



PSYCHOTHERAPY
AND COUNSELLING
FEDERATION OF
AUSTRALIA

PACFA Response to the Higher Education Support Amendment (Job-Ready Graduates and Supporting Regional and Remote Students) Bill 2020

Submission to the Senate Standing
Committees on Education and
Employment (Legislation Committee)

September 2020

Psychotherapy and Counselling Federation of Australia

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About PACFA

The Psychotherapy and Counselling Federation of Australia (PACFA) is a leading national peak body for counsellors and psychotherapists. Our mission is to represent the profession to communities and government, and to develop the evidence-base relating to the practice of counselling and psychotherapy.

PACFA promotes the development of the practice of counselling and psychotherapy and respects and supports the diversity of approaches within the profession. PACFA provides a united forum for counsellors and psychotherapists, and for counselling and psychotherapy associations, to foster professional identity for practitioners, support research and training, and ensure public accountability to consumers, the public and government.

Introduction & Key Recommendations

PACFA thanks the Senate Standing Committees on Education and Employment for the opportunity to respond to the Australian Government's investment in higher education through the Job-Ready Graduates Higher Education Reform Package.

Our previous submission in response to the Higher Education Reforms Package draft legislation is provided as [Appendix A](#), below. PACFA is providing this further response to raise serious concerns regarding subsequent amendments to funding in the draft legislation, which will result in study towards professional qualifications in Counselling or Psychotherapy costing 1.8 times those of equivalent mental health professions, while Government contributions to study drop by 90 percent.

The draft legislation currently before the Senate fails to recognise the status of registered Counsellors and Psychotherapists as appropriately regulated allied professionals with unique skills and attributes. This submission identifies significant threats posed by funding reforms to future workforce sustainability and notes the imperative for alignment with the broader reform agenda for Mental Health and Suicide Prevention. PACFA makes the following recommendations for reform:

Recommendation 1:

The Australian Government should amend the Higher Education Reforms Package to provide consistent recognition of training pathways across the diverse and multi-disciplinary mental health workforce through the immediate creation of a Professional Pathway Counselling and Psychotherapy.

Funding for the Professional Pathway Counselling and Psychotherapy should be provided at Government Contribution Cluster 2 (\$13,250) and Student Contribution Band 2 (\$7,950).

Recommendation 2:

Finalisation of the Higher Education Reforms Package should be informed by the broader Mental Health and Suicide Prevention agenda, with a particular focus on future mental health workforce requirements.

PACFA recommends that the Australian Government engage with the National Mental Health Workforce Strategy Taskforce and other experts to discuss the Higher Education sector's capacity to respond to increased demand for mental health workers, including the costs of training, future workforce training requirements and integrated approaches to training.

The Counselling and Psychotherapy Profession

Counselling and Psychotherapy training is a unique form of relational training which distinguishes Counsellors and Psychotherapists from mental health professionals trained in other disciplines who also provide counselling services. Counsellors and Psychotherapists are trained and experienced in delivering person-centred services, supporting clients to develop their own understanding of their experiences, and facilitating clients' recovery process.

The curriculum of Counselling and Psychotherapy training focuses on the reflective-practitioner model which fosters accountability through reflexivity and ongoing supervision. This model, alongside the profession's strong focus on ethical practice, its commitment to recovery-oriented care, and the regulation provided for the profession by PACFA and the Australian Counselling Association (ACA), ensure protection to clients, carers and families.

Although counselling and psychotherapy overlap, there are also some differences. Counselling focuses on enhancing people's capacity to cope with specific life challenges such as relationship endings, bereavement, and anxiety. Seeing a counsellor helps people resolve crises, reduce distress, develop goals for change and improve wellbeing. Psychotherapy focuses to a greater extent on helping people achieve better self-understanding and to change long-standing patterns of behaviour that may be disrupting relationships, work and study.

Using their specialised relational skills, Counsellors and Psychotherapists have the capacity to support clients presenting with a range of mild to moderate through to more complex mental health issues and are able to work with, and within, multi-disciplinary mental health teams.

