



Australian Psychology Accreditation Council  
**Alignment Accreditation Standards  
Review 2025: Consultation Report**

January 2026

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## Acknowledgements

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### **APAC Board of Directors**

- Adjunct Professor John Dunn (Chair), Professor Mary Katsikitis (Deputy Chair), Professor Andrew Christie, Associate Professor Melissa Davis (AAC Chair), Mr Mark Eldridge (FRCAC Chair), Mr Roberts Fearnside (NC Chair), Associate Professor Kaye Frankcom, Ms Jillian Harrington, and Professor Gene Moyle.

### **APAC Staff**

- Mr David Ensor (CEO), Ms Sara Couch, Ms Stephanie Korilis, Mr Joshua Williams, Ms Anna To, and Ms Kavitha Faruqui (until June 2025).
- In particular, the leadership and attention to detail of the project lead, Ms Stephanie Roberts, is acknowledged.

**APAC would also like to thank all stakeholders and individuals for engaging and providing feedback on the review of the Accreditation Standards.**

## Purpose of this document

This document outlines the consultation approach used to draft and revise the Accreditation Standards. The process of revising the Accreditation Standards has been iterative and involved input from multiple groups, including expert advisory groups, the APAC Accreditation Assessment Committee (AAC) and the APAC Board. APAC developed this report to ensure transparency regarding the Alignment Accreditation Standards Review consultation process and findings.

## Background

In October 2024, the Australian Psychology Accreditation Council (APAC) commenced a review of the [Accreditation Standards for Psychology Programs 2019](#) (Accreditation Standards).

The purpose of the Accreditation Standards is for the accreditation and monitoring of programs of study leading to eligibility to apply for general registration as a psychologist and/or area of practice endorsement in Australia. The Accreditation Standards are used by APAC for the purpose of accreditation and by education providers in preparing for an accreditation assessment.

The Accreditation Standards Review was initiated in response to changes in the Psychology Board of Australia's (PsyBA) [Professional competencies for psychologists](#) (Professional competencies), and the introduction of a PsyBA [Code of conduct for psychologists](#) (Code of conduct), which both commence 1 December 2025. The Code of conduct replaces the Australian Psychological Society's Code of Ethics, which had served as a regulatory code since 2010.

A secondary objective of the Accreditation Standards Review was to consider key areas of the Accreditation Standards to ensure they remain consistent with the Paramount Principle, Guiding Principles and Objectives of the [Health Practitioner Regulation National Law Act 2009](#) (National Law), including recent amendments, and to consider improvements identified through regular accreditation assessment activities since the previous review, and finally, to remain responsive to contemporary developments in health practitioner education and psychology practice.

APAC conducted a range of consultation activities, resulting in broad feedback, and received recommendations from three expert advisory groups to form the revised Accreditation Standards. The Accreditation Standards Drafting Team finalised the draft Accreditation Standards and revised them to create the final version.

The AAC approved the revised Accreditation Standards for APAC Board consideration in July 2025. The APAC Board endorsed the revised Accreditation Standards for submission to the PsyBA in October 2025. The PsyBA approved the Accreditation Standards in November 2025, and they went into effect on 1 December 2025.

Please visit APAC's website to view the [2025 Accreditation Standards](#).

## Review timeline and consultation activities overview

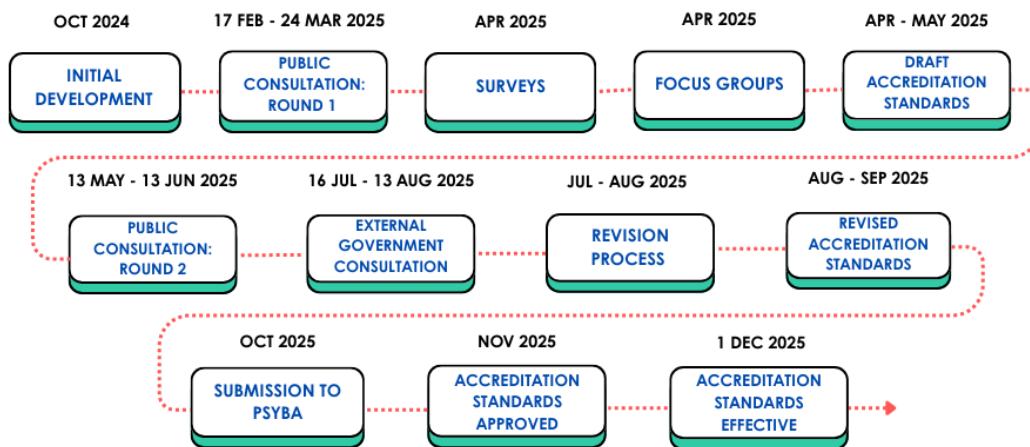


Diagram 1: The diagram describes the consultation process and activities undertaken as part of this Accreditation Standards Review.

## How we consulted

APAC designed the consultation process and activities in accordance with Ahpra's [Procedures for the development of accreditation standards](#) (2023).

This procedure explains principles of good regulatory practice, wide-ranging consultation and the submission of new or revised Accreditation Standards to the National Board.

APAC contacted stakeholders in the education sector, the psychology profession, patient safety bodies, education regulatory bodies, relevant community and consumer groups, healthcare consumer bodies and governments throughout the review, providing multiple opportunities to submit both formative and specific feedback on the draft Accreditation Standards.

APAC communicated with stakeholders about consultation activities and provided regular updates on the review through our newsletter, website, social media and direct emails. Engagement with these communications was strong and increased throughout the review's duration.

