



RESPONSE TO:

**Best Practice Self-Regulation Model for Psychotherapy and  
Counselling in Australia**

Response to The Department of Human Services invitation to Member Associations and interested parties to make submissions on the Report and findings prepared by Professor Margot Schofield on Best Practice Self-Regulation Models for Psychotherapy and Counselling in Australia.

Mr Dan Harvey  
Service and Workforce Planning Branch  
Department of Human Services  
GPO Box 4057  
Melbourne 3001  
[practitioner.regulation@dhs.vic.gov.au](mailto:practitioner.regulation@dhs.vic.gov.au)



1. As an independent, state based professional counselling association and a member association of the Australian Counselling Association (ACA), the Federation of Victorian Counsellors (FVC) was not approached to contribute to this report in any manner.
2. The FVC represents many Counselling Professionals whose membership requirements parallel those of the ACA and are bound by the same or similar Codes of Practice.
3. The FVC represents those professionals qualified as Counsellors from Certificate IV level and above.
4. The FVC does not represent those professionals who claim counselling as part of their practice without necessarily having completed a recognized qualification at AQTF standards.
5. The FVC wishes to have noted that other professionals practicing and claiming counselling status from a psychological, medical or social field of training need not have completed an accredited counselling qualification. Individually, they may or may not have completed an element of counselling within their primary qualification and yet are gaining the benefits of counselling recognition and declaring representation of the counselling industry. Professional counsellors are an individual industry within the allied health industry.
6. The FVC endorses the principle of accredited and recognized Counselor training and accreditation through a national registration process that involves the registration of counsellors at all levels of qualification at AQTF standards, who belong to professional bodies, undertake regular supervision, have ongoing professional development and have a suitable professional and public liability insurance provision.

7. As an organisation that represents many rural and regional country practitioners, the process of registration should be mindful of the differences not only in all levels of qualification but the ability and practicability to attend supervision and ongoing professional development. Therefore, such conditions imposed should be firm and flexible rather than stringent and restrictive.
8. With these points, the FVC endorses, in principle, the response submitted by the Australian Counselling Association (ACA) to the Best Practice Self-Regulation Models for Psychotherapy and Counselling in Australia:

1. The Boards of ACA and PACFA recommend that the Practitioner Regulation Sub-Committee of the Health Workforce Principal Committee review the proposed single national credentialing system for unregulated health professions that has been adopted in principle for ARCAP by the Counselling and Psychotherapy professions and recommend its acceptance as a transitional model for these professions until an alternative statutory regulatory model has been presented for wider community consultation in respect of any subsequent national registration system.
2. That the AHMAC accept that if statutory regulation is not a readily available option, that the alternative self-regulatory single national credentialing system for counsellors and psychotherapists be adopted as an interim measure to obviate discrimination in government policy and practices between regulated, partially regulated and as yet unregulated health and allied health professions.

Barbara Matheson  
President FVC  
MFVC CMACA MNALAG

John Dunn  
Vice President FVC  
FFVC CMACA