

13 June 2025

Level 11, 257 Collins Street  
Melbourne VIC 3000  
PO Box 38  
Flinders Lane VIC 8009  
T: (03) 8662 3300

Professor John Dunn  
Chair, Australian Psychology Accreditation Council  
PO Box 20  
Collins Street West Vic 8007  
Australia

Sent via email: [apacstandards@apac.au](mailto:apacstandards@apac.au)

Dear Professor Dunn,

### **APAC Alignment Accreditation Standards Review: Public Consultation Round 2**

The Australian Psychological Society (APS) welcomes the opportunity to provide feedback on the Australian Psychology Accreditation Council (APAC) Alignment Accreditation Standards Review: Consultation Paper – Round 2. The APS is committed to advancing the science, ethical practice and application of psychology to promote mental health and wellbeing, empowering individuals, organisations and communities to reach their full potential. Our work is informed by United Nations human rights treaties and conventions<sup>1</sup> and the United Nations Sustainable Development Goals (SDGs)<sup>2</sup>.

As the leading professional association for psychologists in Australia, we appreciated the invitation from APAC CEO David Ensor to participate in the Review earlier this year. Our members are involved in many aspects relevant to the Review, either as academic and teaching staff, students, practicing psychologists and supervisors. We are aware that many APS members will have provided their own perspective via their associated Higher Education Provider (HEP) or as individuals. We have been pleased to receive a great response from APS members to inform our comments below, covering a diversity of areas of practice, training, and work setting.

In addition to the points addressing the specific consultation questions, we note the following messages which were consistent across the APS member feedback we received:

- Overall, the proposed updates represent a positive step in aligning competencies with contemporary practice and the Psychology Board of Australia's updated Professional Competencies and Code of Conduct<sup>3,4</sup>. We commend APAC on the hard work it has taken to get to this point and want to couch our feedback in light of these positive developments to the Standards, particularly in terms of digital competence, reflexivity and self-care.
- As will be discussed later, we are concerned at the removal of the reference to psychology being a science-based discipline. This point has been particularly concerning to our members as the scientific evidence-base is a cornerstone of the psychology discipline and an essential defining and differentiating feature from other professions. It also then results in misalignment with the Professional Competency for Psychologists, Competency 1<sup>4</sup>.
- Taken together, the changes represent a greater emphasis on psychology practice in clinical settings particularly in Levels 1 and 2. It is important to note that not every psychology student intends to be a registered psychologist or even stay within the field in the future.

The current proposed criteria appear to be rigid regarding interventions and assessment, with the focus being largely on therapeutic interventions at an individual level, rather than the full spectrum of what an intervention can look like across the discipline of psychology. Furthermore, there appears to be a distinct focus on clinical practice, which risks losing the diversity of the psychology profession.

- In addition, the volume of new competencies risks adding an increased burden on HEPs to demonstrate their program(s) have met the Standards. Ongoing work to reduce duplication and refine the wording may help lessen the impact of these new requirements.
- We commend the greater inclusion and consideration of First Nations ways of being and doing and the extension of cultural safety is very important. Practically, however, we are concerned that this will place a large burden on Aboriginal and Torres Strait Islander staff, and relevant organisations to provide input, opportunities, and advice. In order to minimise the risk of overburdening (and potentially burning out – antithetical to safe practice) First Nations staff and HEP affiliated organisations, we recommend providing HEPs with some flexibility on how they consult internally and externally to meet the competencies in this new domain.

Notwithstanding the current APAC consultation, we note that changes to the training of psychology as a result of the education training and reform agenda<sup>5</sup> may impact the competencies that students are expected to achieve in Levels 1 – 4. Given this, we suggest that future (re)alignment may be necessary when these changes come into effect.

As with our response to the Round 1 Consultation, we acknowledge the work that has been done to consider the appropriate updates to the current Accreditation Standards and are broadly supportive of their implementation. We look forward to working with APAC as these initiatives unfold. If any further information is required from the APS in the meantime, I would be happy to be contacted through the National Office on (03) 8662 3300 or by email at [z.burgess@psychology.org.au](mailto:z.burgess@psychology.org.au).