APAC provided the PsyBA with regular progress updates throughout the review and advice on the likely regulatory impacts of the revised Accreditation Standards. Based on this advice, no formal request was made by the PsyBA to complete a Regulatory Impact Statement (RIS) for review by the [Office of Impact Analysis](#).

## Initial development

- The initial development of the Accreditation Standards Review involved identifying areas of specific focus through completing a mapping exercise comparing APAC's Accreditation Standards to the PsyBA's draft Professional competencies. Further mapping was completed by the expert advisory groups on the Code of conduct and final Professional competencies. This mapping assisted APAC in identifying current alignment and areas that needed further development in the Accreditation Standards. The identified areas of focus guided the development of consultation materials and the formation of specialty expert advisory groups.

The areas of focus identified were:

- Reflexivity, Cultural Safety, Aboriginal and Torres Strait Islander Social and Emotional Wellbeing, Diversity and Inclusion, Self-care, Client Safety and Digital Competence.

## Consultation activities

### Public consultation round 1

The APAC Alignment Accreditation Standards Review 2025 Round 1 Public Consultation occurred from 17 February to 31 March 2025 (6 weeks). The paper and discussion questions are available to view on the [Alignment Accreditation Standards Review](#) 2025 webpage.

The paper and discussion questions explored the areas of focus and areas to update in the existing 2019 Accreditation Standards. The purpose of the paper was to provoke stakeholder feedback on each of these areas to deepen APAC's understanding of these topics and support the development of draft Accreditation Standards.

These questions were designed to enable stakeholders to give open-ended feedback, and the responses were analysed thematically. Feedback received supported the development of the draft Accreditation Standards.

We received a total of 14 submissions, 4 from education providers, 7 from organisations, and 3 from individuals.

### Summary findings

- **Reflexivity and reflection:** A strong theme was ensuring that practitioners and educators have a fundamental and practical understanding of reflexivity and reflection before they can teach these competencies. Submissions suggested that reflexivity and reflection should be taught early in undergraduate training, whilst acknowledging their benefits and limitations. Submissions noted that a variety of methods can be used to teach and assess reflexivity and reflection, such as reflective essays or journals, portfolios, peer and self-assessment, observation, and feedback.
- **Cultural Safety:** Submissions noted the importance of acknowledging the link between Western bias inherent in traditional psychology training systems, such as the Scientist-Practitioner Model (SPM), and introducing progressive pedagogies. Progressive pedagogies should complement and contrast existing Western systems. Cultural safety must be a shared, ongoing commitment requiring active and genuine engagement with Aboriginal and Torres Strait Islander Peoples and groups, which centres Aboriginal and Torres Strait Islander Peoples as experts in their own knowledge, lived experiences, and methodologies.
- **Aboriginal and Torres Strait Islander Social and Emotional Wellbeing:** Key questions were about the usefulness of currently available resources regarding Aboriginal and Torres Strait Islander social and emotional wellbeing. The [Australian Indigenous Psychology Education Project \(AIPEP\)](#) Core Frameworks and resources have been broadly adopted. However, some submissions highlighted time constraints and a lack of staff confidence as barriers against further integration and underlined the need for greater support.
- **Diversity and inclusion:** Submissions highlighted that diversity principles, knowledge and training are ongoing areas of competence throughout a practitioner's career. Submissions called for a nuanced framing of diversity, ensuring that intersectionality and

the compounding risks of discrimination are appropriately considered. They also stressed that diverse people and groups are experts in their lived experiences, and curricula development would benefit from this expertise.

- **Self-care:** Submissions suggested that self-care should be integrated into all levels of programs, with a specific focus on Level 3 and Level 4 programs, due to the high workload and placement demands. Submissions noted that a lack of self-care could lead to impaired decision-making and clinical judgement, ethical lapses, boundary violations, burnout, poor client outcomes, complaints, and erosion of public trust. This could contribute to workforce shortages and increased attrition.
- **Client safety:** Submissions highlighted client safety as a cornerstone of psychology and directly connected to public safety, and that theory and fundamental concepts should be taught early in training, before students engage in direct client contact. Maintaining client safety involves ensuring cultural safety, adopting trauma-aware and neurodiversity-affirming practices, respecting diverse groups, and instilling client preferences and values in clinical decision-making, whilst managing boundaries to ensure a safe environment for clients and practitioners.
- **Digital competence:** Submission noted that the introduction of new digital technologies will outpace the ability of the Accreditation Standards to adapt and instead suggested a principles and ethics-based approach. This approach should include evaluation skills focused on ethical use, limitations, equity and access, privacy, confidentiality, professional boundaries, health misinformation, informed consent, and compliance with Accreditation Standards. For Level 3 and Level 4 programs, this could include cybersecurity training, use of AI, telehealth, risk management and safety protocols, and ethical and legal aspects of data storage.
- **Updates to APAC's Accreditation Standards (2019):** There were recommendations to consider the Australian Psychology Placement Alliance placement recommendations, the *International Competences for Undergraduate Psychology (ICUP)* Model, and Diversity Council Australia's guidelines in the Accreditation Standards Review. Additional suggestions highlighted interprofessional learning, human rights and health equity approaches, simulation and the placement context.

## Surveys

APAC released three separate surveys alongside the public consultation round 1 paper and survey. The three separate surveys targeted specific stakeholder groups and opened on 12 March 2025 and closed on 4 April 2025. The prominent stakeholder groups were the public and community, students and recent graduates and area of practice endorsement programs.

Findings from the survey contributed to the initial draft of the Accreditation Standards. Below are the summary findings from each survey.

