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Sent via email: apacstandards@apac.au

Dear Professor Dunn,

APAC Alignment Accreditation Standards Review: Consultation Paper – Round 1

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 1 (the Consultation Paper). 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[1] and the United Nations Sustainable Development Goals (SDGs)[2].

As the leading professional association for psychologists in Australia, we appreciated the invitation from APAC CEO David Ensor to participate in the Review. Our members are involved in many aspects relevant to the Review, either as academic and teaching staff, students, practicing psychologists and supervisors. We look forward to working together and representing our members throughout the multi-stage Review process. For the current consultation paper, however, we note that many of the issues raised are intrinsically pedagogical in nature and, therefore, outside the remit of the APS.

In light of this, the APS commends the thorough nature of the current review process and offers the following feedback to support the intent to align APAC Accreditation Standards with the Psychology Board of Australia's updated Professional Competencies and Code of Conduct[3,4]. We appreciate the opportunity to provide some high-level input into the principles underlying the Standards review and their eventual updating.

Reflectivity and reflexivity

The APS supports the consideration of reflexivity and reflectivity in the 2025 APAC Alignment Accreditation Standards review and wholeheartedly appreciates the importance of teaching and assessing reflexive and reflective skills for students of psychology. Reflexivity and reflectivity are essential components of culturally safe practice in psychology, and for this reason, central to the training and ongoing professional development of psychologists. Both concepts contribute to self-awareness, ethical decision-making, and the enhancement of therapeutic and research practices focussed on ensuring the safety of people who interact with psychologists, including those from other cultures and diverse backgrounds.

Given that reflexivity and reflectivity require psychologists to critically examine their role in shaping assessment, intervention and research processes across settings, the APS recommends teaching the concepts from the commencement of a psychology course (Level 1) and throughout its duration through to, and including, postgraduate degrees and placements (Level 4).

Both reflexivity and reflectivity need to be understood conceptually as well as being integrated into practice. For this reason, they need to be taught both theoretically and practically, i.e., lectures, reading, discussion and active practice, assessed through written assignments, interviews and observation.

In addition to an ongoing understanding of one's own cultural positionality, reflexivity and reflectivity encourage psychology students and psychologists to reflect on how to engage with diverse populations in a way that is safe for clients. They are key to culturally secure practice, irrespective of setting or location.

Reflexivity and reflectivity are also important to minimise research bias by recognising an individual's potential to influence data collection and interpretation. Both reflexivity and reflectivity need to be explicitly taught in the areas of practice, as well as in research methods. This can be undertaken by 'perspective taking' exercises[5] or other evidence-based pedagogical approaches.

Cultural Safety

The APS strongly encourages the incorporation of Aboriginal and Torres Strait Islander representatives (psychologists, researchers and community members) in the development and ongoing review of all psychology programs as a requirement for tertiary education providers to maintain their accreditation status. Representatives could provide feedback via regular stakeholder reference group meetings, and/or by working alongside course and unit coordinators in the review of lecture content, assessments, and self-directed learning resources provided to students.

As we have previously advocated, the unique impact of colonisation means there must be deep recognition of the intergenerational trauma and ongoing disenfranchisement that has been created in Australia. We note this is also reflected in Principle 2 of the Psychology Board's *Code of Conduct for Psychologists*[3] and is incorporated in Competencies 7 and 8 (and underlies others) in the *Professional competencies for psychologists*[4]. Appropriate, co-developed strategies must (a) take into account culture as a protective factor to build social and emotional wellbeing and resilience[6,7] and (b) recognise that many of the social determinants of mental health and wellbeing are not uniform across communities or cultures[7,8]. Genuine co-production is essential to ensure that the standards are indeed culturally safe and fit for purpose.

A great deal of research, consultation, and development has been undertaken to create The Indigenous Social and Wellbeing Framework[9]. Some of our members, and those of The Australian Indigenous Psychologists Association (AIPA), and the Australian Indigenous Psychology Education Project (AIPEP), have been involved in the translation of this important work into the psychology curriculum. The APS wholeheartedly supports this work and advocates for the standards to recognise the important of understanding and working with Australia's First Nations peoples in psychological practice.

Importantly, cultural safety requires lifelong reflection and adjustment, as acknowledged by an Aboriginal APS member:

> *"It is an ongoing process for me as a psychologist to question not only my competence, but also what I do and how I go about my interventions. It means that as a researcher, I must question who benefits or who might be disadvantaged by my research. It means that as a teacher, I must be mindful of what I communicate to students and question ways that I may be able to help give voice to Aboriginal and Torres Strait Islander clients."*[10(p. 7)]

Diversity and Inclusion

While existing curricula for post-graduate courses may already recognise the importance of diversity and inclusion, awareness and understanding of the significance of diverse backgrounds, and responsiveness to them, also needs to be included in undergraduate curricula.

