

The Psychology Board of Australia
G.P.O. Box 9958
Melbourne VIC 3001

Dear Colleagues,

RE: Public consultation – Updating the competences for general registration

The Society of Industrial and Organisational Psychology Australia (SIOPA) has prepared the attached submission for the public consultations relating to the updating of general registration competencies. All organisational psychologists registered in Australia are required to achieve general registration, and for many who complete an organisational psychology degree, they may continue to practice as general registered psychologists and not gain specialist endorsement. It is important that the consultations have a fair representation from the variety of psychology professions, and as a member-based organisation representing Organisational Psychology, we have prepared our submission from that lens. The practice of organisational psychology in Australia is often different to health-related interventions of clinical and other general psychologists, and we hope our submission highlights some places where this difference may need further consideration.

In general, SIOPA supports the proposed changes to the competencies for general registration. The changes seem to better highlight the diversity of Organisational Psychology practice in Australia. Our detailed submission has a few suggestions for further thought, but in the broad, we note:

- The removal of specifics in the competencies means they can be flexible to changing knowledge and practice and better reflect the diversity of practitioners who may hold general registration, including organisational psychology.
- The embedding of cultural safety in the psychology standards is necessary, appropriate, and important for Aboriginal and/or Torres Strait Islander health and wellbeing. Working toward better cultural safety is crucial in Closing the Gap.
- The greater focus on reflective practice and self-care is a good improvement and reflects the importance of health and wellbeing of practitioners and the broader workforce.

The upskilling of current and future practitioners and supervisors will be a critical part of the transition and implementation of the proposed changes. SIOPA is well-placed as a member-based organisation for organisational psychology in Australia to support this training and would be happy to assist the Board as appropriate.

Should you have any further questions or wish to seek clarification on our submission, please feel free to contact myself as the current President via email siopapresident@gmail.com.

Kind regards,

Abby Haslehurst
SIOPA President

Andrea Titus
SIOPA Vice President

Public consultation: Draft competencies for general registration

The Psychology Board of Australia is inviting comments on the *Draft professional competencies for psychologists*. The specific questions the Board is seeking feedback on are listed below. All questions are optional and you are welcome to respond to as many as are relevant or that you have a view on.

Please submit your feedback on this submission template by email to: psychconsultation@ahpra.gov.au by close of business **Tuesday 11 April 2023**.

Preferred option
<p>1. Are you in support of updating the professional competencies for general registration? Please provide a rationale for your view.</p>
<p>Yes. SIOPA supports the updating of competencies in line with the provided consultation material. We feel that the updated competencies better reflect the diversity of psychology practice, including organisational psychology. We have a few suggestions that are made throughout in terms of places where the current proposed competencies may not represent the diversity of organisational psychology practice in Australia, see question 12.</p>
Structure of the updated competencies
<p>2. Do you agree with approach to create a single document that lists all the professional competencies in one place?</p>
<p>Yes. The ability of students and supervisors to be able to access all competencies in one place is important and minimises confusion.</p>
<p>3. The term ‘threshold professional competency’ has been introduced to describe the minimum professional competency necessary to practise safely and effectively as a registered psychologist in Australia. Do the Draft professional competencies sufficiently describe the threshold level of professional competency required to safely practise as a psychologist in a range of contexts and situations?</p>
<p>Yes. Our view is from the perspective of organisational psychologists. We believe that the competencies along with each professionals own judgements about their appropriate scope of practice, is sufficient to support quality and safe psychological practice in Australia.</p>
<p>4. We have improved our approach to drafting the competencies to better align with international psychology regulators, to emphasise that the competencies are interconnected (holistic approach) and to improve how we write the competencies (e.g. using action verbs). Do you agree with the updated drafting approach?</p>
<p>We agree with the approach and that it meets the needs for development of competencies.</p>
<p>5. The Draft professional competencies for psychologists have been written at a high level. This aims to provide both sufficient information for clarity and direction, but also be flexible enough to be relevant to the diverse contexts where psychologists train and work. Did we get the balance right? Please provide a rationale for your view.</p>
<p>We agree that the balance is better in these competencies than previously. The high-level competencies mean that these competencies are both better suited to diverse contexts and are more flexible to changes in practice and evidence. However, we do think that potential unintended consequences of less specific competencies may be less consistency in training and would</p>

suggest additional material is developed to clearly outline what the specific core skills and knowledge for psychology is, and work to imbed this in education and training programs in collaboration with the accreditation body.