### Public and community survey

The primary purpose of this survey was to provide stakeholders with an additional avenue to provide feedback during the public consultation round 1 phase.

- The survey had an overall low response rate, with most respondents identifying as psychologists and/or academics (9 out of 12).
- Respondents noted a narrowing of the psychology discipline. They suggested that a more holistic, integrated approach that factored in client preference and values would

ensure psychology continues to meet people's mental health needs and remains relevant in an increasingly crowded space.

- Systemic and structural factors were frequently mentioned in responses, such as the training pathways, placement poverty, government funding for mental health support and workforce demands and pressures. Respondents wanted to see changes in these areas to make them more equitable, efficient, and rigorous.
- Responses highlighted some concerns interpreting and integrating the new PsyBA Professional competencies 3, 7, 8 and digital competencies. In particular, upskilling the psychology workforce to be ready to teach and supervise students in these competencies.

### Student and recent graduate survey

APAC invited students and recent graduates via the APAC mailing list and through education providers' student committees or representatives. This survey sought feedback on student and recent graduate experiences studying psychology in Australia and their opinions on the future of the profession. The survey responses were anonymous.

- 70% of the 62 respondents were female, and the most common age range was 21-25. Most respondents were current postgraduate students in their 5<sup>th</sup> year or higher (45%), followed by current undergraduate students (25%), recent graduates (16%) and 4<sup>th</sup> year students (12%). Most current students were employed whilst studying (58%) and pursuing the professional psychology pathway (92%) compared to the academic pathway (8%).
- Many noted that placement poverty had a significant impact on their training or that of their cohort.
- Generally, respondents were somewhat satisfied (39%) or very satisfied (16%) with the balance between practical training and theoretical knowledge in their degrees. However, a sizeable portion were somewhat dissatisfied (22%) or very dissatisfied (11%) and wanted more practical training in their undergraduate degree centred on psychological assessment, case conceptualisation, and interventions and techniques to address key groups or issues, like family, sexual and domestic violence.
- Key areas for further integration in programs were: decolonising the curriculum and increasing content related to Indigenous cultures, diversity, intersectionality, neurodiversity, and trauma-aware approaches. Additionally, students identified a lack of knowledge about how psychology operates within structures such as Medicare and in clinical settings, including understanding the different areas of practice endorsement.
- Respondents were asked if they believe psychology education and training in Australia is responsive to the evolving mental health needs of Australians. Responses indicate a low confidence in this area, with 45% responding 'somewhat' and 29% 'No'. Most responses identified the complexity of pathways, resourcing, and speciality training on key issues as critical barriers.

### Area of practice endorsement (AoPE) survey

The purpose of this survey was to provide education providers with the opportunity to give advice on the perceived impact of aligning the APAC Accreditation Standards to PsyBA's Professional competencies and Code of conduct on Level 3-4 and Level 4 programs of study. The survey was also available to the APS Area of Practice Endorsement Colleges and AAPI for additional feedback.

- Clinical Psychology was the most represented Area of Practice Endorsement (22 out of 39 respondents).

- Respondents cited practical, rather than conceptual, implementation challenges with an emphasis on workload and resources.
- A limitation of the consultation is the absence of a response from some specialties, such as Community Psychology, these programs were not represented in the responses. However, given that there are no Community Psychology programs actively running, this could account for the lack of responses from HEPs.
- Results from education providers suggest a moderate anticipated impact across both level 3 and 4 programs, with no indication of severe misalignment, suggesting implementation of the PsyBA Professional competencies and Code of conduct will be achievable for education providers.

## Focus groups

The focus groups were facilitated by APAC staff and designed to provide avenues for open discussion on the focus areas, areas for improvement in the Accreditation Standards, and broader sector developments.

APAC held three separate focus group meetings, with each meeting lasting for 90 minutes. APAC met with representatives from the Australian Association of Psychologists (AAPi) on 17 March 2025, the Australian Psychological Society (APS) on 21 March 2025, and the Heads of Psychology, Australia (HPA) on 8 April 2025.

The summary findings below show where the three focus groups were aligned and shared similar insights during their sessions.

### Summary findings:

- There was support for scaffolding key competencies early in students' education and training (reflexivity, cultural safety, diversity, equity and inclusion principles and ethics). This included ensuring cultural safety, diversity, and inclusion are integrated across the whole program, rather than in single units.
- Improving the accessibility and access of psychology programs for students and staff training to support these students.
- Digital competence was identified as a rapidly evolving, important area where students and practitioners often lack sufficient knowledge. Key gaps included understanding privacy principles, data breaches, and ethical use of digital platforms.
- The responsibility for student and practitioner well-being was seen as a shared duty between individuals and the system. The term 'self-care' was discussed as potentially too narrow to account for all factors influencing the health of practitioners and students in contemporary practice. Instead, 'psychosocial safety' was the preferred term of the focus groups.
- Systemic barriers and challenges, including university capacity constraints, such as limitations on staff time, physical space, and funding, which make it difficult to add new content to already crowded programs. Institutional culture or resistance to change was also recognised as a major obstacle. However, there was a shared view that current education programs need better alignment with professional practice demands to ensure graduates are work-ready.

