



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

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Respondent organisation (where relevant)

Heads of Departments and Schools of Psychology Association (HODSPA)

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

The present review of the Australian Qualifications Framework (AQF) appears to be focused upon the issues of micro- and macro-credentialing. We see value in this. However, we would like to draw attention to the current levels and the narrow way in which, particularly Level 10, has been viewed. This has had a significant impact on postgraduate programs in Psychology.

Background

Psychologists in Australia are classed as either 'generalist' or 'specialist'. Up until now generalists have completed four years of training at an institution, typically a university, comprising of a 3-year undergraduate degree and in most cases a year-long undergraduate Honours program. They then enter a 2-year internship, approved by the

Psychology Board of Australia (PsyBA). Upon completion of the internship, they are required to take the National Psychology Exam. If they pass, they are registered as 'generalist' psychologists.

Specialist psychologists complete the same four years of undergraduate training, followed by a 2-year Masters program. Following the successful completion of their Masters degree, they can register as a 'generalist' psychologist. However, most will go on to complete a 3000-hour Registrarship, approved by PsyBA. When they have completed their Registrarship, they are said to hold an Area of Practice Endorsement (AoPE). There are currently nine such specialties as listed below:

- Clinical
- Clinical Neuropsychology
- Community
- Counselling
- Education and Development
- Forensic
- Health
- Organizational
- Sports and Exercise

The Heads of Departments and Schools of Psychology Association (HODSPA), the Australian Psychological Society (APS), and the PsyBA have been working together to improve the training of registered psychologists in Australia. Thus, the 4+2 route to 'generalist' registration set out above is being replaced by a 5+1 route, which includes the usual 4-year undergraduate training, a 1-year Masters, and then a 1-year internship. These changes are underway. However, at present 'specialist' training does not appear comparable with that in countries such as the United Kingdom or the United States, where a professional doctorate is the minimum qualification for a speciality such as clinical psychology.

Professional Doctorate

Institutions had responded to this by developing a 3-year Professional Doctorate program. These were developed according to a set of guidelines produced by the specialist Colleges of the APS. They comprised of:

Coursework: All of the specialist Masters coursework plus advanced coursework. The criteria for "advanced coursework" was defined by each College. For clinical psychology, this was in-depth training in a specialised area, e.g., by way of client population – child/older age, or specialised interventions for a complex disorder (e.g., eating disorders, Borderline Personality Disorder) or specialised interventions (e.g., advanced cognitive therapy, dialectical behaviour therapy), or advanced skills (e.g., clinical supervision). The advanced coursework had to include a minimum of 48 hours of face-to-face teaching.

Practicum: All the requirements of Masters practicum (e.g., 1000 hours) plus an advanced practicum. Advanced practicum comprised 500 hours of practicum under supervision in an

area that met criteria for “advanced” (usually with more severe and complex client presentations or requiring specialised interventions.)

Research: Usually equivalent to 33% or one year Full Time Equivalent. Had to be a new/novel contribution to the cognate specialisation, but was not quite as substantive as the PhD. Examination was similar to PhD. Publications: usually 1 or 2 publications as compared to 3-4 for the PhD.

At the time of the previous review of the AQF, an increasing number of institutions were offering Professional Doctorates. They were also increasingly popular with students, not least because the PsyBA reduced the length of the 3000-hour registrarship for students graduating from such programs. Thus, the training of ‘specialist’ psychologists was equivalent to that of international comparators.

The release of the revised AQF in 2010 resulted in the almost immediate demise of the 3-year Professional Doctorate because it now had to incorporate at least 2-years of research training (cf. page 63, Australian Qualifications Framework, 2nd. Edition, 2013.) Those putting together the AQF took a narrow position on what is required of a program at Level 10 and forced the Professional Doctorate to look like the research doctorate, despite the fact that they had quite different purposes. A small number of institutions, four at last count, still offer a Professional Doctorate in psychology, including 2-years of research training. However, most have reverted to Masters training only, with a small number of students undertaking Masters/PhD training, where they are required to complete the requirements of the full doctoral research program.

(We are surprised that no one has ever queried what is clearly an anachronism, equating years of study with quality. Most of us know of people who have completed a PhD in 15 months. Does this mean they are of lesser quality? Likewise, the review of the National Registration and Accreditation System (the Wood Review) is explicit in its opposition to requirements based upon time.)

Thus, at one stroke the AQF stymied the efforts of the psychological community to improve training standards and to provide graduates with a title suitable to their endeavours. Indeed, we think that part of the problem resides in the use of the word ‘doctor’. It is clearly silly to equate the term ‘doctor’ with completing a research degree at level 10 of the AQF. Many people are called ‘doctor’ who only hold an undergraduate qualification, e.g., chiropractors, dentists, and veterinarians. In contrast, ‘specialist’ psychologists who have completed eight years of training, four at postgraduate level, are not allowed to call themselves ‘doctor’. In what follows, we suggest a number of ways that this could be overcome.

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.

Recommendations

1. The obvious way of dealing with the above problem is to reinstate the conditions under which the 3-year Professional Doctorate prevailed. We would argue that the combination of the 1-year of research training, which is clearly at doctoral level and the advanced practicum, are more than adequate in terms of the requirements for Level 10. Indeed, Swinburne University requires students completing the advanced practicum to produce a 25,000 word thesis, examining four of the cases they have worked with during the Practicum.
2. The advanced practicum is clearly at Level 10. Given that this the case and the PsyBA reduces the length of the Registrarship by 1500 hours from 3000 to 1500 hours for those who complete the advanced practicum, we have a radical proposal to make for those who have completed the 'specialist' Masters and Registrarship. Note that these people have completed a 2-year postgraduate degree and a 2-year Registrarship on top of that. Thus, they have completed four years of postgraduate training, which would be more than enough to earn a Professional Doctorate. We believe that those who complete the Registrarship and obtain the relevant AoPE should be awarded a Professional Doctorate by the institution where they completed their Masters degree. The actual Registrarship would be signed off by both the institution and the PsyBA and a 25,000 word thesis would be required as per Swinburne University. Note that this approach provides an excellent example of *macro-credentialling*, putting together two activities that are clearly commensurate, but involving different bodies.

The Australian Qualifications Framework seems stuck in the last century. It is unfortunate that it has prevented innovation in the discipline of Psychology. This review provides an opportunity to correct that problem.

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