

9<sup>th</sup> September 2010

**Professor Brin Grenyer, Chair**  
Psychology Board of Australia  
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GPO Box 9958  
Melbourne Vic 3001

Dear Professor Grenyer

**Re. Revisions to the Guidelines on Area of Practice Endorsements**

I am a Counselling Psychologist of some 20 years' experience, qualified and registered in WA, and working in private practice for the past 10 years.

I am responding to your invitation for submissions, in particular constructive comments on the guidelines, and suggestions for *improved descriptions of the areas of practice in 3.1.3*.

I note that the descriptions of most 'areas of practice' in the Guidelines correspond almost verbatim to the content of each corresponding APS College speciality. However, in the case of Counselling Psychologists a very important phrase (that is clearly part of the APS Counselling College description) has been omitted, namely that counselling psychologists treat a wide range of psychological problems **and mental health disorders**. This omission of the phrase '**and mental health disorders**' needs to be rectified in the final Guidelines.

Not to do so, is to misrepresent the professional expertise of Counselling Psychologists in a way that is likely to be deleterious and discriminating to Counselling Psychologists –

- a) in terms of misleading the public and referring medical practitioners as to the specialist capabilities of Counselling Psychologists in assessment and treatment of mental health disorders;
- b) in the workplace, where counselling psychologists have demonstrably equivalent skills to clinical psychologists in dealing with mental health disorders, and their specialist mental health treatment skills should not be understated, excluded or misrepresented by the PBA. This is particularly important for those of us in private practice treating identical client groups to clinical psychologists, and seeking full recognition of this fact by Medicare in terms of qualifying for the higher specialist rebate rate.

As a Counselling Psychologist, who is also a member of the College of Clinical Psychologists, having obtained recognition of the equivalence of my specialist expertise, I call on the PBA to ensure that it **fully and accurately represents the**

**capacity of counselling psychologists to treat mental health disorders**, as urged in previous submissions by the Association of Counselling Psychologists (WA).

To underscore the validity of the above assertions regarding the advanced competencies of Counselling Psychologists in treatment of mental health disorders, I refer you to the following relevant documents which are also attached herewith as Appendices for your attention:

- 1) Domains of Knowledge – APS College of Counselling Psychologists
- 2) APS Course Approval Guidelines – APS College of Counselling Psychologists
- 3) The ‘Checklist of Specialist Skills and Knowledge’ for Counselling Psychology which has been used for specialist registration by the Psychologists Board of WA over many years.

In conclusion, I emphasise that **diagnosis and treatment of mental health disorders** are essential to the definition of counselling psychology in Australia in 2010 and beyond. Every credible source of information about counselling psychology reinforces this point. The PBA cannot legitimately ignore this core component of what Counselling Psychologists practise in their day to day work.

Therefore, I would like to recommend that the PBA modify the description of the Counselling Psychology area of practice for the revised Guidelines to read as follows:

Option 1:

- Counselling psychologists are specialists in the provision of psychological therapy for a wide range of psychological problems and mental health disorders, providing psychological assessment and psychotherapy for individuals, couples, families and groups.

Option 2:

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

I thank you for your consideration of the above proposed modification to the description of the Counselling Psychology area of practice endorsement in the PBA Guidelines on Area of Practice Endorsements, to ensure the **inclusion** of our expertise in the key core competency area of **treating mental health disorders**.

Yours sincerely,

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