



# Fitness to Practice/ Inherent Requirements Policy

Master of Psychology (Forensic)

School of Psychology, UNSW

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# PART 1: Introduction

## 1.1 Introduction to the Fitness to Practice Policy

The University of New South Wales School of Psychology acknowledges the need to ensure students enrolled in the professional practice programs such as the MPsychol (Forensic) program maintain the standards of conduct, compliance, performance and capacity ensuring ongoing fitness to practice in the profession throughout their enrolment, at a level appropriate to their stage of enrolment. The School further acknowledges that failure to do so may result in an unacceptable level of risk that the student may not be able to meet the expected standards as registered psychologists both to UNSW internal procedures and policies but also within the AHPRA mandatory reporting obligations (<https://www.ahpra.gov.au/Notifications/mandatorynotifications/Mandatory-notifications.aspx>).

Failure to maintain fitness to practice are profession-specific, but may include situations where a student has:

- engaged in conduct that is inconsistent with the standards and ethical obligations of the relevant profession, relative to the student's level of enrolment or competence; and/or
- demonstrated an inability or unwillingness to comply with rules, regulations or standards for practice in the profession necessary for undertaking placement with a provider/agency; and/or
- failed to demonstrate competent knowledge or performance in one or more professional standards critical to the student's current level of enrolment, where normal educational processes have failed to address these concerns; and/or
- a disability or health condition, the consequences of which may impact the student's capacity to practice at the standard required by the profession.

This policy must be read and understood in conjunction with University policies and procedures, including, but not limited to:

- The MPsychol (Forensic) Placement Policy
- The MPsychol (Forensic) Program Guide

## 1.2 Policy Statement

It is recognized that UNSW School of Psychology has registration, accreditation or broader professional obligations to ensure students are fit to practice within their profession, at a level appropriate given the student's position in their degree.

UNSW School of Psychology has an obligation within the limits as set out by the relevant legislation to provide a fair and appropriate procedure to ensure the following, in relation to student behaviour during enrolment in a program with a placement component:

- programs are able to meet their professional obligations for ensuring students are fit to practice;
- students are supported to attain and maintain the standards of conduct, compliance, knowledge, performance and capacity required to be 'fit to practice' as competent, safe, and ethical practitioners in their profession;
- the reputation and wellbeing of the following entities is safeguarded:
  - the student themselves;
  - members of the public impacted by a student's behaviour while on placement, including to the student's service recipients, which may include children and young people;
  - placement organisations/partners and their staff; and
  - the University and its staff and students.

The Inherent Requirements Policy outlines procedures for managing concerns, both internal and

external to the program.

UNSW School of Psychology is responsible for ensuring the inherent requirements of their programs encompass the professional standards required in order to satisfy the professional, accreditation, and registration requirements of their programs. These may include legislation, codes of conduct, ethical guidelines, and other required standards guiding the profession.

UNSW School of Psychology must ensure that prospective and current students are aware of the inherent requirements that apply to a given program, and therefore aware of the program specific standards ensuring the student's continued fitness to practice as student practitioners during their enrolment. Upon acceptance into a program, students are sent information with information on policies and procedures within the university and within the program.

Students within the UNSW psychology programs are obliged to ensure they continue to meet the inherent requirements that apply to their program throughout their enrolment. Where a student with a disability or chronic health condition, or, on the basis of other grounds (such as culture) is concerned about their ability to do so, they are encouraged to discuss their concerns with their Program Director and/or Equitable Learning facilitator to determine whether reasonable adjustments will be of benefit (noting that there may be inherent requirements that cannot be addressed through the implementation of a reasonable adjustment).

Where the University initiates action under the Inherent Requirements or Fitness to Practice policy, the following principles will apply:

- The safety of the public and those involved in a placement, including the student and all other impacted persons, including children and young people, will be of paramount importance.
- The procedures followed must be consistent with the requirements of procedural fairness, including student right of reply, right of appeal, and privacy.
- Students are supported to regain compliance with the inherent requirements defining fitness to practice through reasonable adjustment and remediation measures, where reasonably possible.
- Confidentiality must be respected and maintained by all parties within the constraints of the need to investigate and to hear a concern, subject to any legal requirements for disclosure and in accordance with other University policies, procedures and guidelines.
- The University may be obliged to disclose relevant personal information about the investigation or outcome of the investigation of a student's failure to maintain inherent requirements to parties within or outside of the University.

## PART 2: Inherent Requirements

### 2.1 Introduction to the Inherent Requirements Policy

The UNSW School of Psychology supports the right of all people to pursue psychology programs. The School is committed to making reasonable adjustments to teaching and learning, assessment, forensic practice and other activities to address the impact of students' disabilities so that they are able to participate in their program.

Inherent Requirements (IR) means the abilities, knowledge and standards of conduct and performance that are essential for a student to be able to achieve the learning outcomes of a program or subject and transition to the profession after graduating. These may include compulsory standards set by professional, registration, or accreditation bodies, such as AHPRA (Australian Health Practitioner Regulation Agency) and PsyBA (Psychology Board of Australia).

To support potential and current students' decision making, a series of inherent requirement statements have been developed. These statements specify the requirements of the MPsychol (Forensic) program for student admission and progression. The statements are clustered under eight domains consisting of ethical behaviour, behavioural stability, legal, communication, cognition, relational skills, reflective skills and sustainable performance. Many of the activities associated with the professional practice of a registered psychologist are time sensitive, where the capacity to perform certain activities within specified time limits is required to reduce or avoid risks to client safety and wellbeing. The safety and wellbeing of students and others is always of paramount importance.

Students are required to undertake course and placement activities in mixed gender environments which reflect the Australian health care context.

Successfully completing the MPsychol (Forensic) program at UNSW enables you to apply for registration as a registered psychologist with the Psychology Board of Australia (PsyBA), which is a partner board of the Australian Health Practitioners Registration Authority (AHPRA). The inherent requirements outlined below provide a guide for students and staff when deciding whether a student is able to meet requirements and the type of reasonable adjustments that could be put in place to allow a student to complete the program without compromising the academic integrity of the program.

### 2.2 How to Read the Inherent Requirements Statements

If a student has been made an offer to enrol in the MPsychol (Forensic) program in the UNSW School of Psychology, a review of the inherent requirement statements is required to reflect on the potential challenges in meeting them.

