
**COMMENTS ON THE CONSULTATION PAPER
ON
REGISTRATION STANDARDS AND
RELATED MATTERS**

**AS ISSUED BY
THE PSYCHOLOGY BOARD OF AUSTRALIA
(PBA)**

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EXECUTIVE SUMMARY:

This document is in response to the first consultation paper as issued by the PBA. It is evident that the board has been very diligent in addressing some significant issues.

While professional standards are important, there are a number of aspects in the consultation paper which are of concern. In particular, the following areas are addressed:

- Continuing Professional Development
- Proposed Requirements for General Registration
- Proposed Requirements for Specialist Registration
- Specialist Title.

The issue of “supply” needs to be considered very carefully by the PBA.

It is hoped that the deliberations of the PBA are fruitful and that the considered opinions of a broad group of Australian psychologists can be accommodated, where practical.

DOCUMENT INTENT:

The comments in this submission are in response to the first consultation paper as released by the Psychology Board of Australia (PBA) on 27 October 2009. The frame of reference for these comments is the practice of organisational psychology in Australia, together with perceptions of, and feedback from, the international scene. It is based upon my extensive experience as an organisational (consultant) psychologist and my membership of (and at times active participation in) various bodies: Australian Psychological Society and College of Organisational Psychologists; British Psychological Society and Division of Occupational Psychologists; American Psychological Association and in particular the Society for Industrial and Organizational Psychology; International Association of Applied Psychology; and the International Test Commission.

PREAMBLE:

The members of the PBA have been appointed to implement the regulatory reforms under the NRAS as initiated by COAG. As such, the PBA has a responsibility for ensuring the development of high standards consistent with the stated aim of “protecting the public”, while bearing in mind the caveat of costs and workforce planning requirements. However, the responsibility under the Act extends, I believe, to a “duty of care” component to the profession of psychology. Given that the legislation encompasses all psychologists, it is imperative that the registration and accreditation system has the flexibility to accommodate all elements of the profession. It is important that the new system, in endeavouring to minimise risk to the public, does not damage nation building initiatives. The just released report by the Australian Government, *Management matters in Australia: Just how productive are we?*, highlights the significant deficiency in Australian organisations with respect to people practices. In particular, our efforts in nurturing and developing talent are, by international standards, poor. This has clear implications for our future capacity to innovate and to enhance real and sustainable growth in our economy.

Productive organisations provide significant revenue and resources for the health sector via the vehicle of taxation. “Healthy” organisations, effective leadership and appropriate organisational planning and people management strategies contribute indirectly to growth in GDP as well as

individual well-being. The recommendations and directives of the PBA are likely to impact on Australia's ability to close the aforementioned gap with respect to talent development and related organisational and leadership practices. These elements are required to ensure innovation and the development of effective and sustainable organisational growth.

The powerful combination of registration and accreditation, across the full spectrum of our very diverse profession, means that the PBA is now the "central player" in how Australian psychologists will contribute to organisational and individual well-being in the future. This responsibility may not have been sought by members of the PBA – but it is the reality.

The traditional model encompassing a professional body (such as the APS) taking responsibility for the development of the profession is being superseded by a model driven by external regulatory, consumer, political, insurance, financial and economic pressures. The PBA needs to ensure that their actions ensure the sustainability of the profession through the maintenance of not only high standards but also "supply". After all, this sweeping regulatory reform (NRAS) has an underlying "supply" and "demand" mechanism. The 2006 Productivity Commission Report and the subsequent Australian Intergovernmental Agreement (IGA) underpin this proposition.

SPECIFIC COMMENTS:

Submissions by other bodies and individuals may well cover all proposed standards, but I wish to comment on a few elements only.

1. Continuing Professional Development

It should be noted, as context/frame is very relevant I believe, that I am an avid supporter of professional development. For example, I have attended all eight biennial national conferences of the College of Organisational Psychology and this has also included numerous workshops conducted by leading international organisational psychologists. I have attended various international conferences in applied psychology and organisational psychology and my professional development submission to the APS for the period 2007 to 2009 was 160 hours. I was randomly audited several years earlier and was able to produce a thick document substantiating my claim for that period.

Although the PBA is yet to provide guidelines, it is trusted that these guidelines keep in mind not only the diversity of the profession of psychology, but also the varied means by which individuals learn and develop. The PBA's very strong focus on "qualifications" suggests that the PBA may under-value the importance of tacit knowledge, for example. This is particularly true for organisational psychology and organisational consulting, given the importance of environmental and system elements, as well as the personal factors associated with any of our activities. In other words, an effective organisational psychologist/consultant needs to draw on a very broad body of knowledge, including important elements outside of the field of psychology. They also need integrative skills and the capacity to think systemically and critically.

