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Productivity Commission
C/-GPO Box 1428
Canberra City ACT 2601

Submitted to: https://engage.pc.gov.au/page/make-a-submission

Dear Commissioners,

APS response to the Five Pillars of Productivity consultation

The Australian Psychological Society (APS) welcomes the opportunity to respond to the Productivity Commission's (the Commission's) Five Pillars of Productivity consultation and the recommendations in the five draft Interim Reports. We commend the Commission's commitment to identifying practical reforms to improve Australia's living standards.

About the APS
The APS is the leading professional association for psychologists in Australia. We are committed to advancing the scientific discipline and ethical practice of psychology to promote health and wellbeing, empowering individuals, organisations and communities to reach their full potential We advocate for a fair, inclusive and environmentally sustainable world, recognising the evidence that national and global prosperity, now and in the future, hinges on prioritising the wellbeing of people and the planet[1]

Organisational Psychology
This submission was prepared along with representatives from the APS College of Organisational Psychologists (COP); one of nine Areas of Practice Endorsement in psychology. By applying psychological science, organisational psychologists analyse organisations and their people, and design strategies to recruit, motivate, develop, change and inspire people in their workplace[2]. The organisational psychology workforce in Australia is small, but influential. Organisational psychologists work with businesses at every scale, including government organisations and not-for-profits and focus on key priority areas relevant to the Five Pillars of Productivity consultation.

In general, psychologists are uniquely positioned to support the Australian Government's efforts to increase productivity. At the foundation of any productivity reform is the need for people to work differently, whether that involves streamlining processes, adopting new technology, or responding to changing regulation. For this to succeed, workers must adapt mindsets, acquire new skills, and remain motivated to apply them.

Psychological science shows us that individual behaviour is shaped most powerfully by the organisational systems and environments people operate within, and the effectiveness of the processes designed to support change[3]. Without careful attention to these factors, reforms risk underperformance and poor wellbeing. The Commission itself has identified the significant cost of poor mental health at work, with a loss of participation and productivity estimated at $12-$39 billion per year[4].

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Psychologists, in particular organisational psychologists, bring a rigorous, evidence-based understanding of how to design systems, workplaces and change processes that enable people to adapt and thrive. This expertise ensures productivity reforms translate into meaningful and sustainable outcomes.

At this stage of the Commission's work, as the focus moves to actionable recommendations and implementation, we have four key areas of expertise that are especially relevant:

1. **Driving Effective System-Level Change -** Achievement of the productivity outcomes will require organisational change. Organisational psychologists draw on decades of research and practical evidence to increase the effectiveness of change and decrease the risks of poor implementation[e.g. see 5]
2. **Designing Work for Productivity and Wellbeing -** Poorly designed work structures and processes undermine productivity, engagement and wellbeing. Organisational psychologists apply research-based models such as SMART work design[6] to prevent psychological harm, enhance wellbeing, increase commitment and productivity.
3. **Reducing Psychosocial Risk -** Unmanaged psychosocial risks can erode productivity through absenteeism, disengagement and turnover. Organisational and other psychologists in Australia have contributed to workplace health and safety legislation and regulations and are uniquely qualified to assess psychosocial risk and embed preventative approaches, which are key to a productive economy.
4. **Evidence-based Policy and Practice –** Organisational psychologists have expert knowledge in applying systematic diagnosis, rigorous evaluation and stakeholder engagement to workplace interventions. The likelihood that productivity initiatives are feasible, accepted, and deliver meaningful results, while minimising unintended consequences, is increased through this evidence-based approach.

In the following response, we outline specific recommendations for each of the five pillars, addressing key areas of opportunity to draw on psychological expertise to increase implementation effectiveness. While much of it is written from an organisational psychology perspective, this is an example of only one area of practice with much of it able to be generalised across the psychology profession. The APS would be pleased to have further input to the Commission's work as the reform agenda progresses.

Thank you for the opportunity to respond to this important consultation. If any further information is required from the APS, I would be happy to be contacted through the National Office on (03) 8662 3300 or by email at [redacted]

Yours sincerely,

[redacted]

[redacted]

Response to the five pillars of productivity inquiries

Creating a more dynamic and resilient economy

The Commission highlights taxation reform and enhanced regulatory practice as critical to lifting Australia's investment, competition and productivity. In Draft Recommendation 2.3, *"Enhance regulatory practice to deliver growth, competition and innovation"*, the Commission calls for *"a change to the current architecture and culture [of the regulatory system]"* (page 5, Interim Report). Organisational psychologists are uniquely positioned to contribute at the system level by strengthening regulatory stewardship capability, developing practical tools for risk management and impact analysis, and embedding evaluation methods that help regulators balance compliance with innovation while ensuring reform delivers real productivity gains. Regulatory reform will need to address the challenges associated with balancing the requirement to regulate with innovation, to allow business dynamism.

