



# APS Response to Consultation Regulation Impact Statement: Recommendations of the 2018 Review of the Model Work Health and Safety Laws

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## Contributors

**Jacinta Connor**

Policy Officer

[j.Connor@psychology.org.au](mailto:j.Connor@psychology.org.au)**Heather Ikin**

Organisational Psychologist

National Chair of the APS College of Organisational Psychologists

**Dr Christine Boag-Hodgson**

Organisational Psychologist

Treasurer of the APS College of Organisational Psychologists

**Traci Carse**

Organisational Psychologist

National Awareness and Engagement Lead

APS College of Organisational Psychologists

The Australian Psychological Society Limited  
Level 13, 257 Collins Street  
Melbourne VIC 3000  
PO Box 38  
Flinders Lane VIC 8009

T: (03) 8662 3300  
F: (03) 9663 6177  
ABN 23 000 543 788

## The Australian Psychological Society

The Australian Psychological Society (APS) is the peak professional organisation for psychology in Australia and we work to amplify the role of psychological science and psychologists and strive to ensure psychological services are used to benefit individuals, systems and communities. Importantly the APS focuses on quality improvement strategies and research on responding to increasingly complex societal issues, including psychologically healthy work environments.

APS members have diverse expertise in applying psychology across a range of issues and the APS College of Organisational Psychologists has a long history in developing and promoting knowledge about psychologically healthy and productive workplaces. APS members have been thought leaders in the development of the literature demonstrating the efficiency and effectiveness, impact and outcomes of mental health in the workplace.

Psychologists, particularly those trained in organisational psychology, provide expertise to organisations about understanding and implementing evidence-based strategies to promote mental health at work. This includes expertise to address a range of workplace factors that can result in distress, mental health problems, poor wellbeing, fatigue, increased physical safety risks, and unsatisfactory employment conditions. Organisational Psychologists are trained to possess enhanced expertise in areas such as employee wellbeing, organisational culture, leadership, job and organisation design, and human factors, all of which are relevant to managing risks to the mental health of employees.

## Format of the APS response

The APS welcomes the opportunity to provide feedback to Safe Work Australia on the Consultation Regulation Impact Statement covering recommendations of the 2018 Review of the Model Work Health and Safety Laws (the 2018 Boland Review). The following APS response focuses on Recommendation 2: Psychosocial Risks. The APS recognises that this consultation focuses on 12 of the 34 recommendations and that further work is required to assess the impact of the remaining recommendations as indicated in Appendix A of the consultation paper. In recognition of the further work required to assess the impact of the remaining recommendations, this response also provides considerations addressing Recommendation 3: Continually assess new industries, hazards and working arrangements. We welcome further consultation assessing the impact of the remaining recommendations.

## APS Response to Recommendation 2: Make regulation dealing with psychosocial risk factors

Almost half of all Australians experience a mental health disorder in their lifetime and reduced productivity due to mental health problems is estimated to be \$11 billion per-year<sup>1,2</sup>. Employers have considerable influence and control over the impact the working environment and organisational culture have on employees' mental health and wellbeing and play a significant role in prevention of mental health problems. Compared with physical health and injuries, psychosocial risk factors and psychological injury are poorly recognised and more targeted strategies are required to ensure parity of both mental and physical health<sup>3</sup>.

Evidence suggests the return on investment is maximised when employers implement multi-level strategies that include primary, secondary and tertiary interventions for managing psychosocial risk factors targeted at both individual employee risk factors as well as organisational level factors<sup>4</sup>. Typically organisations focus on secondary and tertiary strategies (i.e. designed to change employee behaviour and reduce stress responses through training, information and counselling) and less on early identification and modification (i.e., primary prevention) of psychosocial hazards<sup>5,6</sup>. This leaves a substantial gap in the implementation of psychological interventions to effectively address the psychological health and wellbeing of employees.

From a perspective of policy translation, one of the major barriers to addressing the psychological health and wellbeing of employees is the current disconnect between legislation and workplace policy that sets out what is required for a healthy workplace and the coalface operationalisation of such policy. As discussed in the APS response to the Productivity Commission Inquiry into mental health, at the policy level, health and safety legislation and labour law are an important catalyst for organisational action. There are several international examples of the positive impacts that legal and regulatory framework reforms can have to elevate the responsibility of employers to provide a psychologically healthy workplace. For example, in Finland, employers must identify and address psychosocial risk factors to employee health. While Australia requires an employer to provide and maintain a working environment that is safe and without risk to the mental health of their employees<sup>7</sup>, there is considerably more that can be done.

