Australian Psychology Accreditation Council

Alignment Accreditation Standards Review: Consultation Paper

Round 1: Public Consultation

17 February 2025

Contents

1. How to respond:

Please respond in writing using the submission template and submit your submission via email with the subject line **'Round 1: Public consultation submission.'** Ensure the email contains the contact information and name of the individual or organisation. You may address some or all of the listed discussion questions.

Please submit before **24 March 2025** to apacstandards@apac.au

For further information, please refer to our website:

APAC Alignment Accreditation Standards Review

If you have questions about this consultation paper, the Alignment Accreditation Standards Review, or related matters, please email apacstandards@apac.au

2. Publication of submissions:

APAC may publish submissions on its website at its discretion. Please state in your submission if you do not want your submission published.

Requests for confidentiality can be made for privacy reasons or if the submission contains sensitive information or personal experiences. Submissions must clearly state if they wish to remain confidential. Requests for confidentiality should also indicate if part or all of the submission is to remain confidential. These submissions will not be published on APAC's website or in any other public format.

Published submissions will contain the names of businesses, organisations and/or individuals unless confidentiality is requested.

3. This consultation paper's purpose:

Under the *National Law*, APAC is required to ensure that accreditation Standards are contemporary and relevant; therefore, the Standards are reviewed regularly. The Standards Review Project will review and revise the Accreditation Standards to produce a new version that aligns with PsyBA's Professional Competencies and Code of Conduct and reflects contemporary developments in the sector.

This consultation paper concerns the Alignment Accreditation Standards Review in 2025. It will allow key stakeholders and the public to contribute their knowledge on critical issues relevant to the review. This paper will outline, explain, and direct submissions to respond to a series of key questions. These submissions will be analysed, interpreted, and used as part of supporting evidence to develop the draft Standards. A report summarising the key findings from this consultation will be released publicly.

4. The Alignment Accreditation Standards 2025 Review: Overview:

4.1 Governance:

A formalised Project Control Group (PCG) coordinates the Alignment Accreditation Standards Review 2025. The PCG is Chaired by APAC CEO David Ensor and includes Accreditation Assessment Committee Chair A/Prof Melissa Davis, Acting Accreditation Manager Stepanie Korilis and Accreditation Project Lead Stephanie Roberts.

The **Project Control Group (PCG)** has been formed to manage timelines, deliverables, and approve operational documents. The PCG will inform the APAC Accreditation Assessment Committee (AAC) on Alignment Accreditation Standards Review 2025 Project developments and impacts.

The **APAC Accreditation Assessment Committee (AAC)** will approve consultation papers and draft versions of the Standards. They will provide subject matter expertise throughout the development of new Standards.

The **APAC Board** will be given regular progress updates on the Alignment Accreditation Standards Review 2025 Project's progress and will approve the new Standards before submission to PsyBA.

The **Psychology Board of Australia (PsyBA)** will receive regular updates on the progress of the Alignment Accreditation Standards Review 2025 Project. The final draft of the Standards will be submitted to PsyBA for approval.

4.2 The process of undertaking the review:

The APAC Accreditation Standards are typically reviewed approximately every 5 years or as necessary to ensure they remain contemporary and relevant to psychology education and training. While this review will align APAC Accreditation Standards with the PsyBA's Professional Competencies and Code of Conduct, a future review will consider more transformative opportunities to support workforce development and contemporary approaches to accreditation.

The scope, requirements, and timeframe of this review were considered by the AAC and APAC Board before a project plan was developed.

Three working groups were formed for the Standards Review Project. The **Psychology Accreditation Working Group**, **Aboriginal and Torres Strait Islander Advisory Group** and **Diversity in Psychology Advisory Group.** These groups included APAC AAC members, Assessors, and Australian Indigenous Psychology Education Project (AIPEP) members. A formal Expression of Interest was released to the public, inviting applicants to fill the remaining places in the working and advisory groups. These groups will meet for five sessions throughout the course of the review to provide consultative support and assist in drafting updated Standards.

Further consultation will be conducted with key stakeholders in the psychology education and training sector, including but not limited to the Heads of Psychology (HODSPA), the Australian Psychological Society (APS) and the Australian Association for Psychologists (AAPi).

A survey will be released publicly to provide key stakeholders with an alternative mechanism to provide feedback on key issues.
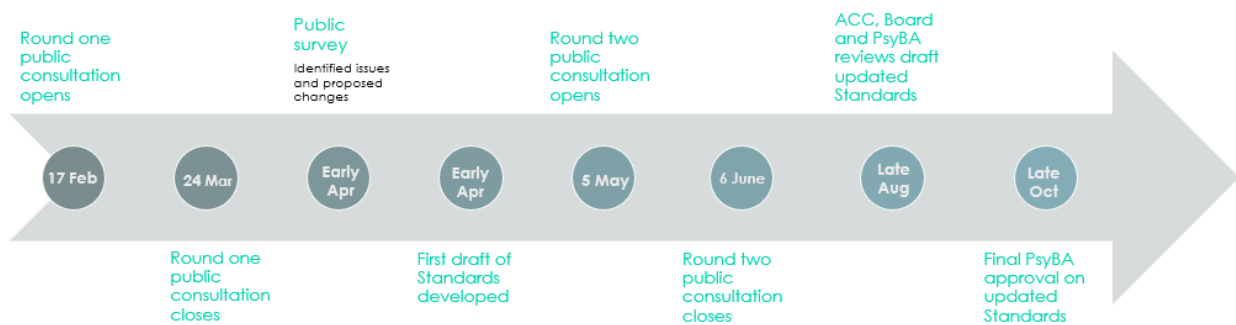
Two rounds of public consultation will be initiated to ensure a broad range of stakeholders are consulted. Draft Standards will be developed from the first round of consultation, the working and advisory groups and other supporting evidence. These draft Standards will be included in Public Consultation Round 2 for further consideration.