Corporate tax reform to spur business investment

While tax design itself sits outside the expertise of the psychology profession, by evaluating company-level behavioural responses to new incentives, policymakers can test whether the intended productivity impacts are realised and whether complementary measures are needed to ensure companies take full advantage of the reforms.

Regulating to promote business dynamism

The Commission emphasises that regulation should promote growth and innovation while managing risk proportionally. Organisational psychologists can strengthen this by bringing a behavioural lens to regulation: anticipating how companies respond to new rules and identifying practical compliance barriers. They can also help regulators clarify and apply risk tolerances through developing structured decision frameworks, simulations, scenario planning and culture assessments.

In line with the Commission's call for stronger regulatory stewardship, the work of organisational psychologists builds capability through stakeholder engagement methods that build cross-agency collaboration, and by developing adaptive leadership in regulators [for more see 7,8]. Over-regulation is typically connected to risk aversion, fear of failure, and blame-avoidance. Training could include regulatory examples highlighting the upsides/benefits of regulation as well as the downsides of over-regulation. Discussions about trade-offs and flow-on effects are a necessary part of this training. Psychological research can inform this, such as Professor Robert Sutton's concept of the 'cone of friction' at work, which refers to the areas where people are unaware of how their decisions make life "unwittingly difficult for people"[9]. Further, the transfer of training to application on the job is closely linked to actions of leaders and whether the organisational culture supports the application of new skills. Organisational psychologists are experts at designing interventions to support the emergence of a positive risk culture. For example, scenario planning and simulations could be especially useful.

Research conducted by psychologists, and particularly organisational psychologists, can be drawn upon to enhance critical thinking needed at an individual level, using evidence-based techniques and practices that encourage and reinforce learning and developmental norms and that encourage innovative and systemic thinking[10]. At a systemic level, however, research into innovation has identified the key aspects not only of individuals, but also of teams and work cultures. There is a strong evidence base to draw on about what is needed for a creative, innovative team mindset and a stewardship approach to solving challenges.

This team/group-oriented research has pinpointed the optimal environmental conditions the team/group needs - from shared goal clarity and alignment to effective conflict styles and optimal communication structures. The practical application of this research enables teams, organisations and industry sectors to achieve more innovative, dynamic cultures and outcomes[11–14].

INFORMATION REQUEST 2.1: Overlapping reporting frameworks can create duplicative obligations for organisations. For example, in workplace reporting, companies may be required to provide similar data under different frameworks, such as the *Workplace Gender Equality Act 2012* obligations, *Sex Discrimination Act 1984*, the Right to Disconnect, and WHS regulations pertaining to psychosocial risk management. Streamlining these processes so organisations provide data once would ease compliance effort.

INFORMATION REQUEST 2.5 To help promulgate and embed a culture of regulatory stewardship within the Australian Public Service, we suggest the expertise of psychologists be drawn upon to provide:

- Organisational culture experience, to promote values and behaviours to support Public Service Agencies and Departments to crystalise what stewardship would look like in the context of their own unique organisational culture
- Capability/skill building training in stewardship mindsets and behaviours including leadership modelling
- Development of stewardship processes to enhance engagement of all parties
- Change management expertise to assist in communicating, phasing and evaluating the embedding of regulatory stewardship

Investing in cheaper, cleaner energy and the net zero transformation

Our response addresses the three priority areas identified by the Commission in this Interim Report, namely:

1. Reducing the cost of meeting emissions targets
2. Speeding up approvals for new energy infrastructure
3. Addressing barriers to private investment in adaption

Each of these goals rely on changing policies and incentives to influence the behaviour of key decision makers, i.e., the planners, designers, constructors and operators of energy infrastructure and large and small energy consumers. The field of behaviour change at work is a core area of expertise for psychologists and draws on decades of research[15]. In the APS position statement *Psychology and Climate Change*[16], we outline some of the ways psychology practice can overcome barriers to behavioural change.

Where significant decisions about investment and project design are needed, the speed of understanding and uptake of these new policies will be limited by the rate at which these key decision makers are able to make sense of them. The implementation of these policies will be more effective if communication about them is accompanied by targeted interventions to build shared understanding across the partnerships that deliver them and along the impacted industry value chains.

The recent Infrastructure Australia (IA) paper "*Delivering Net Zero Infrastructure: Workforce Report*"[17] highlights the critical importance of building the skills of both technical professionals, such as engineers and scientists and non-technical professionals, such as economists and accountants who are involved in the early stages of project planning.
The focus of workforce education is often directed towards the largest workforces, but these small cohorts of senior decision makers actually have the most impact on the delivery of project outcomes[18,19] and specified emission reduction potential, as noted by IA[17(p. 24)].

