

Psychotherapists and Counsellors Professional Liaison Group (PLG)
30 September 2010

Differentiation and threshold level(s) of qualification – an international perspective

Executive summary and recommendations

Introduction

This paper explores different international perspectives on the issues relating to differentiation and threshold level(s) of qualification.

Decision

The PLG is invited to discuss the attached paper.

Background information

The outstanding areas within the PLG's terms of reference are as follows:

- The question of whether the structure of the Register should differentiate between psychotherapists and counsellors.
- The question of whether the structure of the Register should differentiate between those qualified to work with children and young people and those qualified to work with adults.
- The standards of proficiency for psychotherapists and counsellors.
- The threshold level(s) of qualification for entry to the Register

Resource implications

None.

Financial implications

None.

Appendices

None

Date of paper

20 September 2010

1. Introduction

About this paper

- 1.1 At its meeting on 12 May 2010, the PLG asked the Executive to gain further information on the international perspective on the issues relating to differentiation and threshold level(s) of qualification.
- 1.2 This paper looks at international regulation, including both statutory and voluntary schemes. In countries where there is statutory regulation, voluntary systems are not considered. Where regulation is based on states or provinces rather than countries, several examples are given. In each case, information is provided on whether counselling and/or psychotherapy are differentiated and the requirements necessary to gain registration, including the levels of qualification.
- 1.3 The information provided is not exhaustive and the focus of this paper is on English speaking countries. However, it should be noted that the regulation of psychotherapists and counsellors is not limited to those countries. For example, eight countries within Europe have passed a national law which regulates psychotherapy practice in that country, including Germany, Italy and Austria.¹
- 1.4 This paper is divided into four sections:
 - Section one provides an introduction to the paper.
 - Section two summarises the PLG's current approach to differentiation and levels of qualification for entry to the Register.
 - Section three provides an overview of how psychotherapists and counsellors are regulated internationally.
 - Section four identifies points for discussion by the PLG and draws conclusions based on the information provided.
- 1.5 This paper should be considered with regards to the outstanding areas within the PLG's terms of reference:
 - The question of whether the structure of the Register should differentiate between psychotherapists and counsellors.
 - The question of whether the structure of the Register should differentiate between those qualified to work with children and young people and those qualified to work with adults.
 - The standards of proficiency for psychotherapists and counsellors.
 - The threshold level(s) of qualification for entry to the Register
- 1.6 The information gathered and discussed in this paper is relevant to these terms of reference rather than to broader issues around models of regulation or the rationales for different models of regulation.

¹ Ginger, Serge (2009) 'Legal status and training of psychotherapists in Europe', European Journal of Psychotherapy and Counselling, 11:2, 173-182

2. Differentiation and threshold levels of qualification

Recommendations by the PLG

- 2.1 The PLG had previously agreed that there should be differentiation between psychotherapists and counsellors (it should be noted that the agreement was not unanimous). Differentiation means that there would be separate protected title(s) for psychotherapists and for counsellors and that individuals would need to be registered as both psychotherapists and counsellors to use both titles.
- 2.2 The PLG recommended this because they believed that there were differences between the practice of psychotherapists and counsellors that should be reflected in the standards set by the regulator. The PLG also agreed that modalities of practice would not be reflected in the Register.²
- 2.3 The PLG was also asked to recommend a threshold level of qualification for entry to the HPC Register. This is the level of qualification normally expected to meet the standards that we set. The decision to differentiate between psychotherapists and counsellors on the HPC Register meant that it was possible to set a different level of qualification for the professions.
- 2.4 The PLG recommended the following:
 - For counsellors, level 5 on the National Qualifications Framework / level 5 on the Framework for Higher Education Qualifications / level 8/9 on the Scottish Credit and Qualifications Framework.
 - For psychotherapists, level 7 on the National Qualifications Framework / level 7 on the Framework for Higher Education Qualifications / level 11 on the Scottish Credit and Qualifications Framework.³

3. International perspectives

America

- 3.1 Each state in America has its own laws for the regulation of professions, including psychotherapists and counsellors. There is diversity in the groups that practise both psychotherapy and counselling across the states and diversity in how they are regulated by the state licensing boards. Regulation in America is usually based on obtaining licences to practice from the relevant health boards.
- 3.2 Currently, all 50 states have some form of counsellor licensing, some of which have also set up systems to regulate psychotherapy.⁴ This paper explores different systems of regulation in two states.

