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Dear Professor O’Kane and members of the Australian Universities Accord Panel,

### **APS response to the Australian Universities Accord Review**

The Australian Psychological Society (APS) is pleased to contribute to the review of Australia’s higher education system and commends the Accord on the ambition and scope of the work. The Australian Universities Accord provides a significant opportunity to consider future skills and capabilities required by government, communities and industries to thrive in a dynamic and volatile environment.

Higher education is an essential part of the training and qualification requirements of psychologists and it is critical to ensure the future sustainability of Australia’s higher education system to equip the psychological workforce of the future. Many of our members work in the higher education and research sectors and we have compiled and synthesised their input in the consideration of our response. Psychologists and researchers in the discipline of psychology are well-equipped to contribute to the reform of higher education in line with psychological research and evidence. Some psychologists have advanced expertise in designing systems and organisations to promote wellbeing and productivity as well as tailoring learning environments to individuals’ needs.

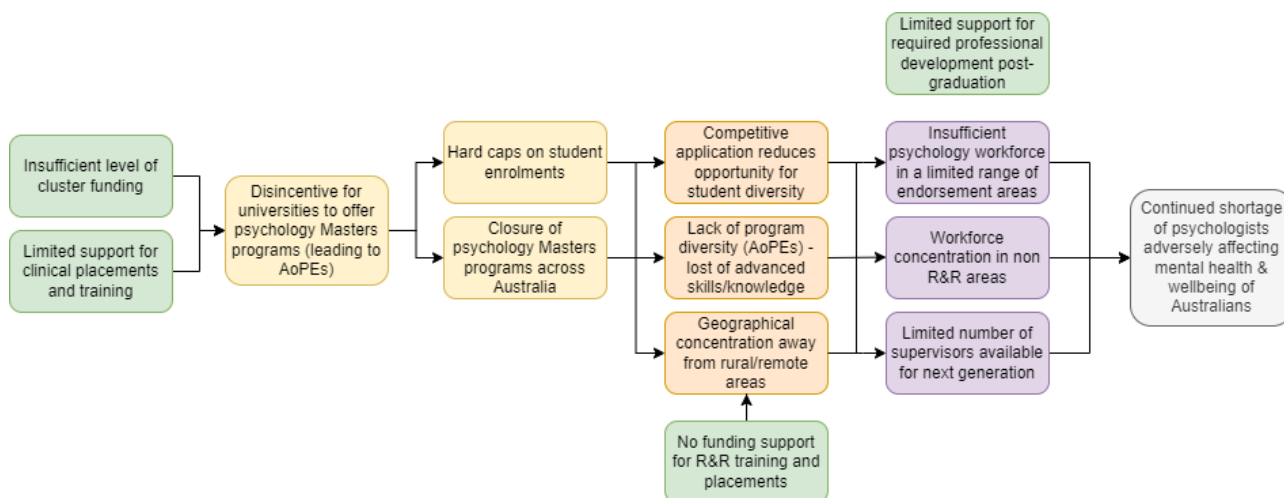
As with all our work at the APS, we consider our response in light of the Sustainable Development Goals (SDGs).<sup>1</sup> Of particular relevance is SDG 4, which seeks to “ensure inclusive and equitable quality education and promote lifelong learning opportunities for all”<sup>2</sup>. The Review has the capacity to impact the direction of higher education in Australia to ensure its sustainable quality and international competitiveness while remaining equitable and accessible.

### **Workforce issues are directly tied to funding arrangements**

The *Discussion Paper* invites ideas for reform to bring about alignment between Australia’s higher education system and national needs. To illustrate this, we provide a case study about the training of psychologists, who require postgraduate qualifications to become registered and to practice. Of all registered psychologists, 42% have an Area of Practice Endorsement (AoPE), representing advanced training (at the Masters or Doctoral level) and expertise in one or more areas of psychological practice.<sup>3</sup> There are nine AoPEs recognised by the Psychology Board of Australia: Clinical Neuropsychology, Clinical Psychology, Community Psychology, Counselling Psychology, Educational and Developmental Psychology, Forensic Psychology, Health Psychology, Organisational Psychology, and Sport and Exercise Psychology. In addition to the work of generalist psychologists, psychologists with an AoPE contribute to the wide and diverse scope of psychological practice to support and enhance the wellbeing and lives of Australians across the lifespan and across many different contexts.

This case study shows the downstream implications of current higher education funding policies for the mental health and wellbeing of Australians. While this is a simplified representation, we highlight

the cumulative and interactive effects of funding decisions on the postgraduate training of psychologists at Australian universities. These decisions directly affect the supply and sustainability of the psychology workforce, and, ultimately, the ability for Australians to access psychological treatment and support in a timely way wherever they are in the country.



