



4 March 2021

Ms Rachel Phillips
Chair
Psychology Board of Australia
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Email: psychologychair@ahpra.gov.au

Dear Rachel,

Education training and reform and PERG petition

Thank you for your letter dated 3 March 2021. Unfortunately, your letter raised more questions, than answers. I would like to reiterate that the Australian Association of Psychologists (AAPI) appreciates being invited to be involved in the Education and Training Reforms process and will continue to work in good faith and collaboratively in the process. As you are aware, AAPI represents its members and the broader psychology community and strongly advocates for equality, diversity and democracy in psychology.

AAPI has been deeply disappointed with the Psychology Board of Australia Education and Training Reforms to date. We have very serious concerns regarding the representatives appointed to the Psychology Expert Reference Group (PERG), the processes involved and the conduct of its activities. I have raised these concerns previously with you privately in email, letter and an online meeting, in the hope of having these resolved quickly and privately. Unfortunately, this did not occur. I will again raise our concerns with you.

AAPI only become aware of PERG well after it was formed. We immediately become concerned that membership of PERG was by personal invitation, rather than by open process publicly asking for those with the expertise the psychology board was seeking to apply.

You mention in your letter and other documentation that PERG members were selected for their expertise in training and supervising provisional psychologists, psychology regulation, and psychology accreditation. Coincidentally these matched the chair/president of the major bodies in psychology, except AAPI. This membership included 4 clinical psychologists, 2 psychology academics and 1 community member. I have included the PERG membership below.

- Ms Rachel Phillips (Clinical Psychologist) National Board Chair - Qld, and Chair of PERG
- Professor Jennifer Scott (Clinical Psychologist) National Board member - Tas
- Ms Julia Duffy Regional (Community Member) Board Community member - Qld
- Professor Caroline Hunt (Clinical Psychologist) and current president of the Australian Clinical Psychology Association (ACPA)
- Ms Ros Knight (Clinical Psychologist) recent former President (Ros was president at the time of her appointment), Australian Psychological Society (APS)
- Professor John Dunn (Psychology Academic) Chair, Australian Psychology Accreditation Council (APAC)
- Professor Renata Meuter (Psychology Academic) Chair, Heads of Departments and Schools of Psychology Association in Australia (HODSPA)

To date, the formation and work of PERG has been lacking in transparent and open processes. It is not transparent to state that PERG is already appointed with the capacity for inclusion of AAPI or others to be denied. It is not ethical to appoint a committee that has the appearance of bias. As we have discussed with you previously, the lack of appearance of being unbiased and lack of wide-ranging representation on PERG is extremely concerning. There is a lack of diversity on the panel including psychologists without endorsement, those holding endorsements in areas other than clinical psychology, indigenous representation or provisional psychologist representation.

It needs to be said that it has not gone unnoticed that the chosen individuals with the Board's desired skills set are not particularly unique. There are many psychologists who have been involved in senior levels of research into psychologists' capabilities and who had already conducted international research into training for psychologists and standards. There are many in the sector who have those skills and more, but not having an open application process has been and will continue to be seen as lacking transparency and fairness. For a stakeholder funded organisation, it is not simply whether bias exists that matters, it is whether it may reasonably be perceived to exist.

The noticeable perceived bias is that the hand selected participants of PERG have competing interests. For example, the psychology board hand selected and invited Professor Caroline Hunt, listed as an 'independent expert'. Professor Hunt was at the time of appointment to PERG a board member of the Australian Clinical Psychology Association (ACPA) and is currently the President of ACPA. This is an arguably non-independent expert, whose views about the education of psychologists have been in the public domain over many years.

You can read more about ACPA in their [mission statement](#) and their [objectives](#). In summary, ACPA is a member association for clinical psychologists and advocates for the rights of clinical psychologists.

For the Psychology Board to select and appoint either a board member or president of ACPA on PERG to advise the Board on the review of the competencies for general registration and call them an 'independent expert' is in my opinion unacceptable.

You mention in your letter dated 3 March 2021, that "PERG met six times in 2020 and held their final meeting in December 2020. The PERG has now completed its tasks and there are no future meetings of PERG planned." Then you refer to the PERG [Communiques](#) for further information. I will now refer to these communiques in more detail. There have been 2 communiques published.

The first communique was published on 8 September 2020, announcing the formation of PERG. In this communique, you include the following:

"The role of the Psychology Expert Reference Group (PERG) is to provide profession-specific advice to the Board on improving the competencies for general registration and to recommend draft revised competencies to the Board for public consultation in late 2021. The members of the PERG have expert knowledge about the competencies required by psychologists for safe practice, and represent the areas of accreditation, training, regulation and national professional peak organisations in psychology."

I would like to bring to your attention that AAPi is a national professional peak organisation in psychology and despite, for example, AAPi president Anne Marie Collins having decades of experience as a psychologist, senior leadership experience, experience in training and regulation and supervision of clinicians as well as a law degree and further legal practice qualifications, neither Anne Marie nor any other representative from AAPi were invited to participate. AAPi is intimately aware of the issues of psychologists and AAPi is best placed to determine and contribute to any sound review of competencies for registered psychologists.

In the second communique published on 13 January 2021, there is **no mention** of PERG having completed its tasks and **no mention** of no further meetings planned. It seems to imply the opposite by listing the next steps to be completed, that include:

- Seeking the opinion of targeted stakeholders on the early draft competencies, including Aboriginal and Torres Strait Islander Peoples, consumer groups, industry, and the profession.
- Making any subsequent adjustments to the draft revised competencies for general registration based on this advice, and
- Conducting public consultation on the draft revised competencies for general registration later in 2021.

Having convened PERG in September 2020, it seems very unusual that PERG completed its tasks for such an important reform, in December 2020 with no further meetings planned despite having next steps and further input to consider.

Could you respond to the following:

1. Were PERG members required to disclose any conflicts of interest?
2. Are PERG members being paid by the Psychology Board or any other body for their involvement in PERG?
3. We assumed meetings were minuted as per usual professional protocol and we seek immediate receipt of such.
4. Has preliminary information on draft recommendations been shared with organisations the PERG members are associated with such as the APS and ACPA?

Psychology continues to be a deeply divided profession and PERG further contributes to this destructive divide. The Psychology Board Education and Training Reforms should be an opportunity to help unite psychologists for the betterment of the profession and address the pressing and vital issues of supply and access of psychology services for the public. However, with fundamental flaws in processes such as the appointment of PERG membership, major fractures in psychology will continue to the detriment of the Australian public and their mental health. The process and appointment of PERG exacerbates the valid concerns of the majority of psychologists, who are not valued nor considered apart from a review process about them but not with them. Any future reference group should be properly representative of the psychologists it reviews. AApi has a responsibility to represent our members. This is what we are doing and will continue to do.

I appreciate your offer to once again meet to discuss this further and I can be contacted as per below with your earliest availability.

Regards,



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