² Report of the psychotherapists and counsellors professional liaison group, pages 12-22
<http://www.hpc-uk.org/aboutus/consultations/closed/index.asp?id=93>

³ Ibid, page 45

⁴ <http://www.aascb.org/displaycommon.cfm?an=6>

Arizona

The Board of Behavioural Health Examiners

3.3 The Board of Behavioural Health Examiners licenses marriage and family therapists, counsellors, social workers and substance abuse counsellors providing psychotherapy services in Arizona. The system became mandatory in July 2004, so that individuals must register with the Board before practising.⁵

Registration requirements

3.4 Under the Board's rules individuals applying for a license must have completed a Masters degree or higher in counselling or a related field from an appropriate education provider. The rules lay out the topics to be covered in the curriculum, the number of hours to be completed each semester and the number of hours of supervised practice to be completed.⁶

3.5 Having completed the education programme, applicants must then successfully pass an exam run by several organisations, including the National Board of Certified Counselors and the Commission on Rehabilitation Certification. Individuals must also complete a minimum of 3200 hours of supervised work experience, over at least two years.⁷

Definition of counselling

3.6 The practice of professional counselling is defined within the Board's rules. It is defined as the professional application of psychological, mental health and human development theories, principles and techniques to:

- Facilitate human development and adjustment throughout the human life span.
- Assess and facilitate career development.
- Treat interpersonal relationship issues and nervous, mental and emotional disorders that are cognitive, affective or behavioural.
- Manage symptoms of mental illness.
- Assess, appraise, evaluate, diagnose and treat individuals, couples, families and groups through the use of psychotherapy.⁸

3.7 The rules also define the practice of substance abuse counselling, which includes the '...use of psychotherapy for the purpose of evaluation, diagnosis and treatment of clients'.⁹

3.8 In both cases therefore, psychotherapy is brought within the definition of professional counselling. In addition the rules make reference to training

⁵ The Board of Behavioural Health Examiners <http://www.azbbhe.us/board%20history.htm> and <http://www.azcommerce.com/BusAsst/SmallBiz/SBS/IA/IAba.htm>

⁶ The Board of Behavioural Health Examiners Rules <http://www.azbbhe.us/ADOPTED%20RULES.pdf>, articles R4-6-501 A - N.

⁷ Ibid, articles R4-6-502 and R4-6-503.

⁸ Ibid

⁹ Ibid

on psychotherapy in the course curriculum and undertaking psychotherapy during the supervised practice.¹⁰

Vermont

The Board of Allied Mental Health

3.9 The Board of Allied Mental Health was set up in 2006 and provides licenses for individuals who are practising as mental health counsellors and marriage and family therapists. Clinical mental health counsellors must gain a licence from the Board before practising in Vermont. The Board also administers a roster of psychotherapists who are not licensed to practice within another profession.¹¹

Clinical mental health counsellors

Registration requirements

- 3.10 Applicants apply for a licence either on the basis of a practicing licence from another state, or on the basis of completing an education programme, licensing examination and supervised practice.
- 3.11 Applicants applying on the basis of completing an education programme must have successfully completed a Masters degree or higher degree in counselling or a related subject. They should also have completed at least 600 hours of supervised practice though 1,000 hours of supervised practice is preferred. Applicants must also successfully complete both the National Clinical Mental Health Counseling Examination (NCMHCE) and the National Counselor Examination (NCE).¹²
- 3.12 After completing the education programme, individuals then undertake a further 3,000 hours of supervised practice over at least two years. The supervised practice can only begin after completion of the education programme. Individuals must be registered on the roster of non-licensed and non-certified psychotherapists to undertake this practice.¹³

Definition of clinical mental health counselling

- 3.13 The statute which set up the licensing process for clinical mental health counsellors also defined the practice of clinical mental health counselling. It is defined as providing professional counselling services drawn largely from the theory and practice of psychotherapy and the discipline of clinical mental health counselling.
- 3.14 The practice of clinical mental health counselling involves ‘...the application of principles of psychotherapy, human development, learning

¹⁰ Ibid, articles R4-6-501 J and R4-6-504 B.

