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Psychology Board of Australia
GPO Box 9958
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Re: Public consultation paper 26: Area of practice endorsements

Dear Board members,

Thank you for the opportunity to provide input into the public consultation on Area of practice endorsements. The college would like to provide feedback on the definition and competencies required for counselling psychology endorsement, as we have concerns about many aspects of the proposed guidelines, as outlined in Appendix B of the draft guidelines.

The College of Counselling Psychologists represents virtually the entire discipline of counselling psychology in Australia; there are 949 PsyBA endorsed counselling psychologists and the College has 1060 members, including student members.

Responses to the Board's general questions for consideration

Q1 From your perspective, how are the current guidelines working?

The current guidelines for counselling psychology are problematic in a number of aspects. The College has received consistent feedback from members concerned that the current definition and associated competencies required for counselling psychology endorsement are not an accurate reflection of the postgraduate training counselling psychologists receive, nor the realities of everyday practice for counselling psychologists. Specifically, the competencies don't reflect the training received in the assessment, formulation, diagnosis and treatment of mental health disorders, and expertise working with other modalities, particularly couple therapy. In essence, the guidelines do not portray an accurate picture of the training and practice of counselling psychology in Australia, and is misleading to psychologists and the general public.

Q2 Do the draft guidelines address issues that you may have previously raised?

No. The college is disappointed the revised guidelines have not addressed issues with the definition and competencies required for counselling psychology endorsement that have been raised on numerous occasions with the Board, both in writing and via face to face meetings, since the first guidelines were released in 2011. As the Board would be aware, the College has submitted a number of proposed amendments to the definition and

competencies for counselling psychology endorsement and was advised that the Board was reluctant to make any changes until the next public consultation. The College hopes that the Board will now be open to feedback and amending the definition and associated competencies for counselling psychology endorsement, so there is an accurate description of the teaching and practice of counselling psychology in Australia.

Q4 Do you think that the area of practice competencies accurately reflect the range of core skills and knowledge common to all psychologists who work in the area of practice?

No. The current competencies described for counselling psychology are not an accurate reflection of the core skills, knowledge and competencies of those trained as counselling psychologists in Australia, nor consistent with established international competencies for counselling psychologists.

Q5 Are there core areas of skill and knowledge that are specific to a particular area of psychology practice that are missing from the competencies (Appendix B) for that area of practice?

The current guidelines are missing core elements of the training and practice of counselling psychology. The guidelines fail to mention counselling psychologists' competence in couple therapy and competence in the assessment, formulation, diagnosis and evidence-based treatment of mental disorders. In addition, knowledge of psychopathology and psychopharmacology is missing.

Q6 Is there any other content that needs to be changed or deleted in the draft revised guidelines?

The guidelines include reference to competence in community interventions – this is not a core competence of counselling psychologists. This best sits within the area of community psychology and should therefore be deleted from the guidelines for counselling psychology.

Q7 Is there anything missing that needs to be added to the draft revised guidelines?

The College is concerned that the opening paragraph to the competencies and skills counselling psychologists must attain is an inaccurate and misleading description of counselling psychology in Australia. This statement is limited and written in a generalist way that doesn't capture the core features of counselling psychology. The opening paragraph needs to be amended to recognise counselling psychologists' competence in the assessment, formulation, diagnosis and evidence-based treatment for mental disorders across the lifespan. In addition, it needs to acknowledge counselling psychologists' competence in a range of modalities, particularly couple therapy.

The College has made a number of proposed amendments to the opening preamble and competencies required for counselling psychology endorsement and this is attached as a separate document. These amendments have been developed by those that are best placed to comment on the training and practice of counselling psychology in Australia: The APS College of Counselling Psychologists, the Association of Counselling Psychologists and coordinators of Australian postgraduate counselling psychology programs.

The remainder of this submission presents the aspects of the competencies required for counselling psychology endorsement the College wishes to see changed and the rationale for these changes.

Preamble – competencies required for counselling psychology endorsement

The College proposes to amend the introductory paragraph to:

Counselling psychologists use their knowledge and understanding of psychology, psychotherapy, and mental health to treat a wide range of psychological issues, problems, and mental health disorders. They provide assessment, formulation, diagnosis and psychotherapy for individuals, couples, families, and groups across the lifespan. They use evidence-based therapies and evidence-based therapy relationships to assist clients to resolve mental health disorders or psychological problems and move toward greater psychological health. They research, evaluate and develop new methods for improving psychological health and therapeutic interventions for psychological problems and disorders.

In addition, the College proposes to amend paragraph 3 to:

Specific services of counselling psychologists include assessment and provision of psychological therapy for a wide range of issues and disorders including anxiety, depression, post-traumatic stress disorder, grief and loss, relationship difficulties, domestic violence, sexual abuse and trauma, career development, substance use disorders, eating disorders, and personality disorders.