In line with Recommendation 3 contained in the APS Submission to the Productivity Commission into Mental Health, the APS makes the following broad recommendation.

## Recommendation 1: Reform regulatory approaches to mental health in the workplace

The APS recommends that Government implement safe and evidence-based strategies about what fosters good workplace-related mental health by reforming the regulatory approaches to mental health at work so that regulators are sufficiently resourced to engage with industry and monitor and enforce legislative requirements. The APS firmly believe that the regulatory system needs to act as an incentive to drive change in organisational culture.

## Addressing the impact questions asked

### **1. How are you, your organisation or your stakeholders affected by the problems identified in the 2018 Review findings, and to what extent?**

Psychologists are engaged as experts within work health and safety regulatory agencies, as consultants to regulatory agencies, and within strategic human resources and health and safety functions. Psychologists work on 'both sides' of the legislation, as regulators and as regulatees and are leading service providers to organisations regarding the mental health of workers.

A regulatory response to managing psychosocial risk factors impacts on both the work of psychologists, employees, employers and the community more broadly. As has been identified in several inquiries into mental health, the way workplaces manage and support psychological health has downstream impacts on the psychological health of employees and play an important role in reducing the mental health burden, stigma and discrimination.

### **2. What practical impact, including the costs and benefits, would the options set out in this Consultation RIS have on you, your organisation or your stakeholders? Please provide evidence of the impacts wherever possible.**

Improving workplace responses to managing psychosocial risk factors will have significant downstream cost saving to employers, organisations, the government and the broader health sector. Strengthening the psychological health of employees will deliver significant labour market productivity benefits due to improved employment outcomes and increased productivity. A healthy labour supply is one of the major factors that drive the economy, however mental health problems can significantly impact the labour market. For those employed, mental health disorders can reduce productivity by up to 9 per cent<sup>8</sup>. For example absenteeism and reduced productivity (presenteeism) due to mental ill-health are estimated to be \$11 billion per year<sup>9, 10</sup>. Further investment to improve psychosocial risk factors in the workplace will assist with preventing the onset of mental health disorders and promote the mental health and wellbeing of the workforce.

Please refer to the APS's response to the Productivity Commission Inquiry into Mental Health for further information.

**3. Do you have suggestions for other options to address the problems identified in the 2018 Review findings? Please provide information and evidence on the impacts of your suggested option, including how it would improve the WHS outcomes or reduce compliance costs.**

Early identification and modification (i.e. primary prevention) of psychosocial hazards is the most effective way to reduce the burden of mental health problems in working populations when implemented alongside secondary and tertiary interventions<sup>6, 4</sup>. For example, implementing strategies for preventing workplace burnout is an important primary prevention measure. However, primary prevention strategies are generally under-utilised and instead problems tend to be left to emerge, and this leads to an over-reliance on secondary and tertiary interventions<sup>5, 11, 12</sup>.

It is important that organisations understand the range of strategies commonly employed to address mental health at work, and the extent to which these are focused on prevention versus management. A clear framework requiring focus on primary prevention of psychosocial hazards, with sufficient support from regulators to meet these standards will increase awareness and help organisations to invest money and resources in a more targeted manner.

### Recommendation 2: Implement a code of practice

In addition to proposed amendments to the WHS Regulations, the APS recommends implementing a new code of practice that stipulates the minimum standard required by organisations in managing risks to the psychological health of workers. This code of practice should have a degree of flexibility, to be applicable to smaller organisations who are often less resourced than larger organisations.

Having more clearly defined requirements for employers through the WHS Regulations will provide weight to the compliance and enforcement action taken by regulators. Amending the regulations is considered by the APS as important, however, the capacity of regulatory agencies to enforce the legislation and regulations as they pertain to psychological health needs to be considered.

### **Recommendation 3: Review compliance and enforcement strategies of regulators as it relates to psychosocial safety**

The APS recommends the government review regulatory strategies across Australia to determine if they are fit for purpose, and make recommendations to regulators to improve regulatory outcomes, ensuring employers understand the minimum standards for compliance, and consequences of non-compliance, where psychosocial safety is concerned.

