

# Western Australian Auditor General's Report



## Delivering School Psychology Services



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23 June 2022

**Office of the Auditor General  
Western Australia**

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***The Office of the Auditor General acknowledges the traditional custodians throughout Western Australia and their continuing connection to the land, waters and community. We pay our respects to all members of the Aboriginal communities and their cultures, and to Elders both past and present.***

## WESTERN AUSTRALIAN AUDITOR GENERAL'S REPORT

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### **Delivering School Psychology Services**

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**THE PRESIDENT  
LEGISLATIVE COUNCIL**

**THE SPEAKER  
LEGISLATIVE ASSEMBLY**

### **DELIVERING SCHOOL PSYCHOLOGY SERVICES**

This report has been prepared for submission to Parliament under the provisions of section 25 of the *Auditor General Act 2006*.

Performance audits are an integral part of my Office's overall program of audit and assurance for Parliament. They seek to provide Parliament and the people of WA with assessments of the effectiveness and efficiency of public sector programs and activities, and identify opportunities for improved performance.

This audit examined the Department of Education's School Psychology Service. We reviewed how the service is set-up and the timeliness and consistency of support for students' psychological needs.

I wish to acknowledge the entity's staff for their cooperation with this audit.

A handwritten signature in black ink, appearing to be 'Caroline Spencer'.

CAROLINE SPENCER  
AUDITOR GENERAL  
23 June 2022

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## Auditor General's overview

Good mental health and wellbeing is a key part of children getting the most from their education. Not getting timely help can have a significant impact on a child's development and educational achievement. Schools are often the place where the need for support first becomes apparent, and they offer the opportunity to provide preventative and support programs.



School psychologists are a vital part of identifying and supporting students who need extra assistance. They provide whole-school programs, education for teachers, psychological assessments, therapy and support to both groups of students and individuals. The importance of the School Psychology Service, delivered by the Department of Education across its system of 800 public schools, is the reason we undertook this audit. We wanted to know if a service that we knew was in high demand, and which has the ability to so positively impact on students' wellbeing and educational achievement, is being delivered optimally.

We found that while there are many excellent features of the service, with many dedicated professionals and support staff doing their best to assist students, the administration of the service can be much improved. Indeed, it must be – in order to derive maximum benefit from limited resources for the wellbeing of our school-age children across the State.

It was clear to us in doing this audit that the work that school psychologists do is highly valued by schools, teachers and families.

But school psychologists can't be everything to everyone. Trying to do everything leads to unrealistic expectations, unclear support and referral pathways, demand outstripping supply, and inequitable outcomes for both schools and students. Some schools are ending up with impracticably small allocations of psychologist support, and whether a student's needs are met often depends more on local factors than consistent delivery of an effectively planned range of services across the State education system.

Resources are further stretched by school psychologists supporting students who should be receiving support from more specialised external mental health services but can't get timely access to those services. The Department needs to clearly define the psychology services it does provide in schools, and work with external entities to better support timely availability of services and efficient referral pathways. This will help redirect school psychologists back to proactive and preventative intervention which is most effective at the whole-school level while making sure students in need of more intensive and specialised support do not fall through the gaps. This will take careful coordination and must be backed by significant improvements in the Department's definition, guidance, planning, monitoring and evaluation of those services.

The Department understands that current school psychology service provision is inadequate to meet needs, and Government has funded the recruitment of 100 extra school psychologists over the next 4 years. However, unless gaps in service and workforce planning are fixed, and feedback is used to continually improve the service, it will not be possible to determine if that investment will be enough to deliver more consistent and timely access to the right support for kids who need it.

# Executive summary

## Introduction

This audit examined the Department of Education's (Department) School Psychology Service (SPS). We reviewed how the SPS is set-up and the timeliness and consistency of support for students' psychological needs.

Fieldwork for this audit was conducted between October 2021 and April 2022 and included engagement with staff from the SPS, the Department's central and regional offices, and a sample of schools.

## Background

The emotional health and wellbeing of children in Western Australia (WA) is declining.<sup>1</sup> Approximately 14% of 4- to 17-year-olds in WA experience a mental health issue<sup>2</sup> with children in regional and remote areas having higher rates of mental ill-health.<sup>3</sup> Schools have identified mental health as well as emotional and behavioural disorders as the most common issues impacting student wellbeing. School staff listed anxiety, depression, post-traumatic stress disorder, behavioural and learning disorders such as Attention Deficit Hyperactivity Disorder (ADHD), bullying, social isolation and prolonged peer conflict as common mental health issues for students.<sup>4</sup>

Poor mental health and wellbeing can impact a child's ability to get the most from their education and schools are often the place where issues with children's mental health are identified. When a student's psychological support needs are not met, the student's learning and the learning of other students can be disrupted.

School psychologists usually work in schools as part of a student services team. They are part of a broader system of other government and non-government providers that aim to identify, support and treat students' mental health issues. School psychologists focus on helping students address psychological issues and disabilities that affect learning. They can work at the whole-school level, with groups of students or with individuals and can assess and diagnose learning difficulties and some disabilities. The SPS also provides support to schools when students engage in suicidal behaviours or non-suicidal self-harm and self-injury.