While some other health professions approach mental health using a medical model, professional practice for Counsellors and Psychotherapists is based on a non-medical, biopsychosocial model. Counselling focuses on the treatment and prevention of mental illness, while actively promoting mental health and wellbeing.

Standards and Regulation for Counselling and Psychotherapy

Counselling and Psychotherapy is one of a large number of health and allied health professions that are considered safe to be self-regulating, with a range of industry-based regulatory mechanisms in place to support self-regulation.

Like Social Workers and other highly skilled allied health professionals, national registration as a Counsellor or Psychotherapist with PACFA or the ACA requires a process of verification to ensure that training, qualifications, and supervised experience meet required standards.

Regulation mechanisms also ensure that once registered, practicing Counsellors and Psychotherapists meet annual supervision and professional development requirements, insurance requirements, adhere to Codes of Ethics for Counsellors and Psychotherapists and compliance with complaints handling processes.

The [PACFA Training Standards 2018](#) specify that tertiary education and training in counselling and psychotherapy must be undertaken in a qualification approved by the Australian Skills Quality Authority (ASQA) at either the undergraduate or postgraduate levels (AQF level 7 to 9). For a training program to be recognised by PACFA, the core curriculum must focus on counselling and/or

psychotherapy and must include subject knowledge, skills, and application of knowledge and skills. There must be a significant component in the curriculum of experiential learning and practical training in counselling and psychotherapy skills and interventions, and a requirement to undertake supervised client hours during training.

PACFA has established a course accreditation program to support high standards in counselling and psychotherapy education and to help students choose quality training courses for their counselling or psychotherapy training. Accreditation of any undergraduate or postgraduate course by PACFA specifies a minimum volume of learning requirements for specialised Counselling or Psychotherapy curriculum content, hours of instruction and supervised practice. Details of [PACFA Accredited Courses](#) are available on the PACFA website.

Workforce Participation & Careers in Counselling and Psychotherapy

Graduate Counsellors and Psychotherapists registered with PACFA or the ACA use their unique training and skills as pathways to careers in mental health and human service agencies, educational institutions, private practice, government, business and industrial settings. Counsellors and Psychotherapists are employed in a diverse range of sectors, including the government, non-government and private sectors.

In the public sector, Counsellors and Psychotherapists are now eligible to sub-contract rehabilitation services under NSW workers compensation (SIRA) to provide services to victims of crime, including childhood sexual abuse in selected jurisdictions, and to be engaged as Counsellors in government funded schools in some states and territories. Registered Counsellors and Psychotherapists are also eligible to provide therapeutic supports under the National Disability Insurance Scheme.

Opportunities for work in the private sector have broadened with the recognition of Counsellors and Psychotherapists by a range of significant private providers including many of Australia's largest Employee Assistance Programs and an increasing number of Private Health Funds, in addition to their employment as in a range of independent and private schools across Australia.

There remains ample scope for the future expansion of supports provided by Counsellors and Psychotherapists under state and territory funded initiatives. Counsellors and Psychotherapists have the therapeutic skills and experience to deliver a wide range of services to the community in relation to mental health, including counselling for victims of family violence and sexual abuse, school counselling, support for recovery for people covered by traffic accident and workers' compensation schemes.

Impact of Higher Education Reforms on Professional Pathways in Counselling & Psychotherapy

Under the Australian Standard Classification of Education, professional training pathways for a range of mental health workforce professions including Counselling and Psychotherapy, Social Work and Psychology are all classified under “ASCED 09 - Society and Culture”.

PACFA’s initial assessment of the Higher Education Reform Package’s [Impact on Training Costs](#) in our August submission emphasised the substantial negative impact of funding reforms across mental health professions listed as ASCED 09, which saw an exponential rise in student fee contributions coupled with a 90 percent decline in Government contributions.

Subsequent to our August submission, the Coalition Government announced amendments to the Higher Education Package legislation to create the disciplines of Professional Pathway Psychology and Professional Pathway Social Work. This change will set units of study for the new Professional Pathways at Commonwealth Government Contribution cluster 2 (now \$13,250) and Student Contribution Band 2 (now \$7,950).