If a student thinks they may experience challenges related to a disability, chronic health condition or any other reason, they should discuss their concerns with the [UNSW Equitable Learning Support](#) in conjunction with the Program Director. Staff work collaboratively with students to determine reasonable adjustments to assist in meeting the Inherent Requirements. In the case where it is determined that Inherent Requirements cannot be met with reasonable adjustments, the University staff can provide guidance regarding other study options.

These inherent requirements should be read in conjunction with:

UNSW MPsychol (Forensic) Program Guidelines  
[Psychology Board of Australia codes, guidelines and policies](#)  
[Australian Psychology Accreditation Council Standards](#)

Each inherent requirement is made up of the following five levels:

- Level 1 - introduction and description of the inherent requirement
- Level 2 - explanation of why this is an inherent requirement of the program
- Level 3 - the nature of any adjustments that may be made to allow you to meet the requirement

- Level 4 - examples of things you must be able to do to show you've met the requirement

There are eight domains of inherent requirements in the Master of Psychology programs. Some domains have a number of sub-domains.

- Ethical behaviour
- Behavioural stability
- Legal Requirements
- Communication
- Cognition
- Relational skills
- Reflective skills
- Sustainable performance

## 2.3 Inherent Requirements

<h1 style="margin: 0;">Inherent Requirement 1 – Ethical Behaviour</h1>	
<hr style="width: 80%; margin: 0 auto;"/> <p><b>Level 1 – definition/description</b></p> <hr style="width: 80%; margin: 0 auto;"/>	<hr style="width: 80%; margin: 0 auto;"/> <p><i>Psychologists are governed by codes, policies, guidelines and regulations of the organization and jurisdiction in which they work. They are accountable and responsible for ensuring professional and ethical behaviour. Students must demonstrate their knowledge and engagement in ethical behaviour in practice throughout their academic and placement activities.</i></p> <hr style="width: 80%; margin: 0 auto;"/>
<hr style="width: 80%; margin: 0 auto;"/> <p><b>Level 2 – rationale</b></p> <hr style="width: 80%; margin: 0 auto;"/>	<hr style="width: 80%; margin: 0 auto;"/> <p><i>Compliance with professional and ethical standards ensures safe, competent interactions and relationships with students and their clients. Forensic psychologists often must deal with vulnerable and diverse populations; ensuring their</i></p>

	<p><i>physical, psychological, emotional and spiritual well being is of the utmost importance (in keeping with General Principle A (Respect for the rights and dignity of people and peoples) (APS Code of <a href="#">Ethics</a>).</i></p> <hr/>
<hr/> <p><b>Level 3 – potential adjustments</b></p> <hr/>	<hr/> <p><i>Any adjustment must not compromise the safety or security of clients, organizations or colleagues, and further, must not compromise any codes, guidelines, policies or regulation of UNSW, the placement organization or AHPRA.</i></p> <hr/>
<hr/> <p><b>Level 4 – exemplars that demonstrate that students have met the inherent requirement</b></p> <hr/>	<hr/> <p><i>Adherence to conduct required to maintain provisional registration as a psychologist, and maintain good standing as a student within UNSW.</i></p> <hr/>

## ***Inherent Requirement 2 – Behavioural Stability***

<hr/> <p><b>Level 1 – definition/description</b></p> <hr/>	<hr/> <p><i>Behavioural stability is related to an individual’s consistency in their behaviour and cognitive, emotional and socially stable qualities and dispositions. It is required to function and adapt effectively and</i></p>
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	<p><i>sensitively across demanding roles and environments. Students must be able to demonstrate behavioural stability to work constructively in a diverse and changing academic and clinical environment, which may at times be challenging and unpredictable.</i></p> <hr/>
<hr/> <p><b>Level 2 – rationale</b></p> <hr/>	<hr/> <p><i>Behavioural stability is required to work individually and in teams in diverse and changing environments and with a diversity of clients. Students will be exposed to situations which are challenging and unpredictable, and will be required to have the behavioural stability to manage these objectively and professionally. Behavioural stability should not be conflated with rigidity in cognitive or emotional style; it is more closely aligned with the ability to be flexible within a set of professional and ethical parameters.</i></p> <hr/>
<hr/> <p><b>Level 3 – potential adjustments</b></p> <hr/>	<hr/> <p><i>Adjustments must support stable, effective and professional behaviour in both academic and clinical settings. Any adjustment must not compromise the safety or security of clients, organizations or colleagues, and further, must not compromise any codes, guidelines, policies or regulation of UNSW, the placement organization or AHPRA.</i></p> <hr/>
<hr/> <p><b>Level 4 – exemplars that demonstrate that students have</b></p>	<hr/> <p><i>Being receptive and responding appropriately to constructive feedback. Having a strong tolerance for scrutiny and uncertainty. Demonstrating the ability to manage one's own</i></p>



<p><b>met the inherent requirement</b></p> <hr/>	<p><i>emotional state in order to be able to develop and maintain a working relationship with a diverse range of clients. Ability to manage conflicts to maintain work relationships with colleagues, within and between organizations.</i></p> <hr/>
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## ***Inherent Requirement 3 – Legal Requirements***

<p><b>Level 1 – definition/description</b></p> <hr/>	<p><i>Psychological practice is mandated by specific legislation to enable the safe delivery of care. Students must be able to demonstrate knowledge of, and compliance with, relevant laws and professional regulations through their academic and placement activities.</i></p> <hr/>
<p><b>Level 2 – rationale</b></p> <hr/>	<p><i>Knowledge, understanding and compliance with legislative and regulatory requirements are necessary pre-requisites to placements in order to reduce the risk of harm to self and others. Compliance with these regulations and the law ensures that students are both responsible and accountable for their practice. Forensic psychologists, in particular, need to be aware of the potential interaction between their practice and the law.</i></p> <hr/>

<p style="text-align: center;"><b>Level 3 – potential adjustments</b></p>	<p style="text-align: center;"><i>Adjustments must be consistent with legal and regulatory requirements. Any adjustment must not compromise the safety or security of clients, organizations or colleagues, and further, must not compromise any codes, guidelines, policies or regulation of UNSW, the placement organization or AHPRA.</i></p>
<p style="text-align: center;"><b>Level 4 – exemplars that demonstrate that students have met the inherent requirement</b></p>	<p style="text-align: center;"><i>Complying with legal requirements regarding all aspects of practice. Complying with requirements for provisional registration with the Australian Health Professional Registration Authority (AHPRA). Seeking supervision or guidance if ethical or professional issues arise throughout their professional program.</i></p>