In addition, assessment for psychology students could include more detailed, reflexive and reflective comment on the exploration of the links between aspects of diversity and wellbeing. In postgraduate courses that include professional placements, presenting concerns, barriers to engagement, and poor outcomes may need to be understood within the context of the various aspects of diversity.

Psychology training needs to incorporate all aspects of diversity rather than limiting the focus of education to a select few. Furthermore, while we commend recognition of the different aspects of diversity, curricula could go further in addressing the compounding effects of vulnerabilities i.e. intersectional disadvantage[11,12]. For example, when individuals have more than one attribute associated with diversity (for example being a member of an ethnic or religious minority, having a disability, or being a member of the LGBTIQA+ community), the impacts of discrimination and marginalisation can overlap and amplify [13] which can be related to a higher risk of suicide and poor mental health and wellbeing[14]. Typically, the effects of intersectional disadvantage are difficult to investigate quantitatively as the number of people who share particular combinations of characteristics are limited[15].

Knowing this, it is important that psychologists are aware of different aspects of diversity, how they apply to themselves (in terms of reflexivity and reflectivity) and how elements of diversity may interact with the people for whom they provide services. Our members tell us there is room for improvement in psychology training programs to amplify the importance of intrapersonal and interpersonal factors (e.g., social or economic status, geographic location, immigration status, and religious or spiritual beliefs and community connection) and the impact they can have on psychological health and wellbeing.

With regard to enhancing the training of psychologists around the topic of diversity, tertiary education providers could be required to consult with peak bodies representing various areas of diversity when creating or reviewing the content of curricula. Assessment for core units in psychology education could include aspects of diversity within the context of the subject matter, to ensure that, as with reflexivity and reflectivity, diversity is elevated and explored in detail across an entire course of study – both undergraduate and postgraduate. Ensuring exposure to clients with diverse backgrounds also needs to be an element of student placements.

Self-Care

Self-care is essential to reduce risk of burnout and unsafe practice, both of which are likely to impact the effectiveness of psychology services (irrespective of the setting or location) and potentially public trust in psychologists as experts in their domain[16]. Moreover, psychologists have an ethical obligation "to be aware of the potential impact of [their] our own emotional and mental health, so as not to impair [their] our ability as competent psychologists"[16(p. 4)].

Self-care competencies should be incorporated at all levels of study, with increasing focus at the post-graduate level, especially when preparing students for professional placements and practice. Self-care competencies can also be embedded in units focused on assessment and therapeutic skills by reiterating the importance of reflexive and reflective practice. Self-awareness can potentially limit the risk of burn-out and having a theoretical framework through which to understand these experiences is helpful for both students and practicing psychologists.

In addition to the resource cited in the Consultation Paper, the APS offers a free online course on self-care[17] for members (and other psychologists for a fee) in recognition that life-long learning (i.e., CPD and supervision) are important to support self-care and avoid burnout.

In collaboration with Australian National University staff, and others, the APS supported research which examined relevant psychology workforce issues in the context of disasters[18].

In this report, psychologists reported on the type of workplace and personal self-care strategies they utilise and their relative effectiveness. From a national workforce perspective, self-care is also important to ensure that psychologists remain effectively engaged while practicing their profession.

Importantly, self-care must be developed throughout every aspect of the study of psychology to prepare graduates achieve successful transition into the psychology workforce. The recent final report of the Universities Accord detailed the necessity to ensure that learning environments (both online and on-campus) are "safe, welcoming, and inclusive spaces for all students" [19(p. 168)].

Feedback from our members who are early in their psychological careers suggest that some felt burnout at as result of their training and that they could have been better supported during their placements.

Client Safety

Client safety is a cornerstone concept that is central to the ethos of the practice of psychology: the principles of 'beneficence' and 'non-maleficence'[20]. The APS agrees that client safety is linked to cultural safety and again emphasises the importance of reflexivity and reflectivity as concepts and activities that are taught and practised for the duration of psychology training and within a number of different contexts, i.e., professional practice, research, and core units. All aspects of client safety need to be embedded and taught within psychology education and training – at least at the theoretical level. Ethical decision-making skills also need to be taught and assessed, and lifelong learning (through CPD and supervision) needs to be emphasised as a means to continue to ensure that the practice of psychology occurs with an emphasis on client safety.

As noted in the Consultation Paper, public safety is assured within 10 associated criteria. It is also a key element of our current APS Code of Ethics[20] – the driver of ethical professional practice. Public safety underpins all aspects of the practice of psychology and regulatory matters relevant to registration as a psychologist. For this reason, it is assumed that client safety will be an integral aspect of training focused on the Psychology Board of Australia Code of Conduct. Psychology students will need to be familiar with the Code and provided with opportunities to engage with vignettes and practicum experiences that require critical thinking and ethical decision-making.

