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## [31-124] Reflection on the SIA Ltd professional project and the Body of Knowledge

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### Abstract

**In the last five years, the Safety Institute of Australia Limited (SIA) has developed and implemented a number of strategies to gain professional recognition for the “generalist occupational health and safety (OHS) professional” in Australia and internationally. Despite a considerable amount of work by the SIA aimed at gaining professional status, there does not appear to have been any published debate or reflection about how the drive for professionalism will contribute to the prevention of occupational disease and injury. Professionalisation has been promoted as a sign of maturity for the SIA and as an unquestionably good outcome, as it has been assumed that professionalisation will provide unmitigated benefits for workplace health and safety. The aim of this paper is to critically reflect on the processes of professionalisation (the professional project) and discuss the ways in which this project may shape the field of occupational health and safety.**

**Keywords: OHS, professionalisation, SIA, professional project, Body of Knowledge.**

### Introduction

The Safety Institute of Australia Ltd (SIA) is currently embarking on a drive to make the “generalist occupational health and safety (OHS) professional” a recognised profession. The term “generalist OHS professional” encompasses those people with tertiary education who are employed in roles which include job titles such as OHS Manager, Safety Advisor, OHS Facilitator and OHS Coordinator, etc. The term is designed to demarcate this occupational group from the related but more clearly-defined occupations such as ergonomists and occupational hygienists as well as from vocationally-educated OHS practitioners, although it should be noted that the boundaries between these occupations are relatively porous.

OHS employees and consultants comprise one of a number of occupational groups which are currently seeking to gain recognition as a profession. The emergence of new professions in fields such project management, professional services and human resources has attracted considerable attention from scholars

interested in the sociology of the professions, and it is publications from this field which have informed the issues discussed in this paper. The SIA's drive to professionalise OHS (a process referred to as the "professional project") is an important development in the history of OHS in Australia.

The broad aim of this commentary article is to generate a wider debate and more scholarly attention to the emergence of the generalist OHS profession. Specifically, the aims of this paper are to:

- outline the strategies that the SIA has undertaken to gain professional status for a section of the SIA membership
- reflect on these strategies in the wider context of the sociology of the professions and the implications for improving OHS, and
- reflect on the implications of accreditation for the autonomy of tertiary OHS education.

The overall desirability of developing an OHS profession is not questioned; indeed, the further development of OHS as a profession is almost certain given the growing significance of OHS in developed economies and the international growth of knowledge workers in the services sector. However, the aim of this paper is to critically reflect on the processes of professionalisation, and specifically, the SIA's professional project, and to discuss some of the ways in which this project may shape the field of OHS, possibly with adverse consequences.

We are concerned that the professional project has the potential to promote a narrow technical view of OHS rather than a wider view which acknowledges the societal relations of power and politics. In particular, professionalisation has the potential to diminish worker participation and the role of trade unions. We are also concerned that the accreditation of university courses, implicated in professionalisation, also establishes a framework which could challenge academic values and the independence of universities to determine what is taught and the learning objectives. These concerns are based on the understanding that professionalisation is a complex process with mixed outcomes and effects. As such, we aim to generate a wider debate and more scholarly attention to emergence of the generalist OHS profession.

## Methods

The paper is divided into four parts. Publicly available literature and information from the SIA's and AOHSEB websites was accessed to develop the commentary and inform the discussion and reflection on the SIA's professional project. A more description of the methods for each part follows:

- Part 1 and Part 2 of the paper provide an outline of the generalist OHS professional and the SIA's professionalisation strategies. A review of the literature was conducted via the journal databases EBSCOhost Academic Search Elite, Australia/New Zealand Reference Centre, Business Source Elite, CINAHL with Full Text, e-Book Collection, E-Journals, Ergonomics Abstracts, MEDLINE, PsychARTICLES, PsychINFO and Social Work Abstracts using combinations of the following terms: *accredit\**, *body of knowledge*, *competenc\**, *general\**, *occup\**, *OHS*, *professional\**, *Safety Institute of Australia* and *safety* (where \* means "and derivatives"). Literature was included if it was published between 01 January 2005 and 01 November 2014 inclusive, if it was an academic journal article (a report of original research OR commentary OR a systematic review), if it was published in a peer-reviewed journal (Australian OR international) and if it dealt explicitly with "professional project" topics (Australian OR international). A selection of journal articles published prior to 2005, conference papers, industry reports, newspaper articles, books and Cochrane summaries were included based on the authors' professional judgment. It is important to note that there is an overall paucity of literature on the topic.
- Part 3 of the paper discusses some of the key concepts of the sociology of the professions from the literature. Literature was obtained via a Queensland University of Technology library database search of contemporary review articles and books.
- Part 4 of the paper discusses some of the implications of professionalisation for tertiary education. Again, literature was obtained via a Queensland University of Technology library database search of contemporary review articles and books.

