



## Response template for draft principles for the use of outcome-based approaches to accreditation – Public consultation

**October 2025**

This response template is the preferred way to submit your feedback to the public consultation on the draft **principles for the use of outcome-based approaches to accreditation**.

Please provide any feedback, including your responses to the questions in the text boxes on the following pages. The boxes will expand to accommodate your response. You do not need to respond to a question if you have no comment.

### **Making a submission**

Please complete this response template and email to [AC\\_consultation@ahpra.gov.au](mailto:AC_consultation@ahpra.gov.au) using the subject line 'Feedback: Public consultation on principles for the use of outcome-based approaches to accreditation'.

**Consultation closes on 24 December 2025**

### **Publication of submissions**

We publish submissions at our discretion. We generally publish submissions on our website to encourage discussion and inform the community and stakeholders. Please advise us if you do not want your submission published.

We will not place on our website, or make available to the public, submissions that contain offensive or defamatory comments or which are outside the scope of the subject of the consultation. Before publication, we may remove any personally identifying information from submissions, including contact details.

We can accept submissions made in confidence. These submissions will not be published on the website or elsewhere. Submissions may be confidential because they include personal experiences or other sensitive information. A request for access to a confidential submission will be determined in accordance with the *Freedom of Information Act 1982* (Cth), which has provisions designed to protect personal information and information given in confidence. Please let us know if you do not want us to publish your submission or want us to treat all or part of it as confidential.

**Published submissions will include the names of the individuals and/or the organisations that made the submission unless confidentiality is expressly requested.**

<b>Initial questions</b>
<i>To help us better understand your situation and the context of your feedback please provide us with some details about you. These details will not be published in any summary of the collated feedback from this consultation.</i>
<b>Question A</b>
Are you completing this submission on behalf of an organisation or as an individual?
<b>Your answer:</b>

Australian Health Practitioner Regulation Agency  
National Boards

GPO Box 9958 Melbourne VIC 3001 [Ahpra.gov.au](http://Ahpra.gov.au) 1300 419 495

Organisation

Name of organisation: Australian Psychological Society

Submitted on behalf of: Dr Zena Burgess (CEO)

Contact email: z.burgess@psychology.org.au

Myself

Name: [Click or tap here to enter text.](#)

Contact email: [Click or tap here to enter text.](#)

### Question B

If you are completing this submission as an individual, are you:

A registered health practitioner?

Profession: [Click or tap here to enter text.](#)

Other: [Click or tap here to enter text.](#)

### Question C

Would you like your submission to be published?

Yes, publish my submission **with** my name/organisation name

Yes, publish my submission **without** my name/ organisation name

No – **do not** publish my submission

## Your responses to the consultation questions

Principles for the use of outcome-based approaches to accreditation

### Question 1: Does any content need to be added or amended in the draft principles for the use of outcome-based approaches to accreditation?

The Australian Psychological Society (APS) commends the Australian Health Practitioner Regulation Agency (Ahpra) Board Accreditation Committee (the Committee) for progressing the draft principles and responding to recommendations raised in our submission to the February 2024 preliminary consultation<sup>1</sup>. The APS considers that the proposed principles, together with the accompanying table summarising types of accreditation measures, will be useful for guiding accreditation authorities in the application of outcome-based approaches to accreditation.

Further, we consider that the psychology profession is already experienced in applying outcome-based approaches to accreditation. For example, the [Australian Psychology Accreditation Council \(APAC\) 2019 Accreditation Standards for Psychology Programs](#)<sup>2</sup> introduced a contemporary approach to measuring education quality by assessing outcomes rather than solely accounting for inputs. Following a recent [APAC review](#)<sup>3</sup>, the 2019 Standards have since been superseded by the [2025 APAC Accreditation Standards for Psychology Programs](#)<sup>4</sup> to ensure continued alignment with the Psychology

Board of Australia (PsyBA) [Code of Conduct for Psychologists](#)<sup>5</sup> and [Professional Competencies for Psychologists](#)<sup>6</sup>, which came into effect on 1 December, 2025.

With regards to **Principle 1: Safe Practice**, the APS endorses the *1.1 Statement that “Culturally safe practice and the elimination of racism must be central to all accreditation standards and processes”* (p. 12, Consultation Paper).