While PACFA commends the Coalition Government’s commitment to protecting the future workforce supply of Social Workers and Psychologists, we have significant concerns regarding both the immediate and long term-impact impact of the amended funding reforms, both for the Counselling and Psychotherapy profession and for the sustainability of a diverse and multi-disciplined Australian mental health workforce. An assessment of the funding changes to both student and Commonwealth Government contributions is provided below.

Table 1: Higher Education Funding Reforms to Student Fee Contributions

Discipline	Student Contribution per full time year of study			
	Current	Proposed	Impact	
			Cost	%
Social Work & Psychology	Band 1: \$6,804	Band 2: \$7,950	+\$1,146	+ 17%
Counselling & Psychotherapy	Band 1: \$6,804	Band 4: \$14,500	+\$7,698	+ 113%

While out-of-pocket costs for students will rise across all three disciplines under the proposed reforms, the introduction of Professional Pathways means that Social Work and Psychology students will now face only a modest **17 percent increase** in fees.

By contrast, the **113 percent increase** to fees for Counselling and Psychotherapy will have a significant negative impact for students, who face out-of-pocket students costs **\$7,698 higher** per full-time year than under current funding arrangements.

The differential impact on student fees between mental health disciplines will create a strong disincentive for students to undertake professional qualifications in Counselling and Psychotherapy, which will now come at a cost to students **1.8 times higher** than pursuing Professional Pathway training in Social Work or Psychology.

PACFA has significant concerns regarding both the immediate and long-term impact of the Higher Education Reform Package for Counselling and Psychotherapy students and for the mental health

workforce as a whole which already faces significant workforce shortages, particularly in rural and remotes areas.

The immediate impact of reforms to funding classifications is the creation of significant disincentives for student enrolment in Counselling and Psychotherapy units of study at the undergraduate level, and to enrolment in Counselling and Psychotherapy graduate courses.

Those students who choose to commit to training in Counselling and Psychotherapy will now face either significantly higher immediate costs for attaining a professional qualification or will enter the graduate workforce with relatively higher levels of accrued student debt than their counterparts in other mental health professions.

Table 3: Higher Education Funding Reforms to Government Contributions

Discipline	Government Contribution per full time year of study			
	Current	Proposed	Impact	
			Cost	%
Social Work & Psychology	Cluster 2: \$11,015	Cluster 2: \$13,250	+\$2,235	+ 20%
Counselling & Psychotherapy	Cluster 2: \$11,015	Cluster 1: \$1,100	-\$9,915	- 90%

Current funding arrangements provide equity in Government funding contributions to the costs of delivering training across all three disciplines. However, under the amended Higher Education Reforms Package, Government contributions to Counselling and Psychotherapy training will **drop by 90 percent**, posing significant challenges to ensuring the continued delivery of accredited Counselling and Psychotherapy courses.

Government contributions to the cost of providing training in Counselling and Psychotherapy will be \$9,915 lower per year while for Social Work and Psychology they will rise by \$2,235, resulting in a funding differential of **\$12,150 per year** between disciplines.

The proposed funding reforms will create a significant disparity between disciplines, with the Commonwealth Government's relative contribution to the cost of delivering training in Counselling and Psychotherapy **dropping from 100 percent to only 29 percent** of contributions towards Professional Pathway training in Social Work or Psychology.

The very substantial differential impact of the proposed funding reforms will have negative consequences for students and training providers and pose a threat to ensuring and adequately skilled and multi-disciplinary future workforce to provide crucial mental health and social assistance supports to all Australians.

Recommendation 1

The Australian Government should amend the Higher Education Reforms Package to provide consistent recognition of training pathways across the diverse and multi-disciplinary mental health workforce through the immediate creation of a Professional Pathway Counselling and Psychotherapy.

Funding for the Professional Pathway Counselling and Psychotherapy should be provided at Government Contribution Cluster 2 (\$13,250) and Student Contribution Band 2 (\$7,950).