Again, this learning should be embedded within undergraduate training and amplified in postgraduate courses – especially as students work towards professional placements. Education providers, placement coordinators and supervisors need to ensure that students on placement are provided with opportunities to explore and apply their learning about client safety – both theoretically and practically.

A person-centred approach to interactions with clients, other practitioners, employers, community groups and other associated parties – within a reflexive and reflective framework – provides a model for respectful and safe relationships. That is, ongoing consideration of the other's reality, experiences and needs, along with a high level of self-awareness and an appreciation for the dynamics inherent to interactions between people (being cognisant of factors such as power differentials, cultural backgrounds and diversity) will support respectful relationships. Teaching reflexive and reflective practice, as outlined above, provides a method for addressing the challenge of forming respectful and safe relationships.

Digital Competence

As acknowledged in the Consultation Paper, relevant Psychology Board of Australia Professional Competencies[4], and Principle 3 of the Psychology Board of Australia *Code of Conduct*[3], digital competence encompasses many aspects of psychological practice.

The accelerating growth of new technologies and tools also bring with them increasing complexity and new considerations to practice responsibly with client safety being held paramount.

The use of digital platforms is commonplace in psychological practice, for example, communication with other health practitioners or government agencies (such as education, justice, social services), research, and private practice.

Emerging areas of practice include telehealth, VR for exposure therapies, mental health apps, social media, and Artificial Intelligence (AI).

Understanding these digital spaces is essential for maintaining professional standards, ensuring client well-being, and upholding ethical responsibilities. Exposure to a broad range of digital technologies and environments within an education context, therefore, is important to ensure psychologists are training to be competent in contemporary and future practice. Moreover, psychologists must be continually updating their skills and knowledge in this field and be aware of changes to how technologies are used and applied (e.g. use of collected data in AI product training) and the impact of these technologies on mental health and wellbeing (e.g. digital addiction, or social media use and cyberbullying).

The rapid growth and diverse implementation of new technologies means that standards may become quickly outdated if they focus on particular technologies and their current application. To ensure appropriate, effective and efficient use of emerging digital technologies, psychologists must develop high-level critical evaluation skills which are principle based. Considerations around ethical use, limitations, privacy, confidentiality, equity and access, health misinformation, professional boundaries, client choice and informed consent, compliance with standards etc. will remain, and if anything, become more complex. Focussing on such principles will equip future psychologists to consider the implications of new technologies and scenarios when they emerge.

Psychologists must also be familiar with, and develop the capacity to ensure compliance to, relevant digital standards. For example, when working directly in the context of digital mental health, the *National Safety and Quality Digital Mental Health Standards*[21] outlines (1) "the clinical and technical governance, safety and quality systems and the safe environment…that are required to maintain and improve the reliability, safety and quality of digital mental health care" (2) "the systems and strategies to create a person-centred digital mental health system" and (3) the processes for developing and delivering digital mental health services, minimising harm to service users, their support people and others, communicating for safety and recognising and responding to acute deterioration in mental state." [21(p. 5)]. The Australian Digital Health Agency also provides resources and standards for digital health settings[22]. Importantly, as outlined in our previous advocacy, targeted governance and standards for some emerging technologies (such as AI) are urgently needed but still in development[23,24].

General comments

- Given that reflexivity and reflectivity require critical thinking and self-evaluation, it is vital that psychology students experience an adequate level of psychological safety to enable them to explore and practice these competencies.

- Psychology education would benefit from a shared pedagogical framework across higher education providers, to avoid repetitive efforts and to create a high level of consistency in psychology training.

- Deciding when to integrate specific competencies into the training structure is an important consideration, e.g., from Level 1 with a broad, more general thematic pedagogical approach that develops and amplifies through Levels 2, 3 and 4 into a more focussed, practical pedagogical approach.

  Determining accountabilities and responsibilities in psychology training, including acknowledging the impact of settings within which students learn, is critical to student experience and to ensuring the achievement of graduate competencies, e.g., self-care. Higher education providers, in collaboration with placement providers and supervisors, have an obligation to provide a psychologically safe, constructive learning environment.

  There must be effective communication and a clear understanding of who is ultimately accountable and responsible for the experience a student has during their psychology education, including while on placement (if they reach this level). Within this context, self-care (and other competencies) should be modelled and supported throughout all psychology training.

- The APS has heard concerns about pressures from different sources towards a homogenisation of health professions. We are aware of a tendency towards deprofessionalisation or professional substitution – where another profession, with different competencies and/or standards of training are being employed in roles that have traditionally been held by psychologists. Collectively, we need to be advocating for the distinctiveness and unique contribution of psychologists. This starts with promoting a clear understanding of our professional role(s) and status as a profession, not simply our skills and competencies.

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 providing more detailed commentary to the draft standards in Public Consultation Round 2. 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.

Yours sincerely

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Chief Executive Officer

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