The proposed requirement of ten hours of individual supervision per year is highly unusual. What evidence is there to support the efficacy of this approach to enhancing "high professional standards"? Is this approach equally valid/effective across the three levels of the professional life cycle: introductory, mid-term and mature? Does this approach suit all disciplines within psychology?

Organisational psychologists in independent practice, or within a small group, will have real difficulty in regard to this individual supervision requirement. We are very circumspect when talking with colleagues in relation to our activities. We will not reveal details of client (that is, organisation) matters and perhaps not even the industry sector, although this is very relevant at times. We do not share costs/pricing information – this is commercially very sensitive and client organisations which reveal such information to another psychologist/consultant run the real risk of upsetting people. This proposed element of CPD appears to be well suited to primary care case study discussions (including ethics I realise) but is likely to be very problematic for organisational psychologists, particularly for those in an independent business. Even those working within an organisation (such as an OD Specialist) may well find it difficult to engage in appropriate dialogue both internal and external to the business. “Commercial in confidence” is an important consideration for many of us.¹ I am pleased that there is no need for the supervision to be ‘accredited’. This would not be workable at all, in my opinion.

There is another matter with respect to CPD. The PBA consultation documents needs clarification in terms of the use of the term “supervisor” although I am sure that other submissions will address this issue in more detail.

2. Proposed Requirements for General Registration

The proposal that an examination is introduced begs serious review given that psychology is a very diverse profession. The Society for Industrial and Organizational Psychology (SIOP) – Division 14 of the APA – has taken action in a number of cases (most recently in California) to prevent psychology boards from implementing exams that are focused almost exclusively on the clinical perspective. “Actions like this on the state level can threaten the livelihood of our practitioners, even though their practices focus mainly on business consulting.”²

The person/entity that prepares the agenda (assuming that this agenda is followed) for a committee meeting may be more powerful than the Chairperson. Similarly, the person or group responsible for setting the exam (and the standards) is in a very powerful position. I concur with the submission from the College of Organisational Psychologists: Much more consideration and debate on this matter is required.

The issues of 4 + 2, 5 + 1 and Master’s level qualifications and supervised practice programs have been addressed in other submissions. Based on the comments of course co-ordinators of university organisational psychology programs, I believe that there will be a lack of synchronicity in terms of supply (courses/staff/supervisors) and demand (students/proposed regulatory requirements). Some of my comments below in the section (Specialist Registration) are appropriate here as well.

3. Proposed Requirements for Specialist Registration

I suspect that this element is a “two-edged sword” and in fact unless it is handled carefully, it could be quite damaging. In essence, this proposal will garner support from those who stand to gain, at least in the short-term. This was certainly evident from some of the comments at the public meeting held in Melbourne on 19 November 2009. A “caste”

¹ On the issue of commercial in confidence, I recall at one stage meeting with a provisionally registered psychologist who had just moved to Queensland from interstate and was working with a rival recruitment/consulting firm which employed no psychologists. However, I quickly gained the impression that I could not supervise this individual as I realised that I would be helping her (and her organisation) to submit proposals and conduct work in direct competition with myself. I have absolutely no doubt that they would take advantage of this situation, given my understanding of their ethical practices, which fell well short of that which was acceptable.

² Email from David Nershi, Executive Director, SIOP, 17 November 2009.

system will develop; I have no doubt about that. However, it is starting to develop in psychology anyway, irrespective of the specialist title.

The requirement for specialist title to be based upon a doctorate (and one year's supervised practice) is aimed at equivalence with the USA. I anticipate a real bottleneck/shortage with respect to supervision as well as staffing, funding and resourcing in general.

Organisational psychologists, in the main, are selected (by potential employers and clients) not on the basis of the possession of a high level qualification but in terms of the following criteria:

- Solid qualifications suitable for general registration
- Awareness of business and organisational matters beyond just psychology
- Cognitively sharp
- Good communication and interpersonal skills
- Good work ethic
- Open to new experiences
- Flexible to working outside of the psychology domain/body of knowledge
- Outcome orientated
- Client orientated.

Organisational psychologists, in recruiting a new organisational psychologist, are much more likely to use our "technology" (psychological assessment relevant to work settings) than is likely to be the case for those recruiting for psychologists within the health domain. As such, academic attainment, while important, does not carry as much weight as do the personal elements as noted above. Clients and organisational psychologists will not hesitate to appoint a suitable psychologist who possesses the minimum required qualifications for registration, over a better qualified applicant who lacks the qualities noted above. Clients (unless government departments) are not concerned about such matters: they want timely and quality deliverables and are much less concerned about elements of title, qualifications and the like: these are seen as the trappings of status.