As an example, a team of organisational psychologists who work at the University of Queensland's Sustainable Infrastructure Research Hub[20], has developed a competency model and designed an industry focused education program with the aim of:

- increasing understanding of translating sustainability regulations and requirements into practice,
- developing a depth of understanding about building cross-disciplinary collaboration, and
- establishing the routines of transferring learning to accelerate adoption.

The Commission could increase the effectiveness of the implementation of these policy changes by utilising the expertise of relevant professionals such as organisational psychologists to formulate interventions, e.g., skill development and embedding learning mechanisms into the policy design. Further, the Commission could recommend that this expertise is also applied in the proposed specialist 'strike team' for priority projects (Draft Recommendation 2.2) and to support the proposed new responsibility for the Climate Change Authority (Draft Recommendation 3.4) by specifying roles to be filled by personnel qualified in organisational psychology in those organisations. In addition, the APS recommends the Commission engage with university-based research translation groups that are both focused in this area and include relevant organisational psychology expertise to enable evaluation and learning from the implementation process[20–22].

Harnessing data and digital technology

The APS commends the Commission's thoughtful consideration in this Interim Report of both the potential and risks of artificial intelligence (AI) technology implementation, as the most significant part of the evolving data and digital technology landscape. There is clear recognition that the potential impacts must be carefully considered to ensure that the workforce is both equipped for the future and that the risks to those who may be disenfranchised by this change are considered. This has been further expanded on in the recently published Jobs and Skills Australia report "Our Gen AI Transition: Implications for Work and Skills"[23]. The Commission highlights AI, data access, privacy and digital reporting as key reform priorities. Organisational psychologists could contribute to the reform priorities through:

- **AI regulation:** Drawing on established work design research and national centres of expertise[24–26], to support gap analyses of existing laws by identifying AI-related psychosocial risks and ensuring adoption boosts productivity without harming workers. These research hubs include foci such as 'Optimising human and technology performance' and 'Saving energy and minimising waste' which relate to many of the topics raised in this Interim Report.
- **Data access:** Designing user-centred data-access systems that are trusted, simple to use and encourage widespread uptake, so productivity benefits are realised.
- **Privacy:** Informing Privacy Act reforms by demonstrating how compliance models influence organisational behaviour and by evaluating whether outcomes-based approaches cut costs and build trust.
- **Digital reporting:** Enabling organisational adoption through evidence-based change management and work design, avoiding the productivity losses and workforce impacts of poorly managed transitions[4].

Redesigning work simultaneously from both technical and people perspectives

There is an aspect of the transition to digital technology that does not appear to have been considered in great detail in the Interim Report. To avoid harmful consequences on the employees who will work with the new technology, it is important to apply thoughtful redesign of work as it is implemented. There is a risk of falling into the "technocentric fallacy" where technology change alone is seen as the driver of productivity.
Decades of research drawing on the sociotechnical systems theory of work shows that both aspects need to be redesigned together to lead to quality work and to realise productivity gains[27].

Change management done poorly costs money and mental health

In many Australian industries, workers are already experiencing high levels of mental health consequences at work, such as burnout, that leads to presenteeism and absenteeism. As mentioned above, the Commission's research has quantified this to be in the range of $12-39 billion per annum[4]. Inadequate change management is specifically highlighted as a risk to workers' wellbeing and mental health. If this digital transformation is implemented poorly, the risk to workers' mental health will likely be compounded, with a related decrease in productivity.
The focus in Draft Recommendation 1.1, that productivity growth from AI is built on existing legal foundations with a review conducted on regulatory gaps, must take into account requirements from the psychosocial risk and broader mental health at work legislation to consider workers' risk of psychological and physical harm from workplace change. Integrating this strength with the safe implementation of AI and other digital transitions is an opportunity that could be capitalised on with the assistance of relevant professionals such as organisational psychologists.

Building a skilled and adaptable workforce

The focus of this report is appropriately on key policy structures that can smooth the path to building and changing the skills that Australian workers bring to their jobs. The Commission highlights three priorities: lifting skills and qualifications, ensuring entry regulations are fit-for-purpose, and supporting lifelong learning and mobility. Organisational psychology, being an applied science, offers evidence-based frameworks to bridge the gap between policy intent and real-world implementation through:

- **Providing effective resources to improve student outcomes** by embedding change management, training and evidence-based work design into national EdTech and AI reforms, recognising that these reforms reshape teachers' roles and must reduce psychosocial risks for productivity gains to be realised.

- **Building skills and qualifications for a more productive workforce** by supporting subject matter experts (SMEs) and industry bodies to identify skills gaps through training needs analysis, ensuring programs are tied to actual job requirement and evaluated for impact. In addition, by assisting SMEs to take up training incentives by identifying critical needs, strengthening leadership capability, and directing investment to the most relevant programs so subsidies translate into productivity gains. These measures identify skill gaps and ensure reforms reach SMEs efficiently.