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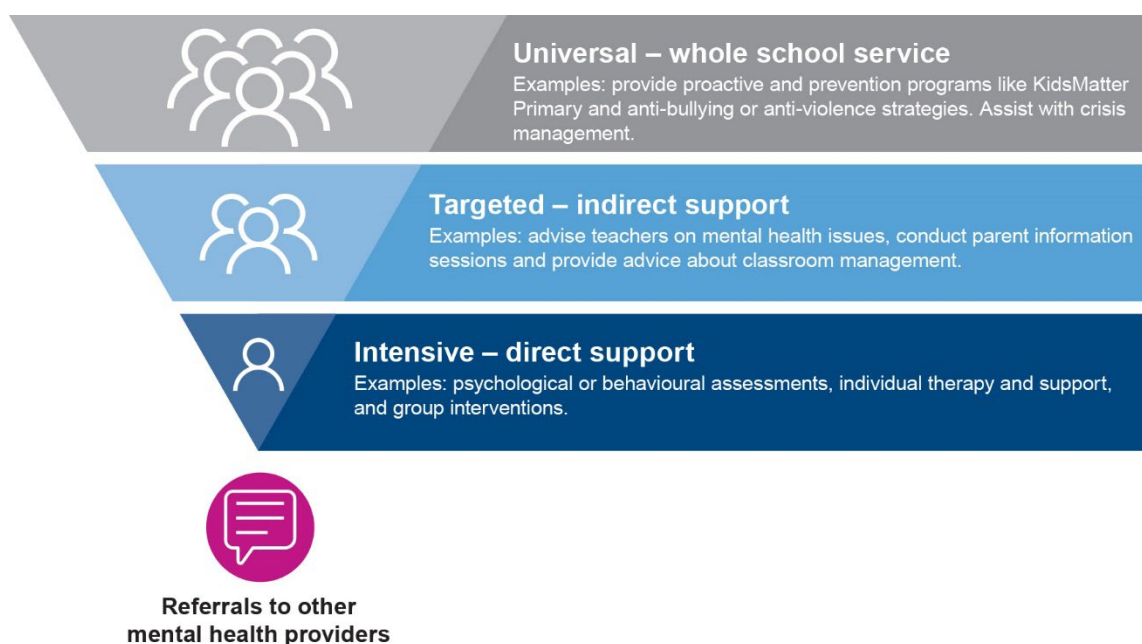
<sup>1</sup> Ministerial Taskforce into Public Mental Health Services for Infants, Children and Adolescents aged 0-18 years in Western Australia (ICA Taskforce), Final Report, March 2022, downloaded 18 March 2022, p. 6.

<sup>2</sup> Ibid.

<sup>3</sup> Ibid, p. 12.

<sup>4</sup> Commissioner for Children and Young People, *School survey findings on student wellbeing*, October 2020, downloaded 3 November 2021, p. 4.





Source: OAG using the Australian Psychological Society's *Framework for effective delivery of school psychology services; a practice guide for psychologists and school leaders*.

**Figure 1: Types of services provided by school psychologists**

The SPS has deployed school psychologists to government schools to support students to achieve academic success. There are 820 government schools across WA and almost 320,000 students enrolled from kindergarten to year 12<sup>5</sup> supported by 253 full-time equivalent (FTE) school psychologists who have been allocated directly to schools, with additional specialist services and support available via lead school psychologists and Statewide Services (see Figure 2).

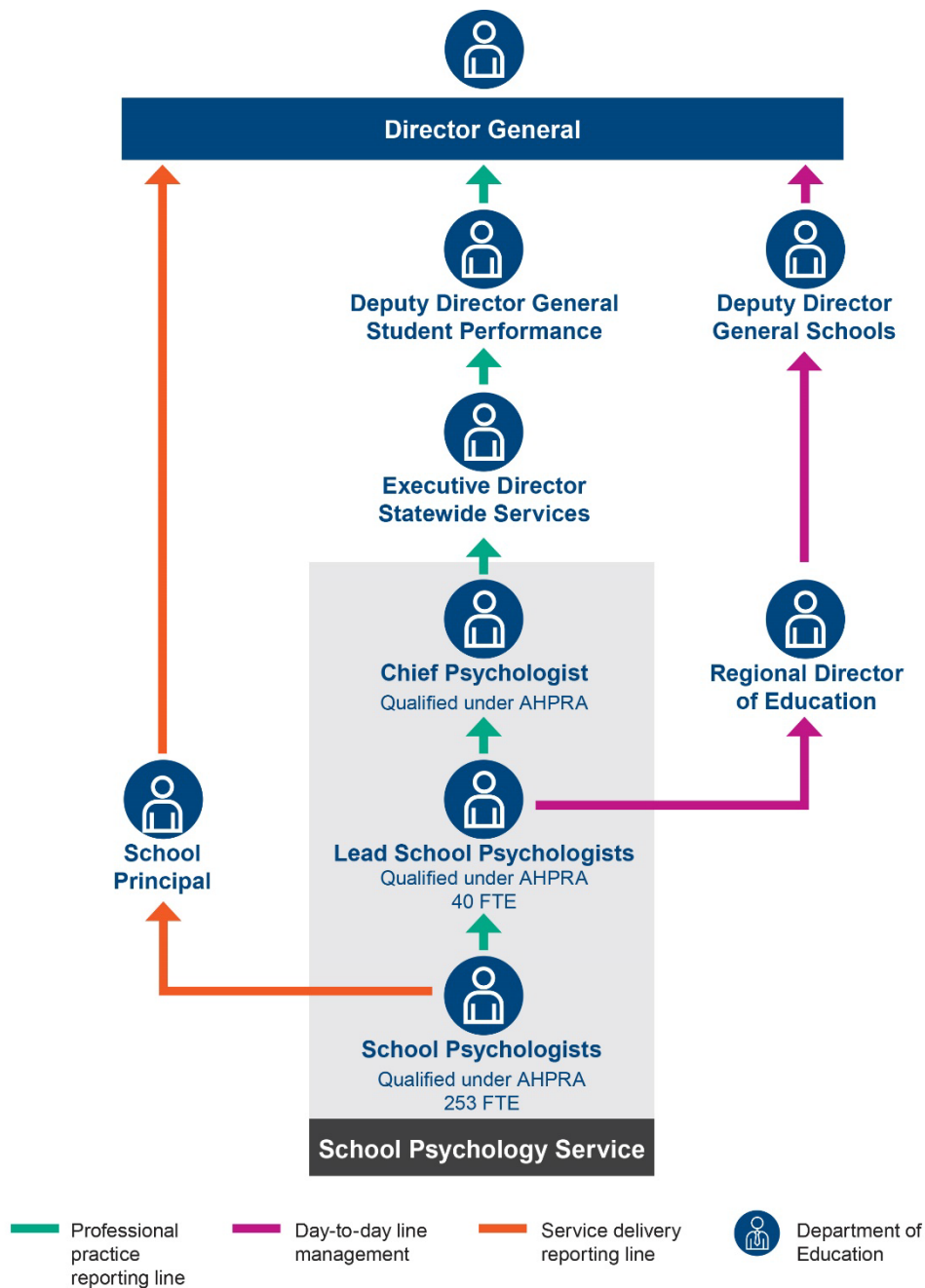
The overall budget for the SPS in the 2021 calendar year was \$48.7 million. The State Government is currently increasing the size of the SPS, with plans to recruit an additional 100 school psychologists to provide services in schools by 2025 at a cost of \$42.2 million over 4 years<sup>6</sup>, of which \$6.4 million will be directed to non-government schools.<sup>7</sup>

