

9 June 2023

Senate Inquiry  
Inquiry Page Parliament of Australia

Via email: [community.affairs.sen@aph.gov.au](mailto:community.affairs.sen@aph.gov.au)

Dear Committee Secretariat

***“Barriers to consistent, timely and best practice assessment of attention deficit hyperactivity disorder (ADHD) and support services for people with ADHD”***

Thank you for the opportunity to provide a response to the abovementioned Inquiry. Our response will address the following ***“(c) the availability, training and attitudes of treating practitioners, including workforce development options for increasing access to ADHD assessment and support services”***

Our response will cover the following areas:

- Registered Counsellors: *A tertiary qualified under-utilised workforce*
- Solving a workforce shortage
- Research supporting Workforce Shortages, Affordability and Accessibility
- A Registered Counsellors role in a multi-disciplinary team
- Development of National Standards
- Recommendations

**About Australian Counselling Association (“ACA”)**

The ACA is the largest self-regulated peak registration body for Counsellors and Psychotherapists in Australia, with over 12,000 members. ACA serves a crucial role in advocating and advancing the profession of counselling and psychotherapy, such as establishing appropriate training standards, accrediting education courses, establishing and overseeing codes of ethical practice, assisting members with employment and practice development, and assisting the mental health consumer access to ethical and appropriate service providers.

Please note that for the purposes of this submission, the terms Counsellor and Psychotherapists are interchangeable and will be herein referred to as “Registered Counsellors”.

**Registered Counsellors: *A tertiary qualified under-utilised workforce***

Registered Counsellors are an under-utilised workforce available to assist in addressing the growing demand and unmet need of persons seeking support from a mental health professional.

Registered Counsellors are trained to deliver person-centred care using evidence-based practices in mental health including the focussed psychological strategies listed below. This education and training takes a minimum of 5 years to meet a level commensurate with the eligibility criteria applying to other allied health professionals who deliver focussed

psychological strategies under Medicare Benefits Scheme (“MBS”). These focussed psychological strategies include (Medicare, 2023):

- psychoeducation including motivational interviewing
- cognitive-behavioural therapy, including behavioural interventions (behaviour modification, exposure techniques, activity scheduling) and cognitive interventions (cognitive therapy)
- relaxation strategies (progressive muscle relaxation, controlled breathing)
- skills training (problem solving skills and training, anger management, social skills training, communication training, stress management, parent management training)
- interpersonal therapy (especially for depression)
- narrative therapy (for Aboriginal and Torres Strait Islander peoples)

At this time, Registered Counsellors are not eligible to become MBS providers. However, providing counselling support services to persons with ADHD is within the scope of practice of Registered Counsellors. ADHD is a disorder of dysregulation of thoughts, emotions, movements and impulses, with comorbidities including depression, anxiety, eating disorders, substance use disorders, gambling, grief, and difficulties in financial, relationship, occupational and social functioning.

The following table is a representation of ACA Standards that applied to Registered Counsellors who meet Level 3 and Level 4 criteria of who would be best placed to provide timely and best practice support services for people with ADHD.

Requirement	ACA Minimum Standards
Education	Tertiary Qualifications in Counselling and/or Psychotherapy at AQF Level 7 or 9 (Bachelor of Counselling or Master of Counselling)
Supervised Practice	To attain a Level 3 membership requires: 750 hours of post-qualifying client contact hours and 75 hours of clinical supervision completed over a minimum of 2 years
Membership	ACA Level 3 membership ACA Level 4 membership
Ongoing Professional Development (OPD)	Are required to meet 25 points per membership year
Clinical Supervision	10 hours of clinical supervision per year. Ratio is 1 hour supervision per 20 client contact hours

Requirement	ACA Minimum Standards
Practice Standards	Scope of Practice July 2021 (2 <sup>nd</sup> edition) ACA Code of Ethics 2018
Insurance	Professional Indemnity & Public Liability Insurance
Mental Health Practice Standards	Not applicable however work is due to commence on the development of National Standards for Counsellors and Psychotherapists with Department of Health.

To ensure that Registered Counsellors are well equipped to support the ADHD community, mandatory completion of the Fundamentals of Adult ADHD Patient Management course by Beyond GP.com.au will be necessary. Funding needs to be allocated to ensure that mental health professionals are well informed and educated about working with this community.

## Solving a workforce shortage

Without appropriate action of the government, the demand for ADHD support will continue to increase. Registered Counsellors are a qualified solution to addressing the demand, availability and affordability of mental health services to the community.