Mental Health Workforce Shortages

There are currently shortages in the mental health workforce nationally. People who seek mental health services from psychologists may experience limited availability and long waiting times for initial appointments and between sessions in some metropolitan areas and other areas with low service access and high levels of underlying mental health need, such as rural and regional Australia. This leads to potentially prolonged psychological distress, contributes to disruption in treatment and increases therapy drop-out rates, which in turn increases the likelihood of future mental health issues.

Counsellors and Psychotherapists are an underutilised part of the mental health workforce with the potential to help address these workforce shortages. The pathway for training in Counselling and Psychotherapy is shorter than some other mental health career pathways, making it an attractive option for prospective students, and an effective way to help address national workforce shortages.

The Counselling and Psychotherapy profession is participating in the development of a new [National Mental Health Workforce Strategy](#) to ensure the important contribution of Counsellors and Psychotherapists is understood and harnessed.

National mental health priorities

The Higher Education Reforms Package is being introduced at a time of significant long-term reform in Mental Health and Suicide Prevention and coincides with the development of national plans and strategies to expand and substantially reshape Australia's mental health workforce.

PACFA's earlier submission provides details of current national priorities in Mental Health and Suicide Prevention, with a particular focus on reshaping the Mental Health Workforce. See: [A Coordinated Approach to Australia's Future Mental Health Workforce](#).

As a peak organisation for the Counselling and Psychotherapy profession, PACFA sees an imperative for alignment of the Higher Education Reforms Package with existing national reform priorities, including the Australian Government's commitment to a long-term National Mental Health and Suicide Prevention Strategy.

Recommendation 2

Finalisation of the Higher Education Reforms Package should be informed by the broader Mental Health and Suicide Prevention agenda, with a particular focus on future mental health workforce requirements.

PACFA recommends that the Australian Government engage with the National Mental Health Workforce Strategy Taskforce and other industry experts to discuss the Higher Education sector's capacity to respond to increased demand for mental health workers, including the costs of training, future workforce training requirements and integrated approaches to training.



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PACFA promotes the development of the practice of counselling and psychotherapy and respects and supports the diversity of approaches within the profession. PACFA provides a united forum for counsellors and psychotherapists, and for counselling and psychotherapy associations, to foster professional identity for practitioners, support research and training, and ensure public accountability to consumers, the public and government.

Executive Summary & Recommendations

PACFA welcomes the Australian Government's investment in higher education reform through the Job-Ready Graduates Higher Education Reform Package. However, as a peak organisation for the Counselling and Psychotherapy professions, we have serious concerns regarding the funding reforms outlined in the draft legislation, which will result in significantly higher course fees and create a disincentive for enrolment across a range of mental health professions.

In this submission PACFA assesses the impact of the proposed funding reforms on Counselling and Psychotherapy and other mental health professions, provides context for the dangers posed by these funding changes within the broader reform agenda for Mental Health and Suicide Prevention, and makes the following recommendations for reform:

Recommendation 1:

The Australian Government must prioritise amendments to the Higher Education Reforms Package to ensure a sustainable, diverse and multi-disciplinary mental health workforce through a consistent approach to funding across all mental health professions. PACFA recommends that all mental health professions are classified as Government Contribution Cluster 2 and Student Contribution Band 2 qualifications, with the exemption of Mental Health Nursing (Cluster 3/Band 1) and Clinical Psychology (Cluster 2/Band 1).

Recommendation 2:

Finalisation of the Higher Education Reforms Package should be informed by the broader Mental Health and Suicide Prevention agenda, with a particular focus on future mental health workforce requirements.

PACFA recommends that the Department of Education, Skills and Employment engage with the National Mental Health Workforce Strategy Taskforce to discuss the Higher Education sector's capacity to respond to increased demand for mental health workers, including the costs of training, future workforce training requirements and integrated approaches to training.

Supporting a Diverse and Multi-Disciplinary Mental Health Workforce

PACFA has prepared this submission to the Australian Government Job-Ready Graduates Package Draft Legislation Consultation in order to voice our serious concerns about the potential impact of the proposed higher education funding reforms on the future of Australia’s mental health workforce.