School psychologists have different reporting lines for professional practice oversight, service delivery and line management. They are provided with professional practice support by the Chief Psychologist and lead school psychologists located in each of the Department's 8 education regions. School psychologists also are accountable to school principals for the services they deliver in schools and to regional directors of education who provide line management for corporate and human resources purposes. These reporting relationships are shown in Figure 2.

<sup>5</sup> Department of Education, *Annual Report 2020-21*, p. 10.

<sup>6</sup> 2021-22 WA Budget – Fact Sheets – *Investing in Education and Training*; <https://www.ourstatebudget.wa.gov.au/2021-22/fact-sheets/education.pdf>.

<sup>7</sup> WA State Budget 2021-2022, *Budget Paper No. 2*, Budget Statements Volume 1.



Source: OAG analysis of the Department's information

*Note: AHPRA - Australian Health Practitioner Regulation Agency*

**Figure 2: School psychologist reporting lines**

This audit focused on whether the Department is managing the SPS effectively so that students' psychological support needs are identified and met promptly.

## Conclusion

The Department of Education employs psychologists who hold appropriate tertiary qualifications and professional registration. School psychologists are highly valued by schools and the SPS meets the needs of some students and schools. However, whether students' needs are met is more reliant on local and individual factors than an effectively planned and appropriately resourced service. The expectations of schools and students are

often not met because it is not clear what services and support the SPS will deliver and how many school psychologists it needs to do that.

The Department has not defined what services the SPS will provide or which services should be sourced from other providers. It also has not determined the balance between indirect educational psychology support to schools and direct support to individual students. Consequently, the Department cannot effectively plan the size and structure of the workforce it requires, or provide clarity to students, parents and teachers on what they can reasonably expect from the SPS, and what services they may need to access externally. An additional 100 school psychologists are planned to be recruited by 2025 which will increase the level of support provided, but it is not clear if this will result in the right number of staff to provide consistent and timely access to effective services.

The Department allocates school psychologists to schools via a formula that uses proxy indicators of need such as social and economic disadvantage. While this provides apparent fairness, there are no links to demand already identified in schools and the minimum allocation leaves some schools with impractically small amounts of school psychologist time. One in 5 schools have an allocation of only 5 days of school psychologist time each term (that is, 0.5 day per week), or less. Overall, three-quarters of schools have less than 2 days per week of psychologist time, including some large schools of over 700 students.

The Department is not gathering and using performance information on the timeliness and effectiveness of services and does not seek systemic feedback on the service from schools. This limits the Department's ability to improve the availability and accessibility of both its own services and those from external providers. Anecdotally, schools estimated that accessing external services can take between 3 and 24 months. The lack of information also limits the Department's ability to demonstrate if the SPS is providing timely and consistent access to services that support student wellbeing and learning outcomes.

## Key findings

### **The Department does not plan services based on demand and has not defined what the SPS will provide, resulting in inequitable service delivery**

The Department does not base service planning on a comprehensive analysis of demand. It does not consider information on how the SPS is currently being used or analyse broad trends in youth mental health to predict demand. Without this, the Department cannot ensure that the SPS provides the right kind of support in the right place at the right time.

The Department has not defined what services the SPS should be delivering. School psychologists can provide a range of services from whole-of-school programs, targeted support to teachers or groups of students and 1-on-1 support. The Department has not defined the expected balance between these services. The Department also does not have a clear picture of other health services and not-for-profit providers available in each region and school community. This means the Department cannot give clear guidance to schools and families about when students should be supported in school or when they should be referred to other services. It also limits its ability to work effectively with service providers to ensure availability of services and accessible referral pathways.

Schools require more guidance and support from the Department to make the best use of their school psychologists. The Department needs to provide clarity on what services are available and how to plan for, modify and evaluate service priorities each year. Similarly, teachers need more guidance on how to identify students' needs and take appropriate action. Without this, schools often prioritise students who are the most disruptive without considering if this is the best use of a school psychologist's time. An exception is where the

Department has provided clear guidance for managing suicidal behaviours or non-suicidal self-harm and self-injury.

### **Weaknesses in the Department's planning and allocation of its psychologists result in some schools having insufficient support**

The Department has not defined the optimal number of school psychologists and the mix of skills and experience required to effectively meet demand across its schools. The Department does not have clear information on staffing, including the number of qualified psychologists deployed in other Department roles, vacancies or requests from schools for additional resources. Weaknesses in workforce planning mean that the Department does not know if the current mix of staff is sufficient or if the State Government's additional 100 school psychologists will be effective in meeting demand for school psychologists.

