APPENDIX 1: Process for reviewing courses in psychotherapy and counselling

Education Program Accreditation Committee

Process for reviewing courses in Psychotherapy and Counselling

INTRODUCTION

The Psychotherapy & Counselling Federation of Australia (PACFA) regularly reviews psychotherapy and counselling programs to ensure that they meet the criteria required by the PACFA Training Standards.

Responsibility for reviewing psychotherapy and counselling programs is delegated to the Education Program Accreditation Committee (EPAC).

This document sets out the process to be followed by members of PACFA Accreditation Panels when reviewing a psychotherapy or counselling training programs of behalf of EPAC.

1. APPLICATIONS FOR ACCREDITATION AND REACCREDITATION

1.1 An application for accreditation or reaccreditation of a course is first received by the PACFA office. Payment should accompany the application.

1.2 The PACFA Office forwards the application to the Chair of EPAC for a first assessment.

1.3 The application will initially be assessed by the Chair of EPAC prior to appointment of a panel.

The Chair will either:

- Appoint a panel to undertake the accreditation site visit and make a recommendation to EPAC on the submission (see section 3.)
  - OR
- After consultation with EPAC, inform the Applicant that further development of the application is required before submitting the documentation to a panel.

If further development of the application is required, the Applicant will be invited to submit amendments to the application within twelve months of the date of original submission. These changes will then be further assessed by the Chair and EPAC.
1.4 If the application is assessed as being ready for a site visit and panel review, the Chair of EPAC negotiates a suitable date with the Applicant and begins to nominate a panel and seek confirmation from the Applicant that the nominated panel is acceptable.

1.5 Applications remain current for a period of twelve months from the date of original submission. After that period the chair will seek endorsement from EPAC to refuse the application. A further fee would be required for any re-submission.

1.6 Institutions are asked to lodge their applications as early as possible, particularly if there is an important target date, such as a new academic year, that they wish to meet. The appointment of panel members, negotiating the final visit schedule and confirming the final recommendation from the panel with EPAC can take up to six months to complete.

2. PACFA ACCREDITATION PANEL

2.1 A panel, made up of three assessors, including a Panel Chair, will be formed to act as the Accreditation Panel to review the application for accreditation or re-accreditation of a counselling or psychotherapy course.

2.2 The EPAC Chair is delegated by the Committee to source and appoint suitable members for the Accreditation Panel, which is responsible for reviewing all applications for accreditation.

2.3 Panel members are recruited:

- Either among Accreditation Panel members who have had previous successful experience as panellists in the past;
  
  OR

- By email request to PACFA Branches and Colleges and PACFA Member Associations to provide nominees for Panel membership. Branches, Colleges and Member Associations approached for nominees will normally have members in the geographical location of the training provider seeking accreditation so that travel costs are kept to a minimum.

Nominations for the PACFA Accreditation Panel should be suitably qualified and experienced practitioners or academics with knowledge and understanding of curriculum design, principles of higher education or adult education, the tertiary education environment, and of the minimum standards for psychotherapy and counselling training. Ideally, nominees will have served on a PACFA Committee or Leadership Group or the Management Committee of a PACFA Member Association and have experience in assessing professional qualifications.

EPAC members can be Panel members.

2.4 The Panel will be formed giving consideration to the types of courses under review, the standing of the institution and availability of assessors. Panel members will be appointed in consultation with training providers.

2.5 When selecting the Panel, the following will be taken into account:

i) Compatibility of the proposed Panel with the training program;

ii) Particular knowledge base relevant to any special needs of the training program;
iii) Travel distance involved to contain costs for the site visit;

iv) Good standing of the proposed panel members; and

v) Avoidance of actual or possible conflicts of Interest.

2.6 The Chair of EPAC will delegate the role of Panel Chair to a suitably qualified and experienced individual member of PACFA, a member of a PACFA Member Association or member of EPAC. The Chair of EPAC can be the Panel Chair.

A Panel Chair thus delegated will have had previous significant experience as a member of EPAC accreditation panels.