Yours sincerely

**Dr Zena Burgess, FAPS FAICD**  
Chief Executive Officer

## Public Consultation Round 2: Submission Template:

The Australian Psychology Accreditation Council is seeking feedback on its Accreditation Standards in 2025. Please refer to the **'APAC Consultation Paper – Round 2'** for further details. This paper features the proposed draft revised Accreditation Standards and 14 questions in total. Please respond to any or all of the questions.

**Please note:** The proposed revised draft Standards featured in the 'APAC Consultation Paper – Round 2' only include revised criteria and graduate competencies; the remaining criteria are essentially unchanged and can be viewed in the current 2019 [Accreditation Standards](#).

Submissions will be collected, analysed and interpreted, with the findings being collated into a report that will be released publicly. This second round of consultation will inform the proposed draft revised Standards.

### How to respond:

Please respond to the discussion feedback questions using the submission template, **OR** through the [APAC Alignment Accreditation Standards Review – Public Consultation - Round 2](#) survey.

If you are completing your response using this submission template. Please ensure your response contains the contact information and name of the individual or organisation. Please clearly mark your submission with the subject 'APAC Round 2 Submission' and send it to [apacstandards@apac.au](mailto:apacstandards@apac.au)

Responses must be submitted before the deadline on **13 June 2025**.

For further information, please refer to our website:

[APAC Alignment Accreditation Standards Review](#)

### Publication of submissions:

APAC will publish submissions on its website except where confidentiality is requested or required. Please state in your submission if you do not want your submission published.

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

#### Submission details:

Name of organisation/Individual: Dr Zena Burgess

Position (if on behalf of an organisation): CEO, Australian Psychological Society

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Email (required): [z.burgess@psychology.org.au](mailto:z.burgess@psychology.org.au)

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Phone: (03) 8662 3300

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## Discussion Questions for Your Feedback:

### Questions

1. Do you consider the proposed draft revised Standards are at the threshold level required for
    - i. public safety  
Yes ☒, No ☐, Partly ☐, Do not know ☐
    - ii. cultural safety  
Yes ☐, No ☐, Partly ☒, Do not know ☐
    - iii. Aboriginal and Torres Strait Islander social and emotional wellbeing  
Yes ☐, No ☐, Partly ☒, Do not know ☐
    - iv. diversity and inclusion and  
Yes ☐, No ☐, Partly ☒, Do not know ☐
    - v. professional skills in reflexivity, digital competence and self-care?  
Yes ☐, No ☐, Partly ☒, Do not know ☐
- 

Further comment:

Overall, we agree that the amendments and additions help to align the Standards with contemporary practice and the expected knowledge and behaviour in many professional settings in Australia. However, the current conceptualisation fails to reflect the full diversity of the profession and discipline of psychology.

**Public Safety:** The Standards establish good foundations for ensuring public safety, however, we urge the reinsertion of 'evidence-based' and 'scientific' (as discussed below) as they are defining features of psychology as a discipline and practice.

**Cultural Safety:** The intent of Domain 6 is both commendable and essential for improving cultural responsiveness in the psychology workforce. Ensuring that students develop the knowledge and skills to deliver culturally safe services to Aboriginal and Torres Strait Islander Peoples is a vital part of ethical and competent practice.

However, the practical implications of this Standard may unintentionally present challenges for implementation and equity across psychology programs. Specifically, requiring students to *apply* culturally safe services during placement may be unrealistic in contexts where students do not have direct access to Aboriginal and Torres Strait Islander clients.

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For example, organisational psychology students often work in corporate or consulting settings where opportunities to work with many diverse clients may not arise organically. The standard could inadvertently disadvantage students based on placement setting, rather than the quality of their training. In addition, Domain 6 could place a disproportionate demand on Aboriginal and Torres Strait Islander organisations to take students on placement where they may not be well prepared to do so.

**Aboriginal and Torres Strait Islander social and emotional wellbeing:** We commend this holistic approach, which emphasises the interconnected dimensions of wellbeing across body, mind/emotions, family/kinship, community, culture, country, and spirituality, and offers an alternative to Western conceptualisation of these concepts. Further work needs to occur to ensure these are respectfully and appropriately integrated into evidence-based pedagogical approaches at varying levels of training, without unduly burdening First Nations staff and advisors.