## ***Inherent Requirement 4 – Communication Skills (verbal, non-verbal and written)***

<p style="text-align: center;"><b>Level 1 – definition/description</b></p>	<p style="text-align: center;"><b>Verbal:</b> <i>Effective and efficient verbal communication, in English, is an essential requirement to provide safe delivery of psychological care. While psychological competency (i.e., can easily translate complex psychological terminology to another language from English) in</i></p>
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*another language is advantageous, it is recognized that most psychological services are provided in English. Students must be able to demonstrate:*

*» The ability to understand and respond to verbal communication accurately, appropriately and in a timely manner.*

*» The ability to provide clear instructions in the context of the situation.*

*» Timely clear feedback and reporting.*

*» The ability to communicate in group settings.*

***Non-verbal:*** *Effective non-verbal communication is fundamental to psychological practice. In demonstrating non verbal communication, it needs to be respectful, clear, attentive, empathic, honest and non-judgmental, and there also needs to be the ability to observe it in others. Students should be able to demonstrate:*

*» The capacity to recognise, interpret and respond appropriately to behavioural cues.*

*» Consistent and appropriate awareness of own behaviours.*

*» Sensitivity to individual and cultural differences.*

***Written:*** *Effective written communication is a fundamental responsibility with professional and legal ramifications. Students must demonstrate capacity to construct coherent written communication appropriate to the circumstances*

	<p><i>which are completed in a timely manner.</i></p> <hr/>
<hr/> <p><b>Level 2 – rationale</b></p> <hr/>	<hr/> <p><b>Verbal:</b> <i>The practice of psychology depends on effective verbal communication with clients and colleagues:</i></p> <p>» <i>Speed and accuracy of communication may be critical for individual safety or treatment.</i></p> <p><b>Non-verbal:</b> <i>The ability to observe and understand non-verbal cues assists with building a working relationship with clients.</i></p> <p>» <i>Displaying consistent and appropriate facial expressions, eye contact, being mindful of space, pacing, body movements and gestures.</i></p> <p>» <i>Being sensitive to individual and cultural differences demonstrates respect and empathy, and permits the development of working relationships with clients.</i></p> <p>» <i>The ability to observe and understand non-verbal cues is essential for safe and effective observation of clients' symptoms and reactions as part of their assessment and treatment.</i></p> <p><b>Written:</b> <i>Construction of written assignments to reflect the required academic standards are necessary to convey knowledge and understanding of relevant subject matter for professional practice.</i></p> <p>» <i>Accurate, timely, effective written communication for a range of purposes and audiences is vital to</i></p>

	<p><i>provide consistent and safe client care.</i></p> <hr/>
<p><b>Level 3 – potential adjustments</b></p> <hr/>	<p><b>Verbal:</b> <i>Any adjustment must address ability to maintain effective, timely, clear and accurate communication to ensure safety.</i></p> <p><b>Non-Verbal:</b> <i>Any adjustment must maintain the ability to recognise, interpret and respond to non-verbal cues as well as initiation of effective non-verbal communication in a timely and appropriate manner.</i></p> <p><b>Written:</b> <i>Any adjustment must not compromise or impede student's ability to demonstrate the minimum acceptable level of knowledge and cognitive skill required to practice safely.</i></p> <hr/>
<p><b>Level 4 – exemplars that demonstrate that students have met the inherent requirement</b></p> <hr/>	<p><b>Verbal:</b></p> <ul style="list-style-type: none"> <li>» <i>Collecting and collating information from clients by asking relevant questions during assessments.</i></li> <li>» <i>Explaining a treatment plan concisely to a client.</i></li> <li>» <i>Discussing the client's progress with other professionals.</i></li> <li>» <i>Participating in group projects and collaborations with other students.</i></li> </ul> <p><b>Non-Verbal:</b></p> <ul style="list-style-type: none"> <li>» <i>Recognising and responding to non-verbal cues indicating a</i></li> </ul>

	<p><i>change in the emotional state of a client.</i></p> <p>» <i>Recognising and responding to non-verbal cues in classroom situations.</i></p> <p><b>Written:</b></p> <p>» <i>Constructing an essay to required academic standards including appropriate referencing of sources.</i></p> <p>» <i>Preparing a psychological assessment report which is appropriate to the purpose and audience, and completed in a timely manner.</i></p> <hr/>
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## ***Inherent Requirement 5 – Cognition (knowledge and cognitive skill, literacy, numeracy)***

<hr/> <p><b>Level 1 – definition/description</b></p> <hr/>	<hr/> <p><b>Knowledge and Cognitive Skill:</b> <i>Consistent and effective knowledge and cognitive skills must be demonstrated to undertake safe and competent practice. Students demonstrate:</i></p> <p>» <i>The capacity to locate, process, integrate, and implement appropriate and relevant information to practice.</i></p> <p><b>Literacy:</b> <i>Competent literacy skills are essential to permit safe</i></p>
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	<p><i>and effective practice during placements. Students should be able to demonstrate:</i></p> <p>» <i>The ability to accurately acquire information and convey appropriate, effective messages.</i></p> <p>» <i>The ability to read and comprehend a range of literature and information.</i></p> <p>» <i>The capacity to understand and implement academic conventions to construct written text in a scholarly manner.</i></p> <p><b>Numeracy:</b> <i>Competent and accurate numeracy skills are essential to provide safe and effective demonstration of psychology practice skills. Students must demonstrate:</i></p> <p>» <i>the ability to interpret and correctly apply numerical data, measurement and numerical criteria in the execution assessments or other ‘scoring type’ tasks while on placement.</i></p> <hr/>
<hr/> <p><b>Level 2 – rationale</b></p> <hr/>	<hr/> <p><b>Knowledge and Cognitive Skills:</b> <i>Satisfactory performance on placements requires identifying and accurately extracting and understanding information from a range of sources, which must also be applied appropriately.</i></p> <p><b>Literacy:</b> <i>The ability to acquire information and to accurately convey messages is fundamental to ensure safe and effective assessment, treatment and delivery of care.</i></p> <p>» <i>The ability to read, decode, interpret and comprehend</i></p>

