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Submitted by email to: [engagement@dandolo.com.au](mailto:engagement@dandolo.com.au)

Dear Ms Gallagher

### **APS Response to the Independent Evaluation of the National School Chaplaincy Program**

The Australian Psychological Society (APS) welcomes the Federal Government Department of Education's commissioning of an evaluation of the National School Chaplaincy Program (NSCP) for the period 2019 to 2022, which aims to evaluate the program's effectiveness in supporting the wellbeing of school students and the broader school community.

The APS appreciates the opportunity to provide a response to inform this evaluation. Working to improve the lives of Australians through psychology is our core business. This includes advocating on behalf of our members and the community for the reform of Australian health and social support systems to improve wellbeing using evidenced-based health promotion, prevention, early intervention and treatment responses.

As with all our work at the APS, we consider issues in light of the global Sustainable Development Goals (SDGs) and the broader social determinants of health<sup>1</sup>. Our response to this consultation about the effectiveness of the National School Chaplaincy Program is informed by the aim of *SDG 3 Good Health and Wellbeing* to "ensure healthy lives and promote well-being for all at all ages".

Below we identify three critical opportunities for the Government that can be incorporated as part of a revised NSCP as per the following evaluation areas:

- Delivery of the program
- Program effectiveness
- Place of the program in the broader context
- Evidence-based improvements

#### **1. Grow the national school psychology workforce by allowing schools to leverage NSCP funding**

The APS has raised significant concerns over many years about the NSCP. While we are not opposed to the presence of chaplains in schools for pastoral care work, we have questioned the investment of scarce government-funded resources that could be redirected to more highly qualified and skilled mental health experts in schools, such as psychologists<sup>2-4</sup>.

Psychologists are AHPRA-regulated mental health professionals with at least 6 years of training including university studies and supervised practice who must demonstrate competence in delivering safe, evidence-based mental healthcare that spans health promotion, prevention, assessment, intervention, planning and consultation<sup>5-7</sup>.

Estimates are that there is only about one school psychologist for every 1500 students<sup>8</sup>. As highlighted in the Productivity Commission's 2020 *Mental Health Inquiry Report*<sup>9</sup>, a ratio of at least one full-time psychologist to every 500 students is needed to ensure best-practice comprehensive school-based mental health support services can be delivered in all Australian primary and secondary schools.

Thus, as the peak body for psychologists, we continue to advocate for more Government investment in psychology services in schools, as detailed in the [APS Psychologists in Schools: Position Statement](#).

The APS welcomes the June 2022 announcement by the Federal Education Minister, Jason Clare MP, that the Albanese Government will change the NSCP to allow schools to choose between hiring a qualified<sup>a</sup> religious chaplain (as is required currently) or a non-religious student welfare officer. We agree this change could give schools more choice to engage student wellbeing workers based on merit irrespective of religious affiliation, including those with psychology training<sup>2</sup>. However, current outsourcing arrangements to the third party providers who currently only hire religious chaplains or student welfare officers (versus direct employment by schools) could present a barrier to this<sup>11</sup>.

**Recommendation 1:** The APS calls on the Government to ensure that the revised NSCP Federal and State agreement remove administrative barriers for schools that wish to access the NSCP to fund, or part-fund, more highly qualified non-religious wellbeing staff, including psychologists.

## **2. Delegate professional coordination of NSCP roles to the school mental health practitioner**

There is undoubtedly a need for pastoral care work in schools, which can be performed by chaplains and student welfare officers operating within the parameters of their training and skills and as part of school wellbeing teams. As reported in the 2018 NSCP evaluation, students, principals and parents who were surveyed expressed a positive sentiment overall towards chaplains, who were described as providing additional school support resources and someone else students can talk to<sup>12</sup>.

We note that teachers were not consulted directly as part of the 2018 NSCP evaluation; nor were school psychologists and counsellors. This indicates a systemic disconnect between the NSCP and existing student wellbeing roles and teams in schools. As indicated by our member psychologists based in schools, the relationship between chaplains and school psychologists and counsellors varies across State/Territory jurisdictions and in public, independent and denominational schools. Some chaplains work closely with school psychologists or counsellors and other school staff in the broader wellbeing team. In other instances, chaplains may have limited professional contact and involvement with school psychologists, counsellors and other staff.

The APS is deeply concerned that a failure to nationally position NSCP chaplains and student welfare officers as part of existing student wellbeing teams contributes to confused, disjointed and reduced quality and safety of student and school community wellbeing responses. The evidence is clear - improved student mental health, psychosocial and educational outcomes require *whole school approaches*, sustained over time with internally *coordinated* tiers of *evidence-based* health promotion, targeted prevention, and early intervention support that are *connected* to the external support system<sup>13-17</sup>. As noted in the 2018 NSCP evaluation, there were some concerns about limited knowledge in the school community about the chaplain's role and the activities/initiatives performed<sup>12</sup>. Co-ordinated, whole school approaches improve understanding of student wellbeing roles and responsibilities across the school community and enables each role to work effectively to their full scopes of practice.

We advocate for school psychologists, as highly trained experts in mental health and AHPRA-regulated mental health professionals, to lead and coordinate whole school approaches and bring together school based wellbeing staff, NSCP chaplains and student welfare officers<sup>18,19</sup>.

Psychologists are also qualified to provide ongoing professional training, coaching and support to members of the student wellbeing team. While there is currently mandatory online cyberbullying training for NSCP chaplains<sup>20</sup>, it is unclear what other professional development opportunities they have access to as employees of third-party providers.

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<sup>a</sup> The current Federal/State Project Agreement for the NSCP states chaplains require a minimum certificate IV level training in youth work, pastoral care, chaplaincy or equivalent with competencies in mental health and making a referral<sup>10</sup>.

While we argue that school psychologists are well placed to provide professional oversight for school wellbeing teams, NSCP chaplains and student welfare officers, we are clear that administrative responsibilities and supervision of chaplains and student welfare officers should be retained by the principal or other appropriate school officer.

**Recommendation 2:** The APS calls on the Government to:

- clearly position NSCP chaplains and student welfare officers as members of school wellbeing teams,
- delegate professional coordination and oversight of the work of NSCP chaplains and student welfare officers to the expert mental health practitioner role in the school (e.g., the school psychologist), and
- ensure the administrative responsibilities and supervision of NSCP chaplains and student welfare workers remains the responsibility of the principal or other appropriate school officer.

### **3. Undertake a fiscal evaluation of the NSCP program**

The APS commends the current evaluation of the NSCP that seeks to understand the effectiveness of the program from the perspective of the direct program stakeholders and beneficiaries (students, principals, parents and chaplains), as well as opening up the evaluation to responses from the broader school community (teachers, school psychologists and counsellors) and the public. As already stated above, we are concerned that the previous evaluation failed to consult directly with many key stakeholders and experts in student wellbeing.

The APS is concerned, however, that within the current tight fiscal context, the current evaluation does not investigate the NSCP value for money or return on the yearly \$61.4 million investment (nor did the previous 2018 NSCP evaluation) or the \$2 million additional NSCP funding provided to support school communities affected by the 2019/2020 bushfires<sup>20</sup>

**Recommendation 3:** The APS calls on the Government to evaluate the return on investment and value for money of the NSCP as part of the next independent evaluation of the NSCP.

If any further information is required from the APS, I would be happy to be contacted through the national 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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