evidence that the Board has taken into account in forming its preliminary view about operational management is primarily at p. 11-13 of the *APAC Submission to the Review of Arrangements for the Accreditation Functions* published on the Board's website www.psychologyboard.gov.au.

❖ Comments

While other attributes meet the required standard, we have serious concerns about the following:

• There are robust systems for managing information and contemporaneous records, including ensuring confidentiality. We consider that APAC does not meet this standard.

The fact that highly confidential APAC information sits on computers within the APS and is accessible to APS staff, with no legally binding regulation of access and no consequences for their breach, is of serious concern for the profession of psychology. This must be addressed with great urgency. We understand the issue lies in the capacity of the APS to demonstrate good will in regard to the profession and its regulation, and we hope that this can be quickly forthcoming. In the meantime, we recommend that APAC seek legal advice as to how to protect this information from breach by APS staff. It may be that APAC requires funding to establish its own systems of data management.

The problems outlined above illustrate the lack of indendence of APAC from the APS. The fact that an agreement has not yet been reached in relation to ownership and licensing of the intellectual property assocaited with APAC accreditation data illustrates the lack of independence and conflict of interest inherent in APS playing such a dominant role in what should be an independent accreditation function.

5.4 Accreditation standards (Domain 4):

The Accreditation Council develops accreditation standards for the assessment of programs of study and education providers

Attributes

- Standards meet relevant Australian and international benchmarks.
- Standards are based on the available research and evidence base.
- Stakeholders are involved in the development and review of standards and there is wide ranging consultation.
- The Accreditation Council reviews the standards regularly.
- In reviewing and developing standards, the Accreditation Council takes account of AHPRA's Procedures for Development of Accreditation Standards and the National Law.

Accreditation standards - Accreditation Council submission

The evidence that the Board has taken into account in forming its preliminary view about accreditation standards is primarily at p. 14-15 of the *APAC Submission to the Review of Arrangements for the Accreditation Functions* published on the Board's website at www.psychologyboard.gov.au.

❖ Comments

• Standards meet relevant Australian and international benchmarks. We consider that APAC does not meet this standard.
Australia has the lowest standard of professional training for psychology in the Western world. In no other regulated jurisdiction of which we are aware, would a person without accredited professional training in psychology be permitted to refer to register as a psychologist. A Masters degree in professional psychology is the lowest level of training accepted in Europe and New Zealand, while Doctoral level training is required in all English speaking developed nations for clinical psychology.

•In reviewing and developing standards, the Accreditation Council takes account of AHPRA's Procedures for Development of Accreditation Standards and the National Law.
APAC currently collates data from academic staff specifically eliciting information about their membership of APS and its colleges, without any reference to PsyBA standards. In so doing, APAC does not adhere to the review of psychology programs and educaton providers against benchmarks established by PsyBA. Evidence of this is found in the staff profile questionnaire distributed in 2012 accreditation of Psychology at Murdoch University, where staff were required to indicate whether they are members of APS, have membership of an APS college, and whether they would be eligible for college membership. Also, in the publications section, staff were asked to indicate which APS college was applicable. No reference to PsyBA standards or endorsement was collated in this exercise. This illustrates APAC's lack of independence from APS.

MURDOCH UNIVERSITY - SCHOOL OF PSYCHOLOGY STAFF PROFILE (sample questions)
Name of staff member:
Qualifications (Degree, conferring institution and date):
Registration as a psychologist in Australia?, Overseas?
Which membership grade of the APS? If none, eligibility for which membership grade of the APS?
Full Membership of which APS College(s):
Eligibility for full Membership of which APS College(s):
For each APS College where membership eligibility is claimed:
For each APS College where membership eligibility is claimed: • Please briefly outline the relevant practice, including supervised practice within or following a postgraduate degree, undertaken in this specialisation; outline the tertiary studies or professional development activities undertaken to ensure coverage of the APS College course content.
Research; (i) Publications. List all publications for the past five years, noting the APS College specialisation where applicable, using the following categories:

5.5 Processes for accreditation of programs of study and education providers (Domain 5):

The Accreditation Council applies the approved accreditation standards and has rigorous, fair and consistent processes for accrediting programs of study and their education providers

Attributes

- The Accreditation Council ensures documentation on the accreditation standards and the procedures for assessment is publicly available.
- The Accreditation Council has policies on the selection, appointment, training and performance review of assessment team members. It's policies provide for the use of competent persons who are qualified by their skills, knowledge and experience to assess professional programs of study and their providers against the accreditation standards.
- There are procedures for identifying, managing and recording conflicts of interest in the work of accreditation assessment teams and working committees.
- The Accreditation Council follows documented processes for decision-making and reporting that comply with the National Law and enable decisions to be made free from undue influence by any interested party.
- Accreditation processes facilitate continuing quality improvement in programs of study by the responsible education provider.
- There is a cyclical accreditation process with regular assessment of accredited education providers and their programs to ensure continuing compliance with standards.
- The Accreditation Council has defined the changes to programs and to providers that may affect the accreditation status, how the education provider reports on these changes and how these changes are assessed.
- There are published complaints, review and appeals processes which are rigorous, fair and responsive.