	<p><i>multiple sources of information is fundamental for safe and effective conduct during placements.</i></p> <p><b>Numeracy:</b> <i>Psychological practice relies in part on collecting data in a numerical form, for example psychometric assessments or Routine Outcome Monitoring data; students must be able to accurately record and manage numerical data and to interpret their findings.</i></p> <hr/>
<hr/> <p><b>Level 3 – potential adjustments</b></p> <hr/>	<hr/> <p><b>Knowledge and Cognitive Skills:</b> <i>Any adjustment must not compromise or impede the student’s ability to demonstrate the minimum acceptable level of knowledge and cognitive skill required to practice safely.</i></p> <p><b>Literacy:</b> <i>Any adjustment must maintain the ability to effectively acquire, comprehend, apply and communicate accurate information.</i></p> <p><b>Numeracy:</b> <i>Any adjustment must not compromise or impede student’s ability to demonstrate the minimum acceptable level of capacity to manage and interpret numerical data.</i></p> <hr/>
<hr/> <p><b>Level 4 – exemplars that demonstrate that students have met the inherent requirement</b></p> <hr/>	<hr/> <p><b>Knowledge and Cognitive Skills:</b></p> <p>» <i>Ability to apply academic knowledge to practice during placements, for example through developing and testing hypotheses, developing treatment plans and then</i></p>



	<p><i>conducting individual sessions for clients based upon this.</i></p> <p><b>Literacy:</b></p> <p>» <i>Conveying a spoken message accurately and effectively in a clinical or forensic setting during placements.</i></p> <p><b>Numeracy:</b></p> <p>» <i>Being able to accurately score and interpret a standardised psychological test on placement.</i></p> <hr/>
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## ***Inherent Requirement 6 – Relational Skills***

<hr/> <p><b>Level 1 – definition/description</b></p> <hr/>	<hr/> <p><i>Psychology practice requires the ability to make and maintain strong relationships with a wide range of clients, often under stressful circumstances. Student demonstrates:</i></p> <p>» <i>The ability to attain and maintain a working relationship with clients.</i></p> <p>» <i>The ability to demonstrate common factors in therapy.</i></p> <hr/>
<hr/> <p><b>Level 2 – rationale</b></p> <hr/>	<hr/> <p>» <i>Highly developed relational skills (common factors) are a cornerstone of effective</i></p>

	<p><i>therapeutic relationships that permit effective assessment and intervention.</i></p> <hr/>
<p><b>Level 3 – potential adjustments</b></p> <hr/>	<p><i>Any adjustment must not compromise the safety or security of clients, organizations or colleagues, and further, must not compromise any codes, guidelines, policies or regulation of UNSW, the placement organization or AHPRA.</i></p> <hr/>
<p><b>Level 4 – exemplars that demonstrate that students have met the inherent requirement</b></p> <hr/>	<p><i>» Able to effectively build a working relationship with a client in order to engage them in an assessment or treatment while on placement.</i></p> <p><i>» Effectively managing difficulties arising in the therapeutic relationship while on placement, ability to make repair. Does not engage in splitting or triangulation within a worksite. Acts with integrity.</i></p> <hr/>

## ***Inherent Requirement 7 – Reflective Skills***

<p style="text-align: center;"><b>Level 1 – definition/description</b></p>	<p style="text-align: center;"><i>Psychological practice requires self-awareness and a capacity for reflectivity in order to consider the effect of one's own issues, actions, values and behaviours on practice.</i></p> <p style="text-align: center;"><i>Student demonstrates:</i></p> <ul style="list-style-type: none"> <li>» <i>The ability to accurately reflect on their professional work.</i></li> <li>» <i>The ability to accept feedback on their professional practice, reflect, and respond constructively.</i></li> </ul>
<p style="text-align: center;"><b>Level 2 – rationale</b></p>	<ul style="list-style-type: none"> <li>» <i>Effective use of supervision is a key teaching strategy in psychology training which requires adequate understanding oneself in order to appropriately engage in this activity.</i></li> <li>» <i>Working with clients while on placement; understanding and responding to them requires adequate understanding of oneself and the ability to effectively manage one's reactions to situations that may arise.</i></li> </ul>
<p style="text-align: center;"><b>Level 3 – potential adjustments</b></p>	<p style="text-align: center;"><i>Any reflective skills impairment must not compromise the student's ability to demonstrate an acceptable minimum level of capacity in this area.</i></p>
<p style="text-align: center;"><b>Level 4 – exemplars that demonstrate that students have</b></p>	<ul style="list-style-type: none"> <li>» <i>Identifying when an issue is outside one's level of competency, or when one's practice may be affected by an impairment.</i></li> </ul>

<hr/> <b>met the inherent requirement</b> <hr/>	
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## ***Inherent Requirement 8 – Sustainable Performance***

<hr/> <b>Level 1 – definition/description</b> <hr/>	<hr/> <p style="text-align: center;"><i>Psychological practice requires both physical and mental performance at a consistent and sustained level to meet individual needs over time. Student demonstrates:</i></p> <ul style="list-style-type: none"> <li style="margin-bottom: 10px;">» <i>Consistent and sustained level of cognitive and physical energy to complete tasks in a timely manner over time.</i></li> <li style="margin-bottom: 10px;">» <i>The ability to perform repetitive activities with a level of concentration that ensures a capacity to focus on the activity.</i></li> <li style="margin-bottom: 10px;">» <i>The capacity to maintain consistency and quality of performance throughout the designated period of duty.</i></li> </ul> <hr/>
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<hr/> <b>Level 2 – rationale</b> <hr/>	<hr/> <ul style="list-style-type: none"> <li style="margin-bottom: 10px;">» <i>Sufficient physical and mental endurance is an essential requirement needed to perform multiple tasks in an assigned period to provide safe and effective care.</i></li> </ul> <hr/>
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<hr/> <b>Level 3 – potential adjustments</b> <hr/>	<hr/> <i>Any adjustment must ensure that performance can be maintained in a relatively consistent manner over a given period of time.</i> <hr/>
<hr/> <b>Level 4 – exemplars that demonstrate that students have met the inherent requirement</b> <hr/>	<hr/> <i>» Participating in tutorials, lectures throughout the day.</i>  <i>» Remaining focussed and providing consistent responses over a negotiated time frame during placement.</i>  <i>» Engaging in appropriate self care to ensure safe and effective delivery of service.</i> <hr/>