The AAC and APAC Board will review and approve the final draft Standards before submission to PsyBA in October 2025.

A Transition Plan will be developed to assist HEPs with the changes and ensure the impact of the transition is well considered and managed.

Further details regarding the process, actions and opportunities to engage with this review is available on the APAC website.

4.3 The Alignment Accreditation Standards Review 2025 Timeline

Round one public consultation opens — 17 Feb

Round one public consultation closes — 24 Mar

Public survey — Identified issues and proposed changes — Early Apr

First draft of Standards developed — Early Apr

Round two public consultation opens — 5 May

Round two public consultation closes — 6 June

ACC, Board and PsyBA reviews draft updated Standards — Late Aug

Final PsyBA approval on updated Standards — Late Oct

5. Background and Context of APAC

The Australian Psychology Accreditation Council Limited (APAC) is an independent not-for profit quality and Standards organisation. Appointed by the Psychology Board of Australia (PsyBA), APAC is the accrediting authority for the psychology profession in Australia under Section 43 of the *Health Practitioner Regulation National Law Act 2009* (the *National Law*) as enacted in each state and territory of Australia.

APAC's main functions include:

- developing Standards for the education and training of psychologists for approval by the PsyBA

- assessing higher education providers (HEP) and the programs of study they offer to determine whether they meet the approved Accreditation Standards

- monitoring accredited HEPs and its programs of study to ensure they continue to meet the approved Accreditation Standards

- assessing, accrediting and examining authorities in other countries, in cooperation with the PsyBA, to determine if graduates of the authorities' examinations or accredited programs of study have the knowledge, skills and professional attributes necessary to practise the profession in Australia

- supporting HEPs in developing and maintaining high-quality programs of education and training in psychology

- advising and consulting to the PsyBA and other bodies on matters of education and training relevant to the psychology profession and discipline.

5.1 APAC's role and responsibilities in accreditation

APAC's vision is to improve societal well-being through ensuring high-quality education and training in psychology. APAC develops the Accreditation Standards for Psychology Programs. APAC conducts accreditation activities to implement and assess psychology programs against the approved Standards to ensure that graduates of accredited programs receive high-quality education and demonstrate achievement of relevant psychological knowledge and skills.

Under the *National Law*, APAC is required to ensure that Accreditation Standards are contemporary and relevant, and therefore, reviewed regularly.

In undertaking a review, APAC must ensure that changes are made in accordance with good regulatory practice and must follow the relevant Guidelines set out by the Australian Health Practitioner Regulation Agency (Ahpra), that there be wide-ranging consultation and ample opportunity for stakeholders to provide input into the Standards. In addition, relevant statutory requirements must be met, Standards must be fit for purpose and consistent with local and international best practice.

5.2 The higher education environment

The Tertiary Education Quality Standards Agency (TEQSA) is the national regulatory and quality assurance body. TEQSA is responsible for regulating and assuring the quality of all providers of higher education in Australia. TEQSA assesses higher education providers and its programs to determine whether they comply with the *Higher Education Standards Framework* (*Threshold Standards*) *2021*.[1]

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[1] For further information see: TEQSA, *Higher Education Standards Framework (Threshold Standards),* Australia, 2021.

APAC accreditation of programs of study is premised on the provider being a registered university or university college with program self-accreditation status or a registered HEP's programs are accredited by the TEQSA. Furthermore, APAC accreditation assumes ongoing compliance with the *Threshold Standards* for the accreditation and delivery of programs of study, including meeting the requirements of the Australian Qualifications Framework (AQF). HEPs at all levels of the AQF accredited by APAC (AQF levels 7 to 10) must demonstrate the breadth and depth of knowledge, skills and application, volume of learning and research as stipulated in the AQF.[2]

5.3 2019 Accreditation Standards

The 2019 Accreditation Standards support the scientist-practitioner model of learning used by the profession and are designed to ensure students acquire the knowledge, skills and attributes required to practise psychology competently and safely.

The Graduate Competencies are the key reference point in the Standards and document the competencies that graduates must have at each exit point. The Graduate Competencies map comprehensively against existing international and national competencies, including the International Declaration on Core Competence in Professional Psychology (IDCP), the PsyBA's National Psychology Examination curriculum and internship competencies, and the Australian National Practice Standards for the Mental Health Workforce.[3]

Application of the 2019 Accreditation Standards

The Standards set out the minimum requirements to be met to deliver psychology programs suitable for safe practice of the profession. Each Domain is supported by a set of Criteria. A Domain is considered as met when the program meets all requirements of each criterion that fall within that Domain.

There are five Domains of the 2019 Accreditation Standards and each Domain is supported by a standard statement:

1. **Domain 1 Public safety:** Public safety is assured.
2. **Domain 2 Academic governance and quality assurance:** Academic governance and quality assurance processes are effective.
3. **Domain 3 Program of study:** Program of study design, delivery and resourcing enable students to achieve the required Graduate Competencies.

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[2] See: APAC, *Accreditation Standards v1.2,* Australia, 2019.

