

PSYCHOLOGISTS REGISTRATION BOARD OF VICTORIA



This submission is made by the Psychologists Registration Board of Victoria ('PRBV') in relation to the Consultation paper on proposed arrangements for accreditation under the National Registration and Accreditation Scheme for the Health Professions.

If you have any queries on these responses please contact the Chief Executive Officer: Ms Melanie Saba, 03 9629 8722 or melanie.saba@psychreg.vic.gov.au

The PRBV concurs in general with the submission of the Council of Psychologists Registration Boards of Australasia Inc ('CPRB') but in addition offers these comments.

PRBV comments on key issues

PRBV comments on 1.6 Principles Point (a):

PRBV believes that the standards of practice used for registering a practitioner should also align with the standards of practice for accrediting a course of study that qualifies a person to be registered.

PRBV comments on 1.6 Principles Point (b):

PRBV believes that the profession must have a role in the assessment of courses and the setting of standards.

PRBV comments on 1.6 Principles Point (c) (d) (e) (f) (g):

PRBV believes that the provisions should be broadened to include maintaining the standards of the profession and developing the profession.

PRBV comments on 3.1 Key features of proposed system Point (a):

PRBV believes that this point should also include practice standards as the basis for the accreditation standards.

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PRBV comments on 3.1 Key features of proposed system Point (c):

PRBV seeks clarifications on this point. Does this paper mean that an Australian board would be assessing an overseas accrediting authority to ensure that it meets Australian standards? PRBV is concerned in regards to the funding and administration of such a key feature of accreditation.

PRBV comments on 3.1 Key features of proposed system:

PRBV agrees that it is appropriate that the purpose of accreditation should align with the purpose of registration.

PRBV comments on 3.2 Roles in relation to accreditation Ministerial Council Point (b):

PRBV believes that this point should be worded as follows “appoint any person or body with existing functions with respect to accreditation in a health profession to undertake accreditation functions under the scheme ***in consultation with the relevant board.***”

PRBV comments on 3.2 Roles in relation to accreditation Ministerial Council Point (c):

PRBV believes that this point should also include practice standards as the basis for the accreditation standards.

PRBV comments on 3.4 Scope of accreditation Point 2, indent 4:

PRBV believes that this point should be worded as follows “post registration training **and supervision** programs”.

PRBV comments on 3.4 Recognition of specialties and accreditation of specialist training Paragraph 1:

PRBV supports the recognition of specialties. It would be in the public interest to know the specialty of the psychologist they are consulting.

PRBV comments on Proposal 3.4.1:

This has been discussed in the registration paper.

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PRBV comments on 3.4 Core Accreditation Functions – IGA definitions of accreditation Point (a):

PRBV would like to make a change to the IGA's definition of accreditation at point (a) "development of accreditation standards through a consultative process for ~~consideration~~ **approval** by the board and then the Ministerial Council."

PRBV comments on 3.4 Core Accreditation Functions – IGA definitions of accreditation Point (c):

PRBV would like point (c) to be elaborated on, as it is concerned how this function will be funded and administered.

PRBV comments on 3.4 Core Accreditation Functions – IGA definitions of accreditation Point (d):

PRBV considers it unusual to have an internal review system that looks at process as well as merits, as generally process is considered by the courts only. The principle behind looking at merits only by an internal review body is that the decision is remade. That is, the review body reconsiders all the information that was before the original decision maker and any new information that may have arisen subsequently and makes its decision. This means that the decision of the review body 'cures' any defect in procedure of the original decision. There are cases to support this.

PRBV comments on 3.4 Core Accreditation Functions Last Paragraph:

PRBV requests that a provision be made in the legislation to revoke or suspend accreditation in the event that a training organisation continually fails to meet accreditation standards. The board must have powers to ensure compliance with accreditation standards.

PRBV comments on 3.5 Governance arrangements for external accreditation bodies Paragraph 5:

PRBV suggests that a section be added to the legislation requiring the board to make policy which would be binding on the accreditation body and on the appropriate consultation to be undertaken by the accreditation body. The cost would have to be borne by the entities seeking accreditation.

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PRBV comments on Proposal 3.5.2:

PRBV believes that any terms and conditions of a contract include removal of accreditation and on what grounds. Terms should also include:

- Accreditation bodies to be bound by policy of board in relation to accreditation;
- Application of FOI and Privacy legislation;
- Process for resolving disputes between Scheme and the Accreditation Body; and
- Internal review mechanism – and bound by decision on review.

PRBV comments on Proposal 3.5.4:

PRBV understands that it is proposed that the national scheme legislation provide that the agency must consult with the boards on the development of the standards to govern registration and accreditation processes within the scheme. PRBV is also of the understanding that the Ministerial Council approves the accreditation standards after the standards have been approved by the board. Does this section relate to governance standards? This proposal requires clarification.

PRBV comments on 3.6 Accreditation Committees:

PRBV supports an accreditation committee. However, the legislation should not determine the number of members. This just adds to the burden for the smaller professions if they are legislated to use this model.

PRBV comments on Proposal 3.6.1:

PRBV requests that standards define conflict of interest. If the education and training experts are also employed by a university or training provider, they cannot make decisions or contribute to discussions regarding any courses from their university that are being reviewed for accreditation.

PRBV comments on Proposal 3.10.2:

PRBV supports proposal, however boards will also require the power to ensure compliance. Boards will need ability to revoke or suspend accreditation, issue penalties etc.

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PRBV comments on Proposal 5.1:

PRBV supports proposal, however continued funding for such a process may become an issue.