## PART 3: Compliance Procedures

### 3.1 Purpose, Context and Definitions

This procedure prescribes the process through which the MPsychol (Forensic) program investigates and manages a student's failure to satisfy the inherent requirements of their program or subject. The procedures described do not preclude a student from utilising any other form of redress available to the student within UNSW policies and procedures. For the purposes of these procedures, the following definitions apply:

- **Action plan** refers to a student created document/plan that identifies a barrier or issue that requires correction and is implemented at the request of a program member, clinic team or supervisor.
- **Appeal** means an application made by a student to have a decision reviewed where that decision relates to a matter affecting an outcome on a course or program decision.
- **External Placement site** means the organisation at which the student's placement is undertaken.
- **Fitness to Practice (FTP)** means a student's demonstrated ability to meet the expected standards of conduct, compliance, knowledge, performance, and capacity required by the relevant profession and legislation governing the profession.
- **Inherent Requirements (IR)** means abilities, knowledge, and standards of conduct and performance that are essential for a student to be able to achieve the learning outcomes of a program or subject, and transition to the profession after graduating.
- **Initial Risk Assessment** means the initial evaluation of a concern raised regarding a student's compliance with inherent requirements, completed by the Program Director/program team/clinic team, in order to determine whether the concern should be investigated formally (through UNSW or AHPRA procedures, and/or through PCAB) or can be addressed informally within the program.

Initial risk assessments involve assessment of the severity of potential hazards and risks resulting from the alleged student behaviour or capacity.

- **Internal Placement site** refers to the UNSW Forensic Psychology Clinic (UFPC)
- **Misconduct** means wilful or unreasonable behaviour that the student would be expected to understand as clearly falling short of reasonable professional standards. Refer to the [Student Code of Conduct](#) for more information.
- **Placement** means a work integrated learning activity, required as part of the MPsychol (Forensic) requirements.
- **Placement Coordinator** means the University staff member responsible for managing a student's placement.
- **Procedural Fairness** refers to the procedures used by a decision-maker in dealing with an allegation are fair and requires:
  - adherence to established principles of natural justice;
  - a hearing appropriate to the level;
  - impartiality of the decision-maker; and
  - evidence to support the finding.
- **Professional Competencies Advisory Board (PCAB)** is an ad hoc board of external psychologists convened by the Program Director to review recommendations of a placement, or program failure. Their remit is to review whether internal policies and procedures were followed and provide a recommendation to the Program Director to review.
- **Program Leave** is a measure that can be recommended as part of a Remediation Plan when a student's non-compliance with inherent requirements poses an unacceptable level of risk that cannot be addressed through reasonable adjustments. Program leave can prohibit a student from engaging in learning activities, attending placements in placement subjects, and/or prohibit the student from registering or re-registering in subjects that contain the same inherent requirement.
- **Reasonable Adjustment** means the provision of measures, actions or adjustments made to teaching, learning, assessment and placements to enable students with disabilities or chronic health conditions the opportunity to meet the relevant program learning outcomes on the same basis as students without a disability. Reasonable adjustments may also be made on religious or other grounds, such as culture. Reasonable adjustments must ensure that competency attainment is not compromised.
- **Remediation** means the opportunity for students to complete an additional placement in order to address the causes of their failure to meet inherent requirements. If remediation is successful, the student will have regained compliance with their program's inherent requirements.
- **Remediation plan** is a student created and directed plan for addressing competency or IR concerns that have resulted in the failure of a placement.
- **Reporter** means any individual or entity who raises a concern with a MPsychol (Forensic) staff member if they witness or have reasonable suspicion regarding a student's failure to maintain the inherent requirements of their course or program.
- **Student** means any person who is enrolled in the MPsychol (Forensic) program at UNSW.
- **Supervisor** refers to an AHPRA accredited supervisor.
- **Support Person** means a person chosen by a student to support them at an Inherent Requirements meeting. The support person may assist the student but not act as an advocate.

### 3.2 Procedures

Any person ("the reporter") may raise a concern with program staff members regarding a student's compliance with program or placement inherent requirements. The Program Director will conduct an initial risk assessment (see section 3.3 for risk considerations) within a short timeframe to ensure that any immediate or serious risk has been managed. The student and any other relevant staff or others

may be consulted in aiding with this determination. Once a level of risk has been determined, the student will be notified by the Program Director to outline a plan and ensure the student has been informed of all avenues of addressing the issue and receiving appropriate resources and support. In the case where an immediate risk needs to be addressed based on the student's capacity or behaviour, such as halting appointments for a student on placement, the Program Director or appropriate staff (such as the Clinic Director or Placement Coordinator) may ensure that the risk is ameliorated.

Where the Program Director determines that the concern is minor and manageable within the programs' own resources, they will ensure that a reasonable plan is developed and implemented by the student and relevant staff or others (development of an Action plan). If a more formal review of the issues is required, the issue may be sent to other UNSW resolution sites, such as Student Conduct and Integrity) or in the case where there has been a recommendation for failure of a placement, the Program Director may convene a Professional Competencies Review Board (PCAB).

The process of considering a concern regarding a student's compliance with inherent requirements is carried out in accordance with procedural fairness. Students have the right to:

- have the concern investigated as promptly as possible;
- be given an opportunity to discuss the concern with program staff;
- invite a support person to attend meetings relating to the investigation of a concern; and
- appeal any outcome through other relevant UNSW policies and procedures

### 3.3 Initial Response – Initial Risk Review

Risk level	Low	Moderate	High
<b>IR breach level</b>	<b>Minor</b> Minor or no impact on student compliance with inherent requirements	<b>Moderate</b> Moderate impact on student compliance with inherent requirements	<b>Major</b> Major failure of student to comply with inherent requirements
<b>Examples of Consequences</b>	<ul style="list-style-type: none"> <li>• Minor or no impact on the reputation of the program and its standing with the profession</li> <li>• Minor impact on other students' learning opportunities</li> <li>• No/minor impact on client/public safety</li> </ul>	<ul style="list-style-type: none"> <li>• Moderate impact on the reputation of the program and its standing with the profession</li> <li>• Moderate impact on other students' learning opportunities</li> <li>• Moderate impact on client/public safety</li> </ul>	<ul style="list-style-type: none"> <li>• Actions impact on the reputation of the program and its standing with the profession</li> <li>• Significant impact on the reputation of the University and/or other organisation(s)</li> <li>• Significant impact on client/public safety</li> <li>• Significant impact on other students' learning opportunities</li> </ul>
<b>Recommended outcome</b>	No formal investigation or action.	Decision by Program Staff as to whether to manage the situation internally within the program or to seek further consultation with other appropriate UNSW resources. If appropriate, the student	

