

Ensuring high standards for psychology education in Australia

Australian Psychology
Accreditation Council



Submission to the Review of Arrangements
for the Exercise of Accreditation Functions
under the Health Practitioner Regulation
National Law Act

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LIST OF ABBREVIATIONS

AHPRA	Australian Health Practitioner Regulation Agency.
APAC	Australian Psychology Accreditation Council Limited.
APS	Australian Psychological Society.
AWC	APAC Accreditation Working Committee.
CPRB	Council of Psychologist Registration Boards Australasia.
EuroPsy	The European Certificate in Psychology.
HODSPA	Heads of Department and Schools of Psychology Association.
ISO/IEC 17011	International Standards Organisation 17011 <i>Conformity assessment -- General requirements for accreditation bodies accrediting conformity assessment bodies.</i>
ISQA	The International Society for Quality Assurance in Health Care.
National Law	Health Practitioner Regulation National Law Act (as in force in States and Territories).
NRAS	National Registration and Accreditation Scheme for the Health Professions.
PsyBA	The Psychology Board of Australia.
Quality Framework	Quality Framework for the Accreditation Function.
Standards	<i>APAC Rules for Accreditation and Accreditation Standards for Psychology Courses, June 2010, version 10.</i>

1.0 ABOUT THIS SUBMISSION

This Submission by the Australian Psychology Accreditation Council (APAC) is the second step in an agreed process for the review of arrangements for accreditation functions under the Health Practitioner Regulation National Law Act 2009¹ (the National Law).

The Australian Health Ministers Advisory Council assigned accreditation functions for the profession of psychology to APAC for three years from 01 July 2010, when the National Registration and Accreditation Scheme for the Health Professions (NRAS) commenced (see Attachment 5.1). Section 253 of the National Law requires that the National Board established for the psychology profession (the Psychology Board of Australia, hereafter PsyBA) must, not later than three years after the commencement of the NRAS, review the arrangements for the exercise of accreditation functions for psychology.

On 14 June 2012 the PsyBA wrote to APAC, commencing the review process (the review). APAC makes this Submission in support of its proposal that accreditation functions under the National Law be re-assigned to APAC for a term of five years commencing on 01 July 2013.

This Submission conforms to an agreed format² which recognises that confidential material (such as information which could identify an individual, concerns ongoing litigation or appeals processes, is commercial-in-confidence or is otherwise by its nature confidential) may be submitted as part of the review process in a confidential attachment that will not be made publicly available. This confidential part of the Submission is contained in a separate document (Attachment 5.20 – Confidential Materials), which will be accessible only by the PsyBA and the Australian Health Practitioner Regulation Agency.

2.0 BACKGROUND INFORMATION AND CONTEXT FOR THIS REVIEW

Since the early 1970's the discipline and profession of psychology in Australia has had a national accreditation process in place for higher education courses. This process was managed by a professional association (the Australian Psychological Society, hereafter APS) and although the accreditation system was not originally intended to be used for the purpose of assessing eligibility for registration as a psychologist, registration boards noted and mostly respected the accreditation status it granted. By 2002, however, concern was growing about inconsistencies between decisions made by the APS concerning the accreditation status of courses and decisions made by State and Territory registration boards regarding which degrees were acceptable qualifications for the purpose of registration. In 2005 this concern led the Council of Psychologists Registration Boards Australasia (CPRB) and the APS to jointly establish a national accreditation body, the Australian Psychology Accreditation Council Limited (APAC).

¹ As in force in each State and Territory. Copies of the Act relevant to each State/Territory are available for download at: <http://www.ahpra.gov.au/Legislation-and-Publications/Legislation.aspx>.

² Agreed at a joint meeting of AHPRA, Accreditation Councils and National Registration Boards on 06 June 2012.

APAC was established as a not-for-profit company limited by guarantee (with no shareholders), governed by a Board of Directors appointed by the two members of the company, the CPRB and the APS. APAC inherited the existing course accreditation processes and accompanying records at start-up, substantially re-developing accreditation standards and processes from 2007, so as to better suit the purposes of registration boards and the discipline, and to bring its policies and practices more into line with current accreditation industry practice.

The establishment of the first elements of the NRAS in 2009 precipitated the closure of State and Territory Boards and therefore the winding up of the CPRB to make way for the establishment of a single national registration board (PsyBA). The demise of CPRB, one of the two members of APAC, required the termination of APAC's membership agreement and left the APS, as the sole member of the APAC, to re-draft APAC's Constitution. The APS redrafted the APAC Constitution in May 2010.

As part of preparations for the introduction of the NRAS, the Australian Health Ministers Advisory Council assigned accreditation functions for the profession of psychology to APAC, appointing it as an external accreditation entity for an initial term of three years under the Health Practitioner Regulation (Administrative Arrangements) National Law Act 2008 (the so-called "Act A"). In July 2010 when the Health Practitioner Regulation National Law Act 2009 (the National Law) came into effect, APAC became subject to the National Law. Late in June 2010 APAC signed an interim funding arrangement with AHPRA in the form of an exchange of letters. In March 2012, APAC signed an *Agreement for the Accreditation Function* (hereafter the funding and service agreement) with AHPRA (on behalf of the PsyBA) to support APAC in fulfilling its accreditation functions and delivering accreditation services for the psychology profession under the National Law.

Since the introduction of the National Law, the Australian Health Practitioner Regulation Agency (AHPRA), the various accreditation authorities (Councils) and National Registration Boards (National Boards) have jointly developed a set of agreed documents concerning accreditation under the National Law, which cover a range of issues associated with accreditation functions, including:

- the guiding principles and objectives of the National Law;
- relationships and communication between accreditation authorities, national boards and AHPRA about accreditation;
- the *Quality Framework for the Accreditation Function*, and
- *Procedures for the Development of Accreditation Standards*.

The documents have been brought together into a single reference paper that sets out the accreditation framework, entitled *Accreditation under the Health Practitioner Regulation National Law Act* (available at <http://www.ahpra.gov.au/Legislation-and-Publications/AHPRA-Publications.aspx>) and which was formally agreed by Councils, National Boards and AHPRA after a joint meeting to consider accreditation issues on 7 June 2011.