Despite there being strong alignment in the main themes from each of the focus groups, there were some differences, and these are presented below by focus group:

- Australian Association of Psychologists
  - Practitioner support and addressing the stigma around seeking help or admitting limitations.
  - Ethics training often uses a fear-based approach, training practitioners to avoid certain actions.
  - Peer supervision and professional networks are vital for practitioners working in isolation to foster self-reflection and ethical practice.
  - Perceived white ethnocentric bias in university settings.
  - Students lack an awareness of the psychology area of practice endorsements available aside from Clinical Psychology.
- Australian Psychological Society
  - Reflexivity needs to be a habitual practice supported by staff and was noted as foundational for cultural safety and psychological safety within training environments.
  - Aboriginal and Torres Strait Islander psychologists have a high cultural load to provide expertise and support. This burden should be shared by non-Indigenous staff through cultural capacity-building training.
  - Unsustainable placement arrangements and workload pressures on students are contributing to placement poverty.
  - Concerns about the devaluing of psychology and its distinctiveness compared to other allied health fields.
  - Poorer graduate outcomes in psychology compared to some other fields were also noted.
- Heads of Psychology, Australia (HPA, formerly HoDSPA)
  - Raised concerns about the difficulty of teaching and assessing abstract concepts like reflexivity, particularly in large undergraduate classes, and the potential for students to experience distress when confronting their biases.
  - Shared concerns about staff upskilling in cultural safety due to many academic staff being researchers without clinical or cultural competence training.
  - The Accreditation Standards could be used as a lever for cultural safety change but warned of the risk of universities' tokenistic compliance over genuine transformation.

## Draft Accreditation Standards

The initial draft Accreditation Standards were formulated by the Accreditation Standards Drafting Team, guided by recommendations from the expert advisory groups, findings from the first round of public consultation, the three surveys, and focus group meetings. The Drafting Team also considered other accreditation authorities' Accreditation Standards through a benchmarking activity that mapped their alignment and discrepancies.

The draft Accreditation Standards and changes were presented in the public consultation round 2 paper.

## Public consultation: Round 2

The APAC Alignment Accreditation Standards Review 2025 Round 2 Public Consultation occurred from 13 May to 13 June 2025 (4 weeks). The paper and discussion questions are available on APAC's [Alignment Accreditation Standards Review 2025](#) webpage.

The paper and feedback questions focused on changes to the Accreditation Standards, whether stakeholders agreed with them, and any other areas that required further change or consideration.

We received 81 submissions in total, 64 written format surveys and 17 through an online survey tool SurveyMonkey. There were 40 submissions from education providers, 18 from organisations, and 23 from individuals.

### Summary findings from public consultation round 2: Survey data

- Most submissions indicated that the draft revised Accreditation Standards were wholly or partly meeting the threshold for public safety (74%), cultural safety (88%), Aboriginal and Torres Strait Islander social and emotional wellbeing (83%), diversity and inclusion (82%), and professional skills in reflexivity, digital competence and self-care (88%) (Question 1).
- Submissions commented on the increase in regulatory burden, with some submissions suggesting it was not appropriate (14%), half indicated it was partly appropriate (54%), and 25% of responses indicated it was wholly appropriate (25%) (Question 3). Several submissions noted that the number of criteria and graduate competencies had grown significantly from the 2019 Accreditation Standards, a growth from 36 to 45 for criteria and from 28 to 47 for graduate competencies.
- Responses were mixed as to whether the draft revised Accreditation Standards were applicable across all types of programs (Question 4).
- Most education providers indicated they would have difficulty providing evidence against one or more of the revised draft Accreditation Standards (68%) (Question 5).
- About a third of stakeholders (36%) indicated that criterion 1.10 (Diversity principles are applied to ensure the safety of students, staff and clients from diverse groups) was only partly sufficient in scope (Question 6). Further feedback on criterion 1.10 is discussed in the themes table below.
- Almost half of submissions (42%) indicated that the new domain 6 Cultural Safety, was 'partly' sufficient (Question 7). Submissions indicated support for the new domain focusing on cultural safety, but have significant concerns about the feasibility, cost, cultural burden and ability to evidence the new criteria. Further feedback is discussed in the themes table below.
- Interprofessional education was proposed to be extended to all Levels. Responses were mixed as to whether this was appropriate, with 22% stating it is not appropriate, 28% partly appropriate, and 32% wholly appropriate (Question 8). Further feedback is discussed in the themes table below (criterion 3.9 and competency 1.8).
- Responses were mixed on the impacts of removing direct mention of 'specialisms' in the Accreditation Standards (Question 9).
- More than half of the submissions identified duplication in the Accreditation Standards (62%), whilst some thought there was no identifiable overlap in the Accreditation Standards themselves (38%) (Question 10).
- Responses were mixed on whether further minor wording changes were necessary to the Accreditation Standards (Question 11) to ensure clarity.

- Just over half of the submissions indicated that further changes would need to be made to the Evidence Guide to support the new Accreditation Standards (54%) (Question 12).
- Almost half of the submissions (48%) indicated further changes to the Accreditation Standards (Question 13).
- Many submissions provided additional feedback that was deemed to be out of scope for the focus of the Alignment Accreditation Standards Review 2025. However, these areas could be considered in a future transformative review, which will have a larger scope.

### Summary findings from public consultation round 2: Themes

Submissions frequently mentioned the criteria and competencies outlined below, and therefore, they were categorised as 'very high' or 'extremely high' priority to revisit in the revision stage.