## Part 1. The generalist OHS professional and professionalisation

In everyday language, the term “generalist OHS professional” is broadly understood as referring to a person who has some specialist knowledge and experience, and works in a full-time OHS role, either as a consultant or employee. However, when judged by the criteria which apply to the established professions, the role of a “generalist OHS professional” is currently more akin to an occupational group rather than a profession.<sup>1</sup>

The “generalist OHS professional” seems to be a relatively new concept; indeed, this term is only used in Australia and originated with the SIA.

The reasons for the lack of professional recognition of generalist OHS professionals are multiple, but most importantly include the fact that there is no industry-wide agreement on the educational requirements for a person to practise as a “generalist OHS professional”<sup>2</sup> and also no recognition by the state. The aim of the SIA — through its professional project — is to create industry-wide recognition for the generalist OHS professional. The development of OHS as a distinct profession has involved a number of steps and can be seen as still a work in progress.

The occupation of the generalist OHS professional has emerged from the more narrowly-defined occupation of “safety officer”, as described, for example, by Hale.<sup>3</sup> The impetus for the broadening of the traditional safety officer role was most likely due to the public and trade union demand for improved OHS which emphasised the growing recognition of occupational disease as distinct from occupational injury. Additionally, the introduction of Robens-style legislation in the 1970s and 1980s provided a comprehensive framework which encompassed both occupational health and occupational safety. In broad terms, this new style of OHS legislation introduced the general duty of care, mandated participation and streamlined the industry-specific provisions for occupational safety and occupational health in one statute. These major changes in the scope, coverage and intent of the legislation were then reflected in the organisation of both the jurisdictional inspectorates and the OHS function in employer organisations. Following the new legislation, there was also the gradual introduction of OHS university courses and tertiary-educated OHS inspectors in state and territory jurisdictions.

### Role of the generalist OHS professional

To date, the research and scholarship on the OHS profession has been largely directed towards classifying and describing the role of the professional with the aim of standardising competencies. European research conducted at the NTNU Norway and TU Delft Netherlands by Hale and others has led the field,<sup>3, 5, 6, 7</sup> and in Australia there have been similar studies,<sup>8, 9, 10, 11</sup> largely following this European research. A distinguishing feature of all these studies is that they assume that professionalisation strategies (as in SIA’s professional project) are unproblematic and that professionalisation and improvement in OHS are synonymous. In other words, these authors appear to have the view that professionalisation of OHS will either have no downside, or at the very least does not require any debate or research on the implications of professionalisation for improving OHS.

## Part 2. The Safety Institute of Australia (SIA) Ltd and its professionalisation strategies

The SIA is Australia’s peak body for generalist OHS professionals; it has the largest membership of all the OHS professional bodies in Australia with over 4,500 individual members and a number of corporate members.<sup>12</sup> In recent years, the SIA has embarked on a range of strategies to gain professional standing for the section of its membership who have tertiary qualifications and who practise as generalist OHS professionals (refer to Table 1 below).

**Table 1. Significant SIA actions for the professional project**<sup>12, 13, 14</sup>

Year	Action
2009	Published a new magazine, “OHS Professional”.

2009	Published a new peer reviewed journal, "Journal of Health & Safety Research & Practice".
2011	Established a company limited by guarantee, Safety Institute of Australia Ltd.
2011	Established the Australian OHS Education Accreditation Board (AOHSEAB).
2011	Commenced a pilot of university OHS course accreditation.
2012	Published the "OHS Body of Knowledge".
2014	Released the second edition of the "OHS Body of Knowledge".
2014	Conducted national workshops on Certification of Generalist OHS Professionals.

