

# Response to Psychology Board of Australia Consultation paper 15: Review of accreditation arrangements for the psychology profession

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## **Response to Psychology Board of Australia Consultation paper 15: Review of accreditation arrangements for the psychology profession**

The Australian Psychological Society (APS) appreciates the opportunity to make a submission to the Psychology Board of Australia (PsyBA) consultation paper. The APS has extensive knowledge and skills regarding accreditation of education and training programs for psychologists and a long and successful history as the accrediting body for university psychology programs across Australia, commencing in 1974.

This submission provides comment solely on Item 6 – Preliminary conclusion of the National Board about whether current arrangements are satisfactory – and therefore the pro forma submission template has not been used.

### **Item 6: Preliminary conclusion of the National Board about whether current arrangements are satisfactory**

The Australian Psychology Accreditation Council (APAC) was initially assigned the accreditation functions in preparation for the commencement of the National Registration and Accreditation Scheme (NRAS) for the triennium commencing in July 2010 and arrangements are now under review to appoint the accrediting authority for the subsequent triennium. The PsyBA has presented a preliminary view to appoint APAC for one year only, with an extension subject to APAC's sole member, the APS, making changes to APAC's constitution to address governance and independence issues and to sufficiently support independent decision making.

#### **A. REAPPOINTMENT OF APAC AS THE ACCREDITING AUTHORITY**

The APS believes that APAC should be reappointed as the accrediting authority for the psychology profession for the next triennium on the basis of the two central arguments.

##### *1. APAC has competently met the NRAS requirements under its existing structure*

APAC was initially assigned the accreditation function for the psychology profession for the first three years of the NRAS, demonstrating that it fulfilled the stipulated requirements for accrediting bodies as laid out by the National Law and the Intergovernmental Agreement governing the NRAS. These requirements included that the governance arrangements should provide for community input and promote input from education providers and professionals, with independence of decision making.

APAC was originally established through an agreement between the Council of Psychologists Registration Boards (CPRB) and the APS in 2005 to create an accrediting authority to oversee one system of accreditation for Australian psychology education and training programs. Since 2005, APAC has competently undertaken accreditation of the undergraduate and postgraduate courses of 38 Australian universities and other higher education bodies, has completed an extensive revision of the Accreditation Guidelines, and has also provided course design advice and training of accreditation assessors.

In 2010 as the structures enabling the implementation of the NRAS were put in place, the CPRB ceased to exist because the State and Territory Boards were closed down, and the alternative single national registration body, the PsyBA, was established. The disbanding of the CPRB therefore left the APS as the sole member of APAC and required a redrafting of APAC's Constitution, the final form of which was agreed to by the CPRB. The composition of the APAC Board was therefore altered to have four Directors nominated by the APS and four others to replace the CPRB – two Directors nominated by PsyBA, one from the Head of Departments and Schools of Psychology Association (HODSPA) and one community representative to provide a consumer perspective. All but the community-appointed Director are required to be either education providers or professionals/practitioners or both.

The altered Constitution of APAC ensured that APAC would meet the stipulated requirements for accrediting bodies, with the decision making function of APAC being fulfilled by its Board of Directors who were required to conduct their duties in the best interests of APAC, the provision of community input on the Board, and input from education providers and professionals being facilitated through the required skills of the appointed APAC Directors. The fact that APAC was assigned the accreditation function for the psychology profession for the first three years of the NRAS demonstrated that governments were confident that APAC had a suitable governance structure to fulfil its accreditation functions, and reflected APAC's successful track record as the independent national accrediting authority for the psychology profession since 2005.

## *2. APAC is able to carry out its accreditation operations independently*

As outlined above, the requirements for accrediting bodies stipulated by the National Law and the Intergovernmental Agreement governing the NRAS included that the governance arrangements of the accrediting body should support independence of decision making. APAC's appointment as the accrediting authority for the first triennium of the NRAS demonstrated governments' confidence in the suitability of APAC's governance structure in this regard.