[3] See: Australian Government, *National practise standards for the mental health workforce 2013,* Victorian Government Department of Health, Melbourne, 2013.

4. **Domain 4 The student experience:** Students are provided with equitable and timely access to information and support.

5. **Domain 5 Assessment:** Assessment is fair, reliable and valid.

2019 Accreditation Standards: Graduate Competencies

The Graduate Competency levels represent a progression through increasing levels of competence:

1. Foundational Competencies (Level 1)

Programs are typically equivalent to an undergraduate Bachelor's Degree, or a higher-level psychology qualification intended as a bridge for students holding a qualification in another discipline, such as a Graduate Diploma.

Graduates at this level have broad and coherent knowledge and skills in the scientific discipline of psychology.

2. Pre-Professional Competencies (Level 2)

Programs are typically equivalent to a Bachelor's Honours Degree or an equivalent level qualification, such as a Graduate Diploma (Advanced), if the Graduate Competencies in research can be met.

Graduates of programs at this level have basic knowledge and skills in the professional practice of psychology and the independent conduct and evaluation of scientific research.

3. Professional Competencies (Level 3)

Programs are typically equivalent to a Master's Degree (Coursework).

Graduates of programs at this level will have advanced knowledge and skills for professional practice and research in psychology.

4. Professional Competencies for specialised areas of practice (Level 4)

Programs are offered either as a Master's Degree (Coursework) or a Doctoral Degree (Professional). Programs may also be offered as a Stand-alone 6th year sequence intended as a bridge for registered psychologists who would like to gain an Area of Practice Endorsement.

A Master's Degree (Coursework) may also be delivered in combination with a Doctoral Degree (Research), providing that the components of the program, including coursework and placements, align with at least a Master's Degree (Coursework).

Graduates of programs at this level have advanced knowledge and skills for professional practice in psychology, as well as specialised knowledge and skills in at least one area of practice in psychology.

The Level 4 Professional Competencies for specialised areas of practice consists of the following nine areas:

- Clinical Neuropsychology

- Clinical psychology
- Community psychology
- Counselling psychology
- Educational and developmental psychology
- Forensic psychology
- Health psychology
- Organisational psychology
- Sport and exercise psychology

The 2019 Accreditation Standards do not stipulate how a provider may package programs of study for the achievement of the Graduate Competencies at the different levels, and any combination of Graduate Competency levels may be packaged. However, the design of the program must allow for different levels of Graduate Competencies to be built sequentially and enable them to be progressively acquired.

6. Related documentation relevant to this review:

6.1 Ahpra – Procedures for the development of Accreditation Standards:

Ahpra has developed *Procedures for developing Accreditation Standards*.[4] These elements outline the type and breadth of consultation APAC must undertake when developing Accreditation Standards and how to report on regulatory impacts. This has been a critical guiding document used to consider effective and appropriate consultation processes, and ensure all relevant stakeholders are represented in this review.

6.2 APAC – Evidence Guide:

The APAC *Evidence Guide* supplements the Accreditation Standards. The purpose of the Evidence Guide is to assist HEPs with interpreting the Standards.[5] This guide assists HEPs in preparing evidence to demonstrate that their programs are designed and delivered in compliance with the Accreditation Standards and support their students in achieving Graduate Competencies. The Evidence Guide will be updated alongside the new Standards to ensure that it remains relevant. A new

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[4] See: AHPRA, *Procedures for the development of Accreditation Standards,* Australia, 2023.

[5] See: APAC, *Evidence Guide Version 1.4,* Australia, 2024.

Evidence Guide will be released after the new Accreditation Standards are approved by PsyBA.

7. The Psychology Board of Australia's professional competencies for psychologists and Code of Conduct: Overview:

7.1 The Psychology Board of Australia's Professional Competencies for psychologists:

The Psychology Board of Australia's *Professional Competencies for psychologists* outlines the essential skills, knowledge, and competencies required for generally registered psychologists to demonstrate and maintain.[6] These competencies are designed to ensure that generally registered psychologists can safely practise, research, and engage with clients, community groups and broader society. These competencies have recently been updated to ensure they remain contemporary and relevant and respond to the needs of the public. The Professional Competencies were released by PsyBA on 7 August 2024 and will be effective on 1 December 2025.

7.2 The Psychology Board of Australia's Code of Conduct:

The Psychology Board of Australia's *Code of Conduct* outlines the Standards of behaviour, attributes, and practices it expects all registered psychologists to exhibit and maintain.[7] These principles are designed to ensure registered psychologists are providing safe, effective, and professional psychological services to clients and the community. These principles have been newly developed to ensure registered psychologists remain responsive to the changing expectations and needs of the public. The Code of Conduct was released by PsyBA on 25 November 2024 and will be effective on 1 December 2025.

8. Aligning the Accreditation Standards and PsyBA's Professional Competencies and Code of Conduct:

A great deal of work has preceded APAC's Alignment Standards Review and needs to be considered when developing and implementing the updated Standards. This review is focused on developing Standards for the education and training of

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[6] See: PsyBA, *Professional Competencies for psychologists,* Australia, 2024.

[7] See: PsyBA, *Code of Conduct,* Australia, 2024.

psychologists for approval by the PsyBA. The Standards are relevant not only for tertiary educators and students but also for practitioners, practice supervisors, employers, and the community, who may be clients of psychological services.