One of these documents, the *Agreed Quality Framework for the Accreditation Function* (hereafter the Quality Framework) contains 45 attributes organised into eight domains and is intended to provide a set of aspirational attributes which characterise good governance and operation of the accreditation entities that have been assigned accreditation functions under the National Law. The attributes in the Quality Framework (Attachment 5.2) underpin the funding and service agreements between AHPRA and accreditation councils and are being used as benchmarks in this review of the first three years of the work of accreditation councils under the National Law.

Section 3 of this Submission contains a report of progress to date in APAC’s program of work to meet each of the domains in the Quality Framework. The Submission also serves as APAC’s initial report to the PsyBA and AHPRA as required by its current funding and service agreement. More information about APAC’s compliance with the Quality Framework is contained in Attachment 5.20, which includes the unedited report of an independent external compliance audit of APAC, recently completed by Chamberlains Law Firm (the Audit).

The Audit examined APAC’s compliance with the Quality Framework, with the requirements of the National Law (including the key elements of APAC’s funding and service agreement with AHPRA), and with other agreed processes as set out in the reference document *Accreditation under the Health Practitioner Regulation National Law Act*. APAC commissioned the Audit to facilitate a transparent and open review, and to provide a expert, independent verification of the information presented in this Submission.

Section 4 sets out APAC’s expected activity to deliver the accreditation functions over the next five years.

3.0 REPORT ON ACCREDITATION FUNCTIONS AGAINST THE QUALITY FRAMEWORK FOR THE ACCREDITATION FUNCTION

This section of the Submission reports on the current status of APAC in its program of work to satisfy each of the eight domains of the Quality Framework and complies with the Sample Report Guide set out in the reference document *Accreditation under the Health Practitioner Regulation National Law Act* (available at <http://www.ahpra.gov.au/Legislation-and-Publications/AHPRA-Publications.aspx>). The report also serves as APAC’s first report to the PsyBA and partially satisfies the reporting requirements set out in Section 12 of the funding and service agreement signed by AHPRA (on behalf of the PsyBA) and APAC in March 2012.

Domain 1 Governance

The accreditation authority effectively governs itself and demonstrates competence and professionalism in the performance of its accreditation role.

Attribute	Initial Report and Status
The accreditation authority is a legally constituted body and registered as a business entity	APAC is a not-for-profit Company Limited by Guarantee and therefore a registered business entity (ABN 26 117 279 857) with the Australian Securities and Investments Commission (ASIC). A copy of APAC’s <i>Certificate of Registration of a Company</i> is provided at Attachment 5.3.
Constitution	APAC’s Constitution, enacted in May 2010, is included at Attachment 5.4.

Attribute	Initial Report and Status
<p>Governance and management structures give priority to its accreditation function relative to other activities</p>	<p>APAC's Constitution and policy documents (including its mission and objectives), assessment procedures, handbooks (Attachment 5.5), staff position descriptions (Attachment 5.6) and Accreditation Working Committee (AWC) Terms of Reference (Attachment 5.7) all reflect the fact that APAC assigns the highest priority to accreditation functions. APAC currently conducts very few activities which are not part of its accreditation functions under the National Law.</p>
<p>The authority is able to demonstrate business stability, including financial viability</p> <p>Accounts meet relevant Australian accounting and financial reporting standards</p>	<p>APAC has operated successfully as a not-for-profit business since 2005 and has demonstrated financial viability in the 2011 financial year. APAC's Annual Accounts for the 2011 financial year, currently being audited by PricewaterhouseCoopers, provide evidence of APAC's financial viability (see below).</p> <p>APAC is subjected to an annual independent financial audit which complies with the Corporations Act 2001, accounting standards and with other professional financial reporting requirements, including the lodging of an audited financial report with the Australian Securities and Investments Commission annually.</p> <p>APAC's Annual Accounts for the financial year ending 31 December 2011, currently in the final stages of being audited by PricewaterhouseCoopers, including the signed Directors' Report and Directors' Declaration, are at Attachment 5.8.</p>
<p>There is a transparent process for selection of the governing body</p>	<p>APAC is governed by a Board of Directors. The selection of Directors for appointment to the Board is determined by APAC's Constitution, which requires that the APS appoints four of the APAC Directors as representatives of the APS. The remaining four APAC Directors are nominated by other key stakeholder groups, such as the community and education providers, and appointed to the Board. Stakeholders making nominations are provided with a Director Statement of Role, which includes high level attributes and competencies required for APAC Directors (Attachment 5.9).</p> <p>APAC acknowledges that the Board appointment process could be improved to increase transparency by APAC's Constitution better describing the process for appointment of Directors, by applying skills-based criteria for selection and nomination (eg including legal skills, financial management skills), and by addressing issues of imbalance in the proportions of Board members nominated for appointment by the stakeholder groups. APAC is also cognisant of the need to introduce a term of office for Directors (currently no term is specified in the Constitution), and APAC recognises the need to ensure that in future community director nominations are initiated by community stakeholders rather than other stakeholder groups. These</p>

Attribute	Initial Report and Status
Company membership arrangements	<p>issues have been identified in more detail in the Independent External Compliance Audit Report (Attachment 5.20). The Audit also recommends solutions to these issues which APAC supports and will seek to achieve by proposing changes to its Constitution which it hopes the member will resolve to accept. APAC is committed to working with the APS as the sole member to deliver greater transparency in nominations and appointments to APAC's Board.</p> <p>Since APAC is a Company Limited by Guarantee, Directors are required to meet ASIC's eligibility requirements and to meet the obligations for company directors which are imposed by Australian Law. APAC's current Directors are listed on APAC's Website at: http://www.psychologycouncil.org.au/about/#board</p> <p>APAC currently has only one member, the Australian Psychological Society. The APS was left as the sole member of APAC in 2010 after the winding up of Council of Psychologist Registration Boards (CPRB) due to the creation of one national registration board (the PsyBA). As the sole remaining member of the company, the APS has control of APAC's Constitution, including the power to approve (or not) any applications for admission of additional members, to change the Constitution, and to wind up the Company, as well as certain legal obligations and responsibilities which it must meet. The APS appoints four of the eight directors to the APAC Board as representatives of the APS.</p> <p>APAC acknowledges the need for greater independence at the Board level than its Constitution currently allows, and wishes to achieve this as part of its current program of transition to greater independence and transparency of processes. APAC is aware of the issues related to Board appointment and member powers raised in the Audit (Attachment 5.20). At its 06 August meeting the APAC Board committed to achieving the changes recommended in that Report concerning Domains 1 and 2 of the Quality Framework (Governance and Independence), but will require the cooperation of the APS as the sole member of the company to achieve this, since only the member can resolve to change the Constitution.</p>
Governance arrangements provide for input from stakeholders including input from the community, education providers and the profession/s	<p>As outlined above, APAC's Constitution provides for four Director nominations from defined categories of stakeholders (one community nominee, two PsyBA nominees, one HODSPA nominee) in addition to four Director appointments by the APS. In addition, APAC's Constitution requires that of the four member-appointed Directors, at least one must have education and training expertise and at least one must be a registered practitioner.</p> <p>While these arrangements make it likely that attitudes, knowledge and skills specific to each of APAC's key stakeholder groups are present among the</p>

