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COMMENTS ON CONSULTATION PAPER 7:

“EXPOSURE DRAFT: GUIDELINES ON AREA OF PRACTICE ENDORSEMENTS (NOVEMBER 2010)”

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This is a public document on behalf of the APS College of Organisational Psychologists, prepared by the College's National Regulatory Developments Working Party (NRD WP)

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PREAMBLE AND SUMMARY:

The APS College of Organisational Psychologists (COP) appreciates the opportunity to comment on this consultation paper (hereafter CP7). We welcome the updates incorporated since the release of the previous consultation paper (CP5). In particular, we support the transition arrangements for Board-approved Supervisors for practice endorsement. In addition, we appreciate the adoption of a more “practice-tailored” approach to the core competencies.

Nevertheless, there are still a number of issues which we believe need to be addressed or at least need to be clarified:

1. The need for the PBA to communicate its view on the maximum number of Practice Area Endorsements (PAEs) acceptable for psychologists under the NRAS.

Recommendation 1: The number of PAEs which can be granted to an individual be limited to two.

2. The “double-crediting” of CPD hours, across practice endorsements, does not reflect the diversity of the profession of psychology as practised in Australia.

Recommendation 2: An individual should be required to gain more than 15 hours of CPD annually within each area of practice endorsement.

3. The core competencies required across the practice endorsements (Appendix C of CP7) require further modification and/or clarification.

Recommendation 3: The PBA should provide clarification on the apparent discrepancy between the practice-tailored approach evident in Appendix C versus the health-focused requirements in place for both the 4+2 system and the current APAC rules for the psychological assessment and measurement competency.

Recommendation 4: For organisational psychologists, the reference to functional analysis (in psychological assessment and measurement (2) (iv)) be deleted and an additional element (2) (v): “computer-based and internet-delivered tests” be added.

Recommendation 5: Reference to expert witnesses, court systems and reports for the legal system be deleted, for organisational psychologists, in the competency f): communication and interpersonal relationships.

Recommendation 6: The reference to children be deleted, for organisational psychologists, in competency h): across the lifespan.

KEY ISSUES:

1. Multiple areas of practice endorsements

In our view Practice Area Endorsements (PAEs) serve to signal to the public (and other registrants) that the registrant has a high level of expertise in the particular designated field (additional to the general competencies expected of all psychologists), based on accredited specialist training, supervised experience in the specialist field, and up-to-date “mature practitioner” experience in it, all of which are publicly recognised by the regulatory authority through its “endorsement”. Implicit also is strong commitment to that field: an endorsement seems not to be appropriate for someone with peripheral interest in and/or who makes only occasional forays into the field.

The public interest is served by PAEs, providing information that acts as a “market signal” and helps ensure protection of the public.

Moreover, under the NRAS legislation absence of an endorsement (or of APS College membership) does not prevent any registrant (in psychology) from working in that specialist field (even though ethical standards may.)

It is difficult, more fundamentally, to conceive that registrants can satisfy the criteria for endorsement in more than two specialist fields. If some (few) can, then of course they may apply to the PBA for endorsement in them. But occasional forays into various specialist fields in limited ways, not underpinned by accredited specialised training and supervised experience with specialised CPD, are not in our view justification for claiming multiple PAEs.

Hopefully the PBA will not accept claims from any one person to all nine PAEs. So where is the bar to be set in terms of number of specialties to be claimed? Ultimately the bar may have legally to be set empirically by the PBA’s processes of evaluating individual applications but by then the public reputational damage to our profession will be done.

An important issue is that of the perceptions of not only the public but also that of the politicians and the health bureaucracy. If there is so much overlap between the areas of practice endorsements, why have various individuals and bodies, including the PBA, sought the discrete PAEs that we now have, through considerable lobbying? The PBA has acknowledged, publicly, that psychology is a diverse profession. Both the PBA and the APS have pushed for specialist recognition, rather than just practice area endorsements. How will AHMC and AHMAC view our PAEs or the push for specialist areas if psychologists hold more than two PAEs? We believe the answer is quite clear – they will think either (a) psychology has low standards, or (b) we are a very homogenous group in terms of the skills, knowledge and experience required, even if the settings are different. COP disagrees with these two views of psychology as practised in Australia.

2. The CPD requirement for individuals to maintain their area of practice endorsement

There are serious Continuing Professional Development implications arising from the “multiple PAEs” issue. COP has already expressed them in its submission to the PBA titled ‘*Comments On Consultation Paper 5:“Proposed Revisions To The Guidelines On Area Of Practice Endorsements (August 2010)” 17 September 2010*’.

An apposite extract is:

5 *The CPD requirement for individuals to maintain their area of practice endorsement (2.4).*

In the case of an individual endeavouring to maintain two practice endorsements, we believe that more than 15 hours of CPD should be gained within each area of practice. We do not support the position that individuals with more than one endorsement can spread their CPD equally while still maintaining just 30 hours of CPD in total per year. The underlying notion of “double-crediting” CPD deserves clearer explication, as do the criteria to be observed for doing so.