The Department uses a formula to allocate school psychologists to schools. While this provides transparency, the formula only uses proxies of need such as school size and an index of disadvantage and does not directly take into account current demand from schools and students. The formula results in nearly 20% of schools receiving only 5 days a term of school psychologist time or less. It does not adjust for the time taken to collaborate with other school psychologists to provide professional support for registration purposes and undertake administrative tasks. This means schools in regional areas and schools with smaller allocations of school psychologist time are disadvantaged.

Schools can supplement their allocation of school psychologist time either by purchasing additional time directly or using a portion of the reserve that is deployed at the discretion of the regional director of education. However, there is a limited number of school psychologists in WA and most are already employed by the Department. As a consequence, additional school psychologists are not always available when schools request them.

### **The Department does not have robust information to enable it to track the effectiveness of the SPS**

The Department does not collect consistent or reliable data to determine if planned services were delivered effectively. It also does not assess if the SPS provides the intended impact for schools and students. Without appropriate monitoring, the Department has limited ability to manage and improve the SPS.

Few schools detail what services they want from their school psychologist and evaluate the service, despite Department guidelines suggesting they do so. In 2020, only 7% of schools provided evidence to the Department that they have evaluated their annual plan to determine if they achieved the intended outcomes. This means that the Department is missing key information that could help it to understand how effectively the SPS is meeting demand.

The Department does not collect and analyse information about whether students get timely access to services. Neither schools nor the Department are tracking how long it takes for students to receive services from the school psychologist or external providers. Schools are therefore unaware how long they need to support the students while they wait for services. Teachers consistently told us this wait could be from 3 to 24 months for health providers. In addition, the Department is not able to determine where there are delays in obtaining services and whether that is due to a lack of services or inaccessible or ineffective referral pathways.

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## Recommendations

The Department of Education should:

1. define which services the SPS and school psychologists will provide and which services will be externally sourced to meet the students' psychological needs

**Entity response:** The Department agrees with this recommendation. Refer to Appendix 1 for the Department's full response.

**Implementation timeframe:** This will reflect the timelines of the ICA Taskforce and the Department's Student Wellbeing and Care Taskforce through 2022 and 2023.

2. implement service planning that is based on a comprehensive assessment of need and demand at student, school and system levels

**Entity response:** The Department agrees with this recommendation. Refer to Appendix 1 for the Department's full response.

**Implementation timeframe:** The new SPS school service planning process will be in place in 2023.

3. where services are externally provided, develop and communicate appropriate referral pathways

**Entity response:** The Department agrees with this recommendation. Refer to Appendix 1 for the Department's full response.

**Implementation timeframe:** Collaboration with other agencies is ongoing and will result in the establishment of agreement between key agencies to establish whole of State understanding and agreed referral processes. This work will form part of the ICA Taskforce response and timeline through 2022 and 2023.

4. develop an operating model that includes

- a. a workforce plan for the SPS that aligns staffing to students' and schools' needs
- b. a resource allocation model that ensures enough school psychology time is available to provide practical support to each school

**Entity response:** The Department agrees with part (a) of this recommendation. Refer to Appendix 1 for the Department's full response.

**Implementation timeframe:** December 2022 for part (a)

5. monitor the performance of the SPS and school psychologists including:

- a. establish and measure performance indicators, especially waitlist numbers and timeframes
- b. improve information on service delivery in schools and timeliness of access, to use in continuous improvement.

**Entity response:** The Department partially agrees with part (a) and agrees with part (b) of this recommendation. Refer to Appendix 1 for the Department's full response.

**Implementation timeframe:** The development work on the new records management system will be undertaken in 2022 and 2023 with implementation in late 2023 and 2024.

## Response from the Department of Education

Schools are a microcosm of society and the increasing demand for psychological services in the community at large, applies equally to schools. This is a challenge for student services teams in schools of which school psychologists are a critical part.

The primary function of the School Psychology Service (SPS) is to support educational outcomes in public school settings. School psychologists assist school staff to enhance the social and emotional wellbeing of all students and thereby prevent the development of mental health problems for students in the future. This proactive and preventative dimension of their work adds value to the school system. Although school psychologists provide professional support and care to the most vulnerable and at-risk students within the public school system, they are not primary providers of clinical mental health support for children and young people.

While the audit made no findings about the appropriateness or efficacy of the professional work of school psychologists, the Department is confident that through its quality assurance processes, supervision practices and support for professional learning of school psychologists, the professional practice within the SPS is of a high standard.

Service planning to ensure that school psychologists are responsive to student and school needs currently occurs at school, regional and central levels. A key mechanism for this is the service agreement that is established between school psychologists and principals. This agreement specifies the psychological services that will be delivered to meet student and school needs. However, the Department acknowledges the need for processes that strengthen SPS planning at the system level along with clearer communication to schools.

The SPS has prepared and will further review the specifications for a contemporary online records management system (ORMS) and is prioritising its development. ORMS will increase capacity to provide information at the school, region and Departmental level and track performance and service effectiveness.

The State Government commitment to add 100 FTE to the SPS staffing complement will enable improvement in the full range of services available to schools including direct psychological intervention for individual students as well as indirect services such as consulting with teachers and principals and supporting whole school improvement strategies.

The Department will continue to work with inter-agency partners to support the reform of infant, child and adolescent mental health services currently being undertaken within Western Australia. The Department has initiated a Student Wellbeing and Care Taskforce which, as part of its remit, will clarify the service expectations of school psychologists and referral pathways within and external to the Department.

The Department acknowledges the recommendations of the Office of the Auditor General and will act on them to ensure that school psychology services are improved for the benefit of all public school students.



## Audit focus and scope

The objective of the audit was to assess if the Department of Education is effectively managing school psychology services so that students get timely access to services that meet their needs.

We based our audit on the following criteria:

- Are students' psychological support needs identified in a timely manner?
- Do school psychology services address identified needs in a timely manner?

We examined whether the Department ensured that school psychologists were appropriately qualified and supported, but did not assess the appropriateness of their professional practice.