The requirement for a PhD or Doctorate will impact greatly on the breadth of candidates entering postgraduate programs. Doctorate studies will impose financially onerous conditions on students and PhD places will be very limited. The 'input' requirements of this scheme will exclude those from certain socio-economic backgrounds or lacking a top rated first class honours degree. This is 'problematic' to say the least.

Finally, there is a lack of clarity with respect to grandparenting requirements. There appears to be a lack of consistency even within the PBA given: the PBA consultation paper, the comments of Gina Geffen in Brisbane on 12 November 2009, and the comments of Brin Grenyer in Melbourne on 19 November 2009. This important aspect should be made explicit.

4. Specialist Title

If organisational psychology is to have a specialist title, I believe it should be acceptable to the psychologists within this register and make sense to their clients (that is, organisational representatives). Furthermore, the title should take into account anticipated future changes in the profession. For example, we are likely to see organisational psychologists become more involved in the development of sustainability within organisations and this is allied to environmental psychology and the environmental movement in general. Thus, the

term “industrial” could well appear anachronistic, retrograde, regressive, etc: and this is certainly the feedback that I have received. Also: see comments in Attachment 1.

This then begs the question, is this just my opinion? No – I would now like to present evidence that the term “organisational” should be used. I would also like to make the point that the term “Industrial and Organisational Psychologist” can be abbreviated to just “Industrial” and this occurs on page 32 of the PBA consultation paper. As a number of colleagues have noted, the use of this term takes us back many years.

Exhibit 1: Meeting of the Griffith University Advisory Committee (Organisational Psychology)

5 November 2009

Group: Academics/Practitioners/Postgraduate Students ($n = 9$)

⇒ No one liked the term “Industrial and Organisational Psychologist”. All were happy with “Organisational Psychologist” although one saw this as also an opportunity to consider alternative names.

Exhibit 2: Meeting of a Working Party (and three others) of the College of Organisational Psychologists (Sydney)

15 November 2009

Group: Practitioners and an academic (an organisational psychology course co-ordinator) ($n = 10$)

- Group included one APS Honorary Fellow, two APS Fellows as well as several (if not all) Members of APS COP.

⇒ No one liked the term “Industrial and Organisational Psychologist”. All were happy with “Organisational Psychologist”.

Exhibit 3: Brief Survey conducted via email to practitioners on my email list

17 and 18 November 2009

Group: Practitioners and two Postgraduate students ($n = 23$)

- Two APS Fellows (not part of Exhibit 2) and most are members of APS COP.
- Brisbane, Sydney, Melbourne, Perth and regional Queensland.

⇒ Based on a choice between five titles, individuals were asked to choose both a first and second preference. Using a weighting system of two points for a first choice and one point for a second choice, the results are as follows:

- Organisational:	38	(20 first choices)
- Industrial and Organisational:	8	(0 first choices)
- Work and Organisation:	7	(1 first choice)
- Work:	4	(0 first choices)
- Business:	6	(2 first choices)

Exhibit 4: A survey conducted using SurveyMonkey.com. Respondents had provided their email addresses to COP Qld on the basis of wishing to be informed of NRAS matters and developments

20 to 23 November 2009

Group: Most were fully registered psychologists (75%), based in Brisbane (70.6%), although fewer than half (41.2%) were full members of COP. (n = 35)

It should be noted that in this survey, the prefix “Specialist” was added to conform to my understanding of how the specialist title would appear on a business card, for example.

For comments provided by participants of this survey, please see Attachment 1. The results are summarised below:

- A clear first preference for “Specialist Organisational Psychologist” or just “Organisational Psychologist”. Several were quite explicit on this point, entering just “Organisational Psychologist” for an “other” option.
- Second preference (well behind): “Specialist Industrial and Organisational Psychologist”.

⇒ Several responded that the prefix “Specialist” was not required (see comments in Attachment 1). This impacted on some responses and thus, after ‘clarifying’ intended responses, the following is provided:

	<u>First Choice</u> (n = 33)	<u>Second Choice</u> (n = 27)
Specialist Organisational	63.6%	37.0%
Specialist Industrial and Organisational	21.2%	25.9%
Specialist Work	-	11.1%
Specialist Work and Organisational	9.1%	18.5%
Specialist Business	6.1%	7.4%

Exhibit 5: Society for Industrial and Organizational Psychology (SIOP)

While the UK (with the term “Occupational”) and Europe (with the term “Work and Organizational”) provide alternative titles, it is evident that the PBA is following the USA in the area of specialist standards and title.

This then begs the question: Where does the US stand in relation to the term “Industrial and Organisational” and are things about to change?