The PsyBA [Code of Conduct for Psychologists](#)<sup>6</sup> also requires psychologists to avoid unlawful discrimination, which the APS considers should be central to safe practice for all regulated health practitioners. This view is consistent with the Committee’s [2023 Glossary of Accreditation Terms](#)<sup>7</sup>, which defines *Interprofessional collaborative practice* as involving practitioners from multiple professional backgrounds working together to deliver care that is free of racism “*and other forms of discrimination*”<sup>7</sup> and the [2024 Interprofessional Collaborative Practice Statement of Intent](#)<sup>8</sup> which commits to a focus on the quality and safety of person-centred care, that is free of discrimination and racism. We therefore recommend the Committee consider inclusion of “*and other forms of unlawful discrimination*” within the **Principle 1.1 Safe Practice** statement.

With regards to **Principle 4: Data and Evidence**, we note that statement 4.3 refers to longitudinal data from health practitioners and consumers being used to assess whether outcomes-based approaches to accreditation are delivering safe care for consumers. There are currently no references indicating how this data will be managed, secured, or governed, for example, ensuring that consent, privacy, and data-handling obligations are met. We recommend that the Committee consider including links to resources to support accreditation authorities in meeting these data management obligations, such as the [Ahpra 2023-2028 Data Strategy](#)<sup>9</sup>, the [National Health and Medical Research Council Management of Data and Information in Research](#) Guide<sup>10</sup> and the [Australian Research Data Commons](#)<sup>11</sup>.

**Question 2: Are the case studies helpful in illustrating the principles? Are there additional case studies that it would be beneficial to include?**

We consider the included case studies to be helpful in illustrating the principles, and inclusive of a range of health professions. We particularly welcome the inclusion of Case Study 13 for **Principle 6: Sharing Information**, which outlines the [APAC -Talking APAC](#)<sup>12</sup> podcast series.

The APS acknowledges that the Committee published its [Guidance on embedding good practice in health practitioner education: Clinical placements, simulation-based learning and virtual care](#)<sup>13</sup> in March 2025. To complement both this guidance and the draft principles for the use of outcome-based approaches to accreditation, it may also be useful to include case studies demonstrating how outcomes achieved through student placements can be mapped to align with accreditation requirements.

**Question 3: Are there any implementation issues the Accreditation Committee should be aware of?**

As the APS outlined in our submission to the preliminary consultation<sup>1</sup>, resource constraints within the tertiary education sector may limit psychology education providers’ ability to fully realise the benefits associated with outcomes-based approaches to accreditation. Higher education providers of postgraduate psychology programs often face challenges arranging students’ placements, particularly in rural and remote areas, due to a shortage of placements and PsyBA approved supervisors<sup>14</sup>. We therefore reiterate a recommendation from our earlier submission<sup>1</sup> that accreditation authorities work with higher education providers to ensure that outcome-based approaches to accreditation recognise the realities of teaching, contemporary best practice, and community needs.

The APS also noted in our previous submission<sup>1</sup> that many students experience ‘placement poverty’ while undertaking unpaid mandatory placements during their tertiary studies. The Universities Accord Final Report<sup>15</sup> recommended that the Australian Government provide financial support to students to

ensure that placement poverty does not prevent tertiary education completion and exacerbate workforce shortages. While the APS supports the introduction of a [Commonwealth Prac Payment](#)<sup>16</sup>, which came into effect on 1 July 2025 for eligible nursing, midwifery, teaching and social work students completing a mandatory placement, we are disappointed that psychology students are not yet eligible<sup>17</sup>. Studying psychology should be based on merit, not a student's ability to afford to live as they complete compulsory unpaid placements. Therefore, the APS continues to advocate for the Federal Government to enable psychology students to be eligible for the Commonwealth Prac Payment.

**Question 4: Are there any potential unintended consequences of the draft principles?**

As identified by the APS in our submission to the preliminary consultation<sup>1</sup>, an unintended consequence of an outcomes-based approach to accreditation may be that outcomes or practitioner competencies that are easier to measure are prioritised over outcomes that are more difficult to assess.

Consistent with **Principle 4: Data and Evidence**, we recommend that the Committee and National Boards monitor the impact that implementing this approach has on students and education providers. The administrative burden associated with meeting accreditation standards for psychology programs is already substantial for higher education providers, given psychology placement requirements and limited supervisor availability. It is therefore critical that any additional impost arising from outcome-based approaches can be sustainably managed by higher education institutions.

**Question 5: Do you have any general comments or feedback about the draft proposed principles?**

As outlined in response to Question 1, we consider the psychology profession to be experienced in incorporating an outcomes-based approach to accreditation, and that APAC has already demonstrated its understanding of these principles through its recent development of the [Accreditation Standards for Psychology Programs](#)<sup>4</sup> aligned with the PsyBA [Code of Conduct](#)<sup>5</sup> and [Professional Competencies for Psychologists](#)<sup>6</sup>.