Processes for accreditation of programs of study and education providers – Accreditation Council submission

The evidence that the Board has taken into account in forming its preliminary view about processes for accreditation of programs of study and education providers is primarily at p. 16-20 of the *APAC Submission to the Review of Arrangements for the Accreditation Functions* published on the Board's website at *www.psychologyboard.gov.au* and is also based on the experience of the National Board in receiving accreditation reports for the accreditation decisions reported to the Board in the period 1 July 2010 to 1 August 2012.

❖ Comments

• The Accreditation Council follows documented processes for decision-making and reporting that comply with the National Law and enable decisions to be made free from undue influence by any interested party.

We acknowledge that accreditation standards and processes were substantially re-developed from 2007 after CRPB became involved and then brought policies and practices more into line with accreditation industry practice. The current structure no longer has these checks and balances.

APS has documented undue influence on APAC accreditation and review of university programs. This undue influence is illustrated in the 2012 APAC review process for university training programs. When collating information about staff profiles and qualifications at Murdoch University, data was collected on staff membership of APS and its colleges. There was no reference to staff qualifications in relation to PsyBA standards, nor did any questions elicit information on endorsements for staff teaching in postgraduate professional training programs. This illustrates the lack of indepence of APAC and APS and conflict of interest of the same.

5.6 Assessing authorities in other countries (than Australia) (Domain 6):

Where this function is exercised by the Accreditation Council, the authority has defined standards and procedures to assess examining and/or accrediting authorities in other countries

Attributes

- The assessment standards aim to determine whether these authorities' processes result in practitioners who have the knowledge, clinical skills and professional attributes necessary to practice in the equivalent profession in Australia.
- Stakeholders are involved in the development and review of standards and there is wide ranging consultation.
- The procedures for initiating consideration of the standards and procedures of authorities in other countries are defined and documented.
- There is a cyclical assessment process to ensure recognised authorities in other countries continue to meet the defined standards.
- The Accreditation Council follows documented systems for decision-making and reporting that enable decisions to be made free from undue influence by any interested party.
- There are published complaints, review and appeals processes which are rigorous, fair and responsive.

Assessing authorities in other countries (than Australia) – Accreditation Council submission

The Psychology Board of Australia has *not* required APAC to assess authorities in other countries.

The Board however has more recently requested (in March 2012) that APAC submit a project plan for the assessment of overseas assessing authorities and undertake the project according to the project plan agreed with the Board.

The evidence that the Board has taken into account in forming its preliminary view about assessing authorities in other countries is primarily at p. 21 of the *APAC Submission to the Review of Arrangements for the Accreditation Functions* published on the Board's website at *www.psychologyboard.gov.au*.

❖ Comments

It is essential that the assessment of overseas authorities are transferred to an independent accreditation body nominated under the National Law. If APAC is able to manage to develop independence from the APS in all aspects of its functioning this would be an appropriate body to undertake such assessments. An independent accrediting body needs to be established to undertake these assessments and all other functions of an independent accreditation body.

5.7 Assessing overseas qualified practitioners (Domain 7):

Where this function is exercised by the Accreditation Council, the authority has processes to assess and/or oversee the assessment of the knowledge, clinical skills and professional attributes of overseas qualified practitioners who are seeking registration in the profession under the National Law and whose qualifications are not approved qualifications under the National Law for the profession

The Psychology Board of Australia has not required APAC to undertake this function.

Attributes

- The assessment standards define the required knowledge, clinical skills and professional attributes necessary to practise the profession in Australia.
- The key assessment criteria, including assessment objectives and standards, are documented.
- The Accreditation Council uses a recognised standard setting process and monitors the overall performance of the assessment.
- The procedures for applying for assessment are defined and published.
- The Accreditation Council publishes information that describes the structure of the examination and components of the assessments.
- The Accreditation Council has policies on the selection, appointment, training and performance review of assessors. Its policies provide for the use of competent persons who are qualified by their skills, knowledge and experience to assess overseas qualified practitioners.
- There are published complaints, review and appeals processes which are rigorous, fair and responsive.