Health and Safety Representatives are empowered under WHS legislation to monitor health and safety, including psychological safety. As key influencers, they play a critical role in identifying and managing psychosocial hazards<sup>13</sup>. Ensuring they are adequately trained in psychological health and wellbeing enables representatives to take action at the operational level to mitigate the psychosocial risk hazards within an organisation. Furthermore, consideration should also be given to training a sub-workforce of health and safety professionals that understand safety management systems and psychological health, and who ensure systems are effectively geared towards psychosocial risk management. This would help to supplement the work of expert psychologists, who have in-depth training and qualifications in understanding the workplace factors that impact on the mental health of employees.

### **Recommendation 4: Ensure psychosocial safety is a central component of formal WHS training**

The APS recommends the Government ensure educational and training institutions responsible for training health and safety professionals include competencies for health and safety professionals to identify and control risks to psychological health.

It is important to note that regulators will never have the resources required to monitor and regulate every Australian business, and instead should consider how to target the organisations that have higher risks for psychological injuries. This includes building the capacity and skills of all professionals who play a role in addressing risks to the mental health of employees. For example, in 2018 the Victorian WorkCover Authority (WorkSafe) established a register of Organisational Psychology Services for the provision of services. The purpose of the register is to provide expertise and input across a range of health, safety and wellbeing strategies for Victorian workplaces.

## Recommendation 5: Use third parties to target organisations where employees are at a high risk of psychological injury

To facilitate regulatory outcomes, the APS recommends the government use third parties, such as health and safety professionals, health and safety representatives, and professional and industry associations to build capacity and address risks to the mental health of employees.

One key area for review is the level of guidance provided to employers to identify and manage psychosocial hazards. Several researchers have sought to review the effectiveness of work health and safety guidelines, and have generally found a lack of consultation with stakeholders and inadequate resources to assist employers with the implementation of guidelines and recommendations<sup>6</sup>. Two studies recently reviewed guidelines specific to mental health internationally, several were Australian. Both reviews suggest the guidelines often lack rigour, are somewhat ambiguous, lack sufficient evidence, provide insufficient practical advice and tools, and need to better articulate what employers are required to do by law, what they should do, and what they may consider doing<sup>6, 14</sup>. Given Safe Work Australia's recent publication of the new guideline *A Work-related psychological health and safety: A systematic approach to meeting your duties*,<sup>15</sup> the government should ensure effective implementation and evaluation of this guidance to achieve improved outcomes for the mental health of workers.

## Recommendation 6: Ensure guidance and reference material for employers is fit for purpose

The APS recommends the government ensure the effective implementation of guidance material for employers in sufficient detail so they are enabled to identify and manage psychosocial hazards.

## 4. What is your preferred option and why will it be best for you, your organisation and your stakeholders?

As outlined in the Boland review, recommendation 2 proposes to amend the model WHS Regulations to deal with how to identify the psychosocial risks associated with psychological injury and the appropriate control measures to manage those risks.

The APS recommends pursuing option 2, amending the regulations, and more broadly considering how changes to the legislative framework will be operationalised. Given the considerable burden of mental disorders in Australia and the significance of the workplace as a contributing factor, the APS believes that the Australian Government needs to amend the legislative framework for ensuring psychosocial safety in the workplace.

The APS agrees that amending the WHS Regulations will elevate the importance of managing risks to psychological health, and require employers to make a concerted effort to manage psychosocial hazards, as they are required to do for physical safety hazards. This occurs in a context where psychological health and wellbeing needs to be elevated and supported across the community and regulatory requirements will substantially contribute to the cultural change required to reduce mental health stigma and discrimination.

Addressing psychosocial hazards in the workplace requires more considered, flexible approaches than those adopted for physical hazards. Where measures to address physical hazards are often very tangible, with clear standards for the most effective controls, psychosocial hazards are more complex, and may manifest in different ways within different organisations. It is likely this complexity that has caused many organisations to be hesitant to implement systematic strategies to manage risks, not understanding how to identify hazards, how to assess potential and actual impacts to worker wellbeing, and what strategies will be most effective in mitigating these risks.