Attribute	Initial Report and Status
	<p>Directors in the boardroom, APAC acknowledges that the current arrangements are not ideal for a number of reasons. First, input from the community is limited to only one Director. Second, Section 15 of APAC's Constitution dictates that the four APS-appointed Directors are "representatives" of the APS, which means that fully half of the Board's Director-based stakeholder input opportunities are allocated to a single stakeholder group (the profession).</p> <p>APAC derives the benefit of a range of stakeholder perspectives and input at the working committee (AWC) level, by ensuring a diversity of educators and practitioners are appointed to the AWC. Members of the AWC were appointed following a public call for Expressions of Interest and were selected against a set of publicised key selection criteria specifying the skills, knowledge and experience required (see Attachment 5.9).</p>

The accreditation authority carries out its accreditation operations independently.

Attribute	Initial Report and Status
<p>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.</p>	<p>Corporations Law and Constitution: APAC’s governance arrangements do not support a perception of independent decision making, and constitutional change will be required to remedy this.</p> <p>APAC acknowledges the view put by the PsyBA in its letter to APAC of 24 June 2011, that “with a split of 4 APS appointed members, and 4 other members, there is not a sufficient perception consistent with the framework that ‘there is no evidence that any party has undue influence’”.</p> <p>APAC acknowledges that its decision-making can never be <i>seen</i> to be independent as long as half of the APAC Director positions on the Board are appointed as representatives of another organisation. APAC’s Directors are bound by the Corporations Act 2001, which imposes a duty that directors of a company exercise their powers and discharge their responsibilities in good faith, in the best interests of the company. The Act states that the use by directors of their powers to benefit the interests of a third party, rather than the interests of the corporation as a whole, may be considered to be a breach of this duty [Sections 182 and 183].</p> <p>Section 15(a) of APAC’s Constitution states that APS nominee Directors are appointed by the Member as “representatives” of the Member. This arrangement has the potential to place some Directors in a position where they could face a conflict of duty, with the conflict occurring between their obligations to represent the interests of the member and their obligations to act in the best interests of APAC according to its mission. Such conflicts do arise from time to time at the APAC Board. The conflict of duty could be exacerbated for two of the APS nominee Directors on the APAC Board who are also company directors on the Board of the APS.</p> <p>These problems were noted in the Audit and will require changes to APAC’s Constitution before APAC can meet this benchmark. Although the APAC Board will recommend the necessary changes to APAC’s Constitution, any changes can only be effected following the passing of a resolution of the sole member of the company, the APS. As such, APAC is committed to working with the APS to resolve this issue.</p> <p>Directors Code of Conduct APAC has measures in place which are designed to enhance and support the independence of Board decision making. These measures include terms of appointment contained in the APAC <i>Director’s Indemnity and Access Deed</i>. These terms require APAC Directors to agree to a Directors Code of Conduct, to sign a Confidentiality Deed, and to complete a Declaration of Conflicts of</p>

	<p>Interest (see Attachments 5.11, 5.12 and 5.13). These instruments essentially bind Directors to a standard of conduct which, if effectively enforced, limits outside interests from playing a role in Board decision making. Despite the fact that the APAC Board is not aware of any instances of undue influence, the Audit report identified improvements which could be made to better protect against them. In this regard the Audit report noted that the APAC Constitution does not provide for consequences for Directors who breach the Code of Conduct and/or confidentiality deed. APAC agrees that such provisions should be placed into the Constitution and the Board should be given the power to remove Directors who commit such a breach. This would significantly strengthen the current protections.</p> <p>Staffing To protect against undue outside influence, staff of the organisation must be accountable to the APAC Board. The employment by APAC of its own staff from January 2012 rectified the previous situation in which APAC was staffed by APS employees, and removed the potential for influence from an outside the organisation on the decision making of the staff responsible for APAC's operations. The terms of employment in place for all APAC staff now include accountability provisions.</p> <p>Premises APAC recognises the PsyBA's view expressed in 2011 that co-location of APAC's offices with the offices of the APS leads to perceptions of a lack of independence. While co-location does not necessarily lead to influence, it will be very hard to counter and overcome the perception of strong APS influence that exists among stakeholders without moving to a separate office location. This perception persists despite APAC taking every opportunity to advise stakeholders otherwise, but it is not surprising considering that APS staff members managed APAC operations until 2012, and that an APS Committee (PDAC) acted as APAC's working committee until August this year.</p> <p>Risk Management The APAC Board has a Risk Management Subcommittee, chaired by a Director, which maintains a Risk Register. The Subcommittee is however unable to adequately deal with matters of risk pertaining to any potential influence of the Member on Board decisions, since half of the Board to whom it reports are representatives of that Member. APAC recognises this governance issue and will seek the cooperation of the member for Constitutional change which will result in stronger protection of the independence of APAC's risk management processes.</p>
<p>There are clear procedures for identifying and managing conflicts of interest. <i>Note: this relates to interest of the governing body. Other processes exist and are</i></p>	<p>Section 5.3 of APAC's Constitution contains some provisions governing how conflicts of interest are managed, but they are limited to two sets of defined circumstances. The first is where the Board is considering specific types of remuneration resolutions, and the second is where a General Meeting considers a conflict of interest resolution about a Director.</p>

reported under domain 5.

