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Professor Brin Greyner, Chair
Psychology Board of Australia
G.P.O. Box 9958
Melbourne VIC, 3001

Re: Guidelines on Psychology Area of Practice Endorsement

Dear Professor Greyner,

I refer to the recently published guidelines for PBA endorsements for “areas of practice” in psychology, which outlines how each of the registered areas can be described. I am concerned that all references to diagnosis and mental health disorders have been excluded from the description of counselling psychology.

After reviewing all of the relevant material, my understanding is that the content for each of these descriptions for “areas of practice” is derived from the content of each corresponding APS College (www.psychology.org.au/community). Specifically, I note that in nearly every case, these descriptions are verbatim matches for the first two sentences of each APS College brochure. In the case of the PBA description for “counselling psychology” however, it would appear that the reference to “mental health disorders” has simply been removed.

To be clear, here are the first two sentences describing counselling psychologists on the website for the APS College of Counselling Psychology:

“Counselling psychologists are specialists in the provision of psychological therapy. They provide psychological assessment and psychotherapy for individuals, couples, families and groups, and treat a wide range of psychological problems and mental health disorders”.

By comparison, here is the description that the Psychology Board of Australia offers:

“Counselling psychologists are specialists in the provision of psychological therapy. They provide psychological assessment and psychotherapy for individuals, couples, families and groups, and treat a wide range of psychological problems”.

I noted that the PBA have made modifications to the description of other areas too. However, in all cases that I have seen these have been non-controversial. In some cases, the description has drawn on other sections of the APS College website to enhance the way that domain is defined. I do not understand why the PBA have

removed any reference to the work of counselling psychologists with mental health disorders and why the PBA did not enhance the description of counselling psychology to specify the advanced skills of counselling psychologist practitioners in diagnosis. The points made below expand on my concerns.

First, your attention is drawn to the website where it appears the PBA has derived the content in question: namely, the APS College of Counselling Psychology page. The second item listed under the heading "Areas of Specialisation" directly refers to mental health disorders. Under that heading, specific reference is made to complex presentations and diagnosis.

Second, the submission sent by the APS to the PBA in April 2010 responding to the consultation paper on codes and guidelines. On page 19 of that document, direct reference is made to the definition of the endorsed areas, containing the statement from the APS College brochure that explicitly refers to the advanced competencies of counselling psychologists in the treatment of mental health disorders.

Third, I direct your attention to the "Checklist of Specialist Skills and Knowledge" for counselling psychology on the website for the Psychologists Board of Western Australia (<http://www.psychboard.wa.gov.au/documents/counsellingchecklist.pdf>). Under the heading for specialist skills in "Assessment" this document states that diagnosis of psychopathology is an advanced competency that counselling psychologist registrars are evaluated on, in addition to the requirement to demonstrate broad-ranging skills in psychotherapy.

Fourth, the most up to date revisions of the APS College of Counselling Psychologists course approval guidelines and "domains of knowledge" documents, make it clear that specialised competencies in the diagnosis and treatment of mental health disorders is deemed an essential proficiency. For your convenience, you will find these documents attached to the following submission; <http://www.health.gov.au/internet/nhhrc/publishing.nsf/Content/083-interim>.

The diagnosis and treatment of mental health disorders are essential to the definition of counselling psychology in Australia. Being psychologists who specialise in psychological therapy, advanced-level skills in diagnosis are required. Every credible source of information about counselling psychology reinforces that point.

I therefore, request that the description for counselling psychology be amended immediately to align with the advice that it has received from every representative and registration group that has up until now defined this specialist domain of the psychology profession. I remain concerned about the impact of national registration on both the profession and the people we serve in the community. I ask that you provide me with clarification and further information as these codes and guidelines develop.

Yours truly,
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