	<p>Placement supervisors or Placement Coordinator (in the case of external placements) may discuss concern with appropriate individuals to implement appropriate informal remediation (an Action Plan)</p>	<p>may remain engaged in learning activities through reasonable adjustments.</p> <p>For lesser issues, the student may be required to develop and complete an Action Plan within the course or placement, for more serious concerns, students may be asked to take program leave and develop a Remediation plan, or in the most significant cases, then other UNSW processes may be implemented (e.g., Student Misconduct Procedures, or mandatory reporting to AHPRA). Where reasonable adjustment and remediation fail, or in the case of misconduct, the program eligibility may be terminated.</p> <p>In the case where failure of a course or placement is recommended, then the Program Director will convene a Professional Competencies Advisory Board (PCAB)</p>
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**Examples**  
 These examples provide a guide only. Risk decisions may be specific to a course or placement

<p><b>Conduct</b></p>	<p>One-off, infrequent, or non-serious instances of:</p> <ul style="list-style-type: none"> <li>• failing to engage or actively participate</li> <li>• lack of punctuality</li> <li>• lack of communication of a minor nature or seriousness (e.g. inappropriate communication that does not lead to, or risk, serious consequences)</li> <li>• Impairing in a minor way the ability of a program staff member or another student to participate in a learning</li> </ul>	<p>Frequent or serious instances of:</p> <ul style="list-style-type: none"> <li>• lack of punctuality</li> <li>• non-attendance and/or lack of communication at compulsory program or placement-based learning activities without a valid reason</li> <li>• Failure to respond to a direction from a program staff member or placement supervisor resulting in minor risk to clients and/or the wider community (including other students and placement staff)</li> </ul> <p>One or more instances of any of the following:</p> <ul style="list-style-type: none"> <li>• Leaving assigned placement without authorisation from program or placement supervisor</li> <li>• Minor breach of privacy or confidentiality (e.g. failure to limit the ability of others to hear or see confidential information). Having</li> </ul>	<p>Frequent or serious instances of:</p> <ul style="list-style-type: none"> <li>• failure to engage or actively participate at any program or placement-based learning activity</li> <li>• non-attendance at any placement-based learning activities without a valid reason</li> </ul> <p>One or more instances of any of the following:</p> <ul style="list-style-type: none"> <li>• Fraud (generation of fraudulent placement documents, forgery, copying professional documentation, etc.);</li> <li>• Failure to respond to a direction from a program staff member or placement supervisor resulting (or potentially resulting) in a serious risk to clients and/or the wider community (including other students and placement staff)</li> <li>• Assault, theft or other serious criminal offence</li> <li>• Intoxication by alcohol or</li> </ul>
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	<p>activity</p> <ul style="list-style-type: none"> <li>• Minor inappropriate use of mobile phones or other electronic devices during University or External Placement site placements (e.g., trying to bring a mobile into a correctional centre).</li> <li>• Inadequate preparation or clean-up of placement work area</li> </ul>	<p>confidential materials on a personal laptop.</p> <ul style="list-style-type: none"> <li>• Minor damage to and/or inappropriate use or lack of care of equipment or materials at a placement site</li> <li>• Minor breach of health and safety policy/ requirements</li> </ul>	<p>drugs in connection with the practice setting (including being under the influence of prescription drugs that impair performance in the placement setting)</p> <ul style="list-style-type: none"> <li>• Engagement in sexual misconduct in connection with the placement</li> <li>• Communication issues of a serious nature (including inappropriate use of social media, victimisation, exploitation and blackmail, harassment, bullying, threatening behaviour, serious rudeness or aggression and intimidation)</li> <li>• Serious breach of confidentiality (disclosure of an individual's information to others, where the information was previously unknown). Includes recording or photographing clients or client information using a mobile phone or similar device</li> <li>• Providing intervention to a client without, or outside of the scope of, an approved treatment plan, appropriate supervision, and/or signed client informed consent</li> <li>• Providing intervention to a client without supervision or supervisor approval</li> <li>• Damage to, or inappropriate use or lack of care for equipment or materials</li> <li>• Serious breach of health and safety policy/ requirements</li> </ul>
<b>Compliance</b>	<p>One-off, infrequent, or non-serious failure to:</p> <ul style="list-style-type: none"> <li>• comply with minor professional</li> </ul>	<p>Frequent or serious failure to:</p> <ul style="list-style-type: none"> <li>• comply with infection control protocols including failure to wear the required personal protective equipment</li> </ul> <p>One or more instances of any of</p>	<p>One or more instances of any of the following:</p> <ul style="list-style-type: none"> <li>• Failure to complete and/or maintain the pre-placement requirements, including signing of all contracts and documents</li> </ul>