**Diversity and inclusion:** 'Diversity principles are applied to ensure the safety of students, staff and clients from diverse groups' is seen as relevant and appropriate. Unfortunately, many students feel unsafe during their studies, and simply applying diversity principles is not enough to ensure safety. All students, regardless of whether they are identifiably a member of an at-risk group should be safe. It is important that culture, background, gender, LGBTIQ+ status, disability, and other aspects of diversity are openly and robustly considered. It was observed that the proposed Domain 6 focuses on building competencies in working with Aboriginal and Torres Strait Islander Peoples which is appropriate due to the unique challenges associated with colonisation and ongoing disenfranchisement with mainstream Australia *inter alia*. However, expanding some references in this section, or adding a separate competency may be indicated so that graduates can demonstrate an ability to work in a culturally safe manner for all cultural groups.

**Professional skills in reflexivity, digital competence and self-care:** Overall, we had only minor comments regarding digital competence and the embedding of reflexivity, however we have some more substantive concerns about self-care (please see Appendix 1). We are concerned that the proposed wording positions self-care, psychosocial risk management and resilience too much on individuals. We agree this competency should be a focus throughout all training in psychology and that it is essential that students can understand and apply the principles. A more systemic lens from Level 1 may be appropriate.

It is also important that students are given adequate access to resources by HEPs to meet the expectations of digital competence and that achieving this does not rely on students owning expensive, personal devices or technology.

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2. Do you disagree with any specific proposed revised or new criteria or graduate competency? Please clearly state the number and explain why you disagree.

Please refer to **Appendix 1** for a list of proposed draft revised criteria and graduate competencies.

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Further comment:

Please see detailed comments in Appendix 1.

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3. The proposed Standards include some additions to the existing criteria, additional competencies and a new Standard (Standard 6). Is this increase in regulatory requirements appropriate?

Yes ☐, No ☐, Partly ☒, Do not know ☐

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Further comment:

As stated in our covering letter the volume of proposed additional competencies may be problematic. The inclusion of these additional competencies (or amended competencies) could necessitate major revisions of existing programs leading to a greater focus on more clinically-oriented content. As they stand, the additional criteria and competencies could introduce unnecessary regulatory oversight in training programs for students who do not intend to work in a clinical or therapeutically focussed settings.

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4. Do you consider that the draft revised Standards are applicable across all types of education providers delivering accredited programs?

Yes ☒, No ☐, Partly ☐, Do not know ☐

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Further comment:

If there is to be consistency in what it means to use the title 'psychologist' then all HEPs need to be held to the same standards of training. However, we expect that HEPs will need time to adjust their programs to bring them into alignment before risking losing their accreditation status.

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5. For providers: Is there any specific proposed new or revised criteria or graduate competency you foresee difficulty providing evidence for? If yes, please clearly state the number and explain your reasoning.

Yes ☒, No ☐

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Further comment:

Although the APS is not an HEP, many of our members work for HEPs and have provided feedback to inform our response to this question. Overall, concerns concentrated on the number of competencies and the strain this will put on education providers to meet the standards. For example, APS members suggested that the volume of Level 2 pre-professional competencies (e.g. in an Honours year) would be particularly difficult to meet. In this year, the research thesis and methodologies require a large proportion of time which may limit the capacity to focus on other competencies and place unmanageable stress on HEPs to meet the new Standards. Please also see the feedback to question 4.

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6. An additional criterion (criterion 1.10) has been added to Domain 1, public safety, to reflect the need for students training in psychology to work safely, effectively, collaboratively and respectfully with people from diverse backgrounds. Is the proposed criterion sufficient in scope?

Yes ☐, No ☐, Partly ☒, Do not know ☐

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Further comment:

Please see Appendix 1.

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7. An additional Standard Domain 6 (Cultural Safety) has been added to align the accreditation framework with the enhanced requirements relating to working safely, effectively, collaboratively and respectfully with Aboriginal and Torres Strait Islander clients. Is the proposed Domain sufficient?

Yes ☐, No ☐, Partly ☒, Do not know ☐

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Further comment:

Please see response to Question 1.

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8. Interprofessional learning has been extended to cover Levels 1 and 2, both to reflect the increased emphasis in the revised PsyBA documents and to scaffold learning in this area at Levels 3 and 4 (where it currently resides). Is this considered appropriate?

Yes ☐, No ☐, Partly ☒, Do not know ☐

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Further comment:

Overall, we agree that this is appropriate, however, placing undue emphasis on interprofessional learning too early risks skewing the training towards practice (noting our previous concerns that many psychology students have no intention of practicing as a psychologist).

