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Dear Chair and Board members,

**CONSULTATION ON REVIEW OF AREA OF PRACTICE ENDORSEMENTS
REGISTRATION STANDARD AND GUIDELINES.**

Thank you for the opportunity to make a submission to the public consultation on the review of Area of Practice Endorsements Registration Standard and Guidelines.

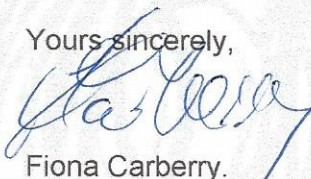
I wish to state my dissatisfaction with the competencies required for counselling psychology endorsement, as outlined in Appendix B of the guidelines. I believe that these competencies do not match those I attained through my Master of Psychology (Counselling Psychology) at Curtin University and completing my registrar-ship to obtain endorsement: namely, they omit knowledge of psychopathology and psychopharmacology, and competence in psychological assessment, formulation and diagnosis of mental disorders, and couple therapy.

The current and proposed guidelines do not depict the work I've previously been employed to do with a Medicare Local/Division of General Practice, which employed both Counselling and Clinical Psychologists and registrars. Nor do the guidelines reflect the work I do now in private practice as a Counselling Psychologist, with children and adults at all stages of the lifespan. I do not presently work with couples, but should I choose to do so in future, it concerns me that the guidelines do not reflect my post-graduate training in couple therapy.

Most clients are referred to me by local GPs who provide Mental Health Treatment Plans under Medicare. The referring GPs are usually seeking assessment, diagnosis and treatment for clients with mental health disorders. I occasionally see clients whose treatment is authorised and paid for by the Insurance Commission of WA, and they are also seeking assessment, diagnosis and treatment for clients with workers' compensation or transport accident insurance claims. To effectively assess, diagnose and treat clients such as those with depressive disorders, anxiety disorders, obsessive-compulsive disorders, trauma and stressor-related disorders, and personality disorders, requires a sound knowledge of psychopathology, competence in psychological assessment, and familiarity with DSM-5 diagnostic criteria and the ability to apply these. It concerns me that the current guidelines give a misleading impression to clients, referring GPs, and other health professionals that I have some *knowledge of* how assessment and diagnosis of mental disorders is done, but am not *competent* to do it.

For these reasons, I support the attached revisions to the guidelines submitted to you in this consultation by the Association of Counselling Psychologists (of which I am currently the Chair) and the APS College of Counselling Psychologists, and urge the Board to give proper consideration to submitting these to the Ministerial Council for approval.

Yours sincerely,



Fiona Carberry.

Appendix 1

ACP Corrected description and competency statements for counselling psychology

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.

Consumers of the services of counselling psychologists are persons, groups, and organisations, including:

- Members of the public, couples, families, and carers
- Medical, specialists and health practitioners
- Health departments, hospitals and community practices
- Community groups
- National, state or local government or non-government organisations and
- Welfare agencies, educational institutions, justice services, victims of crime, and community services

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.

To assure consumers that a counselling psychologist is capable of providing the services required all endorsed practitioners must be competent in areas a-h in this document. All counselling psychologists must be cognisant of the APS Code of Ethics, General Principle 'B.1. Competence' when considering whether they are able to provide a psychological service.

In addition to the generic competencies demonstrated by all registered psychologists, counselling psychologists must have the following specialist skills and possess the following specialist capabilities:

1. knowledge of the discipline:

- a. 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
- b. knowledge of personality, interpersonal processes, individual differences, gender and identity, emotions and experience, and the cognitions and contexts in which meaning and beliefs arise
- c. knowledge of psychopathology and psychopharmacology
- d. 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
- e. understanding of the theory and application of evidence based interventions for mental health problems, including individual psychotherapy, group, family and couple therapy

2. ethical, legal and professional matters:

- a. understanding of ethical issues in various counselling psychology settings and how to appropriately manage them (for example, confidentiality and record keeping, managing professional boundaries) and
- b. competence in communicating counselling psychologists' ethical obligations to others (for example, to families, government departments)

3. psychological assessment and measurement:

- a. knowledge of psychological assessment, with a critical approach to theory, practice, and research
- b. competence in psychological assessment and diagnosis of mental disorders using structured clinical approaches
- c. competence in the assessment of symptom severity using empirically valid and reliable measures
- d. competence in applying measures to evaluate the effectiveness of psychological interventions and
- e. competence in the use of valid and reliable tests of psychological functioning, including learning, intelligence, cognition, emotion, memory and personality

4. intervention strategies:

- a. knowledge of theory and the scientific evidence base for counselling psychology
- b. competence in the delivery of evidence-based psychological therapies for mental health disorders and problems
- c. Competence in individual, couple, family and group interventions

5. research and evaluation:

competence in each of the following:

- a. identification of psychological questions that arise from counselling psychology practice and the design of appropriate research strategies
- b. communication of research methods and findings to non-psychologists in clinical practice settings and
- c. the transformation of research and evaluation findings into policy, applied knowledge, and improved treatments

6. communication and interpersonal relationships:

competence in each of the following:

- a. provision of expert oral and written reports to various stakeholders, including clients, families and carers, health and medical practitioners, and for medico-legal purposes
- b. provision of consultancy advice and psychoeducation about mental health problems and issues
- c. communicating the obligations of a counselling psychologist in various roles and settings (for example, to schools, medical practitioners, criminal justice systems) and
- d. awareness of personal factors as they influence communications between individuals and groups, and the ability to reflect upon interpersonal processes through supervision and peer consultation

7. working within a cross-cultural context:

- a. competence to adequately practise with clients from cultures different from the psychologist's own, including specific knowledge and skills in assessment and intervention with Aboriginal and Torres Strait Islander peoples, and understanding and showing sensitivity to lifestyle diversity and issues of gender equality, particularly as they relate to counselling psychology contexts and

8. practice across the lifespan:

- a. competence with clients in childhood, adolescence, adulthood and late adulthood, as relevant to the work of a counselling psychologist in the context in which the psychologist is employed