A 2007 article in a TIP (a publication of the Society of Industrial and Organizational Psychology) notes that the term “Industrial Psychology” became common after World War I and in 1937 was broadened to “Industrial and Business Psychology”. When the American Association of Applied Psychology merged with the American Psychological Association, the “Business” part was dropped (1962). However, a greater interest in humanistic psychology and the application of social psychology to organisations resulted in a name change in 1973.

Traditionally, “I” is considered hard and “O” is considered soft.

In 2002, SIOP members voted on a potential name change (n = 554) with the results as follows:

SIOP	48.7%
SOP	21.1%
SWP	12.1%
SWOP	10.5%
SBP	7.6% (Business)

With no clear winner, the name SIOP was retained.

In 2009, a new voting system was implemented: a two phase approach. The first phase, aimed at choosing a contender against the incumbent, produced the following results ($n = 2700$):

Society for Organizational Psychology (TSOP)	64.2%
Society for Work Psychology (SWP)	17.6%
Society for Work and Organizational Psychology (SWOP)	18.2%

The “run off” will occur during December 2009 and the results released mid-January 2010. The comments of (a) the SIOP CEO and, (b) the SIOP President should be noted:

- (a) “As far as the outcome of the vote goes, I don’t know that I have a good guess on the outcome. One prominent member told me that he thought it would be a close vote but that the SIOP name would be retained.” (Email dated 17 November 2009)
- (b) “Like Dave, I can’t predict the name change vote. If I had to bet (not predict), I would bet on keeping our current name. Regardless, we want to work heavily on branding over the next few years, and it wouldn’t surprise me to see us explore branding “SIOP” and “organizational psychology” (which has the effect of eliminating “industrial” from our public image).” (Email dated 21 November 2009)

Comment:

It is acknowledged that our biennial conferences are known as “Industrial and Organisational Psychology Conference (IOP)”. I suspect that the initiator of these conferences, Professor Beryl Hesketh, wanted to emulate SIOP and attract keynote speakers from the US. The term “Industrial and Organisational” tends to be used more in academic circles and in fact the three academic participants in “Exhibit 4” all chose this title as their first preference. However, practitioners (and I daresay, clients) are overwhelmingly in favour of the term “Organisational”. Furthermore, there is a strong sense that organisational clients (ie. the ‘public’ for organisational psychologists) prefer this term.

Concluding Comment:

The PBA has introduced a number of initiatives aimed, ostensibly, at enhancing standards. However, it is important to recognise the diversity within the profession and I believe that this is not fully appreciated in some sections of the document.

ATTACHMENT 1**COMMENTS (*Spelling errors retained*):****From Exhibit 3:**

- Would like "Business" as second choice but relevance to public sector work?
- "I-O": Last choice (had "Business" as third choice).
- "Organisational": by a clear margin.
- Second choice: "Corporate" preferred. (This person chose "Organisational" as first choice and "I-O" as second choice.)
- "Organisational Psychologist" only – "No benefit in proposed change".
- "I once had my business called 'Industrial and Organisational Psychology Specialists'". No end of complaints from clients that it was too long, and what was the difference.....?

From Exhibit 4:

"'Specialist' doesn't gel with me in the slightest. The mere title 'work and organisational psychologist' indicates you have a specialist qualification, so drop the weird nonenclature please. I also prefer 'work & organisational psychology' as its well known in other parts of the world - and people understand 'work' psychology. 'industrial & organisational' psychology needs just as much explaining to some as the 'organisational' aspect alone."

"Yes, why are we bothering with this? I personally dont bother with titles but rather prefer to gain credibility by good marketing of my skills, effective communication with valuable referral sources and hard work which gives me the experience with actual clientelle, itself generating more referrrals. I have been involved in businesses all my working life. The business side of psychology is no different to other businesses/professions - networking and the hard slog of building one's reputation."

"From my own experience within the commercial business environment, alot of non-psychs do not understand the title "organisational psychologist". I think the term "business psychologist" will have more meaning to non-psychs and more reflective of the work we do. This would be more aligned to the title alot of our colleagues use in UK. The term business psychologist is quite common there."

"Specialist sounds wankerish."

"All others are subsets of Org Psych - Corporate, Coaching, Industrial, Work, and Business are merely one limited form or cluster of organisations."

"I think the word 'Industrial' in the proposed title is old fashioned and not ideally descriptive. "Organisational" and/or "Work" are more meaningful terms."

"Do we need to have the prefix "Specialist"? It seems redundant - if there is a secondary classification beyond "Psychologist," surely that already indicates a specialist classification."

“Industrial and Organisational Psychology is the internationally recognized term, and is the term that best describes the breadth of the discipline. The term 'Organisational Psychology' only describes half of what we do (it leaves out job analysis, selection, training, performance management, etc).” [From a non-registered academic; non COP member]