The Australian Government Job-Ready Graduates Package draft legislation proposes sweeping reforms to Commonwealth Grant Scheme funding clusters which are intended to streamline tertiary funding and provide target investment in a sustainable and skilled future workforce. However, the reforms take an inconsistent and potentially damaging approach to funding classifications across mental health professions.

Training Pathways for the Mental Health Workforce

Under the Australian Standard Classification of Education (ASCED), training pathways for a range of mental health workforce, including counselling and psychotherapy, are classified under “Society and Culture”. Counselling (including psychotherapy) as well as Social Work and Psychology are three alternative pathways to the mental health workforce and all fall within Funding Cluster 1 and Student Contribution Band 4.

Table 1: Mental Health Workforce Professions in the ASCED

06	HEALTH
0603	NURSING
	060305 Mental Health Nursing
0617	REHABILITATION THERAPIES
	061703 Occupational Therapy
09	SOCIETY AND CULTURE
0905	HUMAN WELFARE STUDIES AND SERVICES
	090501 Social Work
	090513 Counselling (& Psychotherapy)
0907	BEHAVIOURAL SCIENCE
	090701 Psychology

Source: Australian Bureau of Statistics, [Australian Standard Classification of Education](#)

Cost of Training for the Mental Health Workforce

Training to enter the mental health workforce across a diverse range of professions should be prioritised in the Higher Education Reform Package. The Higher Education Reforms Package proposes a streamlined funding system, which simplifies of Government contributions to the cost of tertiary qualifications by halving the number of Cluster categories from 8 down to 4.

The simplified funding system provides incentives to address workforce shortages in a range of professions including Mental Health Nursing and Clinical Psychology and provides substantial Government contributions towards study in selected mental health professions, including Clinical Psychology, Occupational Therapy and Mental Health Nursing.

In comparison, other mental health professions including Counselling and Psychotherapy, Psychology and Social Work will experience an exponential rise in student fee contributions, with the out-of-pocket costs of tuition more than doubling, while receiving insubstantial Government contributions of only \$1,100 per full-time year of study.

The cost of training to enter many professions in the mental health workforce will be significantly higher than for professions that are classified under “Allied Health” or “Other Health” in the ASCED. The differential impact on the mental health professions is highlighted in Table 2 below.

Table 2: Impact of funding reforms on costs for Mental Health Workforce Professions

Australian Standard Classification of Education (ASCED)	Full-Time Student Contribution Per Year		
	Current	Amended	Difference
09 SOCIETY AND CULTURE			
090501 Social Work	\$6,804	\$14,500	+ \$7,698
090513 Counselling (& Psychotherapy)	\$6,804	\$14,500	+ \$7,698
090701 Psychology	\$6,804	\$14,500	+ \$7,698
090701 Clinical Psychology	\$6,804	\$3,700	- \$3,706
06 HEALTH			
060305 Mental Health Nursing	\$6,804	\$3,700	- \$3,706
061703 Occupational Therapy	\$9,698	\$7,700	- \$1,998

There is a perverse impact when entire classification categories from the ASCED are allocated to clusters and bands in the proposed Higher Education Reform Package. The cost of studying counselling or psychotherapy will go up from \$6,805 to \$14,500 per year and the same price increase will apply to Social Work and Psychology.

Qualifications in Clinical Psychology and Mental Health Nursing have been prioritised in the Higher Education Reform Package, but this is not an adequate response to address the training needs of the Australian mental health workforce.

No clear rationale was been provided in the Government’s Job-Ready Graduates Discussion Paper for decreasing the cost to training in other health professions, while increasing the cost of training for the mental health professions.

Only Postgraduate training in Clinical Psychology has been prioritised in the Higher Education Reform Package, even though it would also be classified under “Society and Culture” under the ASCED. Clinical Psychology education will experience a price decrease of \$3,104 (down 45.62%). However undergraduate psychology training would be at a very high cost (\$14,500 per year, like all other mental health training options) in order to enter postgraduate Clinical Psychology training.