Draft criteria	Themes	Submission feedback
<p><b>Criterion 1.6:</b> Before providing psychological services as part of a program, students:</p> <ul style="list-style-type: none"> <li>i. Have demonstrated appropriate knowledge and skills for safe practice under supervision.</li> <li>ii. Where required under the National Law, hold the appropriate registration with the relevant regulatory authority</li> </ul>	<p><b>Public safety</b></p> <p><b>Clarity</b></p>	<p>Submissions expressed concerns that the proposed wording was unclear and shifted the responsibility to students to demonstrate they have appropriate skills before their first placement. The change might be seen as weakening the requirements for students prior to undertaking placement. Submissions called for additional details on the knowledge and skills students should demonstrate. They also suggested removing the word 'skills' to make the criterion more suitable for pre-placement training.</p> <p>Submissions suggested removing 'skills' from the criterion and adding at the 'relevant level' or 'prior to beginning their first placement'</p>
<p><b>Criterion 1.8:</b> The quantity and quality of skills training and/or supervised practice is sufficient to ensure that a graduate will be able to practise safely.</p>	<p><b>Public safety</b></p> <p><b>Unintended consequences</b></p> <p><b>Unnecessary</b></p> <p><b>Clarity</b></p>	<p>Submissions were concerned about the removal of 'suitably qualified psychologists' in relation to supervising students on placement. The word 'sufficient' lacked clarification. The use of 'quality and quantity' suggests flexibility regarding how training could be undertaken. They suggested this change could have implications for public safety.</p> <p>Submissions strongly suggest retaining suitably qualified psychologists. Some submissions suggested combining the proposed criteria 1.8 and 1.9 due to their similarities.</p>
<p><b>Criterion 1.9:</b> Supervision of skills training and/or supervised practice is sufficient and involves multiple methods, including direct observation, to ensure</p>	<p><b>Unintended consequences</b></p> <p><b>Unnecessary</b></p> <p><b>Clarity</b></p>	<p>Submissions had similar concerns to draft criterion 1.8, highlighting the removal of 'duration' from the criterion. Submissions also raised concerns about the pressure to determine student competency and pass students without specific hour requirements, which had been linked to the word 'duration' in the 2019 Accreditation Standards. This may make planning student placements challenging.</p>

Draft criteria	Themes	Submission feedback
that students are practising safely.		Submissions suggested retaining 'duration' and defining 'sufficient'.
<b>Criterion 1.10:</b> Diversity principles are applied to ensure the safety of students, staff and clients from diverse groups.	<b>Ability to measure and evidence</b> <b>Clarity</b> <b>Unnecessary</b>	Submissions suggested that anti-discrimination laws already covered aspects of this criterion, rendering it unnecessary. They also indicated that 'diverse principles' was too broad and lacked clarity, which may lead to variable interpretations, as diverse groups were not specified. Therefore, APAC may have a different interpretation compared to an education provider.  Submissions suggested adding further detail to the criterion by adding 'equity and inclusion' to denote a framework and clarifying 'diverse groups.' Some suggested removing the criterion entirely.
<b>Criterion 2.1:</b> Robust academic governance arrangements that include diverse voices in the systematic monitoring, review and improvement are in place for the programs.	<b>Clarity</b> <b>Unnecessary</b>	Submissions noted that 'diverse voices' lacked definition, and that this could lead to tokenistic compliance. Submissions were unsure how to operationalise or implement this criterion. They identified duplication with criterion 2.3.  Submissions suggested defining 'diverse voices' and clarifying 'robust academic governance'.
<b>Criterion 2.3:</b> There is relevant external and internal input into the design and management of the programs.	<b>Unintended consequences</b>	Submissions preferred the specific list of stakeholder groups outlined in the 2019 Accreditation Standards. They suggested that the change could lead to greater variance between programs and a less diverse group of stakeholders being involved in program design and management.
<b>Criterion 3.1:</b> Program design and delivery are informed by diverse ways of knowing and are underpinned by coherent, contemporary, inclusive, evidence-based pedagogies.	<b>Public safety</b> <b>Dilution of the scientific basis of psychology</b> <b>Lack of evidence for the change</b> <b>Unintended consequences</b> <b>Clarity</b>	The removal of 'Psychology as a science-based discipline' was a major concern for stakeholders, with 52 of 81 submissions highlighting it as a significant issue. The draft criterion was seen as challenging the scientific basis and rigour of psychology, psychologists, and education systems, devaluing the profession and public trust.  Submissions supported the integration of progressive and inclusive pedagogies, ensuring that alternative perspectives to the traditional Western systems are taught to students. However, noted that the proposed criterion lacked balance and diminished the scientific basis of psychology, which made it a deeply and widely opposed change.  Some submissions suggested alternative wording which reintroduced the term 'science-based discipline' whilst retaining inclusive and progressive pedagogies.
<b>Criterion 3.3:</b> Teaching staff are supported by the HEP to deliver program components, with ongoing professional	<b>Public safety</b> <b>Workload burden</b> <b>Financial impacts</b>	Submissions were concerned about the removal of 'appropriately qualified' from this criterion. They perceived it as lowering the bar, introducing ambiguity, and lowering the quality of student training. Submissions were also unsure how to implement 'ongoing professional development' for all their staff. Education providers were specifically concerned about the change affecting how they justify recruiting staff. Submissions identified that there