As stated above, APAC Directors are required to abide by a Director's Code of Conduct, which includes requirements concerning the management of conflicts of interest (Attachment 5.11). All Board meetings begin with a requirement to declare any new conflicts of interest which may have arisen. It was noted in the Audit report that at this time APAC Directors are not, however, required to declare all personal and professional interests relevant to APAC, leaving individuals to decide what interests might constitute a conflict at any point in time. APAC believes that the Constitution should be amended to require full disclosure of all interests which may be relevant, not just those which individual Directors judge to represent conflicts, and will seek to obtain the cooperation of the APS to effect the necessary Constitutional changes to introduce this higher standard.

Domain 3 Operational management

The accreditation authority effectively manages its resources to carry out its accreditation function under the National Law.

Attribute	Initial Report and Status
<p>The accreditation authority manages the human and financial resources to achieve objectives in relation to its accreditation function.</p>	<p>APAC's recent appointment of its own CEO and staff, as well as the setting up of its own HR systems, has now brought management of human resources under the control of APAC for the first time since its establishment.</p> <p>The APAC Board now has full control and management of its financial resources, with its own bank accounts, budgeting, reporting and financial auditing arrangements. The APAC Board receives quarterly reports on APAC's financial position and makes decisions about fees charged, how income is managed, how provisioning for projects is handled, and how resources are deployed in order to meet its accreditation functions successfully and efficiently.</p> <p>The PsyBA will be aware that in 2012 APAC signed a funding and service agreement with AHPRA (on behalf of the PsyBA) which included a budget and a prioritised work plan agreed with the PsyBA for the 2012 financial year.</p>
<p>There are effective systems for monitoring and improving the authority's accreditation processes, and identification and management of risk.</p>	<p>APAC has an active program of work under way in this area, including plans for the introduction of several additional monitoring systems. These mainly relate to performance improvement and quality assurance (in particular assessor performance review, internal and external auditing of accreditation processes and decisions) using the ISO/IEC 17011 and the ISQA International Accreditation Standards for guidance. At this point in time, APAC does not have the human resources to fully implement the additional systems planned, but continues planning for their introduction as soon as possible.</p> <p>APAC has strong risk management systems in place:</p> <ol style="list-style-type: none"> 1. At the accreditation assessment level, risk mitigation policies, training of assessors and monitoring are in operation. APAC has its own contracted legal advisers who are regularly engaged for advice on a range of accreditation matters (a recent example is provided in Attachment 5.20). 2. APAC has a Risk Management Subcommittee of the Board, which oversees the maintenance of a Risk Register (Attachment 5.20) and monitors risk reporting. The Board receives regular risk status and risk mitigation reports.

<p>The authority can operate efficiently and effectively nationally</p>	<p>APAC accredits and monitors more than 420 programs of study across 40 education providers located throughout Australian and offshore. Despite very modest resourcing, stakeholders will attest to the fact that APAC offers efficient, professional accreditation and associated advisory services to a high standard.</p> <p>Assessors, committee members and directors make very large unpaid contributions to APAC's operations.</p>
<p>Robust systems for managing information and records, including ensuring confidentiality</p>	<p>IT and data systems</p> <p>All of APAC's IT systems, including network and data storage, hardware and most of APAC's software are still provided by the APS, though this is now based on a contractual (fee-for-service) basis. The reliance on APS IT systems is a legacy of the past when APAC's staff and most operational systems were provided by the APS. Although APAC and APS have formalised these arrangements by rolling them into a service contract with the APS established early in 2012, there are as yet no performance provisions or detailed service specifications contained in it.</p> <p>Under these arrangements the accreditation data used by APAC continue to be stored on an APS data management system and will remain so for the time being since any change to these arrangements requires clarification of ownership and/or licensing of the intellectual property (IP) which resides therein. APAC has been attempting to negotiate an IP agreement with the APS since March 2012 but is yet to reach any agreement. At APAC's request, security provisions have been put in place for the time being which prevent staff of the APS altering any APAC accreditation data, though APS staff can still view the data.</p> <p>The data systems supplied by the APS have recovery provisions and security against unauthorised access and failure, but the transitional arrangements outlined above mean that some APAC accreditation records are not entirely confidential to APAC.</p> <p>APS has provided verbal assurances that their staff do not have read or write access to APAC documents contained on the network document storage systems provided by the APS to APAC.</p> <p>APAC is aware of the need to develop its own data storage and management systems but cannot progress these developments without an IP agreement with the APS.</p> <p>APAC is developing a document management policy to be implemented in 2014.</p> <p>Assessment systems</p> <p>APAC assessors are required to observe confidentiality requirements which are summarised in APAC's response to Domain 5. Assessors must sign a Confidentiality Agreement before being permitted to undertake each</p>

	<p>accreditation assessment. APAC staff have confidentiality clauses in their contracts of employment.</p> <p>Privacy APAC has a Privacy Policy which is accessible on the APAC website at http://www.psychologycouncil.org.au/privacy/</p>
<p>In setting fee structures, the accreditation authority balances the requirements of the principles of the National Law and efficient business processes</p>	<p>APAC's fees are transparent, always being publicly available on the APAC website 12 months in advance of introduction. Fees are reasonable and fair (as required by Section 3[b] of the National Law) taking into account APAC's legislative responsibility to ensure efficient and effective operation of the Scheme and its obligation to offer efficient business processes. Efficiency and fairness are in part achieved by using a fee scale in which the levels of fees levied reflect the complexity and magnitude of each assessment task. APAC fees are comparable with those of other similar accrediting authorities in Australia.</p> <p>APAC sets fees by analysing the costs of operating under the Scheme and setting a fee structure which achieves recovery of some 60% of the expenses incurred in carrying out its accreditation functions.</p> <p>APAC's current APAC fee schedule is available at: http://www.psychologycouncil.org.au/application-information/</p>

Domain 4 Accreditation standards

The accreditation authority develops accreditation standards for the assessment of programs of study and education providers.