## The OHS Body of Knowledge (OHS BoK)

Central to SIA's strategy for gaining professional standing for OHS professionals has been the production of the "Core Body of Knowledge for the OHS Professional" (referred to as the "OHS BoK") and the establishment of the AOHSEAB.<sup>13</sup> The AOHSEAB was established under the auspices of the SIA principally to accredit tertiary-level OHS courses. The OHS BoK was developed as the basis for auditing and accrediting tertiary OHS courses in Australia and has also been promoted as the international standard for OHS knowledge<sup>13</sup> .<sup>15</sup> (for more detail on the BoK, see our conference paper).<sup>16</sup> Plans are underway to require SIA members seeking a professional grading to have completed an accredited tertiary-level course; thus the AOHSEAB in conjunction with the SIA will control the accreditation of both tertiary courses and individual professionals.

The SIA's professionalisation strategies have been developed to increase the professional status of SIA members who have been awarded professional-level membership grading, distinguishing them from members without tertiary qualifications. In broad terms, these strategies are similar to those adopted by most professions both in Australia and internationally,<sup>17</sup> .<sup>18</sup> and mirror those of, eg the American Society of Safety Engineers.<sup>19</sup> .<sup>20</sup> Taken together, these strategies can be described as part of the SIA's professional project.<sup>21</sup>

The SIA's professional project is based on the development and implementation of the OHS BoK. The volume of the BoK is certainly impressive but the reason for existence is unclear. Is it best understood as a symbolic document created to give the impression that OHS was based on a large body of unified knowledge? In contrast to the BoK approach we would argue that the OHS domain is far from a unified body of knowledge and is best described as an interdisciplinary/multidisciplinary area of knowledge with many contested areas. Furthermore, much of the current practice of OHS appears to be based on a relatively low and undeveloped evidence base, for example, see Cochrane Summaries on construction,<sup>22</sup> back pain,<sup>23</sup> occupational stress<sup>24</sup> and pre-employment screening.<sup>25</sup>

## The case for accreditation of tertiary courses

The SIA has promoted accreditation of tertiary courses as an essential element in the development of a profession. In developing the case for accreditation of university OHS courses, the SIA/AOHSEB identified the following three issues related to OHS professionalisation:

1. There was no regulatory framework or education requirements for OHS professionals.
2. There was a lack of uniformity across OHS education programs.
3. There was no benchmark for assessing the competence of those giving OHS professional advice.

It was claimed that this situation could adversely affect OHS in Australia,<sup>13</sup> and in 2010 this argument was advanced by Toft and others in a major report for the Australian Learning and Teaching Council.<sup>26</sup> However, it is important to note that there is no published evidence that the lack of regulatory framework and uniformity in tertiary-level OHS education in Australia has any adverse impact on OHS outcomes. The BoK itself was developed by SIA via the AOHSEB through a grant from Victorian WorkCover<sup>14</sup> based on concerns about the inaccurate advice that some consultants had provided to employers, however, there was

no published evidence to suggest that it was graduates of tertiary-level OHS courses who provided incorrect advice. Indeed, while debate around the accreditation of OHS courses has been around for some time,<sup>27</sup> the evidence supporting the accreditation of health and other tertiary courses is problematic<sup>29</sup> ,<sup>30</sup> ,<sup>31</sup> though there is some evidence to suggest that accreditation improves outcomes in OHS.<sup>17</sup> The issues which have arisen from the SIA's professional project strategy of accrediting tertiary-level OHS courses in Australia are explored in more detail in Part 4 of this paper. Despite these issues, accrediting tertiary-level OHS courses remains a key aspect of SIA's professional project.

