



Review of the Australian Qualifications Framework

Discussion Paper

DECEMBER 2018

The Australian Qualifications Framework (AQF) Review Panel wishes to draw on the considerable expertise and experience that has developed across a broad range of organisations and individuals in relation to the Review's [Terms of Reference](#).

In its discussion paper, the Panel has opted to provide to organisations and individuals some of the Panel's initial thinking about the case for change to the AQF, but invites differing analysis, conclusions and proposals.

To make a submission to the Review, please email this form to AQFReview@education.gov.au by 15 March 2019.

Please note that the Australian Government Department of Education and Training will not treat a submission as confidential unless requested that the whole submission, or part of the submission, be treated as such.

Please limit your response to no more than 3000 words.

Respondent name

Professor Caroline Hunt

Respondent organisation (where relevant)

Australian Psychology Accreditation Council (APAC)

(APAC is an independent quality and standards organisation, appointed as an external accreditation entity for the Psychology Profession in Australia under the Health Practitioner Regulation National Law Act 2009. APAC develops and reviews accreditation standards for psychology programs of study in Australia. We then work with education providers and use the accreditation standards to determine whether programs of study for students seeking to practice as a registered psychologist in Australia meet the required education standards. APAC accredits more than 600 programs of study across 41 higher education providers).

1. In what ways is the AQF fit, or not fit, for purpose?

In terms of its impact on psychology programs delivered by the higher education sector the AQF has created some challenges. APAC has seen a significant reduction in the

number of Higher Education Providers offering Doctoral Degrees (Professional) for psychology training, from 54 in 2013 to nine in 2019. The reduction of the number of Doctoral Degrees (Professional) has significant implications for the profession of psychology, including the following:

- Doctoral Degrees (Professional) are consistent with international benchmarks, specifically in the UK and North America. For example, a 3-year Doctor of Clinical Psychology degree has been the established standard for psychology practice in the UK and Ireland. Similarly, in the US and Canada, a Doctor of Psychology Degree is the minimum standard for licensure as a psychologist. With few opportunities to complete doctoral-level professional training in Australia, there is limited prospect for international recognition and restricted workforce mobility for Australian graduates in comparable (English-speaking) countries.
- Doctoral Degrees (Professional) provide the opportunity for graduates to achieve advanced practice competencies which cannot be covered in Masters Degrees (Coursework). Therefore there has been a reduced opportunity for advanced or specialist training in professional psychology practice and research.
- The solution taken by a number of health professions to offer a Masters Degree (Extended), (with the volume of learning equivalent to a Doctoral Degree, typically 3-4 years), together with permission for use of the title 'doctor of...' as exceptions to the standard AQF qualification titles, has been deemed unacceptable by key psychology stakeholders, especially the Heads of Departments and Schools of Psychology Association representing Higher Education Providers. Notably, this solution does not address international equivalence of training or the need for the training of advanced practice competencies.

2. Where the AQF is not fit for purpose, what reforms should be made to it and what are the most urgent priorities? Please be specific, having regard to the possible approaches suggested in the discussion paper and other approaches.

A Doctoral Degree (Professional) requires the research component of learning to be "typically for at least two years" which is near impossible to meet within 3- to 4-years in addition to the professional accreditation requirements of advanced coursework and professional placements of 1500 hours under the current APAC standards. Furthermore, there is no need for an individual intending to train for professional practice to undertake research training equivalent to a Doctor of Philosophy.

Although we agree that Level 10 Doctoral degrees (Research and professional) should include research training as a defining characteristic, it is the quantum of research that causes the problem. We argue that a professionally-orientated Doctoral Degree,

focussing on the training needs of professional practice, can include a significant contribution to original knowledge in the discipline and/or research integrated practice in a shortened time period, such as one year of a 3-year program (equivalent to a Masters Degree (Research)).

3. In relation to approaches suggested by the Panel or proposed in submissions or through consultations, what are the major implementation issues the Review should consider? Please consider regulatory and other impacts.

Other than our previous comments we have nothing further to add at this time.

Other