Attribute	Initial Report and Status
Standards meet relevant Australian and International benchmarks	APAC's Accreditation Standards are broadly consistent with comparable overseas accreditation standards for psychology programs of study, and in particular comparable with those imbedded in the EuroPsy, the largest single international standard for psychologist education and training among developed countries. APAC is in the early phase of a major review of accreditation standards for the psychology profession. As is required by the <i>Procedures for Development of Accreditation Standards</i> laid down by the Agency Management Committee under Section 25 of the National Law, APAC will be taking account of relevant international standards during the standards review process.
Standards are based on the available research and evidence base	Psychology is an evidence-based profession and APAC Standards clearly adopt and require evidence-based approaches. APAC is, however, is aware of some limitations to the link between the Standards currently in place and empirical support published in the available research evidence. The first is that the current Standards were written in 2010 and considerable relevant empirical literature has since been published. The second is that there remain a number of areas (mostly concerned with education and training practices) in which published research evidence is limited. APAC's 2012/13 review of the Standards will place a strong emphasis on the available research and evidence base and related advice from expert stakeholders to ensure a strongly evidence-based approach.
Stakeholders are involved in development and review of standards and there is wide ranging consultation	APAC's current review of the Standards is the first review of standards for the psychology profession to be conducted since the introduction of the National Law. As required by Section 46(2) of the National Law, APAC has an extensive consultation process in progress. The first phase of the process includes pre-consultations with key stakeholders to identify critical issues. This phase has included the holding of fora in capital cities around Australia, which will soon be completed and which have been well attended and received by invited key stakeholders. The feedback from this phase is being used in the preparation of a proposed set of draft Standards. APAC will commence the second Consultation phase of the Review on 25 September 2012 with the public release of a Consultation Paper containing those draft

	<p>proposed Standards, as well as a broad assessment of the Standards against the Council of Australian Governments Principles For Best Practice Regulation, as required by the AHPRA under Section 25 of the National Law. APAC will open the Paper to written submissions from all stakeholders for a period of ten weeks (with submissions closing on 08 December 2012) and expects to present a final version of the Standards to the PsyBA for approval in mid March 2013.</p> <p>APAC has information for stakeholders about the review, including an outline of the process, available on its website at http://www.psychologycouncil.org.au/consultations-and-projects/</p>
<p>Accreditation standards for programs of study for general registration, specialist registration and/or endorsement</p>	<p>The APAC <i>Rules For Accreditation and Accreditation Standards For Psychology Courses, June 2010</i> (the Standards), are publicly available from the APAC website at: http://www.psychologycouncil.org.au/standards-and-guidelines/. The Standards came into effect in June 2010 and were approved by the Australian Health Ministers Advisory Council on transition to the NRAS on 01 July 2010. The Standards set out minimum requirements that must be met by all higher education providers and their programs of study in order that those programs are eligible for approval by the PsyBA as suitable qualifications for the purpose of general registration, or for entry to an Area of Practice Endorsement Registrar program.</p> <p>At the request of the PsyBA, APAC has commenced a review of the Standards including the development of new standards for the specialised practice components of postgraduate programs of study that will better support entry to the Area of Practice Endorsement Registrar program.</p>
<p>The accreditation authority reviews the standards regularly</p>	<p>APAC has reviewed Standards regularly. Reviews have included:</p> <p><i>APAC Rules and Standards June 2010</i> <i>APAC Rules and Standards August 2009</i> <i>APAC Rules and Standards November 2008</i> <i>APAC Rules and Standards August 2008</i> <i>APAC Rules and Standards 25 February 2008</i> <i>APAC Rules and Standards 29 October 2007</i> <i>APAC Standards revised February 2007</i> <i>APAC Standards January 2007</i> <i>APAC Standards - to 31 December 2006</i></p> <p>APAC intends to align its review schedule with the PsyBA's schedule for reviewing registration standards.</p>
<p>The authority takes account of AHPRA's procedures for development of accreditation standards and the National Law</p>	<p>This attribute has been addressed as part of the responses to the preceding attributes in this domain.</p>

Domain 5 Processes for accreditation of programs of study and education providers

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

Attribute	Initial Report and Status
List programs of study accredited	<p>APAC maintains a list of currently accredited providers and programs on its website which is diligently maintained. APAC provides regular reports to the PsyBA regarding accreditation outcomes for all assessed providers and their programs of study, using an agreed reporting format. These reports include regular advice on the status of accredited and approved programs of study. AHPRA and PsyBA hold these reports and will be aware that efficient reporting arrangements are in place between APAC and AHPRA to ensure the list of approved programs is always up to date.</p>
Documentation on standards and procedures for assessment of programs is publicly available	<p>APAC's standards and procedures for the assessment of programs are publicly available for download from the APAC website. Assessment procedures are comprehensively documented in the publicly available APAC Assessment Handbook and associated rules, including application processes and the obligations of education providers, are set down in APAC's Rules for Accreditation and Accreditation Standards for Psychology Courses (Version 10, June 2010) on APAC's website.</p> <p>APAC has a stated commitment to rigour, fairness and transparency in its Constitution (Attachment 5.4), and its assessment policies and assessor certification and training program reflect these values (see Attachments 5.5 and 5.14).</p> <p>The APAC website has considerable additional information about Standards and assessment procedures available online at: http://www.psychologycouncil.org.au/application-information</p>
Policies on assessment team selection, appointment, training and performance review	<p>Detailed information concerning assessment teams is available in the APAC Assessment Handbook March 2012.</p> <p>APAC has the following assessor team selection, training and review policies in place:</p> <ol style="list-style-type: none"> 1. APAC uses a set of key selection criteria and a public call for expressions of interest to appoint assessors to the AWC (Attachment 5.15) and has a Code of Conduct to which assessors must adhere (Attachment 5.16). 2. No assessor can be assigned to an assessment within the same state or territory where s/he works and lives (APAC Assessment Handbook March 2012).