*Figure 1:* a schematic of some of the elements which interact with and result from pressures on the higher education system, ultimately leading to poorer mental health and wellbeing outcomes in Australia. For illustrative purposes, green represents policy or funding settings, yellow represents the effects on universities, orange represents the effects on students, and purple represents the effects on health services.

### Cluster Funding

- Currently, psychology Masters courses leading to an AoPE are categorised in Funding Cluster 2. By comparison, courses in other health professions (e.g. medicine, dentistry, pathology), as well as veterinary studies and agriculture, are in Funding Cluster 4 where units attract a Commonwealth contribution amount more than twice that of Funding Cluster 2. Psychology Masters courses receive less funding than courses in nursing, languages, physical sciences and engineering (Cluster 3).
- These issues are exacerbated for students undertaking a Masters of Organisational Psychology, which is in Funding Cluster 1 and attracts lower Commonwealth contributions than other psychology courses leading to an AoPE.
- The present level of funding is not proportionate to the cost of delivering a Masters in psychology program. There has been sustained advocacy over many years, including by the APS,<sup>4</sup> that this lower level of funding relative to other courses risks undermining the sustainability of psychology Masters programs leading to an AoPE in Australia. For example, students in a psychology Masters program must undertake multiple supervised placements. The cost of administering and delivering these placements is borne by each university, with no national coordination, funding or support.<sup>5\*</sup> Psychology Masters programs also often have specialised facilities (e.g. an on-site training clinic) and must maintain high staff-student ratios in order to deliver high-quality and intensive professional training as required to develop future psychologists.

### Consequences on Universities

We have seen two direct consequences of this inflexible cluster funding approach for universities:

- **Enrolment Caps:** As a result of unsustainable funding of psychology Masters courses, universities have placed hard caps on enrolments, typically limiting intakes to a small handful of students each year. This has occurred despite a sustained high level of student interest in these courses,

\* The APS has also advocated for, in the case of psychology, the APS to serve as a coordinator of placements to reduce this burden on universities.

including from students working toward an AoPE, and significant community demand for psychologists.

- **Closure of programs and loss of psychological expertise:** The increasing pressure on universities to continue financially unsustainable programs has led to a reduction in the availability of Masters psychology courses across Australia, both geographically and in terms of range of courses available (particularly across the nine AoPEs). Since 2015, we have seen the discontinuation or teach-out of 92 AoPE courses across Australia. Apart from clinical psychology AoPE programs, programs in the other eight AoPEs are available at fewer than five universities across Australia. Critically, these AoPEs are areas typically focussed on prevention and early intervention efforts which are necessary for a well-rounded psychology workforce in Australia (for example, health psychology, community psychology, and educational and developmental psychology).

### **Professional and Community Impacts**

These outcomes have led to other downstream impacts on the psychology workforce and Australians' ability to access timely psychological treatment and support:

- **Insufficient training pipeline for psychologists:** These university-level constraints limit the number of graduates who become psychologists. Independent analyses have found that the shortages in the psychology workforce are more severe compared with other mental health professions in Australia. It is estimated that Australia only has 35% of the current psychology workforce it requires.<sup>6</sup> The APS has also documented the strain of an insufficient psychology workforce on both psychologists and prospective clients.<sup>7</sup>
- **Perpetuation of geographical maldistribution of psychological services:** Universities offering psychology Masters courses tend to be in large population centres. Compared with doctors and nurses, there are also very limited government initiatives which help postgraduate psychology students and graduates to undertake placements or work in rural and remote areas. This area will be discussed in further detail below.
- **Limitations of availability of qualified supervisors:** There are also cyclical effects of the current funding arrangements. The limited number of new psychologists entering the profession – and the concentration in terms of AoPE and geographical location – also limits the number of psychologists who will become clinical supervisors for the next generation of psychologists in training, as well as their peers.

### **Competency based work integrated learning can help enhance job readiness and employability**

The way in which psychologists are trained provides a successful template for other professional programs in higher education. Many courses require students to complete work experience as part of their coursework. However, the level of rigour and structure around these placements vary significantly. Placements in psychology programs are highly structured and competency driven. This allows students to learn and demonstrate the application of their skills under supervised practice. It also allows them to build local industry experience and demonstrate their value in action. This can be particularly useful for international students undertaking Australian qualifications in key professions.

The introduction of competency-based work integrated learning will enable graduates to find work more readily and demonstrate Australian work experience in their specialist fields of study. Having better future employability options will make Australia a more popular choice for international students and help towards increasing our capability and workforce in key professions. It is recommended that competency-based work integrated learning be considered for tertiary qualifications and programs, providing the structure, support and supervision that students need to succeed.