Rationale for changes

This amended introduction to the competencies is a more accurate description of the training and practice of counselling psychology and is consistent with APS College course approval guidelines (APS, 2013), curriculum taught in counselling psychology programs, established competencies of Australian counselling psychologists (APS, 2012) and the definition of counselling psychology in APS documents and websites. This amended definition acknowledges counselling psychologists' sustained focus on providing psychotherapy and treating mental disorders across the lifespan and working with other modalities, especially couple therapy. It is also consistent with established international competencies for counselling psychologists, particularly those in the United Kingdom, United States, Canada, South Africa and New Zealand.

Knowledge of the discipline

The College proposes to amend specialty capability 1, to read:

Knowledge of the discipline

- i) a broad understanding of the role of counselling psychologists in providing psychological services, including assessment, diagnosis, treatment, prevention, research and consultancy services within the community across diverse settings.**

- ii) knowledge of personality, interpersonal processes, individual differences, gender and identity, emotions and experience, and the cognitions and contexts in which meaning and beliefs arise.**
- iii) knowledge of psychopathology and psychopharmacology**
- iv) understanding scientific approaches to studying psychotherapy and counselling, including the role of client and therapist factors, and therapeutic alliance, and specific and non-specific treatment processes and**
- v) understanding of the theory and application of evidence based interventions for mental health problems, including individual psychotherapy, group, family and couple therapy.**

Rationale for Changes

The training and practice of counselling psychology is characterised by a focus on assessing, diagnosing and providing psychotherapy for high prevalent mental disorders (Di Mattia & Grant, 2016). Units taught in postgraduate counselling psychology programs focus on evidence-based therapies for mental disorders, as well as psychopharmacological treatments for disorders. Another core feature of counselling psychology is a focus on multiple client modalities, with programs teaching units on group, family and couple therapy. Whilst counselling psychology programs focus on skills and competencies in a range of evidence-based psychological therapies, they are also guided by the empirical evidence supporting the importance of the therapeutic alliance to overall outcome in therapy (Di Mattia & Grant, 2016; Grant, Mullings & Denham, 2008), with emphasis on developing skills in establishing, maintaining and repairing the therapeutic alliance.

Psychological Assessment

The College proposes to amend specialist capability 3, to read:

Psychological assessment and measurement:

- i) knowledge of psychological assessment, with a critical approach to theory, practice, and research**
- ii) competence in psychological assessment and diagnosis of mental disorders using structured clinical approaches**
- iii) competence in the assessment of symptom severity using empirically valid and reliable measures**
- iv) competence in applying measures to evaluate the effectiveness of psychological interventions and**
- v) competence in the use of valid and reliable tests of psychological functioning, including learning, intelligence, cognition, emotion, memory and personality**

Rationale for Changes

The College course approval guidelines (APS, 2013) require counselling psychology programs to provide extensive training in assessment, diagnosis and psychotherapy for mild, moderate and high prevalent mental disorders. In addition counselling psychologists are trained in various psychiatric taxonomies (DSM & ICD) and are given a broad perspective of the biopsychosocial factors associated with mental health and ill-health. A review of units taught in counselling psychology programs confirms that training in psychological assessment and treating a wide range of mental disorders is a key aspect of counselling psychology training.

Intervention strategies

The College proposes to amend specialist capability 4, to read:

Intervention strategies

- i) knowledge of theory and the scientific evidence base for counselling psychology**
- ii) competence in the delivery of evidence-based psychological therapies for mental health disorders and problems**
- iii) competence in individual, couple, family and group interventions.**

Rationale for Changes

As outlined in this submission, the delivery of evidence-based psychological therapies is a key competence of counselling psychologists. Programs provide extensive training in a range of evidence-based models for the treatment of psychological problems and mental disorders. Since counselling psychology's inception in Australia in the 1970s, a key feature has been its focus on other modalities (Grant, Mullings & Denham, 2008). Programs teach units on couple, family and group interventions.

Closing remarks

The College has welcomed the opportunity to provide feedback on the competencies required for counselling psychology endorsement. However, we are concerned that much of this feedback has been provided to the Board over the past five years, yet there has been no change to the guidelines. We urge that feedback provided by the College, in conjunction with the Association of Counselling Psychologists and our course coordinators, the people who are best placed to provide feedback on the training and practice of counselling psychology, be actioned by the Board.

The psychology profession is constantly reminded that a primary role of the Psychology Board is to protect the public. One means of protecting the public is to provide accurate information about the competencies of counselling psychologists, which reflects the actual training and practice of counselling psychology in Australia. We therefore urge the Board to adopt the amendments outlined in this submission.

Yours sincerely,



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Chair, College of Counselling Psychologists

References

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