	<p>3. APAC requires all assessors to undertake certification (including training) at least every three years and assessors are required to hold current certification with APAC to be permitted to undertake any APAC assessment work.</p> <p>4. APAC is developing an assessor performance system which will be implemented in 2013.</p> <p>A second more advanced level of certification training for APAC assessors is being developed and is scheduled for introduction in certification training cycle 7 (2014).</p>
<p>Procedures for identifying and managing conflicts of interest in the work of accreditation assessment teams and working committees</p>	<p>APAC has a number of measures in place to protect against, identify and manage conflicts of interest in conducting its assessment work:</p> <ol style="list-style-type: none"> 1. APAC assessors are trained in identification and management of potential conflicts of interest as part of their mandatory Assessor Certification Training (see Attachment 5.20). 2. APAC has a policy of ensuring that assessors do not conduct APAC assessments of providers and their programs within the State/Territory where they live and/or work. 3. APAC's policies require that each assessor completes a declaration of actual or potential conflicts of interest before undertaking each and every accreditation assessment (see Section 3 of the Assessment Handbook, Attachment 5.5). Each declaration is reviewed by APAC staff and where any declaration is made, is also reviewed by the education provider who submitted the application before the assessor is permitted to undertake the assessment. This review process includes provision for the substitution of an alternative assessor where APAC, in consultation with the provider, deems it is warranted (see APAC Assessment Handbook Section 1.11). 4. as instructed by the PsyBA in its letter of June 24 2011, APAC has ceased to use the APS Program Development and Accreditation Committee (PDAC) as its working committee. APAC has appointed its own Accreditation Working Committee (AWC), following a public call for expressions of interest and a selection process (described earlier in this Submission). Members of APAC's AWC are required as a condition of appointment to sign an AWC Register of Conflicts of Interest (Attachment 5.17) to be updated at the commencement of each meeting, and to abide by an AWC Code of Conduct which includes provisions concerning the management of conflicts of interest (Attachment 5.16).

<p>The authority follows its processes for decision-making and reporting which comply with the National Law and enable decisions to be made free from undue influence</p>	<p>APAC employs a three-stage process of decision making for accreditation assessment work:</p> <ol style="list-style-type: none"> 1. Draft recommendations formulated by assessment teams at the conclusion of an assessment (as well as the content of the assessment report in which they are contained) are scrutinised by APAC’s Working Committee, which is essentially a committee of expert peer review. Reports and recommendations may be modified by the AWC (AWC Terms of Reference are at Attachment 5.7). 2. APAC staff provide a second tier of review before a final report and recommendations are prepared for the APAC Board of Directors to consider. 3. The APAC Board makes determinations based on the final reports and recommendations and has the authority to require revision of reports and recommendations, review, audit or complete re-assessment of any matter. <p>APAC has a number of reporting systems in place, including:</p> <ol style="list-style-type: none"> 1. reporting of accreditation assessment outcomes to the PsyBA and AHPRA including the provision of a report as required by Section 48 of the National Law; 2. reporting on outcomes of its monitoring program to the PsyBA and AHPRA as required under Section 50 of the National Law; 3. reporting according to an agreed schedule regarding functions, services and projects undertaken in fulfilment of its funding and service agreement with AHPRA; 4. reporting of operations and projects directly in scheduled periodic joint Board meetings with the PsyBA and AHPRA, and 5. publication of annual reports. <p>Comments on processes for protecting against undue influence in APAC decisions have been dealt with in earlier parts of this Submission.</p> <p>APAC has noted comments made in the Audit report regarding the form of words used for accreditation determinations by the APAC board and has plans to implement the changes suggested in that report.</p>
<p>Accreditation processes facilitate continuing quality improvement</p>	<p>APAC’s accreditation processes facilitate quality improvement of programs of study in several ways:</p> <ol style="list-style-type: none"> 1. APAC’s Rules and Standards require providers to maintain an <i>Advisory/Liaison and Quality Review Committee</i>, which must constitute “an effective quality review committee through which there can be full consultation with representatives of the field supervisors and of organisations likely to employ the Institution’s graduates regarding the standards of training being achieved in the course” (Standard 5.1.4).

	<p>2. APAC requires an annual update on program outcomes and functioning from providers and encourages a self-assessment against the standards once per cycle (APAC can require evidence of such an assessment – Rule 2.4(u)).</p> <p>3. From 2007, APAC enhanced the availability and extent of its advisory services and this service has become very popular with education providers now seeking advice from APAC on a regular basis regarding quality improvement, especially when program changes are being contemplated.</p>
<p>Accreditation cycle including monitoring of accredited programs of study</p>	<p>APAC has a five year accreditation cycle both for providers and the programs of study offered by them, with provision for a range of different types of out-of-cycle assessments. APAC has a program of monitoring designed to meet its obligations under Section 50 of the National Law and the program is outlined in Attachment 5.18. APAC’s advisory service has greatly enhanced monitoring.</p>
<p>Definition of changes to programs and providers which may affect accreditation status, and reporting of changes</p>	<p>APAC requires providers to advise without delay regarding any change to an approved program of study which could reasonably be expected to affect the accreditation status of the program. This reporting requirement is set out in the APAC Rules, is additional to annual reporting and is a condition of the ongoing accreditation contract:</p> <p><i>“Institutions are expected to inform APAC of; changes in its AOU, new courses introduced, substantive changes to course structure, discontinuation of accredited courses, changes to unit codes and/or names, changes to core and elective unit requirements, changes to course names and to resource levels including staffing (particularly resignations and other ways in which the number of staff decreases or the staffing profile shifts significantly) immediately, and where the changes are planned, no later than one month after the proposed changes are announced”</i> (Rule 5.6).</p> <p>APAC has plans to significantly extend and further define the definition of changes which require reporting, as well as the nature of the reporting system, in the Standards and Rules currently under review and expects that changes will be implemented along with the next version of the APAC Standards.</p>

<p>Published complaints, review and appeals processes which are rigorous, fair and responsive</p>	<p>APAC publishes information about complaints on its website and has power to investigate complaints (Rule 7.3, Complaints). Complaints handling processes include provision for confidential interviewing of complainants and other stakeholders, investigation and inspection of documents and other information, escalation to a full audit and if required, referral of matters to other authorities such as AHPRA or the police where appropriate (Section 7, APAC Rules). APAC intends to further develop and refine complaints handling, especially confidentiality provisions, as part of its review of Standards and Rules under way this year.</p> <p>APAC has an internal appeals process which is set out in Section 8 of its Rules and which includes a timetable for appeals processes.</p> <p>Stakeholders will attest to the rigour, fairness, timeliness and professionalism with which APAC handles complaints and appeals.</p> <p>APAC has noted the recommendations made in the Audit report to further define internal review processes and appeals processes, and to extend complaints processes to provide for complaints about assessment team members. These improvements will be put in place in 2013.</p>
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Domain 6 Assessing authorities in other countries

