# c o m p a s s
## C O N S U L T I N G

ORGANISATIONAL and MANAGEMENT
PSYCHOLOGISTS                 CONSULTANTS

- psychological assessment
- career development
- outplacement
- recruitment

3 March 2016

Professor Brin Grenyer                    Sent via email to: psychconsultation@ahpra.gov.au
Chair, Psychology Board of Australia
GPO Box 9958
MELBOURNE VIC 3001

Dear Professor Grenyer

**RE:      PsyBA PUBLIC CONSULTATION PAPER #26**
**         "AREA OF PRACTICE ENDORSEMENTS" (JANUARY 2016)**

In response to the call for feedback on the latest consultation paper, please accept my submission.

I realise that substantial revision of the PsyBA Guidelines may be required following the release of the revised APAC accreditation standards. Frankly, it is very disappointing that this much anticipated revision is taking so long to appear.

In responding to the 15 questions raised in paras 78 and 73 on page 22 of the main document, I also wish to point out what I believe is a clear gap in the competency requirements of at least some psychologists.

**REGISTRATION STANDARD:**

1. The standard appears satisfactory, although my client base (organisational clients) would not be able to distinguish between the areas of practice, and (often) even how psychologists differ from psychiatrists, human resource professionals, etc.

2. Yes. Other areas mentioned in the draft document (e.g. geropsychology) appear to be sub-sets of, say, clinical psychology, as noted, or perhaps health psychology. I believe that greater diversity in the areas of practice would be confusing in the Australian market, although this matter should be reviewed periodically.

3. Yes. Greater flexibility, with clear pathways is desirable – <u>provided competence is maintained</u>.

4. Yes. There are some useful improvements.

5. This is fine – a broad document.

6. Nil.

7. Nil.

**GUIDELINES:**

1. While in general the Guidelines may be satisfactory for a number of areas of practice, there are clear concerns regarding supervisor and placement opportunities for some psychologists. Thus, we are witnessing the development of the Master of Business Psychology Course at the University of Queensland (commencing 2017). This course will address needs and demands in the client base (organisations, not the 'public'), without meeting APAC and PsyBA requirements. It should be of a high quality, producing graduates in demand from a range of organisations.

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**2.** There appear to be no changes with respect to the organisational psychology competencies, apart from more specific comments in relation to Diversity. (No doubt this is driven by COAG/AHPRA.) <u>However</u>, as I have commented previously, I would like to see a 'softening' of 'c' under Psychological Assessment and Evaluation. As noted elsewhere in this submission, there is potential for an 'opportunity cost' when time and resources are appropriated for competence development in health/clinical related matters, for organisational psychologists at least. Furthermore, some (organisational) psychologists may be under the illusion that they possess the requisite knowledge and skills, when this is not the case as they have not gained the opportunity to apply and hone their initial knowledge (and perhaps skills) through use and experience over time. (Similarly, competent clinical psychologists, or others, may apply inappropriate tools, processes and 'paradigms' when engaging in employment related assessments.)

**3.** The revision is clearer in a number of sections.

**4.** NO. There are very few organisational psychologists working in industrial relations, for example, and relatively few working within consumer behaviour / market research / advertising. I suspect that some individuals, in fact, are performing a certain job function in spite of being a (specific) psychologist, not because!

I believe it needs to be made clear that these activities are examples only of where an organisational psychologist <u>may</u> work; some are certainly 'low frequency'. For example, Steiner & Yancey (2013), in citing a survey of US I/O psychology practitioners and academics, report that consumer behaviour is ranked #21 in terms of importance. (It does, however, play an important role in behavioural economics, a growing discipline at the interface between psychology and economics.)

**5.** YES. The draft refers to contextual matters: political, economic, and social. This is fine, but let us consider the models often used in strategic HRM and marketing when analysing change and the forces at play within a system:

> P.E.S.T        [Political, Economic, Social…and Technological]
> P.E.S.T.L.E.
> S.T.E.E.P.L.E.