Key areas and themes from PsyBA's Professional Competencies and Code of Conduct have been identified for discussion and review. These are Reflexivity, Cultural Safety, Client Safety, Diversity and Inclusion, Aboriginal and Torres Strait Islander Social and Emotional Wellbeing, Digital Competence and Self-Care. Reflexivity is inextricably linked to Cultural Safety and Client Safety and ultimately to working with diverse client groups, including Aboriginal and Torres Strait Islander people. The importance of introducing digital competence and self-care into the Accreditation Standards cannot be overlooked, as the psychology profession seeks to become a more sustainable, accessible, and adaptable environment for education, training and practice.

8.1 Reflexivity

Reflexivity is an understanding that you have regarding your own identity, with inherent biases, beliefs, and values that shape your identity. This understanding is essential as it provides a framework for our interpretation of other cultures and ways of viewing and existing in the world. According to the APAC Annexure to the APAC evidence guide: Standard 3 Program of Study, criterion 3.8, "*Reflexivity ... encourages critique and challenge of existing knowledge and practice and therefore encourages growth and evolution of self and disciplinary knowledge systems*".[8] The APAC Annexure addresses embedding Aboriginal and Torres Strait Islander cultural responsiveness in psychology education and training.

Reflexivity permits the establishment of a culturally safe place for psychological practice as it seeks to address any sense of feeling unsafe by people from other cultures and diverse backgrounds. It differs from but encompasses reflectivity as both are fundamental to cultural responsiveness. Reflectivity asks psychology practitioners to reflect on an event or action to understand, consider others' perspectives, seek further learning, and grow professionally from experience. Both Reflexivity and reflectivity require questioning one's own worldview and experience with social and cultural values and norms.

Cultural competency requires critical self-awareness and Reflexivity. It also requires reflection on one's practice, social interactions and the provision of culturally secure care to others. Further, it does not impose new forms of racism and colonisation on

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[8] See: APAC, *Annexure to the APAC evidence guide: Standard 3 Program of Study, criterion 3.8*, p. 11, Australia, 2022.

Aboriginal and Torres Strait Islander peoples.[9] It is fundamental to Cultural Safety and client safety, and ultimately, safe psychological practice with all client groups.

The AIPEP describes Reflexivity as follows: *"The ability to provide culturally responsive services is preceded by an understanding of one's own identity as a cultural being. The capacity of all graduates to understand their own cultural identity relevant to that of another person or group is a foundation skill required in every aspect of personal and professional life. The cultural lens through which a person understands her or his context is essential to the interpretation of, and responses to, the world."*[10]

Extract From APAC Annexure to the APAC evidence guide: Standard 3 Program of Study, criterion 3.8:

"Reflexivity is finding strategies to question your own attitudes, thought processes, values, assumptions, prejudices, and habitual actions, to strive to understand our complex roles in relation to others. To be reflexive is to recognise we are active in shaping our surroundings and begin to critically take circumstances and relationships into consideration rather than merely reacting to them and help review and revise ethical ways of being and relating to our world."[11]

The AIPEP Curriculum Framework Section 2: Pedagogical principles states that *"the ability to provide culturally responsive services is preceded by an understanding of one's own identity as a cultural being. The capacity of all graduates to understand their own cultural identity relevant to that of another person or group is a foundational skill required in every aspect of personal and professional life. The cultural lens through which a person understands their context is essential to the interpretation of, and responses to, the world."*[12]

Reflexivity is identified in PsyBA Professional Competency 3 below:

PsyBA Professional Competency 3: Exercises professional Reflexivity, purposeful and deliberate practice, and self-care.[13]

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[9] See: Roz Walker, Clinton Schultz, and Christopher Sonn, "Cultural Competence – Transforming Policy, Services, Programs and Practice" In *Working Together: Aboriginal and Torres Strait Islander Mental Health and Wellbeing Principles and Practice,* 2nd ed, edited by Pat Dudgeon, Hilary Milroy, & Roz Walker, p. 195-221. Australia: Commonwealth of Australia, 2014.

[10] Pat Dudgeon et al., *Australian Indigenous Psychology Education Project Curriculum Framework,* p. 16. Australia, AIPEP, 2016.

[11] See: APAC, *Annexure to the APAC evidence guide: Standard 3 Program of Study, criterion 3.8,* p. 11, Australia, 2022.

[12] Pat Dudgeon et al., *Australian Indigenous Psychology Education Project Curriculum Framework,* p. 16. Australia, AIPEP, 2016.

[13] PsyBA, *Professional Competencies for psychologists,* Australia, p. 10, 2024.

3.1 Understands the parameters underpinning professional competence and can articulate the knowledge, skills and other attributes necessary to practise effectively and safely.

3.2 Recognises the limits of own competence and refers on to other practitioners.

3.3 Critically evaluates the effectiveness of own professional practice and strengths and weaknesses, including regularly self-assessing against the Professional Competencies.

3.4 Engages in reflection and Reflexivity on the impact of one's own culture, values, beliefs and biases, and acts upon such reflection and ensures practice is responsive and adaptive to client, context and culture.

3.5 Engages in self-reflection and critical self-Reflexivity with disciplinary knowledge and professional practice.

3.6 Identifies areas for improvement in their professional practice, competence and conduct, and implements activities to enhance competence and development of professional identity.

3.7 Monitors and manages self-care to sustain professional functioning and wellbeing.

Related PsyBA Professional Competencies:

7.4 Recognises the impact of one's own values, beliefs, experiences, positionality and cultural identity on practice and demonstrates an ongoing commitment to culturally responsive practice.