There exists today a large pool (over 3,000) of experienced ACA registered counsellors in the allied health sector who hold a bachelor, master or doctoral degree who could be helping to reducing unmet need for psychological treatment services. (ACA, 2023)

Counselling is a self-regulated profession. The Department of Health have advised that it is not a requirement for Counsellors to be regulated by the Australian Health Practitioner Regulation Agency (AHPRA) as this regulation is reserved for those health professions that pose sufficient risk to the community to warrant government regulation. Based on the low risk profile of counsellors, the federal government has determined that counsellors do not require regulation by AHPRA. **Social Workers are also deemed low risk and therefore are not required to be regulated by AHPRA. Social Workers are recognised providers of MBS under Better Access.**

Registered Counsellors work and meet provider compliance and eligibility within legislative environments including (but not limited to):

Environment	Legislation
NDIS	The National Disability Insurance Scheme Act 2013 (NDIS Act)
Private Health Funds	Private Health Insurance (Accreditation) Rules 2011 (Cth)
Work Insurance Agencies	Workers Compensation Regulation Act for Qld, NSW, SA and VIC
Victims of Crime	Victims of Crime Act 1994
Employee Assistance Programs (EAPs)	Work Health and Safety Act 2011
Victorian State Government (from 1 September 2023)	Mental Health and Wellbeing Act 2022

The Victorian Government has now formally recognised Counsellors with the passing of the new Victorian *Mental Health and Wellbeing Act 2022* which comes into effect on 1 September 2023. “Counsellors of a prescribed class” are now formally recognised as a *Mental Health and Wellbeing professional means a person who performs duties in connection with the provision of mental health and wellbeing services.* [Mental Health and Wellbeing Act 2022 \(legislation.vic.gov.au\)](https://legislation.vic.gov.au)

## Research supporting Workforce Shortages, Affordability and Accessibility

The ACA has had independent research conducted that highlight the intensity of the affordability and accessibility issues currently being experienced in metro, rural and regional areas.

In research commissioned by the ACA (conducted by Pure Profile), the below is the percentage of waiting times being experienced by the Australian public during the period February 2022 and March 2022.

### Psychologist/Psychiatrist - Waiting Periods

	ACT	NSW	NT	Qld	SA	Tas	Vic	WA
Wait 4 - 6 weeks	27%	19%	32%	32%	33%	31%	30%	29%
Wait 7+ weeks	14%	20%	7%	7%	16%	9%	14%	18%

In other research, key findings as evidenced in a survey conducted in April 2022 found that nearly 5% of adults had been waiting to access mental health support which they had sought during the past 6 months (Healthengine and Australian Patients Association, 2022 p19). Of these, 72% had been waiting more than 2 months and 59% more than 3 months.

Waitlists for psychologists are approximately 2 months (55 days) and were more prevalent in among psychologists in regional areas (79.2%) compared with those in metropolitan areas (73.5%) (APS, 2022c pp 4-5).

A scarcity of providers in rural and remote areas is inhibiting access to Better Access.

- *50% more psychologists in the allied health sector worked in greater capital city areas than outside, per head of population in 2021.*

When addressing the rural and remote areas, research indicates that practising outside greater capital city areas appears more attractive to counsellors than psychologists.

- *The average annual growth rate in the number of allied health practitioners working outside greater capital city areas was higher for counsellors holding a bachelor, master or doctoral degree (12.2%) than for psychologists and social workers (both 10.0%) between 2016 and 2021.*

### A Registered Counsellors role in a multi-disciplinary team

“A multi-disciplinary team is made up of the patient and multiple health professionals from several different disciplines who participate to care, collaborate and communicate together in order to address as many aspects of a patient’s care as possible.” (NSW Health, 2023)

A Registered Counsellor’s role within a multi-disciplinary team within an ADHD clinic & Co-Management Pathways Model can operate effectively within the MBS and PHN networks. Registered Counsellors would operate mostly in the phases 1 (Awareness) and phase 4 (Management Plan) of the model leaving the data assessment and diagnosis to a GP or Nurse or Psychiatrist. A Registered Counsellor would act to support initial counselling, support and information and then post diagnosis, provide ongoing counselling to the client.

There is also benefit to the inclusion of peer support workers/Lived experience workforce within this multi-disciplinary team to act as an advocate and providing pathway support and relevant resources. Furthermore, this workforce would be ideal for operating the support line for persons seeking assistance and support. The government should extend funding to increase the support to manage increasing demand. Registered Counsellors are qualified to provide Supervision to this peer support workers/Lived experience to also ensure they remain safe at all times.

The ACA endorse and support the ADHD Clinic & GP Co-Management Pathway model proposed by DJGrocott 2023.

There is strong evidence for the contribution of counselling and psychotherapy to the prevention and treatment of mental illness, including depression, anxiety and trauma (Cuijpers, van Straten, Smit, Mihalopoulos & Beekman, 2008). Effective ongoing counselling as part of the multi-disciplinary team will prove beneficial is providing appropriate care and support.