6. The Draft professional competencies for psychologists include a preamble (p. 3-10) and definition section (p. 16-19). Do you support this addition? Is the content clear, relevant and complete?

This information is useful and should be standard knowledge for all psychologists. There are a few typos and other grammar/formatting issues we assume will be tidied in final copyedits.

7. Is the language and structure of the Draft professional competencies for psychologists helpful, clear, relevant and workable? Are there any potential unintended consequences of the current wording?

We think in the broad the wording is clear and easy to understand.

Organisation of the updated competencies

8. The Draft professional competencies for psychologists propose to reorganise the eight core competencies.

Are you in support of combining the current *Knowledge of the discipline* (Competency 1), and *Research and evaluation* (Competency 5) into a new competency: *Applies scientific knowledge of psychology to inform safe and effective practice* (updated Competency 1)?

We support the combination in general, however, note that the movement of the research and evaluation competency does lose some of the required focus. It is not just about applying knowledge, but also the continual cycle of research and evaluation of practice in a rigorous way to contribute to the growing body of evidence about what works. While we agree with the premise of the simplification of competencies, we would urge the Board to consider the extent to which in this domain in particular there might now be some missing requirements for practice.

Anecdotally, it seems that students who have completed the Masters of Organisational Psychology are increasingly struggling with applied research and evaluation. This is an important core competency area for helping to bridge the research and practice gap, continuous quality improvement, and for the development of knowledge about the profession.

9. The Draft professional competencies for psychologists propose to place an intentional focus on professional reflexivity, deliberate practice and self-care (updated Competency 3). Do you support this proposal? Please explain why.

SIOPA supports the inclusion of reflexivity, deliberate practice and self-care in the competencies. We believe this appropriately emphasises the importance of selfcare as a competency, and that reflexive practice is a core part of service delivery. Again, the challenge will be in working with the accreditation council, universities, and peak professional bodies to upskill current and future practitioners and supervisors in this area.

10. The Draft professional competencies for psychologists include amended and expanded core competencies on Aboriginal and Torres Strait Islander health and cultural safety (updated Competency 7).

Is there any content that needs to be clarified, added, amended or removed? Please provide details.

We do not believe that we are appropriately placed to clarify competencies related to cultural safety, however, support their inclusion are a crucial part of the required knowledge, skills, abilities and other characteristics in Australia. Our hope is that the Board has appropriately consulted with lead First Nations academics to guide the development of the cultural safety competencies.

11. The Draft professional competencies for psychologists include an expanded core competency on working with people from diverse groups, including demonstrating cultural responsiveness (updated Competency 8).

Is there any content that needs to be clarified, added, amended or removed? Please provide details.

SIOPA does not have any particular suggestions as to any clarifications, amendments, additions, or removals.

Competencies and their descriptors

12. The Draft professional competencies for psychologists outline eight updated core competencies:

Competency 1: Applies scientific knowledge of psychology to inform safe and effective practice

Competency 2: Practices ethically and professionally

Competency 3: Exercises professional self-reflection and deliberate practice

Competency 4: Conducts psychological assessments

Competency 5: Conducts psychological interventions

Competency 6: Communicates and relates to others effectively and appropriately

Competency 7: Demonstrates a health equity and human rights approach when working with Aboriginal and Torres Strait Islander Peoples, families and communities

Competency 8: Demonstrates a health equity and human rights approach when working with people from diverse groups.