We reviewed the Department's approach to managing the SPS and the support provided to school leaders, teachers and school psychologists to effectively engage with it. In undertaking the audit, we:

- reviewed the Department's policies and procedures
- interviewed key Department executives and staff
- interviewed interested parties including the Mental Health Commission, Commissioner for Children and Young People, State School Teachers Union of WA, WA Primary Principals Association, WA Secondary Schools Executives Association and School Psychology Association of WA
- interviewed school leaders, teachers and school psychologists at a sample of schools from a sample of education geographic regions
- conducted site visits at 3 schools, and online meetings with a further 7 schools
- reviewed the Department's survey results of principals, lead school psychologists and school psychologists
- reviewed the Commissioner for Children and Young People's 'Speaking Out Survey'<sup>8</sup> 2021 results
- reviewed publicly available information to understand school psychology services in other Australian jurisdictions
- analysed the Department's data within their records management system for the School Psychology Service.

This was an independent performance audit, conducted under section 18 of the *Auditor General Act 2006*, in accordance with Australian Standard on Assurance Engagements ASAE 3500 *Performance Engagements*. We complied with the independence and other ethical requirements related to assurance engagements. Performance audits focus primarily on the effective management and operations of entity programs and activities. The approximate cost of undertaking the audit and reporting was \$390,000.

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<sup>8</sup> Commissioner for Children and Young People, *Speaking out Survey*, November 2021, downloaded 3 February 2022

## Audit findings

### **The Department does not plan services based on demand and has not defined what the SPS will provide, resulting in inequitable service delivery**

#### **The Department is not using basic information on demand and activity to inform service planning for the SPS**

The Department does not effectively collect and use data about what school psychologists do and the needs they address. School psychologists upload some of this information into the SPS database, but the data is incomplete, is not entered consistently and is difficult to retrieve. This limits the effectiveness of the Department's planning, as it is not using all relevant information to get a clearer picture of existing student demand.

Principals, lead school psychologists and school psychologists have completed surveys on the SPS since 2011, however the Department has not acted on the feedback. For example, the school psychologists' responses indicated that they need additional support for their own mental wellbeing, yet there has been no additional support provided. The Department's failure to use this extensive data set, collected over a decade, limits their ability to effectively shape the delivery of the SPS.

The Department does not use survey data from external sources to inform planning for delivery of the SPS. For example, the Commissioner for Children and Young People's (CCYP) school survey on student wellbeing showed school staff identified mental health, and emotional and behavioural disorders as the most common issues impacting student wellbeing.<sup>9</sup> They cited occurrences of anxiety, depression, post-traumatic stress disorder, behavioural and learning disorders such as ADHD, bullying, social isolation and prolonged peer conflict as common mental health issues for students. They also raised concerns about students who demonstrated non-suicidal self-injury, suicidal ideation and high risk of addictive behaviours. The Department told us this information was embedded into professional practice guidelines, however the information has not informed SPS planning.

The SPS is represented on a range of State and national working parties and policy groups that focus on issues related to youth mental health and wellbeing. These stakeholders share their knowledge and experience with lead school psychologists on an ad hoc basis, but there is no process in place to incorporate this shared knowledge into planning of the SPS. This means the Department may not be using a valuable source of information when making decisions on which services the SPS should provide within schools.

#### **The Department has not defined what services the SPS will provide**

The Department does not have a strategic or operational plan for the SPS that defines its role. Consequently, the SPS leadership is unable to consistently define what services the SPS should provide to schools and what services will come from health providers. This means the Department cannot explain to schools and school psychologists the appropriate balance between providing educational psychology services and clinical services. Each of the schools we spoke to had different opinions about the role of the SPS which impacted how they used their school psychologist and how they viewed the effectiveness of the service. As a result, school psychologists often do work that the Department does not intend to be part of their role.

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<sup>9</sup> Commissioner for Children and Young People, *School survey findings on student wellbeing*, October 2020, downloaded 3 November 2021.



School psychologists, like all psychologists, are registered by the Psychology Board of Australia. They have expertise in working with children, their families and schools, to promote protective factors and minimise the educational impact of difficulties with mental health or disabilities. School psychologists work at an individual, group and whole-of-school level to support children's mental health, development and learning. They differ to clinical psychologists who generally work in roles related to the diagnosis and treatment of individuals with mental health disorders.

As registered psychologists, school psychologists work within their code of ethics which imposes responsibilities on them to provide support in line with their duty of care. They can do this by referring the student to a specialist service, but if access to that service is limited and slow, they often have to provide interim services while the child waits. This diverts them away from providing preventative services at the whole-school level, causing confusion about where school psychologists should focus their work and inconsistency in service delivery.

The Department's surveys indicate that the highest proportion of school psychologists' time is spent on working with individuals. However, the Australian Psychological Society and CCYP identify whole-school, preventative measures and teacher capacity building as the most effective use of a school psychologist's time. The high proportion of time school psychologists spend providing services to individuals means that they provide more direct services to students than is intended, stretching what is already a limited resource.

The Department has not determined how the SPS will operate as part of a broader network of health service providers. School psychologists play a role in engaging with other service providers, though this role varies from school to school depending on the maturity of the student services team and the availability of other service providers in the region. The Department has not developed effective working relationships with external health service providers, instead they are managed locally by each school psychologist. This reduces the Department's capacity to define efficient referral pathways and preserve the boundaries of the service the SPS provides.

Teachers have not been given consistent guidance on when to refer a student to the school psychologist. This lack of guidance creates an expectation gap about when the school psychologist should be providing support, especially if the student is disruptive. This can lead to a perception that the service is not effective, causing teachers to become disengaged and not seek support when it is needed. This may result in students not getting the care they need.