¹¹ Board of Allied Mental Health Practitioners Administrative Rules, http://www.vtprofessionals.org/opr1/allied/rules/MH_Rules.pdf

¹² Ibid, section 3.6 and 3.17

¹³ Ibid, section 3.18

theory, group dynamics, and the etiology of mental illness and dysfunctional behavior to individuals, couples, families, and groups, for the purposes of treating psychopathology and promoting optimal mental health'. It also includes the diagnosis and treatment of mental and emotional disorders.¹⁴

Roster of non licensed and non-certified psychotherapists

- 3.15 Individuals who practise psychotherapy must disclose their training and qualifications if they are not members of a profession licensed in Vermont. This means that anyone practising psychotherapy and who is not a licensed psychologist, clinical social worker, mental health counsellor, a certified marriage and family therapist or a psychoanalyst must apply for entry to the roster.¹⁵
- 3.16 Individuals on the roster must disclose various pieces of information, including information about their training, their experience and their scope of practice.¹⁶ Individuals are then registered on the roster which is available for members of the public to check:
<https://secure.vtprofessionals.org/renewals/>.

Registration requirements

- 3.17 Unlike clinical mental health counsellors, the statute does not specify the requirements for entry to the roster. Applicants are asked to provide information about the training they have completed when they apply for registration, but there are no specific requirements set for that training if they are applying as a psychotherapist.
- 3.18 Other individuals, such as clinical mental health counsellors who apply to join the roster whilst undertaking supervised practice (see paragraph 3.12 above) would have to meet the specific requirements for their profession.

Definition of psychotherapy

- 3.19 Psychotherapy is defined in the statute as the '... provision of treatment, diagnosis, evaluation or counseling services to individuals or groups, for a consideration, for the purpose of alleviating mental disorders'. Psychotherapy is said to involve the application of therapeutic techniques to understand, modify behaviour or resolve conflicts.¹⁷

¹⁴ Vermont statutes, Chapter 65: Clinical Mental Health Counselors

<http://www.leg.state.vt.us/statutes/fullchapter.cfm?Title=26&Chapter=065>

¹⁵ Board of Allied Mental Health Practitioners Administrative Rules, section 5.1 – 5.2

¹⁶ Ibid, section 5.4

¹⁷ Vermont statutes, Chapter 78: Roster of psychotherapists who are non-licensed and non-certified <http://www.leg.state.vt.us/statutes/fullchapter.cfm?Title=26&Chapter=078>

Canada

- 3.20 Regulation in Canada, as with America, is a provincial matter. This means that there are differences in how psychotherapy and counselling are regulated across the country as regulation. Regulation in Canada works partly on the basis of restricting certain activities to regulated health professionals. These are usually called 'controlled acts' or 'restricted activities'. For example, in Alberta only certain groups of health professionals (including nurses and social workers) can '...perform a psychosocial intervention with an expectation of treating a substantial disorder of thought, mood, perception, orientation or memory that grossly impairs'.¹⁸
- 3.21 Psychiatry and psychology are regulated by statute in every province, but the same is not true of psychotherapy and counselling. Counsellors, including those providing counselling on addiction, careers or employee assistance programmes are not regulated, although guidance counsellors are regulated in Quebec. Several provinces, including Québec and Ontario are currently undertaking work to regulate psychotherapists.
- 3.22 As there are differences in regulation across the provinces, this section will concentrate on provinces which are developing regulatory systems.

Canadian Counselling and Psychotherapy Association

- 3.23 The Canadian Counselling and Psychotherapy Association (CCPA) holds a voluntary register of counsellors and psychotherapists. The CCPA offers 'certification' to members who meet the necessary criteria, including a graduate degree in counselling or related field. They must also undertake at least 120 hours of supervised client contact. The CCPA has also recently begun a process of accrediting education programme, all of which are at Masters level.¹⁹

Nova Scotia

Psychotherapy

- 3.24 Nova Scotia does not currently regulate psychotherapists. However, there are a number of voluntary organisations that they may be members of, including the CCPA.²⁰

Nova Scotia College of Counselling Therapists

- 3.25 In 2008, 'The Counselling Therapists Act' was passed in Nova Scotia. The Act created the Nova Scotia College of Counselling Therapists and protected the titles 'Registered Counselling Therapist', 'Counselling

¹⁸ Government Organisation Act of Alberta, Section 7.1

http://www.qp.alberta.ca/574.cfm?page=g10.cfm&leg_type=Acts&isbncln=9780779740758

¹⁹ <http://www.ccacc.ca/en/accreditedprograms/>

²⁰ <http://www.ccacc.ca/en/>

Therapist' and 'Registered Counselling Therapist Candidate'.²¹ Only individuals registered with the College will be able to use these titles, though counselling practice will not be restricted and there are currently no controlled acts associated with the practice of counselling.