Australia’s mental health workforce is diverse and multi-disciplinary. It is not adequate to only prioritise Clinical Psychology in the Higher Education Reform Package as the mental health workforce is a diverse and multi-disciplinary workforce, not just a workforce of Clinical Psychologists.

A higher education system which addresses existing workforce shortages and promotes the development and expansion of a diverse and multi-disciplinary mental health workforce is crucial to achieving the objectives of Australia’s national mental health reform agenda.

Recommendation 1

The Australian Government must prioritise amendments to the Higher Education Reforms Package to ensure a sustainable, diverse and multi-disciplinary mental health workforce through a consistent approach to funding across all mental health professions.

PACFA recommends that all mental health professions be classified as Government Contribution Cluster 2 and Student Contribution Band 2 qualifications, with the exemption of Mental Health Nursing (Cluster 3/Band 1) and Clinical Psychology (Cluster 2/Band 1).

A Coordinated Approach to Australia's Future Mental Health Workforce

As a national peak body for the Counselling and Psychotherapy professions, PACFA sees an imperative for the alignment of higher education reforms with existing national reform priorities, including the Australian Government's commitment to a long-term National Mental Health and Suicide Prevention Strategy.

The Higher Education Reforms Package is being introduced at a time of significant long-term reform in Mental Health and Suicide Prevention and coincides with the development of national plans and strategies to expand and substantially reshape Australia's mental health workforce.

The Australian Government has made a long-term commitment to addressing Mental Health and Suicide Prevention as a national reform priority and a higher education system which addresses existing workforce shortages and promotes the development and expansion of a diverse and multi-disciplinary mental health workforce is crucial to achieving the objectives of Australia's national mental health reform agenda. Current Mental Health and Suicide Prevention reform activities at the national level include:

Productivity Commission Inquiry into Mental Health

The Productivity Commission submitted the Final Report for the *Inquiry into the social and economic benefits of improving mental health* to Government in June 2020. The report and Government response, due for release in October 2020, will include a number of recommendations to expand and diversify the mental health workforce.

Link: [Productivity Commission Inquiry into Mental Health](#)

Fifth National Mental Health and Suicide Prevention Plan

The Fifth Plan represents commitment from all governments to work together to achieve integrated planning and service delivery of mental health and suicide prevention related services.

Link: [Fifth National Mental Health and Suicide Prevention Plan](#)

Vision 2030 for Mental Health and Suicide Prevention: a blueprint for mental health in Australia

The National Mental Health Commission is currently finalising *Vision 2030 for Mental Health and Suicide Prevention: a blueprint for mental health in Australia*.

One of *Vision 2030's* key objectives is to move towards a social and emotional wellbeing approach to mental health. This shift will involve a substantial expansion and diversification of the mental health workforce and result in a multidisciplinary focus on mental health across a very broad range of professions.

Link: [Vision 2030 for Mental Health and Suicide Prevention: a blueprint for mental health in Australia](#)

National Mental Health Workforce Strategy

Development of the National Mental Health Workforce Strategy commenced in January 2020 and is of particular relevance to the Higher Education Reforms Package.

The Taskforce leading the development of the National Mental Health Workforce Strategy has been asked to consider the quality, supply, distribution and structure of the mental health workforce and identify practical approaches that could be implemented by Australian governments to attract, train and retain the workforce required to meet the demands of the mental health system in the future.

The Taskforce includes a working group looking at Workforce Training and Education, which will conduct a review of the capacity of educational institutions in the tertiary, vocational and community education sectors to respond to increased demand for mental health workers, with a discussion on training requirements and incentives for employers to provide training.

Link: [National Mental Health Workforce Strategy](#)

Recommendation 2:

Finalisation of the Higher Education Reforms Package should be informed by the broader Mental Health and Suicide Prevention agenda, with a particular focus on future mental health workforce requirements.

PACFA recommends that the Department of Education, Skills and Employment engage with the National Mental Health Workforce Strategy Taskforce to discuss the Higher Education sector's capacity to respond to increased demand for mental health workers, including the costs of training, future workforce training requirements and integrated approaches to training.