### **The Department does not provide effective support for schools to engage with the SPS**

School leaders do not receive information from the Department about the range of services and support they can obtain from the SPS. School principals decide how their schools will use their school psychologists but they are not provided with complete information about the services they can receive. The Department has not created centralised information about the range of services that the SPS provides. Without clear and consistent information about the SPS, principals' planning and decisions are not properly informed and services may not align with current priorities in their schools.

Teachers can be the first to identify a student needing psychological support but many are not confident in their skills to do so. CCYP data shows that schools and students felt that teachers were not adequately equipped to identify students' needs and this was confirmed by the teachers we interviewed.<sup>10</sup> This risks teachers either over referring students rather than managing behaviour or under referring because they are unable to identify the need for

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<sup>10</sup> Commissioner for Children and Young People, *School survey findings on student wellbeing*, October 2020, downloaded 3 November 2021

support. As a result, whether students' needs are identified is partly dependent on teachers' experience, which varies from school to school. If needs are not identified, schools and the SPS cannot adequately plan the support required.

The exception is where the Department has provided guidance for managing suicidal behaviours or non-suicidal self-harm and self-injury. This includes support to identify risk and clear guidance on action to be taken, communication channels and record keeping. Providing clear guidance means that school staff are aware of the support available and where it can be sourced.

## **Weaknesses in the Department's planning and allocation of its psychologists result in some schools having insufficient support**

The Department does not have a clear operating model that links workforce with demand and a good understanding of statewide and local needs. The Australian Psychological Society<sup>11</sup> provides a benchmark ratio of 1 school psychologist for every 500 students and this is broadly accepted by the Department. This is a single indicator which will need to be adapted to WA and will vary from school to school based on need, but it suggests the Department is falling short of demand. Based on the total number of school psychologists the Department has advised it employs, in April 2022 it was operating at a ratio of 1 school psychologist for every 872 students. The 2022 model allocating psychologists directly to schools results in 1 school psychologist for every 1,253 students.<sup>12</sup> Additional specialist services and support is available via lead school psychologists and Statewide Services, and some schools have employed psychologists directly. In 2022, 87% of WA schools did not meet the 1:500 ratio in their direct allocation. Without a clear operating model, the Department is unable to determine the necessary size and deployment of the SPS workforce, if it has that workforce in place and if more resources are needed.

Trends indicate increasing demand for student mental health support.<sup>13,14</sup> Since 2011, the Department has increased the number of school psychologists in the SPS in line with increasing student numbers. However, until 2021 the Department did not account for the increasing demand for mental health support. The Department is now seeking to address this gap by employing an additional 100 school psychologists. This is expected to cost \$35.8 million, with recruitment complete by 2025. Without adequate workforce planning the Department does not know if this will meet demand.

The Department's information on its workforce is incomplete and it does not know if allocated resources are being used. The SPS was unable to provide complete and timely information on staffing levels and vacancies. The SPS also could not verify if the current pool of school psychologists is sufficient to meet allocations under its formula or meet regions' and schools' requests for additional FTE. The Department's lack of understanding of the status of its school psychologist workforce compounds the problems from not having an operational model making it unable to ensure that enough school psychologists are available to schools.

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<sup>11</sup> As reported in the Productivity Commission, *Mental health: Productivity Commission inquiry report* volume 2, No. 95, 30 June 2020, downloaded 18 May 2022, p. 238.

<sup>12</sup> Based on student numbers provided by the SPS in their allocation model for 2022 and FTE numbers provided to the OAG in April 2022.

<sup>13</sup> Commissioner for Children and Young People, *School survey findings on student wellbeing*, October 2020, downloaded 3 November 2021.

<sup>14</sup> Ministerial Taskforce into Public Mental Health Services for Infants, Children and Adolescents aged 0-18 years in Western Australia (ICA Taskforce), *Final Report*, March 2022, downloaded 18 March 2022.

## Some schools receive impractically small allocations of school psychologists

The formula the Department uses to allocate school psychologists to individual schools provides a consistent basis for distributing available school psychologist time. The formula was developed by the SPS and the Department's School Funding branch with data analysis provided by the University of Western Australia's Centre of Applied Statistics. It takes into account proxies of need including:

- predicted student numbers
- social disadvantage based on the index of community socio-educational advantage
- location based on the Australian Bureau of Statistics' remoteness index and distance from Perth
- the Department's student disability allocation
- Aboriginality, based on the number of Aboriginal students identified in the Department's February census of students
- students whose disability is yet to be diagnosed
- students who have English as an additional language or dialect.

The Department has not determined a minimum allocation that will mean a school will receive a sufficient level of support. The allocation model has resulted in:

- one in 5 schools have an allocation of only 5 days of school psychologist time each term (that is, 0.5 day per week), or less. Lead school psychologists reported that this small allocation is impractical and principals consistently expressed concern that their allocations of school psychologist time were not sufficient.
- three-quarters of schools have less than 2 days per week of psychologist time, including some large schools of over 700 students.
- only 27 schools in the state (3%) have a full-time school psychologist (see Table 1).

While the formula provides apparent fairness in distributing resources, it results in some schools having an allocation of school psychologist time which provides little benefit to the school.

School psychologist allocation		Number of schools across the state	Percentage of schools across the state (%)	Range of student numbers at the schools	
Days per term	Days per week				
1 - 5	≤ 0.5	162	19.8	4 - 212	77.5%
6 - 10	>0.5 ≤ 1	176	21.5	43 - 452	
11 - 20	>1 - ≤ 2	297	36.2	63 - 918	
21 - 50	>2 - ≤ 5	158	19.3	234 - 1817	
50	Full time school psychologist	2	0.2	380 – 1,318	22.5%
51 - 76	More than 1 full time school psychologist	25	3.0	306 – 2,674	

Source: OAG using the Department's information

## Table 1: School psychologist allocations

There are 28 schools with less than 1 day per term of school psychologist time (0.02 FTE). Half of these schools are community kindergartens and the other half are primary schools with less than 25 students. While a low allocation is understandable for these schools, 1 day a term is unlikely to result in the school being supported. The 5.6 FTE allocated to the 28 schools may have been used more appropriately outside the standard allocation process.