- 3.26 However, at the time of writing the legislation was 'unproclaimed', which means that it has not yet been put into effect.²² This is partly because of concerns about the requirements made within the legislation.

Registration requirements

- 3.27 Nova Scotia currently has the Nova Scotia Association of Counselling Therapists and the intention is that the association will become the College of Counselling Therapists.²³ Individuals who are currently registered with the association as a registered counselling therapist will be able to grandparent to gain access to the title 'registered counselling therapist' if they complete additional training on ethics.²⁴
- 3.28 The Counselling Therapists Act sets the minimum level of qualification leading to licensure as a Masters level or equivalent counselling-therapy programme. The programme must include at least 120 hours of supervised practice and an ethics course. In addition to the degree, candidates must also complete at least two years supervised experience of therapy.²⁵

Definition of counselling

- 3.29 Counselling is defined in the Act as helping clients through the counselling relationship. Counsellors would use a combination of mental health and human development methods, principles and techniques. Use of these would help clients to achieve development or adjustment in an area, for example the social or mental sphere.²⁶ Counselling therapy practice is defined as providing a service to clients that integrates models of human behaviour through a combination of consulting, counselling and assessment.²⁷

Ontario

College of Psychotherapists and Registered Mental Health Therapists

- 3.30 Ontario is currently in the process of bringing psychotherapists into regulation. The Psychotherapy Act of 2007 created a Council to regulate

²¹ Counselling Therapists Act Nova Scotia
http://nslegislature.ca/legc/bills/60th_2nd/1st_read/b201.htm

²² Provincial regulation developments
http://www.ccpcp.ca/index.php?option=com_content&task=view&id=27&Itemid=1

²³ <http://www.gov.ns.ca/news/details.asp?id=20081103007>

²⁴ <http://www.nsact.ca/resources.htm>

²⁵ Requirements for licensure

<http://www.nsact.ca/resources.htm>

²⁶ Counselling Therapists Act, paragraph m

²⁷ Ibid, paragraph ab

psychotherapists and registered mental health therapists.²⁸ A transitional council has now been set up which will develop the standards and regulations for registration and it is hoped that the Council will go live in 2012.²⁹

Registration requirements

- 3.31 The transitional council has not yet set registration requirements. Training in psychotherapy is diverse and is provided in a wide range of education settings from institutes to colleges and academic institutions. It is also acknowledged that individuals who want to practise psychotherapy may have trained in a different profession originally.
- 3.32 There are suggestions that some counsellors may be able to meet the registration requirements for the Council. However, as the registration requirements have not been set this has not been confirmed.³⁰

Definition of psychotherapy

- 3.33 The Psychotherapy Act defines the practice of psychotherapy as ‘the assessment and treatment of cognitive, emotional or behavioural disturbances by psychotherapeutic means, delivered through a therapeutic relationship based primarily on verbal or non-verbal communication’.³¹
- 3.34 The Psychotherapy Act also defines an authorized act which members are allowed to undertake. Subject to any limitations on membership, members are authorized to ‘...treat, by means of psychotherapy technique delivered through a therapeutic relationship, an individual’s serious disorder of thought, cognition, mood, emotional regulation, perception or memory that may seriously impair the individual’s judgement, insight, behaviour, communication or social functioning’.³²
- 3.35 This act can be undertaken by psychotherapists but also by other regulated professions, including physicians, psychologists, nurses, occupational therapists and social workers. The Act specifies that these professions’ regulatory bodies will establish the standards and criteria which the professionals will have to meet to undertake the controlled act.