Draft criteria	Themes	Submission feedback
development opportunities.	<b>Clarity</b> <b>Unnecessary</b>	<p>was overlap with criterion 1.7, however, they thought it was necessary to retain this criterion.</p> <p>Submissions suggested retaining 'appropriately qualified' to ensure that staff have the right level and quality of experience. Submissions also suggested including lived experience.</p>
<b>Criterion 3.9:</b> The application of the principles of interprofessional learning and practice is included as a required learning outcome at all levels in the program.	<b>Public safety</b> <b>Scope of the Standards</b> <b>Feasibility</b> <b>Unintended consequences</b>	<p>Submissions questioned the need to expand interprofessional learning to Level 1 and 2. They highlighted that this may pre-empt pathways reform, could require major curriculum changes and be costly or impractical to introduce in Level 1.</p> <p>Submissions suggested that in lower Levels, students may learn about the principles of interprofessional education to then have a greater understanding before participating in interprofessional collaborative practice in Levels 3 and 4.</p>
<b>Criterion 3.10:</b> All programs support students to understand self-care, manage psychosocial risks and develop resilience.	<b>Unintended consequences</b> <b>Ability to measure</b> <b>Workload burden</b>	<p>Submissions were concerned about the inclusion of 'manage psychosocial risks and develop resilience'. This wording was perceived as placing the majority of the burden for systemic issues on students rather than acknowledging systemic issues and the significant role education providers play. Submissions noted that this may blur the boundaries between student support services and the curriculum. They also highlighted a lack of resources on how to teach and assess self-care.</p> <p>Submissions suggested revising the wording to ensure a balance of responsibility between the education provider and student regarding psychosocial risk and self-care. Submissions suggested removing 'resilience' as it implies overcoming or coping with negative or harmful environments.</p>
<b>Criterion 3.11:</b> Digital competencies, including critical evaluation and ethical use of technology, are appropriately integrated within all levels and clearly articulated as a required learning outcome.	<b>Feasibility</b> <b>Workload burden</b> <b>Financial impacts</b> <b>Unintended consequences</b> <b>Clarity</b>	<p>Submissions were concerned that requiring digital competence at all levels placed too high a burden on education providers. They noted that without further guidance, it may be difficult to implement and scaffold student competency properly.</p> <p>Submissions suggested reconsidering the breadth of this criterion related to all levels. They requested that key concepts be defined, such as 'digital competence' and technology.</p>
<b>Criterion 4.8:</b> Programs must ensure that conflicts of interest, arising from staff with multiple relationships or multiple roles within the program of study, are appropriately identified and mitigated.	<b>Scope of the Standard</b> <b>Feasibility</b> <b>Unnecessary</b> <b>Clarity</b>	<p>Submissions noted that this criterion appears to overlap with existing legal frameworks and is therefore out of scope. It is vague and difficult to operationalise and measure adherence.</p> <p>Some submissions suggested the removal of this criterion.</p>

Draft criteria	Themes	Submission feedback
<b>Criterion 6.1:</b> Aboriginal and Torres Strait Islander ways of knowing, being and doing that facilitate experiences of cultural safety are embedded across all domains and graduate competencies and are clearly articulated in required learning outcomes.	<b>Feasibility</b> <b>Cultural load</b> <b>Workload burden</b> <b>Tokenistic</b> <b>Unnecessary</b>	Submissions were generally supportive of a new domain (cultural safety), although they had some concerns. Submissions were also unsure why the domain focused solely on Aboriginal and Torres Strait Islander Peoples and requested clarity.  Submissions highlighted feasibility concerns with implementing this criterion across all domains and graduate competencies, noting a high colonial load and financial costs. Submissions were concerned about having appropriate staff to meet this criterion and cited the need for additional training.  Submissions suggested that criteria 1.10 and 3.8 already partly cover criterion 6.1, therefore, it is unnecessary.
<b>Criterion 6.2:</b> Students and staff work and learn in a culturally safe environment.	<b>Feasibility</b> <b>Cultural load</b> <b>Workload burden</b>  <b>Ability to Measure</b>  <b>Clarity</b>	Submissions were concerned that this criterion could lead to Indigenous students and staff being pressured to discuss their cultural experiences. Submissions were unsure how to measure or provide evidence for this criterion and requested clarification.
<b>Criterion 6.3:</b> The program provider promotes and supports the recruitment, admission, participation, retention and completion of the program by Aboriginal and Torres Strait Islander Peoples.	<b>Feasibility</b>  <b>Unintended consequences</b>	Submissions noted challenges in tracking and measuring Indigenous student recruitment, retention, and completion rates due to university policies and privacy concerns. Submissions were concerned that this criterion may make it difficult to manage scenarios where Indigenous students are not achieving competencies.
<b>Criterion 6.4:</b> The program provider ensures students are provided with access to appropriate resources and to staff with specialist knowledge, expertise and cultural capabilities, to facilitate learning about Aboriginal and Torres Strait Islander health and wellbeing.	<b>Feasibility</b>  <b>Colonial load</b>  <b>Workload burden</b>  <b>Clarity</b>	Submissions were highly concerned about having appropriate staff with specialist knowledge, citing significant costs and time to build capacity. Submissions assumed this criterion would increase the colonial load for Indigenous staff.  Submissions suggested removing this criterion or lowering the bar to 'where possible' to have staff with specialist knowledge.
<b>Criterion 6.5:</b> Indigenous governance and leadership is included in program design, assessment and	<b>Feasibility</b>  <b>Colonial load</b>  <b>Workload burden</b>	Submissions were unsure how to interpret or implement the term 'Indigenous governance'. Some education providers suggested that this may not currently be feasible due to wider institutional policies and the lack of an existing relationship with Indigenous communities. Building genuine relationships takes time due to the level of trust involved.

Draft criteria	Themes	Submission feedback
ongoing management.		Submissions request further guidance on 'Indigenous governance' and how to meet this criterion. Some submissions suggested 'Indigenous representation' instead of governance.
<b>Criterion 6.6:</b> Students' placement experiences include knowledge and application of culturally safe services for Aboriginal and Torres Strait Islander Peoples.	<b>Public Safety</b> <b>Feasibility</b> <b>Workload burden</b> <b>Colonial load</b> <b>Clarity</b>	Submissions were unsure whether this criterion meant all students needed placement experience with Aboriginal and Torres Strait Islander Peoples, or something else. Submissions highlighted that it would be extremely difficult, if not impossible, to meet this criterion if all students were required to have placement experiences with Aboriginal and Torres Strait Islander Peoples. This could lead to a large colonial load and harm to public safety.  Submissions suggested removing this criterion or revising it so that it no longer centred on placement experience.