7.5 Demonstrates the ability to reflect on and learn from clients/relevant others and their unique experiences.

8.5 Demonstrates the ability to reflect on and learn from Aboriginal and Torres Strait Islander cultures and Aboriginal knowledges.[14]

Reflexivity is not mentioned in the current APAC *Accreditation Standards* (2019).

8.2 Cultural Safety

Changes to the *National Law* recognise Cultural Safety as a guiding principle and objective for the National Scheme and is relevant to regulators, accreditation authorities, educators, employers and practitioners.

Culturally safe practice requires the ongoing critical Reflexivity of health practitioner knowledges, skills, attitudes, actions, practising behaviours and power differentials. Culturally safe practice also entails understanding these elements as cultural

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[14] PsyBA, *Professional Competencies for psychologists,* Australia, p. 12, 2024.

determinants of social and emotional wellbeing. Importantly, Cultural Safety is determined by the consumer's experience. To lay the groundwork for Aboriginal and Torres Strait Islander peoples to experience Cultural Safety, psychology graduates must actively engage in culturally responsive practices, including the consideration of power relations, cultural differences, and Aboriginal and Torres Strait Islander peoples' rights, needs, and experiences.

According to PsyBA, the *"Professional Competencies embed Cultural Safety. This means that all psychologists practising in Australia, irrespective of their own cultural background or work context, need to actively work towards providing positive health outcomes for Indigenous people. The Board considers that Cultural Safety is relevant to every psychologist's scope of practice."*[15]

According to Ahpra, Cultural Safety is defined as follows: *"Cultural Safety is determined by Aboriginal and Torres Strait Islander individuals, families and communities. Culturally safe practise is the ongoing critical reflection of health practitioner knowledge, skills, attitudes, practising behaviours and power differentials in delivering safe, accessible and responsive healthcare free of racism."*[16]

Cultural Safety is central to Aboriginal and Torres Strait Islander peoples' relationships with services. It represents a key philosophical shift from providing a service regardless of difference to support that considers their unique needs.

Cultural Safety and culturally safe encounters are more likely to be experienced by Aboriginal and Torres Strait Islander peoples when individual cultural ways of being, preferences and strengths are identified and included in policies, processes, planning, delivery, monitoring, and evaluation.

Cultural Safety is not explicitly referred to in the Accreditation Standards. However, Criterion 3.8 refers to cultural responsiveness, including with Aboriginal and Torres Strait Islander cultures, is appropriately integrated within the program and clearly articulated as a required learning outcome.

8.3 Aboriginal and Torres Strait Islander Social and Emotional Wellbeing

The Social and Emotional Wellbeing of Aboriginal and Torres Strait Islander people have been embedded into the *National Law* by enshrining Cultural Safety. Significant developments and initiatives have been made to address the health inequalities affecting Aboriginal and Torres Strait Islander peoples. The Aboriginal and Torres Strait Islander Social and Emotional Wellbeing Multi-Dimensional

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[15] See: PsyBA, *Professional Competencies for psychologists,* p. 4. 2024.
[16] See: Ahpra. The National Scheme's Aboriginal and Torres Strait Islander Health and Cultural Safety Strategy 2020-2025). p.18.

Framework was developed to consider aspects of Indigenous health and well-being holistically, illustrating that there are tools and resources to understand and meet the needs of Aboriginal and Torres Strait Islander people and their communities.[17]

The AIPEP describes the social and emotional wellbeing of Aboriginal and Torres Strait Islander people as follows: *"Psychology and psychologists recognise the diversity of Aboriginal and Torres Strait Islander cultures and the manner in which social and emotional wellbeing of both Indigenous and non-Indigenous Australians are enhanced by Indigenous cultures and diversity."*[18]

The Social and Emotional Wellbeing of Aboriginal and Torres Strait Islander People in psychology education and training is also discussed in the APAC Annexure to the APAC evidence guide: Standard 3 Program of Study, Criterion 3.8 and the AIPEP Curriculum Framework.

Aboriginal and Torres Strait Islander Social and Emotional Wellbeing is identified in the PsyBA Code of Conduct and Professional Competencies as follows:

PsyBA Code of Conduct: Principle 2: Psychologists should consider the specific needs of Aboriginal and Torres Strait Islander Peoples and their health and Cultural Safety, including the need to foster open, honest and culturally safe relationships.[19]

PsyBA Professional Competency 8: Demonstrates a health equity and human rights approach when working with Aboriginal and Torres Strait Islander Peoples, families and communities.[20]

8.4 Diversity and Inclusion

Diversity is part of daily life, and ensuring that inclusive practices and spaces are created and maintained is a foundational responsibility for psychologists. Australia is a multicultural and diverse country with a broad range of people, communities and groups. These aspects of Australian society demonstrate the importance of understanding intersectionality and multi-layered diversity. The PsyBA mentions using

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[17] See: Graham Gee, Pat Dudgeon, Clinton Schultz, Amanda Hart and Kerrie Kelly, "Aboriginal and Torres Strait Islander Social and Emotional Wellbeing" In *Working Together: Aboriginal and Torres Strait Islander Mental Health and Wellbeing Principles and Practice,* 2nd ed, edited by Pat Dudgeon, Hilary Milroy, & Roz Walker, p. 55-68. Australia: Commonwealth of Australia, 2014.