We support interprofessional learning being delivered as an introductory concept in Levels 1 and 2 (and being focussed on psychological science/discipline rather than psychological practice). At lower levels, learning about other disciplines could be scaffolded so that there is a basic knowledge base about other health and social professions and where psychology as a science is positioned. This knowledge is then extended with a greater practice focus in later programs.

We recommend the consideration of the term 'multidisciplinary learning' instead of 'interdisciplinary learning' which may be more appropriate for all graduates, particularly those who work in psychology-related domains such as research.

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9. We have removed references to 'specialised' or 'specialisms' in the Standards to align with guidance from Ahpra regarding the usage of these terms. Do you anticipate any unforeseen consequences from this change?

Yes ☐, No ☒, Partly ☐, Do not know ☐

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Further comment:

We agree with being consistent with Ahpra guidance.

We note, however, that it appears the general public are not aware of the different Areas of Practice Endorsement of psychology in the same way they understand specialisms of medicine (e.g. cardiology, oncology etc.). In general, we advocate for language that represents the diversity of the psychology profession, to broaden public understanding and appreciation of the full range of work undertaken by psychologists.

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10. Is there any unnecessary duplication in the Standards? If yes, please state which criteria or graduate competencies this applies to.

Yes ☒, No ☐

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Further comment:

As previously discussed, efforts to reduce the total number of competencies (while still making them comprehensive and meaningful) will ultimately lessen duplicated efforts for HEPs. We suggest the following criteria could be condensed or collapsed:

- Level 3, Criteria 3.25 and 3.26 are implied in other previous competencies such as 3.11, 3.12, 3.18, 3.23.
  - Instead of neurodiversity being vaguely referenced in Level 3, 3.9 we would suggest that this would be better placed within either 1.1 or Domain 4.
  - The proposed new criterion Level 2, 2.7 could be covered by adapting Level 2, 2.2.
  - The proposed new criterion Level 2, 2.8 could be part of Level 2, 2.5.
  - The proposed new criterion Level 2, 2.10 is partially duplicated in Level 2, 2.2
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11. Small changes have been made throughout the Standards to align the language used with the new PsyBA Code of conduct for psychologists and the revised Professional competencies for psychologists. Are there any other minor wording changes that would improve clarity?

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Yes ☒, No ☐, Partly ☐, Do not know ☐

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Further comment:

Please see Appendix 1 below for suggested changes.

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12. The Standards will be accompanied by an Evidence Guide. Based on your current understanding of the Evidence Guide, are there any changes that should be made to this document as well?

Yes ☒, No ☐, Partly ☐, Do not know ☐

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Further comment:

Throughout our responses we have highlighted needs and opportunities for the Evidence Guide to help HEPs provide relevant examples to meet the Standards. In

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particular, how to meet the newly proposed criteria regarding assessing proficiency in multicultural practice and cultural safety (Domain 6). We urge APAC to be flexible and open to practical assessments (e.g., simulation, role play) when placement experience with culturally diverse clients is not possible.

In addition, we recommend a comprehensive glossary or set of definitions to fully understand what is meant in the competencies (for example, a clear definition of psychological practice). Whenever possible, we advocate for consistency with the PsyBA's updated Professional Competencies and Code of Conduct<sup>3,4</sup>.

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13. Are there any other changes to the Standards that should be considered?

Yes ☒, No ☐, Partly ☐, Do not know ☐

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Further comment:

Please see Appendix 1.

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14. Do you have any other comments on the Standards?

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Further comment:

- **Rural and remote considerations:** When considering the introduction of digital competencies, we highlight the appropriate delivery of psychology services and support via telehealth. Importantly, these considerations may intersect with cultural safety in some jurisdictions such as remote and very remote areas of the Northern Territory, Queensland, and Western Australia where practitioners regularly serve clients across vast geographical distances.
  - **Specific skills:** while we recognise the challenges of an already full curriculum, it is important to consider where psychological skills regarding specific skills and applications are best taught, for example, child sexual abuse, domestic and family violence, aged care, disability, psychological effects of climate change, and eating disorder safe care.
  - **Practical issues:** We have received feedback suggesting that the numbering system (Domains vs Levels) used in this paper is confusing which may limit useful and precise feedback.
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## Appendix 1: List of proposed revised or new criteria and graduate competencies:

### Domain 1: Public Safety

Domain 1: Criterion 1.2 (revised)

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Domain 1: Criterion 1.6 (revised)

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Domain 1: Criterion 1.8 (revised)

In the skills training and/or placement context, there is serious concern about the potential implications of removing the requirement of “suitably qualified psychologists” to supervise and train students.

