

5. Your submission

Name of person or organisation

making the submission: Psychology, School of Behavioural, Cognitive and Social Sciences, UNE

Contact person: Dr Tony Marks

Telephone:

Email:

Information about you

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

- Education provider
- 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

In our view, the current governance arrangements do not sufficiently provide for input from all stakeholders, nor is the process sufficiently transparent. Furthermore, amending APACs constitution to provide for wider representation on the Board of Directors will not fully alleviate these problems. If APAC is to remain as the accrediting body, then there should be significant structural change. APACs membership should be opened up to include representatives from consumer advocate groups, employers of psychology graduates, a research organisation (e.g., ARC), HODSPA, a student group, government and, of course, the APS. These same parties should then have proportionate representation on the Board of Directors.

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

Given that APAC is currently wholly owned by the APS, how can it be seen to be independent? The content of APACs very constitution is totally controlled by the APS. As explained in 5.1 above, the accrediting body for Psychology must be widely representative of all stakeholders to be truly independent. Contrary to the attributes listed above, we believe that the interests of APS members are overly reflected in some of the accreditation requirements generated by APAC.

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

Agreed.

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

APACs involvement is setting the Australian benchmarks to which it then claims to set standards, seems a little circular.

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. Its 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

Agreed.

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

The accrediting body should undertake this Domain 6 role.

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

The accrediting body should undertake this Domain 7 role.

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

As explained under 5.1 and 5.2 above, the accrediting body should be truly collaborative, by being owned and controlled by the various stakeholders in Psychology in Australia.

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

 1 2 3 4

Strongly agree

 5

❖ Please provide comments about the Board's preliminary view

Although we are in favour of continuing the current arrangements with APAC for a period of twelve months until changes can be made, we are of the view that the current APAC structure cannot provide sufficient independence, transparency and inclusion. Amending APAC's constitution to allow wider Board representation is a step in the right direction. However, as long as APAC has one sole member (the APS), it cannot be truly independent and collaborative.