[18] See: Pat Dudgeon et al., *Australian Indigenous Psychology Education Project Curriculum Framework,* p. 16. Australia, AIPEP, 2016.

[19] See: PsyBA, *Code of Conduct,* Australia, p.7, 2024.

[20] See: PsyBA, *Professional Competencies for psychologists,* Australia, p.12, 2024.

"health equity" and "human rights" approaches when working with diverse groups and Aboriginal and Torres Strait Islander people.[21]

By understanding these aspects, practitioners, employers, regulators, students, and all those involved in the mental health sector can work together to create a more equitable environment. Psychologists will always be working with communities, clients and client groups that represent aspects of diversity. Therefore, having a strong ability to reflectively and reflexively continually learn is critical.

Extract from PsyBA Professional Competencies for psychologists:

"Psychologists in Australia must be able to work sensitively, respectfully and effectively with people from various cultures and groups that may differ from their own and understand the ways that different forms of diversity intersect with each other. This includes, but is not limited to age, race, ethnicity, language, culture, immigration status, gender, gender identity and expression, sexual orientation, physical attributes, ability, disability, cognitive capacity, social and/or economic status, geographic location, educational attainment, and religious and/or spiritual orientation.

These Professional Competencies place an emphasis on the importance for psychologists to engage in ongoing and reflective and reflexive learning about working with people coming from diverse groups. They place a clear focus on the psychologist's responsibility to understand the history and biases of psychology and its effects on diverse groups, to recognise their own personal background and how to interact with people who are different from the practitioner, and to exercise Reflexivity and critical evaluation of their own practice. It is an ongoing process that requires humility and the continued development of practitioner knowledge, skills and actions. The Professional Competencies include the term 'cultural responsiveness' rather than 'cultural competence' to highlight the importance of practitioners engaging in ongoing learning."[22]

Diversity and inclusion are identified in the PsyBA Code of Conduct and Professional Competencies as follows:

PsyBA Professional Competency 7: Demonstrates a health equity and human rights approach when working with people from diverse groups:

PsyBA Code of Conduct: Principle 3: Respectful, culturally reflective practice requires psychologists to have knowledge of how their own culture, values, attitudes, assumptions and beliefs influence their interactions with people and families, the community, other practitioners and colleagues. Psychologists should contribute to a respectful and safe culture for all, communicate with all clients in a respectful way

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[21] See: PsyBA, *Professional Competencies for Psychologists*, Australia, p. 14, 2024.

[22] See: PsyBA, *Professional Competencies for psychologists,* Australia, p.6. 2024.

and meet their privacy and confidentiality obligations including when communicating online.[23]

Diversity and inclusion are not mentioned in the current APAC *Accreditation Standards* (2019).

8.5 Self–Care

An important competency for psychologists is Self-Care, which is understood to be *"the process of taking care of oneself with behaviours that promote social and emotional wellbeing in both a personal and professional capacity."*[24]

Currently, Self-Care is not overtly addressed or covered in the APAC Accreditation Standards other than to ensure psychology students "… *are informed of the availability of personal and professional support services and are equipped with skills to adequately maintain their own well-being"* within the context of their training institution (Accreditation Standards Criterion 4.5).[25]

Other disciplines, such as Counselling, indicate that the development of Self-Care for a trainee student counsellor is central to optimum outcomes for both the client and the trainee student counsellor.[26]

The Australian Psychological Society has published advice on Self-Care for psychologists, which can provide further information on how Self-Care can be implemented practically.[27]

Self-Care is identified in the PsyBA Professional Competencies as follows:

PsyBA Professional Competency 3: Exercises professional Reflexivity, purposeful and deliberate practice, and self-care.[28]

3.7 Monitors and manages self-care to sustain professional functioning and wellbeing

Self-care is not explicitly mentioned in the current APAC Accreditation Standards (2019).

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[23] See: PsyBA, *Code of Conduct,* p.7. 2024.

[24] See: PsyBA, *Fact Sheet 3, Professional Competencies for psychologists: Understanding competency 3,* Australia, p. 3, 2024.

[25] See: APAC, *Accreditation Standards,* Australia, p. 9. 2019.

[26] Psychotherapy and Counselling Federation of Australia, *Training Standards,* Melbourne: Psychotherapy and Counselling Federation of Australia, 2022.

[27] APS, *Protect your physical and emotional wellbeing with self-care,* Australia, 2023.

[28] PsyBA, *Professional Competencies for psychologists,* Australia, p. 10, 2024.

8.6 Client Safety

Client Safety is linked to Cultural Safety as it encompasses the same principles. Ensuring that Client Safety is upheld and maintained is a core element of PsyBA's Professional Competencies and Code of Conduct. The APAC Accreditation Standards seek to further align and embed these principles.

PsyBA Code of Conduct: 1. Safe, effective, and collaborative services:

Principle 1: Psychologists should practise safely, effectively and in partnership with clients, associated parties (where relevant), other practitioners and colleagues, and be informed by the best available evidence to achieve the best possible client outcomes.[29]

Principle 2: Psychologists should consider the specific needs of Aboriginal and Torres Strait Islander Peoples and their health and Cultural Safety, including the need to foster open, honest and culturally safe relationships.[30]

Principle 3: Respectful, culturally reflective practice requires psychologists to have knowledge of how their own culture, values, attitudes, assumptions and beliefs influence their interactions with people and families, the community, other practitioners and colleagues. Psychologists should contribute to a respectful and safe culture for all, communicate with all clients in a respectful way and meet their privacy and confidentiality obligations including when communicating online.