Whilst a shift to focusing on the outcome of the graduate being able to “practice safely” is important, it is equally important that individuals involved in training have demonstrated proficiencies with, and ongoing adherence to, the same Code of Conduct and Professional Competencies as the psychology students they supervise.

The APS is concerned that students may receive, directly or indirectly, information that is inconsistent with the PsyBA Code of Conduct and the Competencies because the professional supervising them works under different practice standards with different knowledge sets or philosophical frameworks – or worse – completely misinterprets or misunderstands the Code of Conduct as it applies to the profession of psychology.

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Domain 1: Criterion 1.9 (revised) / Domain 1: Criterion 1.10 (revised)

The addition of ‘and/or supervised practice’ implies a reduction of the need for placements, as long as ‘skills training’ is supervised. Skills training and supervised practice are conceptually different and should both be considered as distinct and important aspects of psychology training. This is particularly problematic given that the original 1.10 is also marked to be removed.

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Domain 1: Criterion 1.10 (new)

The current conceptualisation of this criterion warrants further theoretical elaboration to address the multidimensional power dynamics inherent in various domains of psychological work. Specifically, understanding the power asymmetries that may manifest differently across various practice contexts, for example in forensic settings where psychology practitioners interface with legal systems that may inadvertently retraumatise vulnerable populations. We suggest this needs to be clearly articulated, including how these principles should be addressed within pedagogical frameworks in supporting documentation, for example in the Evidence Guide.

### Domain 2: Academic governance and quality assurance

Domain 2: Criterion 2.1 (revised)

Consideration of what ‘diverse voices’ mean in this context would be helpful, perhaps in the Evidence guide or other supporting documentation.

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#### Domain 2: Criterion 2.2 (revised)

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#### Domain 2: Criterion 2.3 (revised)

Removing the specification of which external and internal groups/stakeholders are involved risks them not being included in the design and management of programs. Ultimately, this may mean that programs do not meet the needs and expectations of these core groups.

### Domain: 3: Program of study

#### Domain 3: Criterion 3.1 (revised)

Changes to this criterion elicited a strong response and negative feedback from APS members. We are very concerned that removing the explicit reference to psychology as a 'science-based discipline' could result in serious ramifications for psychology's credibility, rigour, quality, efficacy and impact. Omitting the scientific foundation of psychology risks undermining the profession's legitimacy and the integrity of training programs.

We do acknowledge, however, that valuing diverse ways of knowing is important—particularly to address gaps in the evidence base or to enhance cultural responsiveness. However, this should not come at the expense of grounding psychology in science. Appropriate acknowledgement of Indigenous ways of doing and knowing may be better articulated under the new criterion 1.10, in Domain 6, and/or in Domain 4. Where the evidence is limited or culturally inappropriate, integrating other knowledges may be warranted as long as the limitations of the evidence are clearly articulated.

As previously discussed, the APS is concerned that this, combined with other proposed changes indicates a significant departure from the scientist-practitioner approach. The unique value proposition of psychologists relative to other less-regulated occupational groups has always been the science-based approach. This has helped underpin public safety for many years and we strongly advocate for its reinstatement into the criteria.

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#### Domain 3: Criterion 3.3 (revised)

Changes to 3.3 appear to undermine the requirement for staff to have a base level of training and make it seem like formal qualifications can be replaced with professional development. We note that there is overlap with the *Higher Education Standards Framework (HESF Threshold Standards) 2021* i.e. 3.2 Staffing which requires that staff have 'knowledge of contemporary developments in the field'. This consideration is also applicable to the current criterion 1.7.

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#### Domain 3: Criterion 3.7 (revised)

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#### Domain 3: Criterion 3.8 (revised)

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#### Domain 3: Criterion 3.9 (revised)

This criterion is not well aligned with Competency 6 which emphasises the importance of working collegially in an interdisciplinary team and communicating well. This is distinct from learning 'with' or 'from' other disciplines.