3. DECLARATION OF CONFLICTS OF INTEREST

3.1 The Applicant is notified in writing of the selected Panel members and has to opportunity to ask that another panellist be appointed if the applicant believes there is a potential conflict of interest. If this occurs, different Panel members will normally be selected. If a dispute arises in this process the matter is referred to EPAC for a decision.

3.2 Once their appointments are confirmed, Panel members will be sent the Conflict of Interest Form to be completed and returned to the PACFA Office.

4. INDUCTION OF THE PANEL

4.1 Each member of the Panel will be contacted by the Panel Chair prior to the site visit to provide an induction to the role as deemed necessary and to discuss the process and issues that have arisen from the review of documents submitted by the Applicant. When first appointed to a panel, new members will receive further support from the Panel Chair as appropriate.

5. ACCOUNTABILITY OF ACCREDITATION PANEL

5.1 Each Panel is accountable to EPAC and its first duty is to ensure that the review of the accreditation application and any site visit is conducted according to these Guidelines.

5.2 Any concerns which emerge during the course of the review, which relate to either the review process or PACFA documentation or policy, must be communicated to the EPAC Chair. It is neither appropriate nor acceptable for a member of the Panel to comment publicly upon such issues.

6. REVIEW OF APPOINMENT OF PANEL MEMBERS

6.1 A Panel member can be removed from the PACFA Accreditation Panel at the direction of EPAC, at any time, for any of the following reasons:

i) The panel member is no longer an individual member of PACFA or of a PACFA Member Association;

ii) The panel member has committed a proven breach of the relevant Code of Ethics;

iii) The panel member does not comply with the requirements of the review process (e.g. Reports are below expected standard, time-lines are not complied with, breaches of accountability have occurred);
iv) The panel member has breached confidentiality;

v) The panel member voluntarily withdraws; or

vi) The panel member takes leave of absence.

6.2 Allegations that a Panel member has failed to meet any of the above criteria will be investigated by a sub-committee of EPAC, who will present EPAC with a report for EPAC’s decision. The decision-making process will follow the principles of natural justice. The panel member will be entitled to know the nature of the identified problem and to respond to identified concerns.

6.3 Members who are removed from the PACFA Accreditation Panel will be advised by the Chair of EPAC, in writing, of the reasons for their removal.

7. SITE VISITS

7.1 Site visits are a part of each Accreditation and Re-Accreditation process. They are arranged by the Chair of the PACFA Panel in consultation with the nominated person in the institution applying for accreditation.

7.2 All of the documentation provided by the Institution applying for accreditation will be provided to the Panel by the PACFA Office in reasonable time before the on-site visit to allow them time to review all documentation in preparation for the visit.

7.3 Panel members may request that further information be provided, either prior to the visit or at the time of the visit.

7.4 On arrival at the institution, the Panel will meet in private to discuss any outstanding issues any Panel member may have. The Chair may also wish to discuss matters of procedure with members of the Panel.

Example Visit Schedule:

9.30am to 10.00am  Panel members meet in private
10.00am to 11.00am  Meet with appropriate senior staff including senior academics
11.00am to 11.15am  Morning tea break
11.15am to 12.00pm  Meet with teaching staff involved in the courses
12.00pm to 12.45pm  Meet with students/graduates (include if appropriate)
12.45pm to 2.00pm  Lunch
2.00pm to 3.00pm  Visit physical resources including training rooms and library
3.00pm to 3.30pm  Further discussions with staff (if required)
3.30pm to 4.00pm  Panel members meet in private
4.00pm to 4.30pm  Discuss recommendations with senior staff

The Chair of the Panel will negotiate an agreed schedule which will follow the example schedule as closely as practicable. Any variations will be discussed with the institutional representative.

Members of the Panel would normally expect to be able to consult with various key people and groups such as: heads of departments or sections; representative staff members; recent graduates and current students; senior administrative staff; course advisory members and others. The institution is expected to ensure that full coverage of teaching staff and students/graduates are represented at the meetings.
The Panel will also review resources, including libraries and relevant centres. Managers of support units, external to the institution/department/school, may also be requested to meet with the Panel at short notice.

