

**RESPONSE TO: PRODUCTIVITY COMMISSION
POSITION PAPER ON
AUSTRALIA’S HEALTH WORKFORCE**

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The Productivity Commission Position Paper proposes mechanisms for structural and organisational reform with the stated objective of improved national efficiency in health service delivery.

Proposal 6.1

Proposal 6.1 recommends that the existing accreditation processes be dismantled and a new centralized body be established that is not discipline specific, on the grounds that “professional self interested groups” constitute an impediment to job substitution and redesign. In doing so, it makes no acknowledgement or critique of what has been achieved by Australian Psychology Accreditation Council, the professional body responsible for accreditation of training standards for the profession of psychology.

Australian Psychology Accreditation Council

The Australian Psychology Accreditation Council (APAC) was established in November 2003 by a Memorandum of Understanding between the Council of Psychologists Registration Boards of Australasia (CPRB), and the Australian Psychological Society (APS). Heads of Departments and Schools of Psychology at Australian universities have an Association (HODSPA), which was granted status as formal observer and consultant to APAC. Leaders in the profession recognised the necessity to avoid the proliferation of individual state accreditation processes, and to emulate the standards of accreditation that are exemplified by the Australian Medical Council, primarily having a single body with representation of the various stakeholders.

The primary function of APAC is to accredit programs of education and training in psychology in Australia on behalf of the State and Territory Registration Boards for the purpose of registration as a psychologist and of the APS as prerequisite training for membership. The Council (APAC) comprises three nominees each of CPRB and APS and two observers from HODSPA. APAC is currently being incorporated.

The process of accreditation is explicitly described in the Standards for Accreditation of Australian University Psychology Programs. These Standards were adopted by APAC after extensive consultation*. The Standards are based upon the previously used APS Accreditation Guidelines which have guided the training of professional psychologists for over 20 years. The Standards themselves are reviewed every 5

* APAC Accreditation Standards may be requested from apac@psychology.org.au

years, with very wide consultation of stakeholders, including other professional bodies.

A schedule of accreditation site visits to seven universities has been agreed for 2006. Before a site visit, the school or department of psychology provides detailed information on undergraduate and postgraduate courses, practicals, professional placements, research activities and resources. At the visit itself, consumers (students) are consulted for their views on their training programs.

Continued membership of the APS and renewal of state registration requires evidence of continued professional development. This process is part of the agenda of APAC meetings because it is widely recognised that maintenance of standards in the practice of psychology requires a lifelong commitment to learning and professional development.

Problems with Proposal 6.1

- Single set of standards

The national accreditation agency proposed by the Productivity Commission has no defined relationship to any of the health professions, yet it will set the standards for registration and thus entry for all of them.

While APAC endorses the need for consistent national accreditation criteria, accreditation standards that are applied must be specific to the health profession in question, and will vary according to the level within the profession that is being accredited.

The imposition of a single set of requirements for accreditation to all the various health professions would necessitate that such a set is very broad and general. Broad, general standards or requirements are easily avoided and re – interpreted. .

The training systems of the various health professions are very different. The duration of training differs between the different professions. Each profession has a different set of skills that has to be mastered. Occupational opportunities also differ between the different health professions. A national accreditation regime would require as many subsystems as there are professions to cope with the accreditation of the different health professions.

- Why should each profession regulate itself?

The proposal to dismantle the existing accreditation processes and establish a new central bureaucracy ignores the fundamental reason for discipline specific accreditation: Accreditation is a process of evaluating established education and training courses against defined standards. This is done in relation to the registration requirements of the respective professional Boards. The health professions each regard the responsibility for professional standards of practice (including

education and training for future independent practice) as an obligation to the community. Self regulation permits the setting and maintenance of professional standards.

- Would a single accreditation body improve interaction between disciplines?
No evidence to address this question is outlined in the Productivity Commission Report.
- Would a single accreditation body lead to the creation of new, generic health workers to address shortages in numbers of health professional?
It is difficult to perceive a link between the creation of central bureaucracy mandated with the responsibility for accreditation of at least 15 different health professions and either an increase in the number of health workers or the emergence of new categories of health professionals.

Conclusions

The discipline and the profession of psychology in Australia have taken steps to ensure that equivalent standards are nationally applied by creating APAC, as outlined above. The Standards of Accreditation are subject to revision and updating. APAC unites the interests of the profession, the licensing bodies (Registration Boards) and the educators/trainers of psychologists (Universities). Considerable effort and time has been invested in achieving the existence of such a body. The motivation behind the time and effort has been a commitment to uphold and improve the standards of professional practice in order to protect the public that is being served. The proposed replacement of APAC with an all – purpose accreditation body, unqualified to adopt or apply the developed set of accreditation standards, would not serve the well - being of Australian citizens.