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Dear Mr Harvey

**Submission re: PACFA Final Report on Best Practice Self-Regulation Model for Psychotherapy and Counselling in Australia.**

La Trobe University is a major provider of postgraduate level degree courses in counselling and psychotherapy, alongside its courses in allied health and public health. The University's Faculty of Health Sciences currently offers the following courses:

- Graduate Diploma and Masters Degrees in Counselling and Human Services;
- Masters and Doctoral Degrees in Counselling Psychology,
- Professional Doctorate in Clinical Sciences (Counselling & Psychotherapy)
- Graduate Diploma and Masters Degrees in Art Therapy
- Masters Degree in Clinical Family Therapy
- Master Degree in Couple and Relationship Counselling
- Graduate Certificate in Family Therapy<sup>1</sup>
- Graduate Certificate in Family Therapy in Psychiatry
- Graduate Certificate in Systemic Supervision, Consultation and Training
- Masters Degree in Gestalt Therapy

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<sup>1</sup> Including, so far as I am aware, the first ever Graduate Certificate in Family Therapy for Indigenous workers

As long-standing educators in this discipline area, we welcome the Report which provides an informative and wide-ranging overview of the state of the profession in Australia and issues affecting regulatory control. The report provides an excellent review of the literature and models of regulation. It also provides helpful data on the professional workforce and professional bodies.

This submission seeks to highlight our view that the profession is at a crucial cross-roads in its development. There has been a very rapid expansion of training providers offering courses of widely varying standards. As noted in PACFA's supplementary submission, two-thirds of Australian Universities offer degree courses in counselling and psychotherapy, most of these at postgraduate level. There are an equal number of private training providers, many accredited by state government higher education authorities. These courses struggle to provide adequate practical training experience, appropriate supervised placements and there are few established pathways into suitable employment. Potential students are confused about how to select an appropriate course and how to find employment following training. Employers also have difficulty in determining what constitutes an appropriate training, and counsellors often accept lower award conditions than other allied health practitioners with an equivalent level of training, because of this lack of clarity and regulation. This situation is inequitable.

Our profession falls between the allied health and mental health portfolios, although our practitioners are trained to work within both these areas. The counselling and psychotherapy training programs are located alongside allied health training programs, yet are not recognised by allied health or mental health policy makers. With the growing mental health crisis, counselling and psychotherapy need to be seen as an essential and valuable professional group in meeting the mental health and wellbeing needs of the community. For this to happen, there needs to be greater regulation of the field and clearer structures to support training, supervised placements and pathways into employment.

PACFA has made a significant contribution to defining appropriate training standards and establishing sound self-regulatory structures and processes. However, self-regulation models lack sufficient incentives to unite the whole profession and ensure adequate protection to the public. While PACFA provides a valuable role in regulating nearly 40 professional associations, the report makes it clear that there are a number of associations that have remained outside attempts to create a unified self-regulatory structure.

We would therefore argue that a national statutory approach to regulation is required to ensure that the profession has consistent clear standards and mechanisms for protecting the public. Regulation is also important to prevent those practitioners who have been deregistered from other health professions from practising as a counsellor or psychotherapist.

## RECOMMENDATIONS

We welcome the opportunity to review the report and speak to the need for regulation, and would make the following recommendations:

That the Practitioner Regulation Sub-Committee of the Health Workforce Principal Committee:

1. Review the need for a national statutory regulation model for the Counselling and Psychotherapy profession.
2. In the interim, provide recognition to the current registration model adopted by PACFA, and the unified structure being proposed jointly by PACFA and the ACA. Government incentives should be used to facilitate a comprehensive registration process for counsellors and psychotherapists, distinguishing between tertiary trained professionals and those who have Diploma and other non-degree levels of training, as well as distinguishing those who meet the mental health workforce standards.

We would also recommend that consideration be given to the following issues:

1. Graduate and postgraduate trained counsellors and psychotherapists should be recognised as an allied health profession.
2. Graduate and postgraduate trained counsellors and psychotherapists who meet the mental health competency standards should be recognised as part of the mental health workforce.
3. Regulation needs to be linked to clearer pathways into supervised internship training and employment pathways.
4. A national course accreditation scheme for accrediting counselling and psychotherapy courses is needed to assess how courses meet the particular needs of the profession.
5. Research is needed to map counselling and psychotherapy training requirements and curriculum against the National Practice Standards for the Mental Health Workforce.
6. Research is also needed to define practitioner competencies and training requirements for work in different contexts and different levels of difficulty or specialism.
7. More research is needed to evaluate the effectiveness of a broad range of counselling and psychotherapy practice.

I would be happy to speak further to this submission or provide any additional information that might be helpful.

Yours Sincerely

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