Draft competencies	Themes	Submission feedback
<b>Competency 1.8:</b> Demonstrate understanding of principles associated with effective interprofessional practice.	<b>Scope of competency</b>	Submissions were unsure if interprofessional education should be extended to Level 1. Some submissions suggested it may not be feasible with large cohorts and may be unnecessary in undergraduate programs. Others thought it would be helpful scaffolding for later training.
<b>Competency 2.6:</b> Apply principles of self-care and resilience to manage psychosocial risks in practice settings.	<b>Scope of competency</b> <b>Ability to measure</b>	Submissions raised concerns that the current wording of the competency places additional burdens on students to manage psychosocial risks and develop resilience. Some submissions noted that the wording is misaligned with current legal and ethical frameworks regarding psychosocial risk.  Submissions suggested revising the competency to reflect a shared responsibility and removing reference to 'practice settings', which is not consistent with Level 2 Pre-professional training.
<b>Competency 3.9:</b> Demonstrate proficiency in culturally safe interventions that support adaptive psychological functioning in individuals, groups, and systems; strengthen healthy relationships within the family system or other relevant systems; treat psychological disorders; identify and manage clients who are vulnerable or at	<b>Public safety</b> <b>Unintended consequences</b> <b>Feasibility</b> <b>Ability to measure</b> <b>Unnecessary</b> <b>Clarity</b>	The removal of 'empirically supported' was perceived as undermining the scientific basis of psychology. Submissions suggested the competency was too long, complex and broad, making it difficult to measure and assess. The specific areas indicated in this competency are directly connected to PsyBA Professional competency 5.5. However, a vast majority of submissions did not recognise or identify the origin of this list. They viewed the competency as being closely connected to clinical training (Level 4), rather than Level 3.  Submissions suggested separating key components of this competency into individual competencies to assist with clarity and retaining 'empirically supported'.

Draft competencies	Themes	Submission feedback
risk of harm to self or others.		
<b>Competency 3.19:</b> Reasonably foresee outcomes of decisions and conduct.	<b>Scope of competency</b> <b>Ability to measure</b> <b>Clarity</b> <b>Unnecessary</b>	Submissions were unsure how to implement, measure and provide evidence to meet this competency. The scope was perceived as too broad and lacked clarity. Submissions noted overlap between competencies 3.19, 3.20 and 3.22. Submissions suggested combining the overlapping competencies or narrowing the scope to make the competency measurable and assessable.
<b>Competency 3.20:</b> Take personal responsibility for professional conduct.	<b>Ability to measure</b> <b>Feasibility</b> <b>Unnecessary</b>	Submissions suggested this would be difficult to evidence and implies taking responsibility for negative conduct, not positive conduct. It may already be covered by competency 3.18 (adherence to the PsyBA Code of conduct), and therefore unnecessary. Submissions suggested removing the competency or combining it with 3.19 and 3.20.
<b>Competency 3.22:</b> Manage psychosocial risks associated with the practice of psychology through engaging in self-care and promoting systemic solutions where appropriate.	<b>Clarity</b> <b>Unnecessary</b>	Submissions were unsure what 'promoting systemic solutions' entails and if it implies that students fix system-level issues. They were uncertain how to assess it. They also noted it may overlap with existing legal frameworks. Some submissions suggested adding adherence to relevant legal frameworks and the limited duty of care or removing the draft competency due to overlap with competency 3.18 and existing legal frameworks.
<b>Competency 3.24:</b> Demonstrate proficiency in culturally safe assessment methods including evaluation of cognitive functioning and vocational attainment; psychological and psychosocial functioning; risk to self and others; workplace assessments and performance; and parental and family functioning.	<b>Scope of competency</b> <b>Unnecessary</b> <b>Clarity</b> <b>Feasibility</b> <b>Unintended consequences</b>	Submissions noted that this competency appears to duplicate the 2019 Accreditation Standards competency 3.4 regarding assessment. The specific areas indicated in this competency are directly connected to PsyBA Professional competency 4.4. However, a vast majority of submissions did not recognise the origin of this list. Submissions noted that 'culturally safe assessment methods' may be limited or hard to determine if they are culturally safe. Submissions suggested reducing duplication and combining competencies 3.4 and 3.24 regarding assessment. They also suggested changing 'culturally safe' to culturally responsive.

## Consultation with Governments

APAC conducted further consultation through Ahpra's Jurisdictional Lead Officials (JLO) committee, which regularly and typically informally reviews initial consultations within the National Scheme.

The JLO committee comprises Commonwealth, State, and Territory health officials specialising in health policy, registration, accreditation, and workforce planning, including chief allied health, medical, nursing, and midwifery officers.

APAC sent a consultation paper to the JLO committee, including a statement of assessment, information regarding the Accreditation Standards Review process, a set of specific discussion questions, and the revised Accreditation Standards.

The government consultation opened on 16 July 2025 and closed on 13 August 2025 (4 weeks). Two submissions were received late in September.

We received 7 submissions in total, and the feedback was incorporated into the revised Accreditation Standards and submission documents to the PsyBA.

