

Mr Dan Harvey
Service and Workforce Planning Branch
Department of Human Services
GPO Box 4057
Melbourne 3001

28.8.08

Dear Mr Harvey,

I am writing on behalf of the Australian Centre for Psychoanalysis (ACP), a Member Association (MA) of the Psychotherapy and Counselling Federation of Australia (PACFA), in its Psychoanalysis and Psychoanalytic Psychotherapy section. Our preferred regulatory model is statutory regulation of the professions of Psychotherapy and Counselling. We understand that this is not a government priority at present, and as a consequence we support a self-regulatory model as an interim measure.

The research that grounds Professor Schofield's report on best practice self-regulation of psychotherapy and counselling is very valuable. We believe, however, that the inclusive national credentialing system, the Australian Register of Counsellors and Psychotherapists (ARCAP), since developed by PACFA and the Australian Counselling Association (ACA), has the advantage of being a collaborative project that brings a great number of psychotherapists and counsellors together within a single structure. ARCAP requires observance of, and adherence to, training standards, codes of professional conduct and ethics, insurance requirements, and continued supervision and professional development. ARCAP is strongly supported by the ACP and, on the evidence of the PACFA AGM of August 23-24, 2008, of all the Member Associations.

Many highly qualified members of PACFA MAs have been sorely disadvantaged economically in recent times by the triple burden of GST, no Medicare rebate through the Better Access initiative, and no private health care rebate. In the ACP, most of those who qualify for Clinical or Provisional registrations of ARCAP are Psychologists or Social workers who have since trained as psychoanalysts and who are eligible for GST exemption and rebates. Those who have trained as psychoanalysts and are not of those professions, but do have PhDs, Masters or graduate degrees in related fields, are not eligible for such benefits. All our clinical members have undergone many years of rigorous training in psychoanalytic theory and practice, and engage in continuing professional development, but not all are recognised as health professionals. There is clearly an inequity here. The ACP considers that the establishment of ARCAP, and the protection of the titles "ARCAP Psychotherapist" and "ARCAP Counsellor", will provide both a structure within which the professions of psychotherapy and counselling can grow in strength, and a guarantee of high quality training. We hope this will lead to recognition of the professions' significant role in mental health care. At the very least, we trust that the acknowledgement that psychotherapists and counsellors are qualified and skilled mental health practitioners, often working in concert with doctors and psychiatrists, may lead to GST exemption.

ARCAP is the product of extensive consultation between PACFA and ACA, as well as within and between PACFA MAs. The Working Party chaired by Professor Peter Baume, with the CEOs and Presidents of PACFA and ACA, has produced a self-regulatory model that takes into account the views of a diverse constituency and protects the training standards and ethical practices that are the core of the professions of psychotherapy and counselling.

Yours sincerely,

Dr Susan Schwartz,

Secretary,

Australian Centre for Psychoanalysis,

PO Box 509, Carlton South 3053