### **Equity of access and quality learning**

To be ethical, sustainable, and to best serve the needs of Australia and other regions, our higher education system must have adequate measures in place to ensure equity of access to students from disadvantaged groups.

These considerations include, *inter alia*:

- **Increased access and support for First Nations students** - appropriate support when applying, studying and post-study must be a priority for the sector. Although the APS recognises the efforts to simplify some funding streams under the Job-ready Graduates programme, combining the eligibility of First Nations students with those from other backgrounds risks not taking into account the unique impact of colonisation. There must be deep recognition of the intergenerational trauma and ongoing disenfranchisement that has been created for many First Nations peoples. Universities should hold deep recognition of Indigenous knowledges as contributions to broader research and innovation agendas. There are many deeply imbedded inequalities which underlie First Nations students' success in the higher education system which must be addressed to achieve the parity goal for their enrolments.<sup>8</sup> When considering student wellbeing it is important to recognise the role of culture as a protective factor and as part of positive wellbeing of individuals and groups.<sup>9</sup>
- **Supporting rural and remote Australia** – the higher education system has unique responsibilities to serve rural and remote Australia by both providing access to quality education to regional and rural students and producing professionals equipped to service these regions upon graduation. The chronic psychology workforce shortages in Australia is only magnified in rural and remote areas. The geographic isolation, weather events, effects of climate change, and other aspects of living in rural and remote areas have significant impacts on mental health. Telehealth is able to supplement services in the short term but cannot replace local face-to-face psychological treatment and support. We need to ensure that rural and remote Australians have appropriate access to psychologists by providing incentives to attract and retain psychologists in these areas; for example, reducing the HECS-HELP debt for psychologists willing to work in non-metropolitan locations.

The sector can also do more to ensure that rural students can stay and study locally. It is no surprise that research indicates that students who study at universities located in urban areas are less willing to undertake rural placements than their regional-university based counterparts.<sup>10</sup> Placements are an important opportunity for students to be exposed to rural and regional life and build skills and knowledge that are critical for success later in professional life. As mentioned earlier, the APS has previously advocated to work collaboratively with the sector to help coordinate student placements (relieving the administrative burden from universities), with a particular focus in regional and remote Australia.

- **Provision of high quality and supportive online learning environments** – distance, and more recently online education, have been increasingly seen as a solution to the vast geographic distances between home and university for some students in Australia. Despite distance education being available in Australia since 1911,<sup>11</sup> more research and supported translation to optimise students' individual experiences is needed.<sup>12</sup> Psychologists, particularly those with advanced expertise in learning and developing (such as educational and developmental psychologists) have a unique contribution to ensure higher education system learning environments are supportive and fit for purpose. Psychologists are well placed to enhance this research and assist with the ongoing translation of recommendations.

## Collaboration

The APS supports the concept of aligning the higher education system and national needs through greater collaboration of industry, government, and universities, as well as efforts to increase connections across Australian universities. We consider it critical for these initiatives to be built on strong foundations and principles of engagement and collaboration, whilst also tapping into all relevant tiers of government, industry, associations, and the Australian community to ensure these partnerships foster the development and progression of nationally harmonised positions and change.

First and foremost, the Accord must establish key principles and objectives of collaboration, including relevant processes and procedures. Common goals that will drive outcomes must also be identified, in terms of benefits, as well as having a clear and specific definition of the “big challenges” the Accord is aiming to “solve” through collaboration. Considering these challenges through the lens of the key aims, priorities and mandate of the Accord may be a good starting point. For example, consideration of economic or other benefits. From the APS perspective, we would be keen to collaborate with industry,

government and universities to consider models of funding that can improve and better support training and development for psychologists to ensure the long-term sustainability of the profession.

Another example raised by our members is the ongoing world challenges related to climate change. The higher education sector should be leaders, in collaboration with governments, industry, professional organisations, and the community, in a diversity of approaches to solve these problems including policy development, research, implementation of research findings and behavioural change. As a discipline, psychology has the capacity to provide evidence-based contributions to all aspects of these approaches.

In addition, the APS considers that strengthening the alignment between the Vocational Education and Training and higher education sectors can have significant benefit. To increase the potential of better alignment we recommend also considering the importance of graduates having both 'academic' and 'practical skills' required of all professions and vocations. This would ultimately require greater industry and peak body participation in the development of curricula as well as providing practical training such as supervised placements.

## **Lifelong learning**

### **High Quality Continuing Professional Development**

The APS agrees with the position in the *Discussion Paper* that the key challenges to lifelong learning will require overcoming barriers to change funding, credit and regulatory issues. We believe that in order to develop a culture whereby lifelong learning is effectively facilitated, greater collaboration is required across various levels of government, industry, associations and the Australian community (i.e., see previous section on 'Collaboration').