The regulatory environment of PsyBA addresses E (Ethics) and L (Legal), both directly and indirectly. Bodies such as the Australian Psychological Society focus on the other E (Environmental). But what about <u>T: Technological</u>! This is a significant gap in the competency modelling of psychologists, particularly organisational psychologists. Let me provide some 'evidence' of the importance of addressing this somewhere in the Guidelines:

I.      Employers clearly want technology savvy graduates who offer more than the traditional skills and qualifications expected of professionals. See the Australian Financial Review (AFR) graduate lift out of 15 Feb 2016; note recent content in the press indicating that global organisations such as KPMG are now prepared to recruit graduates (for potential auditor roles) even if they do not possess an accounting degree. Furthermore, what of the example of the QUT graduate qualified in Fine Arts and Software Engineering: securing a job with IBM?

Does what is outlined in this PsyBA document allow for the agility/flexibility being sought by future employers – both within the health and non-health sectors of the economy? (After all, organisational psychologists, despite not being included in the HWA employment statistics, are nevertheless covered by the National Law.)

II. Innovation in products and processes within areas such as recruitment, selection, personnel assessment, and learning and development require psychologists who can work closely with software engineers, and who can effectively evaluate the validity of these technology based assessments and interventions. The 3P model of Standards in psychological test use (People, Product, Processes) requires the psychology profession to raise Standards in 'People' (given the aforementioned changes in Product and Processes) if we are to meet consumer needs…and 'protect the public'.

An article in the AFR of 1 March 2016 reveals that Deloitte (Australia) is trialling the use of a gamification process, instead of traditional testing, to assess graduate applicants. Psychologists need to be more au fait with the range of issues associated with such developments. At the moment, this technology orientated approach is being driven primarily by HR people and some publishers/test developers. Fortunately, Deloitte will evaluate this new process and compare it against the traditional testing approach; we can only hope that this evaluation is rigorous and not based on criteria which are irrelevant to (long-term) employee effectiveness, and related criteria.
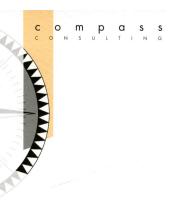
III. Numerous attendees at the annual conference of the Society for Industrial and Organizational Psychology (SIOP), Division 14 of the APA, have a technology connection of some sort. This conference is the premier conference of its type, globally, and nearly always draws 4,000 plus attendees. The closing keynote speaker in 2015 (in Philadelphia) was a Graphics Editor for the New York Times. Possessing a Master of Statistics, she provided a fascinating presentation which was rated much higher than that of traditional closing keynote speakers such as Albert Bandura (2013 conference). The closing keynote presentation for the 2016 conference will be provided by Laszlo Bock (Senior Vice President of People Operations at Google). At this conference there are typically numerous sessions which have an interface with technology, but even so there is a specific themed area: 'Technology (e.g. gamification, social media, and simulations)'.

A workshop at the forthcoming International Test Commission Conference (2016) is titled: 'Computational psychometrics and data mining in assessment: Introduction'. (This has particular relevance to educational assessment.) Although this theme is a little futuristic for most Australian psychologists, it provides further evidence of the clear educational and skills challenges facing psychologists.

IV. SIOP has conducted annual surveys of members over the past 3 years: "What are the top workplace trends, from an I/O psychology perspective, that you see for the forthcoming year?" The 2016 crystal ball (with 700 respondents) produced the following amongst the top 10 anticipated trends:

1) Big Data & Analytics ➡ Decisions
2) Technology & the Way Work is Done
3) Managing Virtual Teams
.
7) Business Agility & Flexibility
.
10) Social Media & Employment Related Decisions

(In 2015, the top trend: Mobile Assessments)

V. The updated recommended text (2016) for the University of Queensland 4$^{th}$ year psychology subject, Personnel Assessment, has made one clear change from the previous edition (2011). This change: Use of Social Media in Recruitment. This development is morphing into assessment as well, as evidenced by a recent paper

published via the Proceedings of the National Academy of Sciences (P.N.A.S.). Facebook was 'data mined' to produce personality assessments, and the lead author subsequently stated that he "expected computers to take over from psychologists".

Furthermore, Kosinski et al (2015), as published in the American Psychologist in September 2015, authored a paper titled "Facebook as a research tool for the Social Sciences: Opportunities, challenges, ethical considerations, and practical guidelines".

The common theme of the above points: The impact of technology in work and society at large, and the implications this has for the knowledge and skills required of psychologists in order to address the needs and demands of Australian organisations, and potentially a broad range of Australian consumers.

Without the requisite skills being provided by psychologists, Australian organisations, and other consumers, are likely to turn to:
A. Alternative 'professionals' who lack solid skills and the necessary appreciation of (applied) psychological theory, and the ethical practices of psychologists, and/or
B. Overseas trained personnel who don't/can't call themselves 'psychologists'.