Since that time, the Quality Framework for the Accreditation Function has been developed, which provides a set of attributes organised into eight domains that characterise good governance and operation of accreditation bodies. APAC's reappointment as the accrediting authority for the psychology profession for the next triennium is being assessed against this Quality Framework. The Quality Framework domains include one on independence to ensure the Accreditation Council carries out its accreditation operations independently, including attributes to ensure that no area has undue influence on decision making processes and that there are clear procedures for identifying and managing conflicts of interest.

The APS could be perceived as having undue influence on the APAC Board because four of the eight Board members are nominated by the APS. However, this number does not give the APS a majority vote even though the APS, as the sole member, ultimately carries the liability if APAC were to become financially insolvent. In addition, all Directors nominated by each of the three stakeholders (the APS, PsyBA and HODSPA) are bound by company law to act in the best interest of APAC as a company, and in this regard their roles and responsibilities as Directors could not be clearer.

All three stakeholders involved in APAC (the APS, PsyBA and HODSPA) have great commonality of purpose and interest in protecting the public through high quality education and training of psychologists, as well as having some differences in focus. Hence, each of these organisations also has the potential for conflict of interest at times – including the PsyBA as a government instrumentality and HODSPA as the representative body for education providers. The nominees of each of these stakeholders who sit on the APAC Board bring their expertise and knowledge from their particular area to enable APAC to have an expert governing body. However, these stakeholder nominees do not bring the interests of the stakeholder to the Board, as their responsibilities as Directors of the APAC company are to act in the best interests of APAC. Where Directors have any potential conflicts of interests, these are managed by the APAC Board’s diligence and processes. It should be noted that all Directors have made very important contributions without any identified problems since APAC has been the psychology accrediting authority under the NRAS.

The central issue in relation to independence of decision making is the independence from government influence of the accrediting body that sets the standards for education and training in the psychology profession. This influence could result in interference to meet a government-of-the-day’s imperatives, such as lowering standards to reduce the cost of education of a profession or to increase the supply of the workforce. Regardless of the merits and aspirations of the current PsyBA, a government-of-the-day could choose to appoint a National Registration Board that would enable the government to meet its own economic or workforce imperatives which could result in a lowering of the standards of accreditation for the training of psychologists. The principle of the independence of the accrediting body from government is therefore of critical importance, and the central involvement of the profession is essential. High standards for psychology practitioner training and hence protection of the public can be ensured through major input to accreditation from psychology educators and the profession.

On the basis of these two arguments, the APS strongly supports the reappointment of APAC as the accrediting authority for the psychology profession for the full triennium. The PsyBA has proposed that APAC is reappointed for a period of one year only, with an extension dependent on changes being made to the APAC Constitution particularly to alter the composition of the Board. The APS has indicated that – where necessary and in the context of its legal and fiduciary requirements as the sole member of APAC – it is prepared to make alterations to the APAC Constitution to ensure that APAC is reappointed as the accrediting authority for the psychology profession.

## **B. CONCERNS REGARDING THE VALIDITY OF THE CONSULTATION QUESTION**

On a final note, the APS wishes to lodge its concern about the use of the Likert scale in Item 6 to gauge agreement or disagreement with the Board’s preliminary view of current arrangements of exercising accreditation functions through APAC. The preliminary view of the Board is multifaceted: it states that accreditation should be limited to one year; it specifies that an extension of accreditation functions is dependent on changes to APAC’s Constitution; and it identifies two issues – governance and independence – that need to be addressed. A “Strongly agree” or “Agree” response

therefore does not necessarily indicate agreement with each part of the Board's view, in the same way as a "Strongly disagree" response does not provide information on which part(s) of the preliminary view a respondent disagrees and in which way it disagrees – e.g., it could disagree with APAC being reappointed at all, or disagree that a one year appointment is appropriate and suggest the full three years etc. This scale is therefore not valid as responses are not able to be interpreted. The APS believes, therefore, that measuring the extent to which respondents to the Consultation paper are in agreement or disagreement with the preliminary view of the PsyBA will not provide valid information for the consultation process.