The PsyBA is currently undertaking a [Psychology Higher Degree Redesign Project](#)<sup>18</sup> and we encourage the PsyBA and APAC to continue working closely together throughout this project to maintain consistent alignment between professional competencies and accreditation standards.

## References

1. Australian Psychological Society. (2024). *APS response to preliminary consultation: Outcome-based approaches to accreditation*.
2. Australian Psychology Accreditation Council. (2019). *Accreditation Standards for Psychology Programs*. [https://apac.au/wp-content/uploads/2021/09/APAC-Accreditation-Standards\\_v1.2\\_rebranded.pdf](https://apac.au/wp-content/uploads/2021/09/APAC-Accreditation-Standards_v1.2_rebranded.pdf)
3. Australian Psychology Accreditation Council. (2025). *Alignment Accreditation Standards Review*. APAC. <https://apac.au/news/accreditation-standards-review-2025/>

4. Australian Psychology Accreditation Council. (2025). *Accreditation Standards for Psychology Programs*.  
<https://apac.au/wp-content/uploads/2025/12/APAC-Accreditation-Standards-for-Psychology-Programs-effective-1-December-2025.pdf>
5. Psychology Board Ahpra. (2025). *Code of conduct for psychologists*.  
<https://www.psychologyboard.gov.au/Standards-and-Guidelines/Professional-practice-standards/Code-of-conduct.aspx>
6. Psychology Board of Australia. (2025). *Professional competencies for psychologists*. Australian Health Practitioner Regulation Agency. <https://www.psychologyboard.gov.au/Standards-and-Guidelines/Professional-practice-standards/Professional-competencies-for-psychology.aspx>
7. Australian Health Practitioner Regulation Agency (Ahpra) Board Accreditation Committee. (2023). *Glossary of Accreditation Terms*. <https://www.ahpra.gov.au/About-Ahpra/Who-We-Are/Ahpra-Board/Accreditation-Committee/Publications.aspx>
8. Australian Health Practitioner Regulation Agency—*Interprofessional Collaborative Practice Statement of Intent*. (2024). <https://www.ahpra.gov.au/News/2024-03-13-Interprofessional-Collaborative-Practice-Statement-of-Intent.aspx>
9. Australian Health Practitioner Regulation Agency—*Data Strategy*. (n.d.). Retrieved December 12, 2025, from <https://www.ahpra.gov.au/About-Ahpra/Data-Strategy.aspx>
10. National Health and Medical Research Council. (2019). *Management of Data and Information in Research: A guide supporting the Australian Code for the Responsible Conduct of Research*. <https://www.nhmrc.gov.au/sites/default/files/documents/attachments/Management-of-Data-and-Information-in-Research.pdf>
11. ARDC. (2025, October 13). *Australian Research Data Commons*. <https://ardc.edu.au/>
12. *Talking APAC | Podcast on Spotify*. (n.d.). Spotify. Retrieved December 12, 2025, from <https://open.spotify.com/show/5kc0eWoNuG4kMMX4WFOg6w>
13. Ahpra Board Accreditation Committee. (n.d.). *Guidance on embedding good practice in health practitioner education: Clinical placements, simulation-based learning and virtual care*. Retrieved December 5, 2025, from <https://www.ahpra.gov.au/About-Ahpra/Who-We-Are/Ahpra-Board/Accreditation-Committee/Publications.aspx>

14. Waugh, J., Ma, N., Chur-Hansen, A., & Sawyer, A. (2023). Rural and remote psychologists' views on provisional psychologist supervision. *Australian Journal of Psychology*, 75(1), 2276949.  
<https://doi.org/10.1080/00049530.2023.2276949>
15. Australian Government Department of Education. (2024, February 25). *Australian Universities Accord Final Report* [Text]. <https://www.education.gov.au/australian-universities-accord/resources/final-report>
16. Australian Government Department of Education. (2024). *Commonwealth Prac Payment* [Text].  
<https://www.education.gov.au/higher-education/commonwealth-prac-payment>
17. Australian Psychological Society. (2024). *APS Response to Universities Accord (Student Support and Other Measures) Bill 2024 inquiry*.  
[https://psychology.org.au/psychology/advocacy/submissions/professional-practice/2024/universities-accord-\(student-support-and-other-measures\)-bill-2024-inquiry](https://psychology.org.au/psychology/advocacy/submissions/professional-practice/2024/universities-accord-(student-support-and-other-measures)-bill-2024-inquiry)
18. *Psychology Board of Australia—Redesigning the higher education pathway*. (2025).  
<https://www.psychologyboard.gov.au/About/Education/Redesigning-the-higher-education-pathway.aspx>