### Part 3. Sociology of the professions and OHS professionalisation

The SIA has based its broad concept of a generalist OHS professional on the definition adopted by Professions Australia, as outlined below:

“A profession is a disciplined group of individuals who adhere to ethical standards and who hold themselves out as, and are accepted by the public as possessing special knowledge and skills in a widely recognised body of learning derived from research, education and training at a high level, and who are prepared to apply this knowledge and exercise these skills in the interest of others. ...”<sup>32</sup>

Evetts has argued that professionalisation inevitably improves professions such as OHS by creating a body of competent, trusted practitioners with a normative value system.<sup>42</sup> However, professionalisation raises a number of questions about the way OHS is theorised and practised.<sup>33</sup> ,<sup>34</sup> ,<sup>35</sup> Although the above definition may be useful for public relations, it is not fully supported by the evidence from research into the role, function and characteristics of professions. In reality, professions are more complex and their roles less clearly defined than the above definition implies. There is now an extensive body of sociological research, developed since the 1960s, which has provided the framework for a more critical and more nuanced appraisal of professions.

The early research on professions and professionalisation was based on studies of the traditional professions — such as law, the clergy, architecture and medicine — but now the academic literature spans a much wider range of emerging and aspiring professions. For example, business management,<sup>36</sup> human resource management,<sup>37</sup> project management<sup>38</sup> and social work<sup>39</sup> have all attracted the attention of social researchers. Despite this, there do not appear to be any published studies on the sociology of the OHS occupations/professions.

The initial studies of the professions were predominantly functionalist and saw the professions as institutions which made an unambiguous positive contribution to society. However, in the 1970s, scholars began to critically question the role of professions, often using concepts of power and conflict.<sup>33</sup> Notably, Larson and others argued that professions actively organised to further their own ends.<sup>21</sup> ,<sup>33</sup> Indeed, Larson<sup>21</sup> proposes that “conflict and struggle around who shall be included or excluded mark the process of internal unification of profession”. The research in the 1970s and 1980s concluded that professions shared a number of common features<sup>4</sup> ,<sup>21</sup> ,<sup>40</sup> including:

- to exclude others from practicing (monopoly and closure)
- to define a curriculum knowledge base
- to increase the status and financial rewards for members, and
- to be recognised by the state.

Larson is credited with developing the idea of the “professional project” which explores the actions that occupational groups take to further their economic and social position by developing a monopoly over specific skills and knowledge, and controlling who has access to that knowledge<sup>17</sup> — such as the SIA is now arguably attempting to do with the OHS profession. The original work by Larson has been supported by

numerous studies demonstrating that the traditional professions were primarily based on the twin foundations of monopoly and closure.<sup>4, 21, 41</sup> However, in the case of the newer professions or aspiring professions like OHS, human resources, business management and information technology, it is extremely unlikely that these occupational groupings will be able to establish a monopoly of practice.

More recently, there seems to be an understanding by scholars that the study of the professions includes aspects of both functionalist and conflict theories.<sup>38</sup> In their 2011 review of the developments in the sociology of the professions, Gorman and Sandefur<sup>33</sup> contend that there was “golden age” for professionals and a “golden age” for the study of the professions in the mid-20<sup>th</sup> century. However, since then, the massive changes in the way work is organised has led to the decline in the classical study of the professions and the emergence of an expanded focus on the study of knowledge-based occupational groups whether they are seen as professional or not.

For some authors, such as Leicht & Fennell functionalist and Marxist, theories have been superseded by institutionalism. Institutionalism is underpinned by ideas that organisations, as they diversify to meet the demands posed by factors such as changes in market structure and technological advances, shape behaviour.<sup>44</sup>

Current research on professionalisation now includes expert or knowledge-based occupations which are not necessarily traditional professions. Nevertheless, there is continuity from the traditional analytical frameworks to the newer approaches. Gorman and Sandefur<sup>33</sup> identify these as four central themes:

- expert knowledge
- autonomy
- normative service orientation supported by the community, and
- status, income and rewards.