Counselling

- 3.36 In Ontario, counselling is distinguished from psychotherapy as the focus of counselling is perceived to be the provision of information, advice-giving, encouragement and instruction.³³

²⁸ Psychotherapy Act 2007

http://www.e-laws.gov.on.ca/html/statutes/english/elaws_statutes_07p10_e.htm

²⁹ <http://www.cprmhto.on.ca/pages/Home>

³⁰ <http://www.ccacc.ca/en/statusofregulation>

³¹ Psychotherapy Act 2007

http://www.e-laws.gov.on.ca/html/statutes/english/elaws_statutes_07p10_e.htm

³² *Ibid*, section 4

³³ Health Professions Regulatory Advisory Council report ‘New Directions’ page 208

http://www.hprac.org/en/reports/resources/New_Directions_April_2006_EN.pdf

- 3.37 The Regulated Health Professions Act (RHPA) of 1991 lays out how health professions are regulated and defines controlled acts which can only be carried out by individuals registered with an appropriate regulator.³⁴
- 3.38 The RHPA makes clear that counselling is exempt from the controlled acts where that counselling is ‘...a communication made about emotional, social, educational or spiritual matters and where that communication is not one that a health profession Act authorizes members to make, for example communication of a diagnosis’.³⁵ This means that individuals can undertake counselling which falls within this definition without being registered.
- 3.39 Therefore, at this time it is unlikely that counsellors will be regulated in Ontario in the next few years. They are also not intended to be regulated by the College of Psychotherapists.
- 3.40 There are several voluntary organisations in Ontario which hold voluntary registers of counsellors and/or psychotherapists, including the CCPA (see paragraph 3.23 above).

Québec

- 3.41 Québec is one of the few provinces in Canada which is undertaking work to regulate both psychotherapy and counselling. However, the only regulated counsellors are those providing guidance counselling (see paragraphs 3.49 to 3.50 below).

Psychotherapists

- 3.42 In June 2009, the National Assembly in Québec passed legislation to regulate the practice of psychotherapy.³⁶ The Bill provides a definition of psychotherapy and restricts the right to practise psychotherapy or use the protected title of psychotherapist to certain groups of appropriately qualified individuals.
- 3.43 Although the legislation has been passed, at the time of writing the provisions in the legislation had not yet been activated. As such, the information provided below may be changed.

Registration requirements

- 3.44 The practice of psychotherapy is limited to these professions:
- physicians,

³⁴ http://www.e-laws.gov.on.ca/html/statutes/english/elaws_statutes_91r18_e.htm

³⁵ *Ibid*, section 29 (2)

³⁶ An Act to amend the Professional Code and other legislative provisions in the field of mental health and human relations,
<http://www2.publicationsduquebec.gouv.qc.ca/dynamicSearch/telecharge.php?type=5&file=2009C28A.PDF>

- psychologists
- guidance counsellors;
- psychoeducators;
- social workers;
- occupational therapists; and
- nurses.³⁷

3.45 In each case, these individuals can only call themselves psychotherapists if they use the title in conjunction with their other professional title, e.g. nurse-psychotherapist.

3.46 Individuals who are registered with other regulators can practice as a psychotherapist if they:

- successfully complete at least a Masters degree in an area linked to mental health or human relations;
- complete the appropriate psychotherapy training;
- undertake continuing professional development; and
- gain a permit in psychotherapy from the regulator for psychologists.

Definition of psychotherapy

3.47 Psychotherapy is defined in the legislation as '...psychological treatment for a mental disorder, behavioural disturbance or other problem resulting in psychological suffering or distress'. The purpose of psychotherapy is to bring changes to the person's functioning, their personality or health. The definition makes clear that the 'treatment' goes beyond help '...aimed at dealing with everyday difficulties and beyond a support or counselling role'.³⁸

3.48 The legislation also sets out various actions which psychotherapists must undertake. They must:

- establish a structured process of interaction with the client;
- do a thorough initial evaluation;
- apply therapeutic procedures based on communication; and
- use scientifically recognised theoretical models and proven intervention methods.³⁹

Guidance counsellors

3.49 Guidance counselling is regulated in Québec through the Ordre des conseillers et conseillères d'orientation du Québec (OCCOPPQ).⁴⁰ A guidance counsellor is defined as an individual who offers career development advice to individuals and who uses an assessment of psychological functioning and the client-practitioner relationship to work with individuals.⁴¹

³⁷ Ibid, Chapter VI.I

³⁸ Ibid, Chapter VI.I, 187.1

³⁹ Ibid, Chapter VI.I, 187.2

⁴⁰ <http://www.occoppq.qc.ca/>, accessed 3 September 2010

⁴¹ Professional Code of Quebec

<http://www.canlii.org/en/qc/laws/stat/rsq-c-c-26/latest/rsq-c-c-26.html>, section 37

3.50 Only individuals who hold the necessary permit issued by the OCCOPPQ can use the titles of 'Vocational Guidance Counsellor' or 'Guidance Counsellor'.⁴² Under the same Bill as that to regulate psychotherapy, guidance counsellors registered with the OCCOPPQ are allowed to undertake certain control acts which include the ability to assess 'mental or neuropsychological disorders'.⁴³

Registration requirements

3.51 Individuals must have completed a specified university degree in guidance and counselling and have an adequate knowledge of French to gain registration with the OCCOPPQ. The education programmes are all at Masters level.

