



PSYCHOLOGY BOARD OF AUSTRALIA

OPTIONS FOR THE PROTECTION OF THE PUBLIC POSED BY THE INAPPROPRIATE USE OF PSYCHOLOGICAL TESTING - CONSULTATION PAPER

INTRODUCTION

Hudson would like to make a response to the Board's consultation paper on psychometric testing.

Hudson's reputable Talent Management business employs more than 50 Psychologists across Australia. Hudson has been providing job related testing and assessment centre services for clients, including private and public sector organisations, for over 25 years. Each year Hudson conducts job related testing for over 10,000 candidates across Australia, from blue collar to white collar; graduates to seasoned managers and professionals. Hudson Talent Management offers completely confidential job related testing and support and is one of Australia's largest private employers of Organisational Psychologists for pre and post employment assessment. Our division employs registered and accredited Psychologists, who operate under the Australian Psychological Society Codes of Ethics and Conduct, maintaining all professional standards required.

Given the specialised nature of Hudson's business, the response provided specifically addresses psychometric assessment in an occupational setting.

Hudson's responses are provided against each of the questions listed in the remainder of this document. In summary, we are in favour of further consideration of one or a combination of the following:

- Accreditation based approach
- Education based approach

In introducing an accreditation based approach, the following issues will need to be considered and addressed:

- The cost of implementation, include the cost to individuals of accreditation.
- Efficient accreditation – reducing the need for numerous similar accreditations.
- The linking of accreditation to formal education and registration.
- Establishment of standard criteria for restriction of tests and the allocation of newly developed tests to restriction levels.

In introducing an education based approach, the following issues will need to be considered and addressed:

- How individuals currently using assessments will be restricted from using them regardless of experience and capability in the use of tools.
- Decreased usage of psychological testing due to increased costs of testing if only psychologists can write reports and administer assessments.



3.4. HUDSON'S RESPONSES TO QUESTIONS FOR STAKEHOLDERS

1. Does the above discussion capture all of the main contexts in which psychological testing is used? If not, what other contexts can be identified in which psychological testing is used and gives rise to concerns regarding the potential for harm to the public?

Hudson's view is that the discussion contains the main contexts in which psychological testing is used. Hudson's response is related only to occupational testing, which is covered by this discussion.

2. Does the discussion adequately identify the types of harms that may occur in each context? If not, what other significant harms should be taken into account?

Hudson's view is that the discussion adequately identifies the types of harms that may occur in the employment context. Hudson does not have specific evidence or further information about specific harms to the public. In occupational assessment we believe that there is not significant risk to individuals' mental health. However, there is risk to individuals' career progression arising from the incorrect use of information provided by testing due to use of incorrect selection of assessments, improper administration of tests, and incorrect interpretation of test results.

3. What, in your view, are the major areas of concern in terms of current practices (i.e., involving the use of psychological testing by non-psychologists) leading to harms to the public? Are you aware of any specific data as to the extent of these harms?

In the employment testing discipline, Hudson recognises the following major areas of concern in current practice:

- assessments being administered and/or used by individuals without appropriate training
- tests being administered under non-standardised testing conditions
- incorrect type of assessments recommended
- use of invalid assessments
- users failing to provide verbal interpretive feedback to candidates and/or clients
- users that are not accredited in the tools providing verbal interpretive feedback to candidates and/or clients
- incorrect feedback or feedback that is not appropriately related to job tasks.

4. Do you believe that there is a compelling case for additional policy action to be undertaken to better restrict the use of psychological testing to psychologists?

In the employment testing setting, the migration of psychometric assessment administration to the internet medium, combined with automated reporting has increased accessibility of psychometric assessment. This increased accessibility has resulted in decreased governance of the use of psychometric assessment. Hudson believes that greater controls are required to safeguard the use of testing in the occupational setting. Our recommendation is that a level based accreditation system represents the most effective method of providing these safeguards.

5. Do you believe that any significant risks would attached to such moves? If so, what are these risks?

Hudson believes that there are significant risks involved in restricting the use of psychological testing to psychologists. In the employment testing discipline, the main risk involved is the decrease in frequency in use of testing to improve employment decisions. The decrease in frequency of testing is expected due to increased cost incurred in conducting assessments based on the decreased availability of test administrators. Psychologists will demand a higher salary cost for administering tests, and many will see the task as administrative and will not be willing to perform the task. Such a requirement will also provide fewer opportunities for trainee psychologists to learn psychological testing skills in a practical setting.



4.1. LEGISLATION TO RESTRICT THE USE OF TESTS TO REGISTERED PSYCHOLOGISTS QUESTIONS FOR STAKEHOLDERS

1. What is the likely practicability of identifying the range of tests to be restricted, having regard to the need to revise and update the relevant list of tests as required? What do you believe are the major reasons for the failure to use the legislative provisions enabling the restriction of the use of these tests in South Australia from the 1970s to the 1990s?

Hudson believes that identification of the range of tests to be restricted is practical if there is the establishment of a governing body to develop the model required to classify restricted tests. Once the model of the restrictions is in place, the main aim of this governing body would be to hold test publishers accountable. It is expected that this body would also establish standards based on validity, reliability, ease of use, purpose of use, etc.

2. What is your view of the alternative approach of relying on other professional regulatory bodies to restrict or prohibit the use of psychological tests by members of the profession which they regulate, as highlighted in the above NCP review?