APAC Accreditation Standard 1: Public safety is assured with 10 associated criteria.

8.7 Digital Competence

Digital Competence is critical for psychologists to develop and maintain contemporary work practices, communicate broadly and deliver, share and store information.

"Digital competence is the confident and critical usage of a range of digital technologies for information, communication and basic problem-solving."[31]

Within the training of psychologists this is implied in several of the APAC Accreditation Standards (Criteria 2.4; 3.6; 4.1; 5.2) that competence in digital environments is part of a psychologists education process.[32]

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[29] See: PsyBA, *Code of Conduct,* Australia, p. 5. 2024.

[30] See: PsyBA, *Code of Conduct,* Australia, p. 7. 2024.

[31] See: PsyBA, *Fact Sheet Digital Competency, Professional competencies for psychologists: Understanding digital competence,* Australia, p. 2, 2024.

[32] See: APAC, *Accreditation Standards,* Australia, p. 8, 9. 2019.

However, Digital Competence now extends to the provision of services online in a telehealth environment. To bridge the gap, the Australian Psychological Society, like other professional bodies, provides information to assist psychologists in a digital telehealth environment.[33] This information provides practical guidance for psychologists and employers to navigate the introduction of telehealth to Medicare. Since then, the telehealth system has become more integrated into psychological practice and is now a fundamental part of it.

As emerging technologies become more widely accepted and used in academic and professional settings, clear frameworks and Standards become more critical. Emerging technologies and advancements highlight the need to embed digital competency into psychology education and training to ensure professional and ethical use.

Relevant aspects of PsyBA Professional Competencies and Code of Conduct for Digital Competence.

PsyBA Professional Competencies:

Competency 6.4: Effectively uses the most appropriate form/s of communication for the client and context; and is aware of the limitations of each mode of communication, including both face to face and digital health practice.

Competency 2.1 – 2.10: Practises ethically and professionally.

Competency 2: addresses the legal and ethical use of digital health to practice safely and within the boundaries of professional competence.

Competency 4.1: Has knowledge of the relative strengths and limitations of the different methods of assessment and modes of delivery relevant to practice across the lifespan and in different contexts, including cultural contexts.

Competency 5.1: Has knowledge of the efficacy and effectiveness of a range of interventions and modes of delivery relevant to practice across the lifespan and in different contexts, including cultural contexts.

PsyBA Code of Conduct: 1. Safe, effective, and collaborative services:

Principle 3: Respectful, culturally reflective practice requires psychologists to have knowledge of how their own culture, values, attitudes, assumptions and beliefs influence their interactions with people and families, the community, other practitioners and colleagues. Psychologists should contribute to a respectful and safe culture for all, communicate with all clients in a respectful way and meet their privacy and confidentiality obligations including when communicating online.

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[33] Australian Psychological Society, *Telehealth,* Australia, accessed 10 February 2025

9. APAC Accreditation Standards additional potential updates:

9.1 Clarifying and improving APAC's Accreditation Standards:

Since the introduction of APAC's Accreditation Standards in 2019, APAC staff and assessors have been monitoring the Standards' effectiveness, clarity, and other factors to ensure they are relevant and contemporary and reflect the psychology education and training sector. The criteria and aspects of the Accreditation Standards below have been identified for review and may be updated alongside the planned alignment update with PsyBA's Professional Competencies and Code of Conduct.

9.2 Accreditation Standards: Domains and Criteria:

2. Domain: Academic Governance and quality assurance

2.2	Quality improvement processes use student evaluations of the programs and internal and external academic and professional peer review, including external benchmarking where programs and assessments may be compared to those offered by other providers.

Quality improvement processes and benchmarking support continual improvement throughout the psychology education and training sector. The language in this criterion suggested that these activities are optional and 'may' involve other providers. This criterion is being reviewed to reconsider the terminology used.

2.4	Mechanisms exist for responding within each program to contemporary developments in psychology education and related disciplines.

This criterion is being reviewed to reassess the concept of 'contemporary' in this context and to investigate whether further clarity is needed on identifying, classifying, and implementing contemporary developments.

3. Domain: Program of study

3.1	Psychology as a science-based discipline using an evidence-based approach and a coherent educational pedagogy informs the documented program design and delivery.

This criterion is being reviewed to consider if expected systems for pedagogy are science-based (Scientist-Practitioner Model) and coherent conflicts with criterion 2.4 progressive pedagogies and contemporary developments.

Expected systems for pedagogy that are science-based and coherent, may conflict with criterion 3.8, cultural responsiveness is appropriately integrated and included as a required learning outcome. Potential clarification and wording changes may allow for different ontologies or further developments, particularly addressing the decolonisation of the psychology curriculum and creating culturally safe environments.

3.2	**Program learning outcomes incorporate all Graduate Competencies for the relevant level(s) and form a coherent body of learning.**

This criterion is being reviewed to determine whether it also covers Indigenous pedagogies, knowledge, content, and decolonising the curriculum.

3.4	**All programs have the sufficient number of staff to support the student cohort in acquiring the relevant Graduate Competencies.**

This criterion is being reviewed to consider what evidence is essential to assess sufficient staffing. The review will take into account the terminology of 'sufficient staffing' and investigate whether SSR can be included in the language. However, if SSR is embedded into the criterion, it would not be the only mechanism to determine if the criterion is met.