## Revision process

The expert advisory groups had their fourth and final meetings to reflect on the draft Accreditation Standards and consider the findings from the public consultation round 2. The Accreditation Standards Drafting Team then reviewed the expert advisory group's final recommendations and the results from public consultation round 2 to revise the draft Accreditation Standards. The revision process addressed the key themes from public consultation round 2 and made changes to balance concerns from submissions with the key objectives of the Accreditation Standards Review.

Final revisions to criteria and graduate competencies that didn't reach consensus within the Accreditation Standards Drafting Team were addressed by the Accreditation Manager, Sara Couch and Project Coordinator, Stephanie Roberts, using all feedback gathered during the review project, including notes from expert advisory group meetings, consultation comments and drafting group meeting notes. This final review ensured that the Accreditation Standards were fit for purpose by using the decision-making hierarchy framework as a final evaluation of the proposed changes before they went through the AAC and APAC Board approval process.

Part of the final revision process was to reduce the regulatory burden of the draft Accreditation Standards by lowering the number of proposed criteria in the domains to 41 and the graduate competencies to 34, totalling 75. This is still higher than the 2019 Accreditation Standards (36 criteria, 28 graduate competencies, 64 total) and represents a 19% increase. However, with the inclusion of a new domain and the integration of new competencies, the changes strike an appropriate balance between the need to reflect new PsyBA Professional practice standards, the National Law and minimising regulatory burden.

## Summary of final revisions to the Accreditation Standards

Further revisions were made to the draft Accreditation Standards, summarised below.

- Domains:
  - Domain 1: Public safety: Further changes were made to reduce duplication by removing proposed criteria 1.7 and 1.8. The diversity criterion 1.10 was revised to include 'equity, inclusion, and cultural responsiveness.'
  - Domain 2: Academic governance and quality assurance: The Standard Statement was updated to include program coordination. The overlap between criteria 2.1 and 2.2 was addressed by combining them and simplifying the wording to provide greater flexibility in meeting the criterion. Criterion 2.3 was revised to emphasise program management and coordination. A new criterion was added about the Head of the Academic Organisational Unit (AOU) having appropriate oversight to ensure the relevance and quality of programs.
  - Domain 3: Program of study: Criterion 3.1 was revised to reinstate 'psychology as a science-based discipline'. Noting that inclusive pedagogies are still recognised and respected alongside Western systems in design and delivery. This change ensures the criterion is balanced and addresses the key criticism of the feedback received from the public consultation round 2. Criterion 3.3 was revised to ensure staff are appropriate and experienced in teaching, supervision and administrative duties and replaces criterion 1.7. Criterion 3.9 regarding interprofessional learning was updated to 'interprofessional education and collaborative practice' to align with Ahpra's Interprofessional Collaborative Practice Statement of Intent. Proposed criteria 3.10 and 3.11 were removed to reduce duplication and overlap with the graduate competencies, which scaffold self-care and digital competence progressively.
  - Domain 4: The student experience: Criterion 4.8 regarding managing multiple relationships was removed as it duplicates existing legislation and regulation.
  - Domain 5: Assessment: Criterion 5.4 was revised to focus on assessment procedures, with program management, coordination, and moderation moving to Domain 2. This change reflects closer alignment with the Standard statement of each domain.
  - Domain 6: Cultural Safety: The Standard Statement was expanded to include culturally safe environments 'free from racism.' Proposed criterion 6.1 was amended to remove 'across all Domains and graduate competencies.' Proposed criterion 6.2 regarding culturally safe environments was removed due to overlap with the revised Standard statement. Criterion 6.5 regarding student experiences was revised to focus on students developing culturally safe knowledge and skills prior to placements.
- Graduate competencies:
  - Level 1 Foundational competencies: Interprofessional learning was revised at this level to address concerns regarding feasibility and identifiable benefits. Further refinements were made to self-care and digital competencies.
  - Level 2 Pre-Professional competencies: Further revisions were made to simplify and clarify existing competencies, including removing competency 2.1 as it is redundant. Competency 2.5 regarding research was revised to better align with the Australian Qualification Framework (AQF). Changes were made to the self-care competency to ensure it aligns with supporting safe and sustainable practice. Minor revisions were made to interprofessional practice and digital competencies. Competency 2.10 was removed as it was not fit for purpose or measurable.

- Level 3 Professional competencies: Competency 3.1 was removed as it was deemed redundant. Competencies 3.4 and 3.24 were combined to reduce duplication. Competency 3.5, regarding case conceptualisation, was simplified and clarified to aid understanding. Competencies 3.10 and 3.11 were combined to reduce duplication. Competency 3.14, regarding research, was revised to better align with the AQF. Proposed competencies 3.18, regarding adherence to the PsyBA Code of conduct, 3.19, reasonably foreseeing outcomes of decision-making, 3.20, taking personal responsibility for conduct, 3.23, working partnerships with clients, 3.25, communicating the psychologist's role and purpose, and 3.26 professionalism, were removed due to duplication, redundancy, clarity, feasibility or difficulty measuring.

## Revised Accreditation Standards

APAC's AAC approved the proposed revised Accreditation Standards with minor amendments for APAC Board consideration in July 2025. The APAC Board endorsed the Accreditation Standards for PsyBA consideration in October 2025. The PsyBA approved the Accreditation Standards on 28 November 2025 (National Law 47 (3)) and set an effective date of 1 December 2025 (National Law section 47 (7b)).

## Next Steps

The revised Accreditation Standards are effective from 1 December 2025, and a transition process is underway.

An updated Evidence Guide and additional resources are being developed to support education providers in meeting the 2025 Accreditation Standards.

APAC recognises that the transition phase of this project will be critical for the successful implementation of the revised Accreditation Standards.