Psychologists are highly skilled in working with people to prevent, identify, formulate and treat mental health problems. This includes working within organisations to manage psychosocial risks and support a psychologically healthy workplace. However, improving the psychosocial risk profile across workplaces requires a multi-level approach including legal, social and cultural change. For example, research demonstrates that legal duties are a fundamental driver for addressing mental health at work<sup>13</sup> and experts agree that effective regulation is the best means of improving employer accountability for mental health. This means there needs to be a sufficient approach taken to hold employers accountable for meeting their obligations under work health and safety legislation. Implementing stronger provisions will require employers to protect the psychological health of workers and will stimulate a greater investment and focus into this critical area.

### Recommendation 7: Adopt option 2 to amend the regulations

The APS recommends pursuing option 2, amending the regulations, and more broadly considering how changes to the legislative framework will be operationalised. The APS also recommends that regulators will need to hold employers accountable for meeting their obligations to the psychological wellbeing of employees under work health and safety legislation.

### 5. Is the state of knowledge on psychosocial hazards, risks and control measures widely accepted and well established? Please support your answer with evidence.

There is a complex array of factors that increase risks to the mental health of workers, and it may not be possible to adequately address each of these within the legislative framework. However, policy makers and regulators need to strongly consider adopting evidence-based risk management strategies as they

emerge in the literature. This approach needs to be flexible to amendments as the evidence becomes available.

Psychosocial risk is derived from the way work is designed, organised, undertaken and managed, and from the interactions between workers and their social and physical working environment. Good risk management practices are typically targeted at preventing exposure to psychosocial hazards, eliminating hazards when they arise, or reducing exposure to such hazards.

There are several significant hazard areas with strong evidence underpinning impacts, indicators and control measures, some of which have been addressed under previous legislation through codes of practice. These include: work-related violence, workplace bullying, work-related fatigue, and work-related stress. Increasingly, remote and isolated work, operating under the influence of drugs and alcohol, and organisational change are a major concern in some industries. Remote and isolated work is currently addressed within the regulations, but the focus tends to be on the physical safety elements, including access to emergency services, rather than the mental health impacts associated with isolation and working away from home (i.e. FIFO work).

Psychosocial risk management is multi-layered. There are helpful resources available to assist organisations to understand the range of factors that could result in poor mental health outcomes for workers<sup>16</sup>. The primary hazard is generally not the problem in itself, but a symptom of other factors, or a cluster of work conditions that have increased risks. Such conditions may include (but are not limited to) experiences of poorly managed organisational changes, excessive work demands, insufficient resources or support, interpersonal conflict, leadership problems, or organisational injustice. To effectively implement strategies for managing workplace risks requires the ability to identify potential risk and implement appropriate organisational practices to mitigate risks. For example, there is a significant body of knowledge about the broad range of underlying factors and clear understandings of the mechanisms that cause employee stress. The challenge for many organisations is the complexity of psychosocial risks, understanding drivers of employee risk and then choosing the most appropriate mitigation strategy to implement.

Psychological evidence evolves with changing workplace environments however this is not a barrier for improving psychosocial risk management practice in Australia and continuous improvement is a required strategy for risk management. The evidence base for psychosocial risk management is derived from scientific research and also organisational data, the perspectives of stakeholders, and the experience and expertise of professionals<sup>17</sup>. Psychologists and particularly organisational psychologists, are trained to optimise employee and organisational performance, through analysing factors that impact on wellbeing, productivity and performance, and working with organisations to devise and implement strategies to address identified areas for improvement. Psychological expertise is critical to undertake organisational diagnostics, identify risks to employee wellbeing, determine root causes, assess potential solutions that will be fit-for-purpose for the organisation's context, implement solutions, and evaluate these to ensure they have been effective. Organisational psychology is the only profession in Australia that receives in-depth training in this area and is then regulated to ensure they practice in an ethical and evidence-based manner.

Mental health stigma, literacy and discrimination at the broader cultural level means employers often understand mental health as an individual issue which leads to the view that when employees are stressed they only need assistance to cope. However, to reduce the burden of mental health in Australia, broader and multi-level strategies are required. Strategies used by organisations need to include organisational level as well as individual level interventions (work and organisation design, leadership, culture etc.). Instead, due to the focus of available information, organisations have tended to concentrate efforts on the impact of mental health conditions once they emerge. Typically organisations focus on mental health in the workplace as it relates to being a 'mental health friendly' or 'mental health aware' workplace, as opposed to a workplace in which hazards to mental health are systematically identified and managed. For example, a report by PricewaterhouseCoopers investigated the return on investment of mentally healthy workplaces and the report is often cited as a key resource in organisational mental health strategy, and used to encourage organisations to invest in the mental health of their workers. However, the investigation did not include a focus on organisation level strategies and instead considered interventions in seven key areas that are predominantly targeted at the individual level (e.g. wellbeing programs, resilience training, health checks, and return to work programs). While the report has strengths its scope is limited.