	<p>codes or requirements</p> <ul style="list-style-type: none"> <li>• comply with infection control protocols including failure to wear the required personal protective equipment</li> </ul>	<p>the following:</p> <ul style="list-style-type: none"> <li>• Pending criminal legal matter of a nature that is unlikely to impact the student's ability to maintain required criminal record clearances and meet placement providers' standards to enable them to continue to undertake a placement</li> </ul>	<p>by all parties, and ensuring their delivery to the Placement Coordinator</p> <ul style="list-style-type: none"> <li>• Breaching standards of the code of ethics, professional association or professional registration body (including failure to maintain provisional psychologist status) as well as the External Placement site policies and procedures</li> <li>• Pending criminal legal matter of a nature that is likely to impact the student's ability to maintain required criminal record clearances and meet placement providers' standards to enable them to continue to undertake practical placements (recognising a student's right to an assumption of innocence until convicted)</li> <li>• Failure to disclose a criminal charge or conviction where the student is required to do so through a student undertaking as part of placement or AHPRA registration.</li> <li>• Failure to disclose an inability to meet inherent requirements, such as failure to disclose a relevant medical problem or disability</li> <li>• Failure to successfully complete a return to practise competency assessment through the program or AHPRA</li> <li>• Failure to complete and/or maintain the pre-placement requirements that is not able to be addressed in the short-term</li> </ul>
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<b>Performance</b>	<p>One-off, infrequent, or non-serious instances of the following:</p> <ul style="list-style-type: none"> <li>• Illegible recording of client records</li> <li>• Lack of English language proficiency resulting in minor misunderstandings in responding to and giving instructions</li> </ul>	<p>One or more instances of any of the following:</p> <ul style="list-style-type: none"> <li>• Lack of English language proficiency resulting in significant misunderstandings in responding to and giving instructions</li> <li>• Deficient, inaccurate or incomplete recording of client records/reports/case notes/student logs</li> <li>• Failure to demonstrate practical competence to the standard and safety levels expected of a student at their level of training that may be remediable</li> </ul>	<p>One or more instances of any of the following:</p> <ul style="list-style-type: none"> <li>• Interpersonal communication skills are not of a sufficient standard to undertake placement activities in the community with persistent failure to improve</li> <li>• English language proficiency that places the public at risk of substantial harm</li> <li>• Failure to demonstrate practical competence to the standard and safety levels expected of a student at their level of training that cannot be remediated</li> </ul>
<b>Capacity</b>	<p>One-off, infrequent, or non-serious instances of the following:</p> <ul style="list-style-type: none"> <li>• Temporary lowering of capacity (for example due to a mental or physical disability or medical condition)</li> <li>• Exacerbation of an existing physical disability or medical condition that is usually well managed and is capable of redress through reasonable adjustments in the short term</li> </ul>	<p>One or more instances of any of the following:</p> <ul style="list-style-type: none"> <li>• Existing disability or medical condition that is not well managed but is capable of remediation in the short term</li> </ul>	<p>One or more instances of any of the following:</p> <ul style="list-style-type: none"> <li>• Chronic lowering of capacity (for example due to a mental or physical disability or medical condition) that impacts a student's capacity to meet inherent requirements and/or places the public at risk of substantial harm</li> </ul>
Adapted from Western Sydney University and University of Queensland 'Fitness to Practice' Policy			

### 3.4 Professional Competencies Review Board (PCAB)

The PCAB involves a non-binding procedure for those instances where the Program Team, Clinic Team or Placement Coordinator/External Placement Supervisor have:

- recommended the failure of an internal or external placement, or
- recommended failure of the program due to more than two failed attempts to pass a course or placement; or
- recommended failure of the program due to significant professional or ethical behaviour has occurred and mandatory reporting through AHPRA have recommended internal resolution

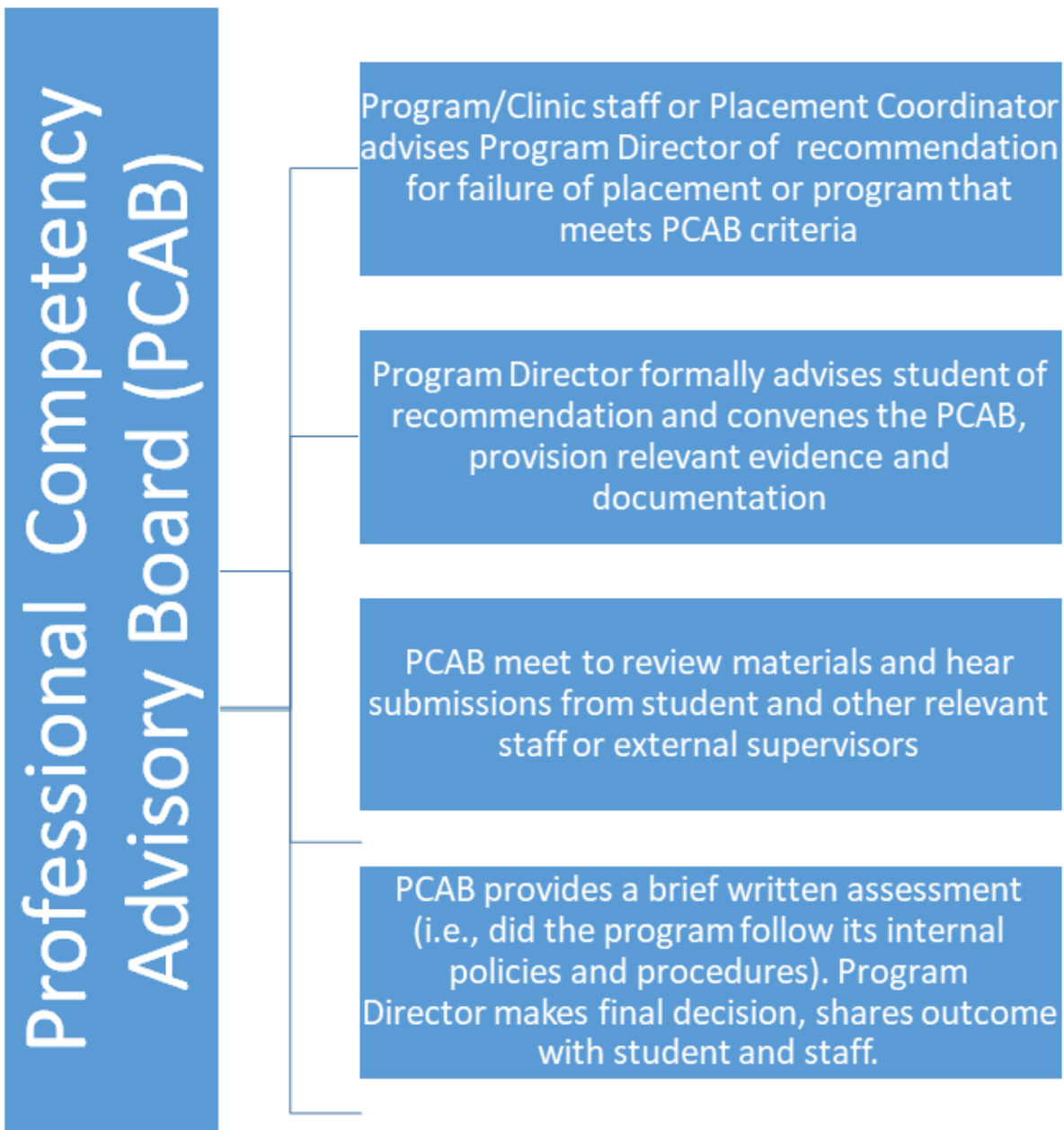
The PCAB is considered as an additional local process which sits alongside and does not limit rights to any other available university process. The primary remit of the PCAB would be to review the decision process of the program/clinic team or placement coordinator/external placement supervisor so that decisions are reflective of professional practice standards and program policies and procedures. The mandate of the PCAB review is to ensure that the recommendation reached by the clinic team or external placement supervisor is a reasonable one. It is crucial for the panel to base their review on evidence rather than hearsay or personal biases. Relying on evidence ensures that decisions are fair, transparent, objective, and well-informed. By addressing the concerns of a likely highly concerned student, maintaining open communication, and ensuring a fair and transparent process, the PCAB can promote a balanced decision-making process.