The Department's formula does not account for necessary operational and administrative tasks. This disadvantages some schools, particularly those with small allocations of school psychologist time or when school psychologists work across multiple schools. As a result, some schools have their school psychologist time reduced. In other schools, psychologists work out of hours to complete administrative tasks, which can lead to burnout.

The Department's formula also does not consider how schools have used their allocations. It does not collect and analyse information on the activities of school psychologists from the previous year or factor in prominent incidents which can predict ongoing demand. Consequently, the Department does not know if the school psychologist time allocated to schools matches their specific needs.

### The Department's strategies for supplementing allocations of school psychologists are restricted by workforce availability

The Department advises schools they can supplement their allocation of school psychologist time by:

- being provided additional school psychologist time through a discretionary allocation managed in each region
- purchasing additional school psychologist time from the Department
- recruiting a school psychologist directly

but these options often fail due to the limited availability of the workforce.

The Department provides directors of education in each region an allocation of school psychologist time equivalent to 7.5% of their region's total school psychologist FTE. This is intended to provide flexibility in the allocation model and enable regions to respond to emerging needs in schools and deliver regional and system priorities. However, there is no additional workforce attached to this allocation. Psychologists are sourced from the limited pool of people already employed by the Department, which results in the discretionary allocations competing with standard allocations of school psychologist time.

The limited pool of psychologists also impacts if requests to purchase additional time are met. Regional and remote areas are particularly vulnerable to these limitations. The Department does not follow a consistent process when schools are willing to pay for additional resources. Schools' requests are handled by lead school psychologists and processes are different in each of the regions. Therefore, often schools are unable to supplement their school psychology allocation even when they are seeking to do so.

Schools are able to directly employ school psychologists by advertising on the open market. In 2022, just over 200 schools employ their school psychologists directly. This option enables schools to recruit from outside the existing pool of school psychologists, such as psychologists from interstate, but this rarely happens. Most often when schools appoint directly, the person is known to them as they are already working for the Department. The direct appointment therefore reduces the number of school psychologists available to the Department.

## **The Department ensures school psychologists are qualified**

When recruiting school psychologists, the Department checks that they are appropriately qualified and eligible for registration with the Australian Health Practitioner Regulation Agency. The Department also ensures that school psychologists maintain ongoing registration.

School psychologists are required to engage in ongoing professional learning to maintain the currency of their clinical knowledge. The Department provides regular opportunities for school psychologists to engage with each other in peer-led professional learning and mentoring. School psychologists also can apply for funding to attend conferences and other training relevant to their profession. The Department provides adequate opportunity for school psychologists to engage in ongoing learning and development relevant to their profession.

## **The Department does not have robust information to track the effectiveness of the SPS**

### **The Department is not actively monitoring how the SPS is performing**

The SPS has not defined its measures of effectiveness and efficiency and is not using activity data to understand what it is currently delivering. This information is usually contained in a strategic plan but the Department does not require the SPS to have one. The SPS leadership team has held workshops on strategic planning but has yet to develop a plan. As a result, there is nothing against which the Department can evaluate the outcomes and impact of the SPS. Without this, the Department cannot know if the SPS is delivering the intended benefits efficiently and effectively.

School psychologists do not consistently record requests for their services in the database the Department uses to record the activities of the SPS. For the 2017 school year there were approximately 24,000 requests for services recorded in the SPS database. Demand for services has grown since then, with over 29,000 cases recorded for the 2020 school year. However, the true number of requests is unknown as school psychologists do not always log cases or close off files promptly. This means the Department does not have access to reliable data about the SPS's levels of activity.

### **The Department does not collect information about whether students get timely access to services**

The Department does not have information that enables it to track the timeliness of service provision. The schools we visited did not collect data on how long it took for students to access internal or external services. Anecdotally, schools estimated that accessing external services can take between 3 and 24 months. Without this information the Department cannot assess if supply is meeting demand which limits their ability to persuade external providers to increase availability of services.

Schools continue to support students while they are waiting to access services. As a result, school psychologists often get drawn into providing support that should come from external providers and the additional demand on schools' resources impacts staff and students' learning and wellbeing. The Department is unable to estimate the cost or broader impacts of continuing to provide support for students while they are waiting for access to services, or the detriment to students and their peers if psychological services are not accessed in a timely way.

## Appendix 1: Department's response to audit recommendations

### **1. Define which services the SPS and school psychologists will provide and which services will be externally sourced to meet students' psychological needs.**

#### Response

The Department agrees with this recommendation.

The Department acknowledges that the psychological needs of students must be addressed by a whole of community approach. The Department will continue to work with inter-agency partners to support the reform of infant, child and adolescent mental health services currently being undertaken within Western Australia and will define the role of the School Psychology Service as part of this whole of community approach.

While the range of services that the School Psychology Service will provide has been defined, the boundary between what services will be provided within the public school system and what services are expected to be delivered by external service providers requires further clarification.

The Department has responded proactively to recommendations from external reports, investigations and surveys, with the establishment in March 2022 of a Student Wellbeing and Care Taskforce. The work of the Taskforce will clarify and articulate the role of the School Psychology Service in supporting student mental health and wellbeing and the limits to what can be expected, particularly in terms of clinical intervention.

Consideration will be given to an agreement between key agencies to establish roles, responsibilities and referral processes.

The School Psychology Service has already identified the need for the School Psychologist Competency Framework to be revised to reflect changes in role and to increase role clarity. This work will proceed as planned.

#### Timeline

This will reflect the timelines of the ICA Taskforce and the Department's Student Wellbeing and Care Taskforce through 2022 and 2023.