Gorman and Sandefur<sup>33</sup> make the point that these four themes are not necessarily used to limit or describe a particular occupation. They can, however, be used to frame questions about how different occupational groups vary in terms of these themes and how these variations can be explained. In her survey of recent developments in professionalisation, Evetts concludes that professionalism entails both normative service values which are beneficial for society as well as negative aspects which can be harnessed to serve bureaucratic and market goals.<sup>42</sup>

Key concepts in the development of the sociology of professions are summarised in the following table:

**Table 2. Summary of the development of sociological perspectives**<sup>4, 7, 21, 33, 40, 43, 44</sup>

Perspective	Key Features
Functionalist Marxist	Professions are an essential part of the division of labour and play a normative role in society. Grounded in conflict between classes; changes in work organisation lead to a decline in classical professions.
Structuralist	Professions organised to further their own ends; theories based on concepts of power through control of knowledge, status and financial rewards.
Institutionalism	Inextricable links between professionalism of occupations and organisations; institutions shape organisational behaviours as normative pressures within organisations act to socialise institutional actors.

The traditional and more recent understanding of professionals and knowledge workers can both be applied the SIA professional project. In the case of the generalist OHS professional, the development of a monopoly on the right to practise is problematic because there are a large number (perhaps the majority?) of people in OHS job roles who do not have specialist knowledge and do not have a tertiary education in OHS. The newer approach to understanding professions as described by Gorman and Sandefur differs from the earlier understanding developed by Larson and others by claiming that self-interest can be removed from the list of

common features on the basis that it is unlikely that an occupational group would be well-enough organised to mobilise around collective self-interest.<sup>21</sup>,<sup>33</sup> Contrary to this view, the SIA provides an example of a very well-organised occupational group.

### **The generalist OHS professional and closure**

The definition of the generalist OHS professional is apparently designed to exclude those in OHS roles without a university undergraduate degree or post-graduate qualification; rather, these people are assigned the role of the “OHS practitioner”. The introduction of the generalist OHS professional aligns with the current SIA membership grading of Chartered Professional Member.<sup>12</sup> However, the current membership structure is hierarchical and there are additional levels of membership from which “entry level” professionals are excluded. It is perhaps relevant here to note that Ackroyd and Muzio found in their study of the UK legal profession that when the profession lost a degree of control of the production of legal graduates from the universities, they developed more hierarchical grading within the profession so that those at the top of the profession could increase their earnings and status.<sup>41</sup>

### **OHS as a socio-technical process**

As discussed in Part 1 of this paper, one of the key elements in the professional project was to produce the OHS BoK. The BoK is very large, and unusual in that it attempts to cover all the knowledge required by an OHS generalist in one publication. This approach can be contrasted with other professions which are able to specify the broad outlines of the required knowledge and let universities decide how to define the knowledge requirements and teach that knowledge. Although not immediately obvious, the framing of OHS as primarily based on a voluminous BoK which can only be gained through tertiary education tends to undermine the conception of OHS as a social process which actively involves all those in the workplace, tripartite social partners and the wider community. There are many published examples of the earlier debates in the 1980s on how OHS was perceived and shaped by social and political processes.<sup>45</sup>,<sup>46</sup>,<sup>47</sup>,<sup>48</sup> The approach promulgated by the BoK conceivably tends to downplay the role of the social partners, in particular trade unions, and casts OHS as primarily a domain for experts who will identify risks and devise management solutions.

### **Part 4. Accreditation and the autonomy of tertiary education**

The SIA accreditation process relies heavily on audit against the Australian Qualifications Framework (AQF)<sup>49</sup> Levels 7, 8 and 9 — or bachelor’s degrees, graduate diplomas and master’s degrees respectively. Although the AQF has been in use for a number of years in the vocational education and training (VET) sector, it has recently been revamped to apply the same approach to the tertiary education sector. The use of the AQF by the SIA to some extent eases the burden of accreditation because universities are now required to audit and comply with new AQF standards. However, the trend towards detailed prescription as embodied in the BoK is also found in the AQF, which has applied the VET sector competency-based learning model to the tertiary sector. A number of scholars have expressed concerns about the tight prescription in the new AQF, which has been seen as a shift from the central role of education from universities (in maintaining and creating knowledge) to employers (defining their knowledge needs) and students as consumers.<sup>50</sup>,<sup>51</sup>,<sup>52</sup>,<sup>53</sup>

The SIA/AOHSEB approach appears to mirror the VET approach, which strictly defines competencies and their assessment. However, technical competency is only part of what is needed from a professional in most fields. Increasingly, OHS professionals are required to participate in solving complex problems and the tight prescription of the BoK may not be the best way of preparing students for this type of work. Weelahan<sup>50</sup> has argued that tight prescription may not be an effective way of preparing students for complex problem solving and higher level tasks because the broader context of knowledge is lost in the detail of tight specification:



“To insist that this should be so results in endless processes of specification that fragment knowledge and the access that students have to knowledge. This is reflected most strongly in competency based training which provides students with access to contextually specific knowledge as it is applied at work, but not the disciplinary system of meaning in which that knowledge is embedded.”<sup>50</sup>

It is important to note that there has been a move towards competency-based training for OHS professionals in other countries.<sup>54</sup>, <sup>55</sup>, <sup>56</sup> The move towards competency-based training in tertiary education and the ensuing “relentless prescription” has also been analysed in a number of other professions; see for example the work of Beck who analysed the tertiary training of teachers in the UK.<sup>51</sup> Beck claims that the competency approach relies on a reductionist view of knowledge and is a form of behaviourism. According to Beck, competency-based training in tertiary education stifles debate and understanding of the underpinning assumptions of the knowledge which has been reduced to standard task acquisition and is then continuously assessed.<sup>51</sup> Although not directly related to tertiary OHS education, it is worth noting that behaviourism is widely deployed in OHS practice in the form of behaviour-based safety with very questionable outcomes.

Because all the elements of competency-based training can be specified with a degree of precision (or at least apparent precision), detailed audit then becomes an integral part of the AQF process. Audit is used to exercise managerial oversight over teaching without engaging with the actual content and to a large extent is based on the assumption that all knowledge is a fixed body of information rather than iterative and contested. The pervasive adoption of audit practices and “audit culture” in higher education has sparked considerable debate and is seen by a number of authors as undermining the long-established values of higher education.<sup>57</sup>, <sup>58</sup>, <sup>59</sup> For example, Craig, Amernic and Tourish<sup>57</sup> call for academics to “resist the physical, intellectual and spiritual colonization of universities by business interests and auditing paraphernalia”. Similarly, Etherington has warned about the corrosive effects of the current federal government’s education policies.<sup>59</sup>

In this context of deep and widespread concerns about the erosion of traditional values of academic autonomy and critical thinking, the following questions arise. To what extent is the SIA’s attempt to define what is taught about OHS in universities furthering academic values, or is it primarily reflecting the interests of the SIA to expand its influence with government and employers? And to what extent is the BoK promulgating a framework for understanding OHS that is predominantly tilted towards an employer perspective? The answers to both these questions are beyond the scope of this paper and could only be answered by research. Nevertheless, they are important questions and need to be asked because there is no apparent evidence that the SIA is aware of these potential adverse effects in the drive for professional status.

### **The OHS course accreditation process**

As noted in Part 1 of this paper, the AOHSEAB claims the responsibility of auditing and accrediting tertiary-level OHS courses in Australia. The accreditation process involves the AOHSEAB-appointed panel auditing the OHS course against a range of criteria, including the BoK and the AQF. If a university is successful in accreditation, then its OHS qualification can be branded as being accredited by the AOHSEAB. Given that a number of courses have already been accredited, it will be difficult for any university not to seek accreditation without risking a decline in student enrolments; indeed, students will seek to study accredited courses because completion of an accredited course becomes part of the requirement for professional membership of the SIA.

This close interdependent relationship between universities and the SIA is a new role for the SIA but generally not for the more established professions. The established high-status and high-income professions such as law and medicine, universities have considerably more power in the relationship because they are able to restrict the entrants into the profession and are not dependent on the accreditation of their courses by the professional associations to attract students. The dependency of OHS tertiary educators on the SIA, together with the AQF competency training approach, appears likely to restrict diversity and innovation

in OHS courses in the medium- to long-term if the current prescriptive and narrow technical approach is continued. This risk could be mitigated by the development of a more active exchange of ideas, research findings, collaboration and debate among OHS tertiary educators, as well as a less prescriptive approach by the SIA to accreditation.

Currently, professional membership of the SIA is not required for practice as an OHS professional, however, a number of employers are including SIA membership in their job selection criteria. As part of the professional project, the SIA is actively working to extend this requirement for professional membership as widely as possible. If this requirement becomes more widely accepted, it would make it a practical necessity for universities to have accredited courses if they wanted to retain viable numbers of students.