The profession of psychology provides an example of how lifelong learning can be available, accessible and effectively implemented. All registered psychologists are responsible for ensuring they maintain, enhance and extend their knowledge and skills throughout their working lives, as well as being familiar with continuing professional development (CPD) guidelines, CPD standards and CPD requirements. These requirements are set out in the Health Practitioner Regulation National Law.<sup>13</sup> CPD is offered through the Australian Psychological Society via a variety of learning formats including live or on-demand webinars, eLearning, workshops, and other activities or events. Furthermore, the training is assessed against a CPD Quality Standards Framework which was developed by Australian psychologists and adult education experts. This gives psychologists confidence that any CPD completed with the APS is of the highest quality.

### **Opportunities for flexible microcredentials**

The current traditional Masters program approach to the training of psychologists may be able to become more flexible by building on the federal government's National Microcredentials Framework<sup>14</sup> to broaden opportunities for individuals to build on their base qualifications and develop advanced skills after graduation. This would allow psychologists to adapt to meet the growing and diverse demands of the profession. Microcredentials support the notion of lifelong learning and enable individuals to complement their existing skill sets without having to undertake a traditional program of study which can be challenging for individuals who are working full-time. Within the field of psychology, practitioners often move across areas of advanced knowledge and competence as a result of the work they undertake.

Having a parallel microcredentials pathway to acquiring advanced skills will allow psychologists to build their knowledge and expertise in a more accessible way. For instance, a general psychologist who is interested in working with organisations would be able to gradually develop their skills in organisational psychology by complementing their existing experience and expertise. Similarly, organisational psychologists wanting to develop deeper therapeutic intervention skills in areas such as working with trauma, would be able to draw on microcredentials to develop stronger clinical expertise. This framework would ensure a sustainable pipeline for the profession as a whole and allow for a more integrated, multi-skilled approach to delivering services; increasing the public value of psychology. As a profession, psychology can look to examples in other industries that have successfully adopted a microcredentials approach to their CPD requirements to ensure sustainability of the profession.

## Student, staff, and community wellbeing

The APS welcomes the recognition of the importance of university students' safety and a positive university experience (*Discussion Paper* section 3.7.1). We agree that physical and cultural safety are important and topical factors (see Question 40) but would emphasise that these aspects of student experience must be considered in the context of psychological safety and wellbeing. The experience of psychological safety and wellbeing belongs not only to university students, but also staff and the broader university community.

Research both in Australia and internationally has documented high levels of psychological distress and impairments in wellbeing in university students, as well as academic and professional staff.<sup>15-25</sup> Unfortunately, we have also seen the adoption of wellbeing strategies that may not be informed by research, evidence and best practice. Such approaches

do not necessarily address the underlying determinants of wellbeing in university communities and can often be exclusionary, stigmatising and psychologically harmful.<sup>26,27</sup>

At the policy level, there has been an absence of coordinated action towards promoting a common and best-practice approach to wellbeing in higher education. This has led to a lack of consistency across institutions, and limited resources and support for universities, staff and students in understanding and enhancing wellbeing in a meaningful way. The Australian Universities Accord provides an opportunity to progress psychological wellbeing and safety in Australian universities.

Psychologists and psychological scientists can have an immense contribution to leading this work, especially in the design, implementation, and evaluation of evidence-informed approaches to wellbeing which operate at a personal, relational, institutional and societal levels. The APS would welcome the opportunity to discuss collaborating on such opportunities with the Panel.

## Other considerations

As Australia's premier professional psychology association, representing more than 28,000 members, the APS is well placed to assist in the translation of research into practice to help accumulate clinical evidence to further refine prevention, early intervention, and mental health treatment initiatives as well the promotion of wellbeing at both an individual and community or population level.

In addition to the increasing number of occupations requiring a bachelor's degree, there are growing numbers of Australians with postgraduate degrees (for example, Masters or Doctors of Philosophy)<sup>28</sup>. It is essential that these degrees contribute to workplaces and are suitable for a range of industries and professional applications. More can be done by governments and higher education communities to ensure that the skills developed during a higher degree are utilised for the benefit of the Australian community.

Thank you for the opportunity to provide input into the Review of Australia's Higher Education System. The APS looks forward to ongoing collaboration with the sector and government to ensure the Accord's objectives are met. If any further information is required from the APS, I would be happy to be contacted through my office on (03) 8662 3300 or by email at [z.burgess@psychology.org.au](mailto:z.burgess@psychology.org.au)

Yours sincerely,



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Chief Executive Officer

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