

30 June 2016

Follow-up Correspondence re the Career Development Practitioner Framework published in the Government Gazette

The Psychological Society of South Africa submitted comment on the proposed Career Development Practitioner Framework on which we received no correspondence from the *Department of Higher Education and Training* (DHET) office (see appendix). It is somewhat concerning that the comments made and concerns noted in our original letter were not acknowledged and there appears to be major oversight in the manner in which the framework is now moving towards implementation.

Our stance on the issue remains unchanged and we still encourage and implore engagement with the DHET to call on the expertise of the following groups to assist ethical implementation of the Competency Framework:

1. Registered psychologists & counsellors (i.e., as qualified and trained service providers), and
2. PsySSA i.e., the Psychological Society of South Africa in their capacity as the national representative body of psychology professionals

The reason why we deem engagement with the above groupings essential is that the competency framework appears to overlook a critical prerequisite in test utilization. Although reference is made to test use and psychology professionals there is a need to overtly state the nature of training and registration needed for ethical test use. Legally psychometric assessments may only be used by psychology professionals registered with the *Health Professions Council of South Africa*. Psychology professionals still remain the only regulated, and historically recognised, profession dealing with career development services. One then has to wonder why engagement with the national body representing psychology professions, i.e., PsySSA in an approach to clarify the confusion and ultimately strengthen the Competency Framework has been overlooked?

As the document currently stands there is much room for misinterpretation and this needs to be addressed as soon as possible.

Although the framework is conceptually a major step in the right direction, we feel that there is a need to engage with the DHET around a number of concerns which has surfaced from our members.

The *Gazetted Career Development Practitioner Framework* directly impacts on the work of many of our members and it is for this reason that we would like to make ourselves available to assist the DHET in playing an active role as key stakeholder as part of the *National Career Development Forum* (see Action Plan re Establish a National Career Development Forum, p. 43).

We need to emphasise that our contribution to the development of education programmes as part of the competency and accreditation requirements for this new category of *Career Development Practitioners* (i.e., *Entry Level, Advanced Level, and Specialist Level*) cannot be overlooked.

On the issue of accreditation we feel it somewhat concerning that there is evidence of commercial involvement between the company tasked with developing the Competency Framework who now also appears to play a central role in the training and accreditation of the career development counsellors.

In conclusion, we are fully supportive of the urgency and need, as described in the competency framework, “*to define the profession and identify its core skills and knowledge base*” (p.1). It is for this reason that we welcome discussions with the DHET and look forward to engage with all parties identified in the framework as stakeholders.

Sincerely

Dr Ewald Crause, Dr Helen Dunbar-Krige and Ms Neo Pule on behalf of the Psychological Society of South Africa
PsySSA Task Team

APPENDIX

Response from the Psychological Society of South Africa on the Career Development Practitioner Framework published in the Government Gazette

We, as the *Psychological Society of South Africa (PsySSA)*, would like to take this opportunity to express our appreciation for the role the *Department of Higher Education and Training (DHET)* is playing in formalizing a field of practice which for many years have been unregulated. Certainly we appreciate the effort taken in formalizing a framework which, if implemented and regulated effectively, can make a significant difference to the field of career education, guidance and service provision.

Although the framework is conceptually a major step in the right direction, we feel that there is a need to engage with the DHET around a number of concerns which has surfaced from our members.

As PsySSA we represent the largest body of Psychology Professionals in South Africa and, at this current juncture, registered psychologists are the only body of Career Development Practitioners regulated by a national body (i.e., the *Health Professions Council of South Africa*). After due consideration of the details outlined in the document we feel it necessary to participate in discussion around the *Career Development Practitioner Framework* for the sake of transparency and accountability to our members.

In addition, it is also only registered psychologists who at this stage can achieve the level of *Specialist Career Development Practitioner* (as outlined in the Framework) in light of the restrictions imposed on psychometric test administration and interpretation (i.e., often referenced in the Framework). It is from this position that we feel that we can make a meaningful contribution to strengthening the formalization and roll-out of the *Career Development Practitioner Framework*.

The *Gazetted Career Development Practitioner Framework* directly impacts on the work of many of our members and it is for this reason that we would like to make ourselves available to assist the DHET in playing an active role as key stakeholder as part of the *National Career Development Forum* (see Action Plan re Establish a National Career Development Forum, p. 43)

We also feel that our contribution to the development of education programmes as part of the competency requirements for this new category of *Career Development Practitioners* (i.e., *Entry Level, Advanced Level, and Specialist Level*) cannot be overlooked.

In conclusion, we are fully supportive of the urgency and need, as described in the competency framework, “to define the profession and identify its core skills and knowledge base” (p.1). It is for this reason that we welcome discussions with the DHET and look forward to engage with all parties identified in the framework as stakeholders.

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Dr Ewald Crause, Dr Helen Dunbar-Krige and Ms Neo Pule on behalf of the Psychological Society of South Africa
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