Assessing overseas qualified practitioners – Accreditation Council submission

The evidence that the Board has taken into account in forming its preliminary view about assessing overseas qualified practitioners is primarily at p. 22 of the *APAC Submission to the Review of Arrangements for the Accreditation Functions* published on the Board's website at *www.psychologyboard.gov.au*.

❖ Comments

Previously State Registration Boards fulfilled these functions in Australia. Under the Natinal Law the Psychology Board of Australia (PsyBA) is responsible for ensuring that the delegated accreditation body complies with the Law. This is not the case currently. The PsyBA has a responsibility to ensure that APAC either become independent of all undue influence, or re-delegate the functions of accreditation to a body that does comply with the National Law in terms of independence.

5.8 Stakeholder collaboration (Domain 8):

The Accreditation Council works to build stakeholder support and collaborates with other national, international and/or professional accreditation authorities

Attributes

- There are processes for engaging with stakeholders, including governments, education institutions, health professional organisations, health providers, national boards and consumers/community.
- There is a communications strategy, including a website providing information about the Accreditation Council's roles, functions and procedures.
- The Accreditation Council collaborates with other national and international accreditation organisations.
- The Accreditation Council collaborates with accreditation authorities for the other registered health professions appointed under the National Law.
- The Accreditation Council works within overarching national and international structures of quality assurance/accreditation.

Stakeholder collaboration - Accreditation Council submission

The evidence that the Board has taken into account in forming its preliminary view about stakeholder collaboration is primarily at p. 23-25 of the *APAC Submission to the Review of Arrangements for the Accreditation Functions* published on the Board's website at www.psychologyboard.gov.au.

❖ Comments

We consider that APAC does meet these standards, notwithstanding the conflict of interest and undue influence of one professional association in APAC's current composition.

6. Preliminary conclusion of the National Board about whether current arrangements are satisfactory

The National Board has undertaken a preliminary review of the current arrangements, including an analysis of risks, benefits and costs. The review was based on the submission provided by the Australian Psychology Accreditation Council (APAC) against the Quality Framework for the Accreditation Function as referenced in section 5 above and the Board's experience working with the Council over the last two years.

Proposed decision of the National Board based on a preliminary review of current arrangements including analysis of risks, benefits and costs

Based on its preliminary review, the preliminary view of the National Board is to continue the current arrangement of exercising accreditation functions through APAC for a period of one year to allow APAC's sole member (the Australian Psychological Society) to make the recommended changes to APAC's Constitution to address the governance and independence issues. The Board would look favourably on extending the accreditation functions through APAC for longer than one year should changes to the constitution sufficiently support independent decision making.

❖ To what extent are you in agreement with the preliminary view of the Board?

Strongly disagree — Strongly agree

(●) 1 ( ) 2 ( ) 3 ( ) 4 ( ) 5

❖ Please provide comments about the Board's preliminary view

ACPA is in agreement with the submission of APAC to the PsyBA and to the PsyBA's assessment of this submission, regarding the lack of independent governance of APAC and the lack of regulation of its Directors. ACPA also has some additional concerns.

It is evident that a great deal of work remains to develop APAC into an independent body that is truely representative of a broad range of stakeholders related to the profession of psychology and regulated in a manner to protect the interests of the accrediting body and the profession. The current dominance of APS (one professional association) within APAC requires urgent review. APAC requires independence in its governance, attention to international standards, and management structures.

ACPA is deeply concerned that the APS may not be prepared to undertake the changes necessary to enable APAC to come into line with the needs of the profession and requirements of the National Law. While a 12 month period is necessary to allow the APS the opportunity to do so, alternative arrangements for accreditation of psychology training and qualifications need to be developed in parrallel by the PsyBA during this period in the event that a smooth transition to a new accrediting body becomes necessary.

ACPA is also concerned that the profession of psychology is solely represented on the APAC Board by the APS, which has drawn a great deal of criticism over the past six years for its management of standards within the profession and the lack of regard for the value of accredited professional training. That such an organisation is the sole member of the accreditation body for psychology is anathema to many endorsed psychologists and undermines faith in the accreditation process.

ACPA is concerned further about the fact that Australia has the lowest standard for professional training in the Western world. It is within the brief of APAC to advance the training requirements for the profession to international standards.

ACPA is grateful to the PsyBA and APAC for this opportunity to comment on the concerns raised by the review of APAC's compliance with the National Law, and the opportunity to raise further concerns relating to the functioning of accreditation under APAC's authority. We thank APAC for the goodwill shown through the commissioning of an independent review of APAC's governance and management and the expressed willingness to address the issues raised.