The PCAB is convened by the Program Director and is comprised of two independent senior forensic or clinical psychologists who have experience in the supervision of provisional psychologists in training. The PCAB convenor will determine the specific evidence required to evaluate the situation and will provide an overview and documentation to the panel members. Additionally, the Program Director will invite the student to participate in the process, though their participation is not mandatory. Additionally, the student will be informed that the PCAB report will not be shared with the student, though the outcome of the review will be shared with the student by the Program Director.

The PCAB will review information submitted by both the student and the program/clinic team or Placement Coordinator/external supervisor(s) (including interviews with the student and relevant staff/supervisors). They will carefully weigh the evidence for reliability, validity and relevance and whether the evidence aligns with current practice within the program, and the profession.

While the PCAB's mandate is primarily to provide an assessment to the program director on whether the program aligned with its own policies and procedures, they can offer feedback to the program director separate to the written review around those program processes.

Following is a flowchart that outlines the procedure.



### 3.5 Procedures and consideration for PCAB

**Convening of a PCAB:** A PCAB is considered for recommendations of failure of a placement or in those situations where a serious breach of ethics or professional practice has led to a recommendation of program failure. A student can decline to participate in the PCAB process, though the procedure will still be held in their absence. While the policy on Student Complaint Procedures (<https://www.unsw.edu.au/content/dam/pdfs/governance/policy/2022-01->

[policies/studentcomplaintprocedure.pdf](#)) generally identifies that local processes should be sought prior to making a formal complaint, the PCAB process would not preclude a student from seeking additional redress for concerns. The Program Director may choose to convene the PCAB based on an individual situation. It is convened through contacting contracted psychologists who have agreed to participate in this process.

**PCAB timeframe:** Given potential concerns regarding whether students can continue to enroll in the associated courses (i.e., PEPs) and census dates that may be relevant, a timeline of four weeks is recommended for the outcome of the PCAB (written report outlining recommendations).

**Information provided to the Student:** The student will be informed that the PCAB will be convened, and an overview of the process is provided including:

- their participation is voluntary, if they choose not to participate, the PCAB will still occur;
- the student is to provide evidence they feel is pertinent to the recommendation; the PCAB will be directed not to attend to hearsay evidence (for example, student concerns that the cohort feels a particular way about something);
- the outcome of the PCAB will be shared to the student (even if they do not participate in the process), but the report, the sources of documentation the PCAB utilized to make their report, or any recommendations from the panel will not be shared;

**Information provided to the PCAB:** Prior to the review commencing, the PCAB members will be briefed by the Program Director as to the mandate of the PCAB (i.e., were internal policies and procedures followed), and will provide the team with relevant information regarding the program (such as a clinic handbook, a program guide, or external placement handbook).

Additionally, the PCAB will be provided with relevant documentation from the Program/Clinic teams and/or Supervisors/Placement Coordinators regarding the competency, professional and/or ethical concerns leading to their recommendation. Documentation may include supervisor notes, supervisor reports, logs, Action plans, Remediation plans, email chains, competency reviews etc.

**Role of the PCAB members and Program Director:** The PCAB will meet (primarily online) to review the information and to organize for additional submissions (e.g., interview with the student, program/clinic team, placement coordinator, external supervisor, or requests for additional documentation). The Program Director will assist the PCAB members in arranging the necessary access to information and the Program Director's role will also be to facilitate and provide contextual information around the program.

**The PCAB report:** The report is intended to be a very brief summary of the context of the convening of the panel, and the outcome of the review, which can include:

1. Non-support of the recommendation by the clinic team or external placement supervisor/placement coordinator (can recommend specific non-binding actions that may be taken) due to evidence that the program's policies or procedures were not followed, or not followed adequately; or
2. Support of the recommendation by the program/course convenor, clinic team or external placement supervisor/placement coordinator; or
3. Inconclusive finding. This may be in instances where there is insufficient evidence that program policies and procedures were followed, or that program policies and procedures did not cover the specific situation.

**Dissemination of the report:** The PCAB report is not intended to be shared with the student, though the outcome may be shared, even in those situations where the student did not participate in the process. The Program Director will meet with the PCAB panelists to discuss their findings and any recommendations or observations. The Program Director will advise the staff/supervisors and the student of the outcome of the review, the Program Director's decision regarding the recommendation, and any actions that will result from the review.

**Information provided to student (sample email template):**

As we have discussed, the clinic team/external supervisor/placement coordinator has made a recommendation for remediation of a placement/discontinuation from the program due to unprofessional or unethical behaviour.

Our program has instituted an informal, non-binding procedure (the Professional Competencies Advisory Board or PCAB) that the Program Director may convene to review the recommendation. Your participation in this process is voluntary. The mandate of the PCAB is to review whether our program policies and procedures were followed. The outcome of the PCAB process consists of a brief report that is provided to the program director. The program director may take the opportunity to share the outcome of the PCAB (though not the report itself), though is not compelled to do so.

If you choose to participate, you will be able to provide the PCAB with evidence that may relate to any concerns you may have around the recommendation. Please be aware that the PCAB will only consider evidence that is supported by documentation (i.e., hearsay opinions will not be deemed sufficient). The PCAB will also request to interview you and will also interview program staff.

Please be aware that this process is meant to occur within a short timeframe to ensure the Program Director can make a decision prior to relevant deadlines (e.g., census dates). Also, please be aware that this procedure does not prevent you utilizing any other more formal procedures that the university has to review program decisions. The program guide is a good place to start to understand what resources are available to you.

The information contained in this guide is correct as at February 2024. Prospective students should contact UNSW to confirm admission requirements and availability of programs. UNSW reserves the right to change any programs, admission requirement or other information herein without any prior notice. CRICOS Provider No. 000098G.

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