One day will normally be sufficient for an accreditation visit. Courses conducted on multiple sites may require variations from the Standard Visit Schedule.

8. RECOMMENDATION OPTIONS

8.1 The following options are available to Accreditation Panels:

i) A recommendation for full accreditation for up to seven years for courses accredited with TEQSA or offered by a TEQSA registered Self-Accrediting Authority or full accreditation for five years for other courses, subject to no significant structural changes in the course concerned, or a fall in standards of education and/or resources.

ii) A recommendation for conditional accreditation with a requirement for certain issues of concern being addressed within a period to be specified. In such circumstances, the period of accreditation may be limited to less than five years. The institution/department/school may also be required to furnish a report to PACFA at prescribed intervals, outlining progress in meeting the conditions.

iii) A recommendation to refuse accreditation. In such cases an adverse report, plus full documentation, will be referred to EPAC.

9. PROCESSES TO BE FOLLOWED AFTER THE REVIEW

9.1 Accreditation Panel’s decision:

i) At the conclusion of the review, the Panel Chair prepares a report and recommendation for EPAC and following consultation with other Panel members forwards it to the Chair, EPAC.

ii) Upon receipt, the report from the Panel will be sent to the training provider with a request for comment on matters of fact only within two (2) weeks.

iii) A training provider may apply for an extension of time beyond two weeks but not exceeding four weeks to the EPAC Chair, providing reasons for the proposed extension of time. The EPAC Chair will normally grant the extension.

iv) The Panel’s report and the training provider’s response are presented to EPAC which then makes a decision.

v) The EPAC Chair, or nominee, writes to the training provider informing them of the outcome of the deliberations of EPAC. A copy of the letter is sent to each member of the Panel.

10. REPORTS OF REVIEWS

10.1 The following guidelines must be used in the preparation of the report:

1. The report must focus upon the degree to which the training provider meets the Training Standards and other relevant criteria. The Panel’s judgement should be based on the
information made available by the training provider and other interested parties, and on material collected through discussions and observations of the course;

2. A recommendation of provisional accreditation must be accompanied by clearly stated requirements for change and the criteria by which achievements of the changes will be judged.

3. Differences amongst Panel members should be identified and minority reports used as and when appropriate: and

4. The review is a retrospective process. However, it may be appropriate for the Panel to include appropriate prospective comments.

11. CONDITIONS OF ACCREDITATION

11.1 Accreditations are normally for up to five years from the date of accreditation. Application can be made for up to seven years of accreditation to allow PACFA and TEQSA accreditation periods to align.

11.2 Unless otherwise stated, accreditation applies only to the specified courses.

11.3 Courses are accredited as structured, with the content at the date of accreditation and on the basis of the information provided by the institution, which must be current at the date of accreditation. Any conditions to accreditation are outlined in the Panel’s report and letter of accreditation. While PACFA expects, and accepts some variation over time (as the course develops), details of significant structural changes must be notified to PACFA immediately. PACFA will then consider the impact of the changes on the accreditation.

12. SIGNIFICANT STRUCTURAL CHANGE

A significant change can be a change in the duration and structure of a course, a change in objectives, or delivery mode, a substantial change in philosophy, emphasis or institutional placement of a course, or significant changes forced by reduced resources, particularly in staffing levels. The institution should consider it a significant change where other regulations require formal approval of changes. The normal evolution of courses, in response to initiatives and content review, would not be considered as a major change.

13. APPEALS AGAINST THE DECISION

Should an institution disagree with the accreditation decision, an appeal setting out the basis for the disagreement may be sent to the PACFA CEO within one month after PACFA has advised the institution of the recommendations of the Panel as confirmed by EPAC. The appeal will be forwarded to the PACFA Board for action. The appeal will be reviewed and final determination of the accreditation decision will be made.