(The reader should be aware that the marketplace may not, in many cases, differentiate between psychologists versus non-psychologists, let alone the area of practice for the said psychologist. Legislation will not happen…and is too blunt a tool anyway. Thus: The need for psychologists to develop the relevant skills, and to simultaneously educate the consumers of psychological services.)

6. I am disappointed, and disagree, with the potentially retrograde step of not requiring specific CPD in order for a psychologist to maintain endorsement within a given area of practice. The removal of this requirement may have the effect of 'dumbing down' the non-clinical (and relatively small) areas of practice. It can be difficult to secure specific CPD related training which is of a non-clinical nature. (For example, witness the offerings from the APS branches and the APS Institute – these are very clinical in focus.) Psychologists should be 'encouraged' to seek CPD relevant to their area(s) of practice.
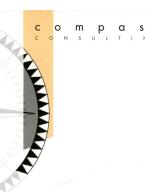
   *(I often favour flexibility over prescription, but in this case there may be unintended consequences from dropping the specific CPD area of practice requirement.)*

7. See above.

8. <u>Additional Comments</u>

   (i) It appears that the PsyBA is satisfied with the current 9 areas of practice, and I am fine with this.

   However, this does raise the question regarding the National Psychology Examination (NPE) and the Board's desire for registrars to undertake the NPE. (I realise the current exemption has been extended until June 2019.) The Board appears to recognise the distinctive nature of the 9 areas of practice, but then, implicit in their approach on this NPE matter, appears to take the approach that 'one size fits all'. The notion (apparently) of just using the same exam as that undertaken by 4 year trained psychologists, without question options or area of practice tailoring, appears to be very inconsistent – as well as inappropriate. There is a significant 'opportunity cost' in, for example, requiring organisational psychologists to be knowledgeable in matters which they are highly likely never to address again in their professional career. (This and other issues, of course, have been raised by many respondents to consultation paper #25.)

(ii) Public consultation paper #26 refers to the International Psychology Competency Project (paras 31 to 34). Having attended two sessions on this matter at ICAP 2014 (Paris), I am not sanguine that a great deal will emerge from this very protracted project which commenced many years ago – despite the calibre of the people comprising the Work Group. There is a natural tension between the dual objectives of developing sufficient rigour, while maintaining flexibility for individual (country) interpretation and adaption; similarly, psychology is arguably the most diverse of the 'health' professions (for example, see Boyack, 2005) and there will be difficulty in securing support, on substantive matters anyway, across the full domain of the discipline and profession. (Perhaps the only area in which there will be agreement will be in relation to ethics – a point made by the incoming President of the IAAP (Janel Gauthier) in providing some closing remarks at the 2<sup>nd</sup> session in Paris.)

It is also disappointing that Australia is not represented in the IPCP Work Group. (There are two from New Zealand, however.)

(iii) <u>General Comments</u>
The difficulty with some of this Australian 'competency' material stems from the fundamental nature of the National Law, when it was passed ultimately by each of the States in 2009/2010. It did not take into account the diversity within Psychology.

The COAG/AHPRA inspired regulation of organisational psychologists will, most likely, see a major decline in this group in Australia. Already, we have witnessed the closure of several postgraduate programs in recent years. (It is recognised that this regulation is not the sole reason for these closures.)

AHPRA (and hence PsyBA) often refers to "protecting the public" as a justification for many matters. This may be fine from a Health perspective, but, in retrospect, Australia should have adopted the APA (American) model for 'licencing' (APA, February 2010). According to this licencing model, approved by the APA Board, there is a need to "account for variations in relevant training, supervision, and practice". As such, there are two groups of applied psychologists in this model:

A. Health Services Provider (HSP), and
B. General Applied Psychologist.

(The notion of 'specialist' is also defined.) Such a distinction between A and B would have helped ensure relevant regulations, standards, and guidelines if introduced into Australia. This would have helped to avoid some of the unintended consequences of an approach based on 'one size fits all' as epitomised by the National Law, and as implemented by AHPRA.

In a number of respects, this draft review is solid. However, it appears quite traditional; let us hope that the APAC revamp of accreditation standards addresses the needs of future psychologists.

Thank you for the opportunity to comment on Public Consultation Paper #26.

Signed

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Registered Psychologist (Organisational)