By developing fair, competency-based assessments, organisational psychologists contribute to recognition of prior learning, and support career development by using validated assessment tools to help workers identify transferable skills, plan training pathways, and transition into high-demand sectors.

Structured career planning and assessments can play a significant role in increasing Australia's workforce productivity. By helping individuals identify their skills, interests, and development needs, use of psychometric tools can vastly improve person–job and person–organisation fit, which is strongly linked to higher performance, engagement, and retention[28–30].

Career assessments also highlight skill gaps and guide targeted upskilling or recognition of prior learning, supporting lifelong learning and workforce adaptability—critical priorities identified by the Commission.
Participation in career planning enhances motivation, goal clarity, and self-efficacy, reducing turnover and absenteeism and contributing to more productive work hours[31].
At a macro level, these tools improve labour allocation, enabling workers to transition into high-demand sectors, reducing structural unemployment, and strengthening the Australian economy.

Fit-for-purpose occupational entry regulations (OERs)

Organisational psychologists bring practical tools such as job analysis, performance simulations, work samples, and psychometric evaluation to identify competencies needed for safe entry into the workforce. They also design structured supervision pathways as alternatives to rigid qualification barriers and use pilot testing and evaluation frameworks to review whether entry standards are proportionate to job risks and fair across different groups, supporting workforce mobility.

The Commission notes psychology workforce entry requirements as an example of needed reform. The APS is considering its response to the Psychology Board of Australia's *Redesigning the Psychology Higher Education Pathway* project. Ultimately, Australia needs practice-ready psychology graduates without losing the evidence-based rigor of psychological science.

Delivering quality care more efficiently

Care services support the physical and mental health of some of the most vulnerable groups and communities in Australia through the provision of health care, early childhood education and care, aged care, disability support and veterans' care enabling greater participation in the community and the economy.

Psychologists not only provide care services across various settings; they are uniquely placed to support the recommendations from the Commission to deliver quality care more efficiently.

For example, across the care economy, organisational psychologists contribute to regulatory design, collaborative commissioning and prevention by applying evidence-based approaches to work design, workforce sustainability, and system evaluation, bridging the gap between policy intent and effective practice.

Reform of quality and safety regulation to support a more cohesive care economy

As psychology is a regulated and registered profession, the APS fully endorses the Commission's recommendation for mutual recognition arrangements for health workers already registered through the National Registration and Accreditation Scheme.

When considering the 'consistent regulatory approach' to AI (Interim report, page 22), the APS supports a consistent approach to the regulation of AI in healthcare that ensures patient safety, data integrity, and ethical oversight while avoiding undue administrative burdens on health practitioners.

However, we caution against introducing additional regulatory bodies or subjecting health practitioners to further layers of regulation, as this could inadvertently add complexity and administrative burden to the healthcare system—a scenario that would be counterproductive given that one of AI's core promises is to streamline non-clinical and administrative aspects of healthcare to improve efficiency and productivity.

Instead, the APS advocates for regulatory bodies and frameworks to concentrate on AI technology providers and platform developers who are directly responsible for designing, deploying, and maintaining AI systems in healthcare settings. To encourage a well-rounded regulatory environment, the APS supports the establishment of an advisory body dedicated to AI in healthcare, one that collaborates closely with health professions to offer profession-specific guidance and address the broader ethical, operational, and social implications of AI [see also 32].

The APS endorses the Commission's recommendation for greater alignment in the regulation of behaviour support plans and use of restrictive practices in the aged care and NDIS sectors – and more broadly – disability services. While we recognise the benefits from aligning regulatory approaches for individuals, we acknowledge that this area of regulation is highly complex. Ultimately, any regulatory measures need to ensure that the rights and interests of people with disability and older Australians are upheld.

Embed collaborative commissioning to increase the integration of care services

The APS supports the recommendation for collaborative commissioning in principle given the goal to reduce fragmentation across care settings and improve care outcomes. Greater flexibility and reduced costs along with harmonisation of commissioning approaches will be beneficial as long as services are sufficiently resourced.

A national framework to support government investment in prevention

Prevention is a cornerstone of APS advocacy. We endorse the recommendation to promote investment in prevention programs that are evidence-based and effective – both in terms of preventing the need for care services and mitigating further decline of a person's physical or mental well-being, decreased functionality, increased illness, or loss of vitality.

Psychologists are fundamentally concerned with preventative health and mental health measures and well placed to support the establishment of a National Prevention Investment Framework for services across the care economy.

However, we note that implementing a national framework to support government investment in prevention will need to consider a critical issue associated with current funding models in health, aged and disability services. That is, reform will need to include strategies to address and possibly modifying current activity-based pricing arrangements and models across jurisdictions and care settings.

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