### **2. Implement service planning that is based on a comprehensive assessment of need and demand at student, school and system levels.**

#### Response

The Department agrees with this recommendation

The Department accepts that service planning should incorporate responsiveness to need. Such planning is currently undertaken at the school, regional and system level but it is accepted that this could be improved.

As part of its planning at system level, the Department has developed a sophisticated evidence based resourcing tool to allocate scarce resources as fairly as possible.

Improved processes for School Psychology Service school service planning have been developed and trialled in the last 12 months. This process will involve comprehensive review of school data, identified needs and whole-school priorities to inform planning. Revised planning documents will explicitly reflect the School Psychology Service's contribution to the school priorities across tiers and include preventative and responsive service delivery.



Data will be collated at a regional and system level to inform planning and resource allocation.

The incorporation of school service planning processes into broader public school accountability requirements will be explored.

#### Timeline

New SPS school service planning process will be in place in 2023.

### **3. Where services are externally provided, develop and communicate appropriate referral pathways.**

#### Response

The Department agrees with this recommendation.

The Department will respond to recommendations from the ICA and Student Wellbeing and Care Taskforces, to strengthen shared care practice and streamline pathways for students to access external supports complementary to school supports and services.

This will require schools and external providers to work together towards a continuum of support.

Resources to support schools and school psychologists to respond to requests for services from external agencies and practitioners are being developed and will be communicated to school psychologists and schools by the end of 2022.

#### Timeline

Collaboration with other agencies is ongoing and will result in the establishment of agreement between key agencies to establish whole of State understandings and agreed referral processes. This work will form part of the ICA Taskforce response and timeline through 2022 and 2023.

### **4. Develop an operating model that includes**

- (a) a workforce plan for the SPS that aligns staffing to students' and schools' needs**
- (b) a resource allocation model that ensures enough school psychology time is available to provide practical support to each school.**

#### Response

The Department agrees with (a) and disagrees with (b).

Regarding recommendation (a), improved workforce planning is currently underway. The Department will develop a comprehensive workforce plan to support the ongoing management and expansion of the school psychology workforce. The plan will be supported by detailed workforce business intelligence reports that will monitor key workforce cost and activity metrics across the state.

Competition for psychologists across the labour market is increasing and the Department will continue to explore innovative ways to attract, recruit and retain staff. Supply must also increase significantly to meet this demand.

Regarding recommendation (b), the Department disagrees with this recommendation [as it considers it already has an evidence-based model for distributing their current resources and that they have strategies for supplementing these allocations including the ability for schools to choose to purchase services from their budgets.]

**OAG response:** The practical limitations of the current model and other administrative aspects are outlined in the audit findings.

#### Timeline

December 2022 for recommendation (a).

### **5. Monitor the performance of the SPS and school psychologists including:**

#### **(a) establish and measure performance indicators, especially waitlist numbers and timeframes**

##### Response

The Department partially agrees with this recommendation.

The Department acknowledges the need for improved establishment and measurement of systemic performance indicators for the School Psychology Service. Appropriate indicators will be identified and data collected to inform planning.

The Department does not believe that waitlist numbers and timeframes would be appropriate performance indicators for the school psychology service. The concepts of wait list numbers and waiting times for service are based on a model of individual referrals to individual practitioners. The operating model of school psychologists is based on a continuum of direct and indirect services with a focus on schools as organisations, school principals and school staff, not simply as one-to-one interventions with individual students.

#### **(b) improve information on service delivery in schools and timeliness of access, to use in continuous improvement**

##### Response

The Department agrees with this recommendation.

The new online records management system for the School Psychology Service will more accurately capture the universal, targeted and intensive work undertaken by school psychologists. It will similarly better capture both direct and indirect service delivery work undertaken.

The specification for the system has already been developed and will allow functionality to reliably measure performance indicators, including numbers, sources and types of service requests, request reasons, outcomes and service delivery timeframes.

School level, regional and system level reports will be regularly drawn from the database to drive continuous improvement.

The Department will ensure that school psychology service planning is improved by embedding within the broader public school accountability requirements. Strengthened communication and processes for planning, accessing and evaluating school psychology service will be developed and made available to schools.

#### Timeline

The development work on the new records management system will be undertaken in 2022 and 2023 with implementation in late 2023 and 2024.



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## Auditor General's 2021-22 reports

Number	Title	Date tabled
20	Fraud Risk Management – Better Practice Guide	22 June 2022
19	Forensic Audit – Construction Training Fund	22 June 2022
18	Opinion on Ministerial Notification – FPC Sawmill Volumes	20 June 2022
17	2022 Transparency Report Major Projects	17 June 2022
16	Staff Rostering in Corrective Services	18 May 2022
15	COVID-19 Contact Tracing System – Application Audit	18 May 2022
14	Audit Results Report – Annual 2020-21 Financial Audits of State Government Entities Part 2: COVID-19 Impact	9 May 2022
13	Information Systems Audit Report 2022 – State Government Entities	31 March 2022
12	Viable Cycling in the Perth Area	9 December 2021
11	Forensic Audit Report – Establishment Phase	8 December 2021
10	Audit Results Report – Annual 2020-21 Financial Audits of State Government Entities	24 November 2021
9	Cyber Security in Local Government	24 November 2021
8	WA's COVID-19 Vaccine Roll-out	18 November 2021
7	Water Corporation: Management of Water Pipes – Follow-Up	17 November 2021
6	Roll-out of State COVID-19 Stimulus Initiatives: July 2020 – March 2021	20 October 2021
5	Local Government COVID-19 Financial Hardship Support	15 October 2021
4	Public Building Maintenance	24 August 2021
3	Staff Exit Controls	5 August 2021
2	SafeWA – Application Audit	2 August 2021
1	Opinion on Ministerial Notification – FPC Arbitration Outcome	29 July 2021

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