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While we appreciate the importance of respecting other discipline's scope of practice and respective expertise, we need to ensure that psychology-discipline specific content is not diluted.

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#### Domain 3: Criterion 3.10 (new)

The APS supports the inclusion of this criterion and our members agree that this important, but the wording is considered insufficient at present to lead to graduates being able to demonstrate this competency. In addition, we note that an unintended consequence of this criterion could be that HEPs are then responsible for an individual student's resilience (for example, whether they are able to cope with a difficult conflict within their family or are getting sufficient sleep etc.). An alternative concept would be 'professional resilience' which would be appropriate to be taught and assessed (note this also applies to Domain 1.7). HEPs may require some guidance and support in demonstrating how to meet this criterion.

It is suggested that self-care could be embedded in assessments at all levels (e.g., the Evidence Guide could provide comment on written and demonstrated or monitored evidence of self-care during practicum placements).

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#### Domain 3: Criterion 3.11 (new)

### Domain 4: The student experience

#### Domain 4: Criterion 4.4 (revised)

This appears to be a requirement under 3.3 of the HESF Threshold Standards 2021<sup>8</sup> and may not be necessary to duplicate.

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#### Domain 4: Criterion 4.5 (revised)

#### Domain 4: Criterion 4.8 (new)

This criterion warrants further consideration as it is quite common for staff to have multiple roles (e.g. teaching subjects, program coordination, marking, research supervision, and clinical supervision). For example, this criterion suggests that a lecturer on a Level 3 or 4 training program could not also be a clinical supervisor or research supervisor for some students. Expecting these roles to be separated is impractical given workforce constraints, particularly for smaller HEPs.

Greater clarity is needed regarding the definition of a conflict of interest and what is meant by "appropriately identified and mitigated." Good governance necessitates HEPs to have policies and procedures in place to acknowledge and mitigate the impact of multiple roles and dual relationships. Importantly, such conflicts can arise in many domains, not just within a program of study.

### Domain 5: Assessment

#### Domain 5: Criterion 5.2 (revised)

We commend the inclusion of 'constructive alignment' in this competency.

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#### Domain 5: Criterion 5.3 (revised)

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Similarly to 1.9, this has removed the necessity of 'direct observation in professional practice settings' i.e. placements. While the APS supports flexible assessment approaches, direct observation is a critical aspect of assessing a psychology student in professional practice settings. In the absence of this, the Evidence guide will need to be very clear about how this competency can be met.

### **Domain 6: Cultural Safety (new)**

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Domain 6: Criterion 6.1 (new)

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Domain 6: Criterion 6.2 (new)

While we agree with and commend the inclusion of this competency, our members raised a potential issue with conscious objection. Specifically, how does a HEP ensure that students who do not undertake a particular activity due to a conscious objection (which would be consistent with this criterion) still meet the competency required. A relevant example in the Evidence Guide would be helpful.

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Domain 6: Criterion 6.3 (new)

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Domain 6: Criterion 6.4 (new)

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Domain 6: Criterion 6.5 (new)

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Domain 6: Criterion 6.6 (new)

There is concern that the current wording for this criterion sets the threshold too high for it to be met reliably. This criteria places considerable pressure on HEPs to secure a number of placements where students have the opportunity to work with Aboriginal and Torres Strait Islander people in order for students to sufficiently meet this competency and for HEPs to maintain accreditation status. The APS is concerned that the requirement to meet this criterion could impact Aboriginal and Torres Strait Islander services in a negative way.

### **Level 1; Foundational Competencies**

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Graduate Competency: 1.1 (revised)

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Graduate Competency: 1.4 (revised)

We note the specification of the values and ethics 'of conduct' in psychology may be limiting and unnecessarily narrow the conceptualisation of ethics. Values and ethics should underlie all areas of psychology-related disciplines and applications including, for example, in research, marketing, or human centred design. Specifically, as previous discussed, this competency emphasises the practice of psychology, further limiting its scope.

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Graduate Competency: 1.5 (revised)

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Graduate Competency: 1.7 (new)

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Graduate Competency: 1.8 (new)

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Graduate Competency: 1.9 (new)

While we agree with the importance of the evidence-base of psychology, specifying 'evidence-based research' raises a question around the type of research that is not evidence based?