Do you suggest any changes to the eight core competencies and their descriptors? What would you like to see changed?

SIOPA in general supports the new competencies, but makes some observations on where the competencies might not capture the diversity of organisational psychology practice:

- we suggest that the merging of the original competency 5 (Research and Evaluation) into competency 1 may have lost some of the intended meaning and the focus on conducting applied research as part of building the knowledge of the discipline and as part of ongoing continual quality improvement of practice
- Competency 6 references specifically multidisciplinary work as it relates to working with other health practitioners to provide care. In organisational psychology, multidisciplinary teams work is likely to not be working with just other health practitioners, but with professionals from a range of other disciplines. We think that this competency could be updated to better reflect this.
- Competency 4 might benefit from highlighting that practitioners need to operate across levels (individual, team, organisational / ecological levels) in their practice and understand the implications of multilevel problems.
- We understand the intent and appropriateness of Competency 4.4 referencing cultural safety, however, in some cases there are not currently appropriate measures. We do not think that this should be removed from the competency, but is a consideration worth raising.

Outcome of implementing the updated competencies

<p>13. We propose that an advanced copy of the professional competencies for psychologists would be published when approved, but not take effect until a later date. <u>The estimated date of effect will be 1 December 2024.</u> This coincides with the annual renewal date for general registration to make it easier for psychologists to plan their CPD and and for stakeholders to prepare to meet the updated competencies.</p> <p>Are you in support of this transition and implementation plan?</p>
<p>SIOPA supports this plan, but again highlights that there would be a need for some stakeholders to receive additional training and support to prepare for this date.</p>
<p>14. We have recommended changes to the <i>Provisional and General Registration standards</i> and the <i>Guidelines for the 4+2 internship program</i> to remove reference to the current core competencies for general registration and replace with the updated competencies (see Attachments F, G, and H). Are you in support of these changes?</p>
<p>SIOPA supports these changes.</p>
<p>15. The Board proposes a transition process and timeframe for updating board documents with the new competencies including the:</p> <ul style="list-style-type: none"> • <i>Guidelines for the 5+1 internship program</i> (separate consultation in 2023) • <i>Guidelines for the National Psychology Exam, and National psychology exam curriculum</i> (separate consultation in 2023/2024). <p>Are there any comments you have on the proposed consultation plan and transition timeframes?</p>
<p>SIOPA does not have any comments on these plans.</p>
<p>16. Are there specific impacts for practitioners, higher degree providers, employers, clients/consumers, governments or other stakeholders that we should be aware of, if the Draft professional competencies for psychologists were to be adopted? Please consider both positive impacts and any potential negative or unintended effects in your answer.</p>
<p>SIOPA does not have any particular groups to raise.</p>
<p>17. Would the proposed changes to the Draft professional competencies for psychologists result in any potential negative or unintended effects for Aboriginal and Torres Strait Islander Peoples or other priority groups in the community? If so, please describe them.</p>
<p>Inadequate training and support for the introduction of cultural safety competencies and lacking embedment into training programs may limit the positive impacts, and in some cases mean people are less likely to engage with Aboriginal and/or Torres Strait Islander communities for fear of doing it wrong (conscious incompetence). There should be a requirement advocated for in accreditation competencies in relation to discrete cultural safety training, and work with AIPA and other health peak bodies (e.g., CATSINaM) to guide the development of training to upskill current practitioners.</p>
<p>18. Would the proposed changes to the Draft professional competencies for psychologists result in any adverse cost implications for practitioners, patients/clients/consumers or other stakeholders? If yes, please describe.</p>
<p>SIOPA does not anticipate any cost implications for stakeholders related to changes in competencies.</p>
<p>Other</p>
<p>19. Do you have any other feedback or comments about the Draft professional competencies for psychologists?</p>

SIOPA supports the updating of the competencies, noting some areas for consideration outlined in our response. We welcome any questions or clarification requests from the Board.