### **Control of knowledge**

All professions attempt to exercise varying degrees of control over the knowledge of their members.<sup>21</sup> Most often, control of knowledge is achieved by specifying an undergraduate degree or a postgraduate specialisation or both. Entry-level qualifications are supplemented by supervised internships and followed by continuing professional development (CPD). By accrediting tertiary OHS courses, the SIA has now arguably moved to control the knowledge base of OHS professionals.

However, unlike most other professional associations, the SIA could be perceived to be tightly prescribing the knowledge that those OHS professionals should have by using the BoK to audit OHS tertiary courses for the purposes of accreditation.<sup>21</sup> Most other professions have been willing to let the universities develop the courses required for entry into the profession which, although similar in broad outline, can vary considerably from university to university. By accepting this role for universities, professional organisations acknowledge the independence and authority of universities and their professional and institutional standing. It is not clear why the SIA has decided to base its approach on tight prescription when there was no published evidence that tertiary OHS graduates lacked any particular knowledge and/or that this lack of knowledge was having an adverse impact of OHS.

In fact, when the current tertiary OHS courses are examined, they all seem to have a roughly similar content, although it should be noted that the volume of learning is not consistent. For example, at the time of writing, master's degrees could be gained in one year of study, and in other cases they require two years. However, it should be noted that these anomalies may diminish with the requirement for all Australian universities to be AQF-compliant by 2015.

Another apparent problem with the BoK is that in Australia tertiary education, OHS is distinguished by being truly multidisciplinary, and to a large extent, the current university courses reflect this approach. On the other hand, the BoK underplays the multidisciplinary nature of OHS by reassembling disciplinary knowledge without acknowledging the disciplinary origins. This means that much of the BoK content is de-contextualised, for example, epidemiology does not appear as a BoK topic heading but some of the foundational principles of epidemiology are presented under the heading of "Models of Causation: Health".

The BoK has recast a large volume of disciplinary knowledge which arguably could have been more easily accessed by referring to contemporary texts, Australian Standards and Australian Codes of Practice. It is not clear why this approach was not taken when most other professions are able to define the professional body of knowledge in broad terms and do not attempt to locate all the relevant knowledge in one publication. It is of interest that Thyer has analysed similar attempts to define a BoK in social work and has concluded that it is not possible because of the interdisciplinary nature of social work practice. In fact, Thyer argues that such attempts to define discipline specific knowledge are counterproductive for the development of the profession.<sup>60</sup>

### **Conclusion**

We are concerned that the SIA's professional project has the potential to promote a narrow technical view of OHS rather than a wider view which encompasses societal relations of power and politics. We are also

concerned that the accreditation of university courses, implicated in professionalisation, also establishes a framework which could challenge academic values and the independence of universities to determine what is taught and the learning objectives.

Professionalisation could have ramifications within the SIA if the majority of members were excluded from gaining professional status because they did not have tertiary qualifications. Additionally, if the study by Ackroyd and Muzio<sup>41</sup> on the British legal profession is any guide, the OHS professional project could also lead to an even more hierarchical structure for the SIA membership.

The use of the BoK as a key element in the professional project has the potential to represent OHS as a unified system of knowledge — which it is not. Additionally, in many instances the BoK presents decontextualised knowledge without clear reference to the disciplinary foundations of this knowledge.

It has also been argued that the use of the current BoK as a tightly prescribed audit tool is not the most effective way of developing the necessary skills, competencies and knowledge for graduate and postgraduate students. The use of the BoK and the SIA accreditation process, together with the AQF, arguably inevitably limits the capacity of universities to decide what they teach and how they teach it. Although these challenges to the role of universities and academic freedom have been identified as a widespread trend in all market economies, they need to be acknowledged and debated in more depth in the OHS professional project.

The further development of accreditation for OHS professionals is not in question. However, more attention needs to be given to the potential downsides of the professional project for the improvement of OHS. Through this commentary article, we aim to generate a wider debate and more scholarly attention to emergence of the generalist OHS profession.

#### Footnotes

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