#### Recommendation 8: Ensure the regulatory framework includes a requirement for multi-level strategies to address psychosocial risks in the workplace.

The APS recommends implementing a regulatory framework that requires employers to undertake strategies to manage psychosocial risks at the primary, secondary and tertiary level within an organisation

#### 6. Do you have suggestions for what prescriptive psychosocial regulations might look like?

The actions an organisation should take to address a psychosocial hazard cannot be prescribed in too much detail, due to the range of factors that will influence what works to control risks in any given situation. Reason's Swiss cheese model<sup>18</sup> for analyzing risk can be applied to formulating regulations in this case, with the goal in mind to mitigate any failures, accidents, or hazards. Using this model each layer of protection would come from primary, secondary, and tertiary prevention and intervention.

The APS would discourage taking a highly prescriptive approach to the regulation of psychosocial risk management. This could only serve to limit the options available to organisations in managing risks. The APS also suggests that organisations should ensure suitably qualified personnel are involved in the development of plans for the identification and management of psychosocial hazards. This will ensure that health and safety and human resource personnel are sufficiently supported to undertake such tasks where they do not have the appropriate training and capability to do so. In amending the regulations,

consideration should be given to stipulating that:

- A person conducting a business or undertaking must manage risks to the health and safety of a worker associated with exposure to psychosocial hazards, in accordance with requirements of the WHS Act
- A person conducting a business or undertaking must ensure a sufficient psychosocial safety management plan is in place, which should include details on how the working environment will be monitored to identify psychosocial hazards, how risks will be assessed, and the process to implement suitable controls
- Where a business employs 100 or more workers, the person conducting a business or undertaking will ensure a suitably qualified and competent person reviews the psychosocial safety management plan to ensure it is effective and meets minimum standards

In regards to point 3 above, the APS can provide guidance on who would be considered 'suitably qualified and competent' to assess the effectiveness of a psychosocial safety management plan.

## Further information about Recommendation 3: Continuously assess new industries, hazards and working arrangements

The APS support recommendation 3 suggesting that Safe Work Australia develop criteria to continuously assess new and emerging business models, industries and hazards to identify if there is a need for legislative change, new model of WHS Regulations or Codes.

Organisational psychology encompasses the area of practice known as Human Factors. Human Factors is "...a body of knowledge about human abilities, human limitations and other human characteristics that are relevant to...the design of tools, machines, systems, tasks and environments for safe, comfortable and effective human use" (p. 11)<sup>19</sup>. Where the safety of the employee is of concern, then Human Factors principles should be utilised to ensure that their safety is not compromised through the design of the equipment and workplace. Human Factors, therefore, also has implications with respect to performance and productivity efficiency.

Human Factors has two implications with regard to recommendation 3:

- When designing these new and emerging business models, the safety of the employees and end users should be considered. This is the field of Human Factors and therefore suitably qualified Human Factors experts need to be involved in these assessments. The integration of human factor experts will ensure the safety of the employee is adequately considered in relation to their performance and interaction with the systems at work.
- Due to their extensive knowledge and understanding of human behaviour and human performance in the workplace, experts should be involved with the assessment of risks and hazards in the workplace.

The expertise of the people involved in the identification of hazards for these new and emerging business

models and industries impact on the comprehensiveness of their findings, which in turn will determine the effectiveness of identifying and managing hazards and the safety of the employees. The risk associated with not including experts is not identifying and managing psychosocial risk factors. Experts with inadequate knowledge about why people behave (antecedents of performance), how people behave (components of performance) and the impacts of work on human behaviour (consequences of performance) may mean that any risk assessment or hazard identification process is biased and potentially ineffective.

## Conclusion

Thank you for considering our feedback. If you would like to discuss any aspects of this submission please contact [REDACTED] from our policy team by email or phone.

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