This research evidence demonstrates demand for Counsellors to treat successfully mild to moderate mental health conditions including ADHD using evidence-based approaches and focussed psychological therapies that are within their scope of practice.

Respondents have reported in ACA commissioned research (conducted by Pure Profile) that they would opt to seek support from qualified counsellors as a means of improving their mental health. Stigma associated with Counsellors not being an issue with the respondents.

### Regular Support

Benefits of regular support. Respondents told ACA the following:

	ACT	NSW	NT	Qld	SA	Tas	Vic	WA
Would opt to see a qualified counsellor vs waiting for psychologist	47%	46%	41%	44%	42%	30%	43%	43%
Regular access to a counsellor would improve their mental health	38%	36%	53%	40%	32%	28%	40%	32%

Adding counsellors to the range of service providers to support the ADHD community will expand the range of service offerings available to consumers.

- Compared with psychologists, counsellors tend to offer a more person-centred approach to mental health which emphasises listening and discussing goals first.
- Counsellors (like Social Workers) are appropriately skilled, qualified and self-regulated to safely and effectively deliver the service or services covered in this submission.

### Development of National Standards

ACA Registered Counsellors operate under standards as identified earlier in this document and it is mandatory that counsellors meet ongoing requirements to maintain their eligibility. ACA pride themselves on to the high standards that have been set already across Accreditation, Supervision, OPD, Complaints and working in accordance with the Scope of Practice, Code of Ethics (ACA, 2023).

The ARCAP Mental Health Practice Standards were developed to provide a set of minimum practice standards for Counsellors, and these are based on the *National practice standards for the mental health workforce 2013*. In addition, both PACFA and ACA members abide by

the Code of Ethics and Practice and Scope of Practice of their respective membership bodies. These agreed industry minimum standards are still agreed today.

With recent news in the 2023 Federal Budget, the Government has allocated \$300,000 to the development of National Standards for Counsellors and Psychotherapists. ACA has been selected as one of the leading organisations within the sector to represent the counselling profession. This 2-year project is planned to start with the Department of Health in the next financial year cycle with the inclusion of a third-party consultant. The National Standards will look to set baselines across (but not limited to) Qualifications, Accreditation, Credentialing, Training, Scope of Practice, Supervision, Complaints Process, OPD as well as looking at Service Models of Care.

## **Recommendations**

To address the current workforce shortages within the mental health sector, the ACA makes the following recommendations to improve accessibility and affordability within the ADHD community:

1. The Government include Registered Counsellors as eligible providers within MBS.
2. New counselling provider numbers are created to ensure appropriate support can be provided.
3. Registered Counsellors are a mandatory inclusion within Primary Health Networks (PHN's) multi-disciplinary teams.
4. PHN's update their workforce strategy to ensure that Registered Counsellors are included as mental health providers.
5. Referrals are given to Counsellors by the PHN's to provide appropriate care to the community.
6. Funding is made available to the PHN's to deliver these services to an expanded workforce including Registered Counsellors

If you require any further information, please do not hesitate to contact me on 07 3356 4255 or [aca@theaca.net.au](mailto:aca@theaca.net.au).

Yours sincerely,

**Jodie McKenzie**  
Chief Executive Officer  
Australian Counselling Association

## References

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- <sup>1</sup>AIHW (Australian Institute of Health and Welfare) 2022, *Mental Health: Prevalence and Impact* [Mental health services in Australia: Mental health: prevalence and impact - Australian Institute of Health and Welfare \(aihw.gov.au\)](#)
- APS (Australian Psychological Society) 2022c, 'Psychologists Unpaid, Underfunded and Overworked', *InPsych*, vol 44 [Psychologists unpaid, underfunded and overworked | APS \(psychology.org.au\)](#)
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- MBS Online Medicare Benefits Schedule, Focussed Psychological Therapies (2023), [Item 2727 | Medicare Benefits Schedule \(health.gov.au\)](#)
- NDIS 2022-23 Annual Pricing Review Consultation Paper March 2023
- NDIS Practice Standards: Verification Module – Required Documentation (September 2021)
- NDIS Pricing Arrangements and Price Limits 2022-2023 (Version 1.1 released October 2022)
- NSW Health, Multidisciplinary teams (2023) [Multidisciplinary team - Integrated care \(nsw.gov.au\)](#)

**Referenced Legislations:**

- Private Health Insurance (Accreditation) Rules 2011 (Cth)
- The National Disability Insurance Scheme Act 2013 (NDIS Act)
- Victims of Crime Act 1994
- Victorian *Mental Health and Wellbeing Act 2022* [Mental Health and Wellbeing Act 2022 \(legislation.vic.gov.au\)](https://legislation.vic.gov.au)
- Work Health and Safety Act 2011
- Workers Compensation Regulation Act for Qld, NSW, SA and VIC