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

Attribute	Initial Report and Status
<p>Standards for assessment</p> <p>Procedures for assessment</p> <p>Assessments of overseas assessing authorities (new, reviewed and monitoring)</p> <p>Cyclical assessment process</p> <p>The authority follows its processes for decision-making and reporting</p>	<p>APAC has not been responsible for this function until recent advice was received from the PsyBA that it intended to assign the function to APAC.</p> <p>APAC had not therefore made the necessary resourcing provisions needed to commence work on this function until the first quarter of 2012, when APAC and the PsyBA agreed on a prioritised work plan and an associated funding agreement which provided for work on assessing authorities in other countries. The provision of funding for this purpose in APAC's agreement with AHPRA, signed in March 2012, has enabled APAC to commence planning for this work.</p> <p>Although APAC has been conducting some preliminary enquiries with overseas authorities, it is too early to yet have standards, procedures or monitoring systems in place.</p> <p>APAC anticipates being able to make more substantial progress on this function, in the form of a report and recommendations to the PsyBA, in the third quarter of 2013.</p>

Domain 7 Assessment of internationally qualified practitioners

Where this function is exercised by the accreditation authority, the authority has processes to assess and/or oversee the assessment of the knowledge, clinical skills and professional attributes of internationally 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.

In October 2010, The Psychology Board of Australia advised APAC that it would retain the assessment of internationally qualified practitioners within its functions under Section 43(1) of the National Law. APAC is therefore not the responsible authority for assessments of overseas trained practitioners under the National Law at this time.

Domain 8 Stakeholder collaboration

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

Attribute	Initial Report and Status
<p>There are processes for engaging with stakeholders</p> <p>There is a communications strategy, including a website providing information about roles, functions and procedures</p>	<p>APAC has a number of mechanisms in place to engage with stakeholders, and has wide and frequent engagement with them as detailed below:</p> <p>Both the Board and the staff of APAC meet regularly with the PsyBA and this engagement includes an annual schedule of Board to Board meetings.</p> <p>APAC regularly attends meetings of the Heads of Departments and Schools of Psychology Association (HODSPA), and the APAC CEO and HODSPA Chair also hold meetings to discuss issues of mutual importance. Most recently, APAC’s Chair and CEO presented at the May HODSPA meeting.</p> <p>The CEO of APAC regularly presents at conferences and APAC will have a strong presence, including an information booth, at the coming Annual APS Conference to be held in September this year.</p> <p>APAC communicates with education providers via letters and email regularly, providing information about accreditation matters and seeking feedback from stakeholders. An example of a recent communication is included at Attachment 5.20. APAC has taken a decision to introduce a quarterly newsletter for education providers in 2013, which will become a key element of an APAC communication strategy that is currently under development. Despite this communications strategy not yet being in place, APAC does have strong communications systems. APAC provides clear and detailed information for stakeholders about its roles, functions and processes of accreditation. This information is available in its Rules and Standards, in the Accreditation Assessment Handbook, and in FAQs, all of which are available on the APAC website at http://www.psychologycouncil.org.au. There are email and telephone numbers on the APAC website and standing invitations for stakeholders to contact APAC both on the website and in APAC’s publicly available documents. APAC’s Annual Report for 2011 is in preparation and will be available to stakeholders later this year.</p> <p>The review of accreditation Standards announced by APAC in the media (see example communication in Attachment 5.19) and now under way includes a scheduled program of wide engagement with stakeholders. As a part of this process, APAC will soon conclude a very well attended series of Fora held in capital cities around Australia, is conducting targeted meetings with some stakeholders such as government, and will open its draft revised Standards to a full public consultation late in September 2012.</p>

Attribute	Initial Report and Status
	<p>The effectiveness of APAC’s engagement with its stakeholders is clearly evident when APAC’s stakeholder contact data are examined: APAC answered close to 3000 phone calls and some 1700 emails from providers, students, AHPRA, government bodies and other stakeholders in 2011.</p>
<p>Collaborates with other national and international accreditation authorities</p>	<p>APAC collaborates extensively and regularly with the other 11 accreditation authorities currently in the National Scheme. This happens formally by virtue of APAC’s membership of the Forum of Australian Health Professions Councils (see next item below) as well as informally (with regular informal sharing/assistance/advice). The CEO of APAC is currently the Deputy Chair of the Forum. Staff of APAC have participated in a number of workshops over the past year, including a Professions Australia workshop on <i>Higher Education and the Professions</i> in 2011 and an international meeting of accreditation bodies organised by the International Network of Quality Assurance Agencies in Higher Education.</p> <p>Staff of other accreditation councils in the NRAS have participated in APAC’s assessor certification training program over the last two years and APAC has provided training to accreditation assessors in New Zealand.</p> <p>As explained earlier in this Submission, APAC has only recently been assigned the function of assessing accrediting authorities in other countries, and although APAC has had some contact with international accreditation authorities, this has so far been limited. APAC’s work plan for 2013 includes significant commitment of resources to this work over the coming year. Related to this function, APAC participated in the 4th International Congress on Licensure, Certification and Credentialing of Psychologists in 2010 and will participate in the 5th Congress to be held in Stockholm in July 2013.</p>

Attribute	Initial Report and Status
Works within overarching national and international structures of quality assurance/accreditation	<p>APAC is a member of the Forum of Australian Health Professions Councils, a peak body the members of which are the 12 accreditation councils currently appointed as external accreditation entities under National Law. The 12 members have adopted the <i>Professions Australia Standards for Professional Accreditation Processes (June 2008)</i>, which strongly influenced the development of the Quality Framework. APAC is a strong participant in the Forum’s activities, such as the recent conference held by the Forum for accreditation staff in May this year, which APAC was involved in designing, and which APAC staff attended.</p> <p>APAC is also a member of the International Network of Quality Assurance Agencies in Higher Education (INQAAHE), which is a world-wide association of more than 200 organisations, the majority of which are quality assurance agencies active in the higher education sector. APAC staff attended the 2011 INQAAHE General Assembly and an INQAAHE international conference for member bodies in April this year.</p> <p>Since 2010 APAC has been working toward compliance with ISO/IEC 17011, using the Standard as a roadmap for the future development of its systems and processes.</p>

4.0 PROJECTED ACTIVITY TO DELIVER ACCREDITATION FUNCTIONS OVER THE NEXT FIVE YEARS

The following tables provide a projection of expected activity to deliver the accreditation functions over the next five years (2012-2016), to the extent possible at this time, given a host of unknown factors which could come into play. APAC would be pleased to elaborate on any of the items listed at the request of the PsyBA.