Hudson believes that the adoption of a model similar to the BPS model that is legislated by a centralised body with representatives from each field of psychology is required.

3. To what degree do you believe that the option of "self-regulation" by public sector employers could be successfully used as a mechanism for restricting the use of psychological tests?

Hudson believes that the current system in place is largely a "self-regulation" system. We believe that this system has resulted in the concerns that currently exist and are the topic of this discussion paper.

4. What evidence exists that long-standing publisher-based restrictions have become less effective over time?

Test publishers have become much more flexible in the use of tools in order to increase their potential to sell more tools to market. While some test publishers have avoided the relaxation of restrictions, market forces have required them to match competitors who do not restrict the use of tests.

5. Are there contexts (e.g. employment decisions) in which the use of psychological tests by non-psychologists would not be expected to yield significant harms, or in which restrictions on the use of tests would be inappropriate and/or impractical? What are these contexts?

Hudson's view is that significant harm can be avoided with suitable accreditation of non-psychologists for specified psychological testing tasks as follows:

- Test Administration – suitable training and accreditation would reduce risks of significant harm.
- Interpretation of test results by intern/trainee psychologists under the supervision of a registered psychologist



4.2. ADOPTING CONTEXT SPECIFIC LEGISLATIVE RESTRICTIONS

QUESTIONS FOR STAKEHOLDERS

1. Do you believe that specific legislative restrictions on the use of psychological testing have been effective, where they currently exist?

Hudson is not aware of where specific legislative restrictions on the use of psychological testing have been effective.

2. More generally, what do you see as being the merits of this potential approach to the issue?

The potential merit of specific legislative restriction the assurance that tests will only be administered by Psychologists. The assumption is that the psychologist qualification will assure the appropriate use of tests with no harm to users.

3. If further action were to be taken in this area, what would you see as being the areas of highest priority?

Hudson's assumption is that a legislative approach, if applied, would make use of a "levelled" approach, where restrictions would be applied based on the risks involved in the use of each test. With this approach, the following priorities would be recommended:

- establishment of the legislative or governing body
- identification of the levels of restriction
- identification of corresponding accreditation or education levels required
- allocation of assessments or groups of assessments to levels
- establishment of a process for allocating new tests developed to levels of restriction.



4.3. ACCREDITATION BASED APPROACHES

QUESTIONS FOR STAKEHOLDERS

1. *How effective do you believe that an accreditation-based approach would be in the Australian context?*

Hudson's view is that an accreditation based approach would be the most effective method of restricting the use of psychological tests. In order for this approach to be most effective, the system would be required to establish a governing body and associated processes for the monitoring and proper management of the accreditation process. Hudson also believes that this approach would be most effective if linked with an education based approach.

2. *Do you have any experience of the operation of an accreditation system in the UK or elsewhere? Can you provide data on its performance?*

No. we do not have experience of this system in the UK or elsewhere.

3. *What you believe would be the key success factors in respect of an accreditation-based approach?*

Hudson's recommendation is that an accreditation system would operate similar to the UK BPS system. Successful application of an accreditation system would make use of a "levelled" approach. Under this approach, individuals would be awarded accreditation based on training and demonstration of competence. Restrictions would be applied to tests aligned to the accreditations, based on the risks involved in the use of each test. With this approach, the following are expected to be essential in successful introduction of the system:

- Establishment of a governing body to develop accreditations.
- Identification of the levels of restriction for tests.
- Identification of corresponding accreditation or education levels required.
- Allocation of assessments or groups of assessments to levels.
- Establishment of a process for allocating new tests developed to levels of restriction.
- Linking education to accreditation (eg. Registration as a psychologist provides automatic accreditation at some levels, or lessened training required for accreditation).



4.4. EDUCATION-BASED APPROACHES HIGHLIGHTING POTENTIAL HARMS

QUESTIONS FOR STAKEHOLDERS

1. What you see as the merits of an education-based approach to this issue?

The establishment of an education-based approach supports the credibility of the psychologist profession.

2. Do you believe that an education-based approach constitutes a sufficient response to the issues highlighted in this consultation paper?

Hudson views that only an education-based approach will not sufficiently address the issues highlighted in the consultation paper. Registration as a psychologist provides a good foundational knowledge of psychometric assessment, however further training is required to effectively use most psychometric assessments. It is Hudson's position that for some tests, accreditations or proof of competence will also be required.



4.5. REINFORCING EXISTING PUBLISHER-BASED RESTRICTIONS QUESTIONS FOR STAKEHOLDERS

1. What you see as being the merits of an approach to this issue that is based on working to improve publisher self-regulation?

Hudson is not in favour of this approach as we view this as a conflict of interest. Test publishers want to maximise the sales of their tests, hence is it against their interest to restrict or limit their use. Furthermore, if publishers are providing training in tools, each publisher will want users to complete their accreditation, not recognising other suitable accreditations.

2. Do you believe that this approach could constitute a sufficient response to the identified issues?

Given the response provided to the previous question, Hudson does not believe this approach could constitute a sufficient response to the identified issues.

3. Do you believe that these steps outlined in the Canadian report discussed above constitute the best approach within this context?

The steps outlined by the Canadian report provide some improvements, and possibly the best approach for a test publisher based system, however, Hudson's view is that this approach is not ideal based on the conflict of interest issue.

4. If not, what other possible actions could be taken?

As the major issue identified by Hudson to this approach is the conflict of interest, we believe that there are no possible actions that could alleviate this concern.