COP believes that generally there is sufficient differentiation between the various areas of practice for the PBA to require more than the general CPD standard of 30 hours in total per year for individuals intending to maintain more than one endorsement. A crucial element is the degree of overlap between the two areas of practice endorsement. In particular regard to Organisational Psychology, there is insufficient overlap conceptually

and in practice-related competencies between it and the other areas of practice to warrant any such “double-crediting” of CPD. Thirty hours annually of CPD specific to our specialisation should be the requirement.

COP stands by these comments. The proposed CPD system will allow individuals with three areas of practice endorsement to maintain each endorsement with just 10 hours of CPD in each area. This is very undesirable in terms of ensuring regular skills enhancements, and in encouraging politicians and health bureaucrats to view psychology as a mature and diverse profession.

3. Core competencies

CP7 provides a brief description of the core competencies expected of a registrar after postgraduate training (3.1.3), and more detailed information for each of the areas of practice is provided in Appendix C. The detail provided for the organisational psychology endorsement reflects a good attempt to take a “practice-tailored” approach to defining the competencies required. Nevertheless, we wish to bring the following to the attention of the PBA, as some of the competency elements are irrelevant to the role and practice of organisational psychologists in Australia.

(c) psychological assessment and measurement

In comparison with the guidelines for the 4+2, the competencies appear very appropriate, and recognise the non-health nature of the tools used by organisational psychologists and the settings in which they work. However we see no reason to include a reference to “functional analysis” in 2. (iv).

On the other hand, it seems very reasonable to acknowledge the impact of technology on the practice of organisation psychology (globally), and this could be achieved via the addition of an element such as: 2. (v): “computer-based and internet-delivered tests”.

The psychological assessment and measurement competency appears to be very relevant to the needs and requirements of the modern organisational psychologist. However there are two important points:

- How do these requirements compare with the health-focused requirements currently in place for the 4+2 system, where no recognition is given to the practice setting? (We refer specifically to the 4+2 requirements for the administration, interpretation and report writing of the WAIS (or similar), as well as memory testing.)
- How do these requirements compare with the latest APAC *Rules for Accreditation and Accreditation Standards for Psychology Courses* (June 2010), which appear to require, even for a Masters of Organisational Psychology, courses to cover the WAIS (or similar), memory testing and the ability to undertake a mental status examination.

It is recognised that the Consultation Paper on psychological test restriction has relevance to the two points noted above, but the PBA is urged to provide clarification on these matters as a matter of priority. COP supports a differentiated approach to defining the competency requirements across the areas of practice, particularly in relation to the psychological assessment and measurement competency.

(f) communication and interpersonal relationships

The 2008 UNSW Graduate Destination survey found that only 3% (of 92 respondents) needed to be competent at “providing expert testimony to courts or tribunals”. The survey was sent to 127 graduates from the 2000 to 2007 Master of Organisational Psychology programs.

In contrast with the 3 individuals identifying with the sub- competency regarding courts or tribunals , 57% of those surveyed indicated a need to be competent at " technical reports and presentations". This broader sub- competency appears to be much more relevant to the role of organisational psychologists.

We request that the PBA adopt a more relevant set of elements for this competency for organisational psychologists and recommend the following:

Deletion of (ii), expert witness and court systems; and (iv) reports for the legal system.

Re-drafting of (iii) to: "The ability to prepare psychological reports for a range of audiences".

Addition of "The ability to present psychological information to non-psychologists in a variety of work contexts".

(h) practice across the lifespan: childhood, adolescent, adulthood and late adulthood

CP7 refers to "...as relevant to the work of an organisational psychologist in the context in which the psychologist is employed". Organisational psychologists do not deal with children as part of their professional role although obviously they may deal with the work-life balance issues that adults may need to address. However this does not constitute a need to demonstrate the core competencies with children.

We re-affirm the comments made in the September 2010 submission, to which we referred when discussing CPD. We urge the PBA to take a more tailored approach with respect to this competency. The issue of "children" in particular appears to be the result of a "copy and paste" approach to parts of the CP7 document.

As for adolescents, we recognise that 18-20 year olds form part of this group and thus may come within the professional orbit of organisational psychologists. Furthermore, vocational psychology and career planning activities are relevant for clients from the adolescent, adult and late adulthood sectors. Changes to the retirement age and the pattern of work arrangements, such as part-time or contract work, mean that organisational psychologists will need increasingly to address issues associated with those over 65 years of age in the workforce.

IN CONCLUSION:

We support the PBA efforts to improve the Guidelines (on area of practice endorsements), a complex process bearing in mind the very diverse nature of our profession and the novel requirements and circumstances that we face with the rather health-focused NRAS.

We hope our feedback will be of assistance to the PBA in enhancing appropriate standards of psychological practice in Australia.