	Planned Program of Activity
Remainder - 2012	<ul style="list-style-type: none"> ■ Complete 2012 program of assessments: <ul style="list-style-type: none"> Scheduled full cycle provider and program assessments under way: <ul style="list-style-type: none"> Australia National University Bond University Charles Darwin University Charles Sturt University Curtin University Murdoch University RMIT University University of Adelaide University of New England University of Western Australia Wollongong University Out-of-cycle assessments (new programs, changes, audits, etc) under way or scheduled for remainder of 2012: <ul style="list-style-type: none"> 1 new campus and associated programs assessment 1 full provider and programs audit 2 new program assessments 4 progress assessments 5 assessments of modified programs ■ Progress changes to increase independent governance and operations <ul style="list-style-type: none"> Progress report with timelines for governance changes ■ Progress Standards Review Project (Phases 1 and 2) ■ Finalise IP agreement

	Planned Program of Activity
2013	<ul style="list-style-type: none"> ■ Currently scheduled full cycle provider and program assessments: <ul style="list-style-type: none"> La Trobe University Macquarie University Monash University Swinburne University University of New South Wales University of Sydney University of the Sunshine Coast ■ Predicted out-of-cycle assessments (new programs, changes, audits, etc): <ul style="list-style-type: none"> 1 new campus and associated programs assessment 2 full provider and program audits 4 new program assessments (2 x GDPP) 5 progress assessments 6 assessments of modified programs ■ Finalise changes to increase independent governance and operations ■ Complete admin policies update ■ Database Project Phase 1 (Establishment) ■ Completion of Standards Review Project, including implementation arrangements (Phase 3) ■ Data Systems Project Phase 1 (Scoping) ■ Assessment of Overseas Authorities Program Phase 1 (Scoping) ■ Development and implementation of Assessor Performance Review System ■ Complete and report to PsyBA on Phase 1 (establishment) of Assessment of Overseas Authorities Program, including recommendations ■ Introduction of quarterly newsletter for education providers ■ Phase 2 of Placement Standards Project
2014	<ul style="list-style-type: none"> ■ Currently scheduled full cycle provider and program assessments: <ul style="list-style-type: none"> Australian Catholic University Griffith University Queensland University of Technology Southern Cross University University of Ballarat University of Canberra University of Melbourne University of Southern Queensland Victoria University

	Planned Program of Activity
	<ul style="list-style-type: none"> ■ Predicted out-of-cycle assessments (new programs, changes, audits, etc): <ul style="list-style-type: none"> 1 new campus and associated programs assessment 1 full provider and program audit 6 new program assessments 6 progress assessments 6 assessments of modified programs ■ Consolidation of administrative systems ■ Phase 2 of Assessment of Overseas Authorities Program (Establishment) ■ Data Systems Project Phase 2 (Establishment) ■ Introduction of Advanced Assessor Certification Training Program (cycle 7) ■ Introduction of document management policy ■ Introduction of complaints process for assessors ■ Phase 3 of Placement Standards Project
2015	<ul style="list-style-type: none"> ■ Currently scheduled full cycle provider and program assessments: <ul style="list-style-type: none"> Australian College of Applied Psychology Australian Institute of Professional Counsellors Central Queensland University Deakin University Edith Cowan University James Cook University University of Newcastle ■ Predicted out-of-cycle assessments (new programs, changes, audits, etc): <ul style="list-style-type: none"> 1 new campus and associated programs assessment 1 full provider and program audit 6 new program assessments 4 progress assessments 4 assessments of modified programs ■ Phase 3 of Assessment of Overseas Authorities Program (Reviewing and planning) ■ Data Systems Project Phase 3 (Consolidation and Extension) ■ Review of complaints processes ■ Review of 2012 Standards implementation (outcomes and compliance data) ■ Phase 3 of Placement Standards Project ■ Review of Monitoring Systems ■ Phase 4 of Placement Standards Project

	Planned Program of Activity
2016	<ul style="list-style-type: none"> ■ Currently scheduled full cycle provider and program assessments: <ul style="list-style-type: none"> Cairnmillar Institute Flinders University University of Queensland University of South Australia University of Tasmania University of Western Sydney ■ Predicted out-of-cycle assessments (new programs, changes, audits, etc): <ul style="list-style-type: none"> 1 new campus and associated programs assessment 1 full provider and program audit 6 new program assessments 4 progress assessments 4 assessments of modified programs ■ Placement Supervision Project (Phase 1) ■ Data Systems Project Phase 4 (International)
2017	<ul style="list-style-type: none"> ■ Currently scheduled full cycle provider and program assessments: <ul style="list-style-type: none"> Australia National University Bond University Charles Darwin University Charles Sturt University Curtin University Murdoch University RMIT University University of Adelaide University of New England University of Western Australia Wollongong University ■ Predicted out-of-cycle assessments (new programs, changes, audits, etc): <ul style="list-style-type: none"> 1 new campus and associated programs assessment 1 full provider and program audit 6 new program assessments 4 progress assessments 4 assessments of modified programs ■ Placement Supervision Project (Phase 2) ■ Data Systems Project Phase 5 (Review)

5.0 ATTACHMENTS

Attachments referred to in this Submission are provided separately in two companion documents to keep file sizes within practical limits:

1. Attachments 5.1-5.19 are in the document “Attachments 1-19 for APAC Submission to the Review of Assignment of Accreditation Functions under the Nat Law”.
2. Attachment 5.20 is in the document “CONFIDENTIAL Attachment 20 for APAC Submission to the Review of Accreditation Arrangements 2012”. This document contains confidential material (information which may identify an individual, which concerns ongoing litigation or appeals processes, is commercial-in-confidence or is otherwise by its nature confidential) and has been submitted to the PsyBA in a separate file that will not be made publicly available but will nonetheless form part of this Submission.