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Graduate Competency: 1.10 (new)

## Level 2: Pre-Professional Competencies

Graduate Competency: 2.6 (new)

While we commend the intent of this new criterion, its current wording risks placing disproportionate responsibility on the individual to manage psychosocial risks that are often systemic in nature. While personal strategies such as self-care and resilience are important, they are insufficient as standalone approaches to mitigate risks that stem from structural issues like excessive workload, unclear role boundaries, or poor organisational culture.

Framing psychosocial risk management primarily as an individual responsibility not only overlooks the substantial evidence base on the importance of organisational and systemic interventions but also risks unintentionally blaming practitioners for burnout or distress. A more balanced and evidence-informed approach would acknowledge the dual responsibility of individuals and organisations in promoting psychologically safe work environments. Reframing this competency to reflect this shared responsibility would help ensure alignment with national workplace health and safety guidance and contemporary psychological research.

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Graduate Competency: 2.7 (new)

Graduate Competency: 2.8 (new)

This appears to be a missed opportunity to integrate the risk of bias in research, to be in line with other criteria (e.g. Domain 1: 1.1).

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Graduate Competency: 2.9 (new)

Graduate Competency: 2.10 (new)

## Level 3: Professional Competencies

Graduate Competency: 3.3 (revised)

The wording of this competency should be consistent with the definition of 'associated party' in the Code of Conduct i.e., *"Associated party/parties are people or bodies psychologists interact with whilst providing a service, who are not a client or third party. They include but are not limited to: a. clients' carers, employers, employees, friends, guardians, partners, relatives and spouses, b. other practitioners, and c. spokespeople representing bodies or communities."*<sup>3(p. 22)</sup>

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Graduate Competency: 3.4 (revised)

Graduate Competency: 3.7 (revised)

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#### Graduate Competency: 3.9 (revised)

The APS has three concerns with the proposed wording of this criterion:

1. Removing 'empirically supported' is consistent with our previous concerns regarding a significant departure from the scientist-practitioner approach. Removing the necessity of empirically supported interventions undermines the foundation of evidence-informed practice. We suggest rewording the criterion to: *"Demonstrate proficiency in tailored, empirically supported, culturally safe..."*
2. The proposed wording is focussed on clinical practice settings.
3. The proposed wording is long, complex, and difficult to parse as it appears to contain a list which requires every item to be addressed. If this is not the case, an 'or' should be included or an indication that the lists are examples only.

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#### Graduate Competency: 3.11 (revised)

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#### Graduate Competency: 3.12 (revised)

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#### Graduate Competency: 3.18 (new)

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#### Graduate Competency: 3.19 (new)

The current conceptualisation of this competency is overly broad and lacks clarity regarding scope. It is not clear whether the criterion refers to clinical decisions, legal decisions, ethical conduct, student assessment decisions, or all of the above. It is also unclear how this could be assessed in practice which would make implementation and evaluation problematic.

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#### Graduate Competency: 3.20 (new)

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#### Graduate Competency: 3.21 (new)

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#### Graduate Competency: 3.22 (new)

While the intention behind proposed criterion 3.22 is commendable, its current wording risks placing disproportionate responsibility on the individual psychology student to manage psychosocial risks through self-care. Please also see our response to Level 2, 2.6. The clause "promoting systemic solutions where appropriate" further minimises the importance of organisational responsibility by suggesting that it is the individual's responsibility to promote the solutions and there is no onus of psychosocial risk management on workplace leadership and systems themselves.

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#### Graduate Competency: 3.23 (new)

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#### Graduate Competency: 3.24 (new)

Feedback from our members suggests that the availability of culturally safe assessment tools is limited, particularly for cognitive and vocational domains in Aboriginal and Torres Strait Islander or non-Western cultural contexts.

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It is difficult to demonstrate a proficiency in tools that do not currently exist. More appropriate wording would be “culturally responsive assessment approaches.”

As previously discussed for Level 3, 3.9, the inclusion of ‘or’ to make it clear that not all listed activities are required (if that is the case) is important for clarity.

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Graduate Competency: 3.25 (new)

This competency could be expanded to also include the need for a psychologist to be able to articulate their scope of practice.

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Graduate Competency: 3.26 (new)

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Graduate Competency: 3.27 (new)

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## References:

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