9.3 Accreditation Standards: Graduate Competencies:

Level 1: Foundational Competencies

1.1	**Comprehend and apply a broad and coherent body of knowledge of psychology, with depth of understanding of underlying principles, theories and concepts in the discipline, using a scientific approach, including the following topics:**

i.	the history and philosophy underpinning the science of psychology and the social, cultural, historical and professional influences on the practice of psychology
ii.	individual differences in capacity, behaviour and personality
iii.	psychological health and well-being
iv.	psychological disorders and evidence-based interventions
v.	learning and memory
vi.	cognition, language and perception
vii.	motivation and emotion
viii.	neuroscience and the biological bases of behaviour
ix.	lifespan developmental psychology
x.	social psychology
xi.	culturally appropriate psychological assessment and measurement

xii.	research methods and statistics.

The review will reevaluate the required skills, knowledge, and topics in the Foundational competencies to ensure they remain relevant and contemporary.

1.5	**Demonstrate interpersonal skills and teamwork**

Reevaluate how interpersonal skills and teamwork is described and assess if changes need to be made to the language of this criterion to ensure it remains contemporary.

9.4 Other areas for consideration in the review of existing Accreditation Standards include:

1. Formatting changes to improve the clarity of interpreting the current Standards (2019). For example, can the criteria be formatted in a way to demonstrate each component of the criterion, therefore, allowing each aspect to be clearer?

2. Clarify that student placement hours can only be counted if undertaken in Australian States and Territories.

3. Update the usage and implementation of terminology of 'Met,' 'Not met,' and 'substantially met' in accordance with the *National Law 2009* (section 48 1a, 1b).

4. Graduate Competency formatting: The need for students in a stand-alone Level 4 program to have evidence of meeting Level 3 Graduate Competencies is included in the preliminary text rather than as a dedicated Graduate Competency. This contrasts with how this is managed for Level 2 (GC 2.1) and Level 3 (3.1).

10. Discussion Questions for Your Feedback:

Reflexivity:

1. How can reflective and reflexive practice be taught and assessed?

2. Are there particular exercises or methods of teaching reflectivity and Reflexivity that are effective and encourage further continual development?

3. How can an understanding of one's cultural identity be taught?

4. How would you encourage a discussion about cultural identity and its importance in working with diverse clients?

Cultural Safety:

1. How do you envision Aboriginal and Torres Strait Islander people leading the psychology education and training sector toward creating a culturally safe environment?

2. Providers: How do you / would you genuinely consult with Aboriginal and Torres Strait Islander people and communities to embed Cultural Safety principles in your institution?

3. How would you / do you address cultural responsiveness in psychological assessment, therapies and interventions?

4. Providers: How can you demonstrate that decolonisation and cultural responsiveness are explicitly taught during psychology education?

5. How do you consider the religious, spiritual, cultural, and social beliefs of the Aboriginal and Torres Strait Islander population with whom you work?

Aboriginal and Torres Strait Islander Social and Emotional Wellbeing:

1. Providers: Have you used previous tools and resources developed by APAC and AIPEP to address Aboriginal and Torres Strait Islander Social and Emotional Wellbeing in your institution? If so, to what degree were they used? If these resources were not used, please indicate why or what alternatives were used.

2. Providers: How do you measure the impact, implementation, and quality of your learning content and curriculum in addressing Aboriginal and Torres Strait Islander Social and Emotional Wellbeing?

Diversity and inclusion:

1. How do you consider various aspects of diversity such as age, race, ethnicity, language, culture, immigration status, gender, gender identity and expression, sexual orientation, physical attributes, ability, disability, cognitive capacity, social and/or economic status, geographic location, educational attainment, and religious and/or spiritual orientation?

2. How should training in psychological practice include knowledge and experience of working with diverse groups?

3. How do you / could you work in partnership with people from diverse groups in designing and delivering learning and teaching experiences?

Self-Care:

1. Why would it be important that a psychologist understands what self-care is?

2. How can a lack of proper self-care impact clients and the broader community?

3. Providers: How would you integrate self-care competencies into the curriculum?

Client Safety:

1. What do you perceive to be challenges in maintaining client safety?

2. Are there any aspects of client safety that should be taught and embedded into psychology education and training?

3. How can we teach students about forming and maintaining relationships in a respectful and safe manner with clients, practitioners, employers, community groups, and other associated parties?

Digital Competence:

1. Why is it important that psychologists understand the digital environment to practise broadly and safely?

2. What aspects of digital knowledge or digital skills do you believe are essential to working, researching, and practising in psychology? Are there any fundamental digital aspects or skills that you believe should be embedded into the Standards?

APAC Standards additional potential updates:

1. Are there any additional areas you think should be reassessed from the current Accreditation Standards (2019)?

2. Are there any aspects you think should not be reviewed that are currently on this list?

3. Do you have any further comments on this list? If so, please indicate the aspect/s or areas you want to elaborate on.

11. Next Steps:

Once Public Consultation Round 1 ends, submissions will be catalogued, analysed, and interpreted before a report on the findings is made. The findings will be disseminated amongst the Accreditation Standards Alignment Review 2025 Working and Advisory Groups and other key stakeholders to inform the first draft of the Standards.

A report based on the findings from this consultation will be released publicly to ensure a transparent and fair process throughout the Alignment Accreditation Standards Review 2025.

Further public consultation will occur, with Public Consultation Round 2 occurring from **5 May - 6 June 2025.**

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