New Zealand

The Psychotherapists Board of Aotearoa New Zealand

3.52 In 2003, New Zealand passed The Health Practitioners Competence Assurance Act (HPCAA) and the legislation came into effect in September 2004. The HPCAA established separate regulatory authorities which would set regulatory frameworks for health practitioners, including psychotherapists.⁴⁴

3.53 The Act established the Psychotherapists Board of Aotearoa New Zealand and required all psychotherapists to register with that board. The requirement was effective from 2009, meaning that psychotherapists can now only practice if they are registered with the board and hold a practising certificate. However, individuals can practise psychotherapy without being registered so long as they do not call themselves psychotherapists.⁴⁵

Registration requirements

3.54 There are currently two routes to registration. One route is based on completion of an approved Masters level qualification delivered either by a university or training institute within New Zealand.

3.55 The other route is based on accreditation of prior experience and learning and successful completion of an assessment accredited or set by the board. Those individuals could have completed initial training in psychology, counselling, psychiatry, nursing, social work or other relevant professions.⁴⁶

⁴² Ibid, section 36

⁴³ An act to amend the Professional Code and other legislative provisions in the field of mental health and human relations;
<http://www2.publicationsduquebec.gouv.qc.ca/dynamicSearch/telecharge.php?type=5&file=2009C28A.PDF>

⁴⁴ <http://www.moh.govt.nz/hpca>, accessed 7 September

⁴⁵ <http://www.pbanz.org.nz/index.php?AbouttheLegislation>,

⁴⁶ <http://www.pbanz.org.nz/index.php?PathwaystoRegistration>

3.56 In both cases, individuals must complete 900 hours of supervised clinical psychotherapy practice over at least three years with regular clinical supervision from a registered psychotherapist. Applicants must also complete 120 hours of personal psychotherapy with a registered psychotherapist. In both cases, these hours can be undertaken either during and/or after the qualification has been completed.⁴⁷

Scope of practice for psychotherapy

3.57 Under the HPCAA, all regulatory authorities must set scopes of practice for the professions that they regulate. The board has set a scope of practice for psychotherapists who work with all clients, for psychotherapists who work with children or young people and for psychotherapists who are completing their training.⁴⁸ These scopes of practice were set in 2008.

3.58 The scope of practice for psychotherapists requires psychotherapists to be competent to use various methods of psychotherapy to help clients in their ‘...personal growth, relationship development, psychological life issues and mental health problems’.

3.59 Psychotherapy can involve the following, but is not limited to ‘...exploring the origins; maintenance and change of life patterns; the assessment, formulation, diagnosis and treatment of mental health problems; and working with patterns of psychological life which may be outside of conscious awareness, including non-verbal and preverbal patterns’.⁴⁹

New Zealand Association of Counsellors

3.60 Counselling is not regulated through the HPCAA, although there is a voluntary register run through the New Zealand Association of Counsellors.

3.61 Training is delivered at various levels from diploma to Masters level. The minimum entry requirements are a diploma in counselling which has a minimum requirement of 1200 hours of course content. Programmes should also include supervised counselling practice.⁵⁰

Australia

3.62 Neither psychotherapists nor counsellors are subject to statutory regulation in Australia. However, there are two umbrella organisations in Australia which undertake the roles of voluntary regulators. They are the Psychotherapy and Counselling Federation of Australia (PACFA) and the Australian Counselling Association (ACA). These organisations have

⁴⁷ Policy on qualifications and eligibility for registration, available <http://www.pbantz.org.nz/index.php?Policy>

⁴⁸ <http://www.pbantz.org.nz/index.php?Scope>

⁴⁹ Ibid

⁵⁰ <http://www.nzac.org.nz/training.html>

worked together to develop a single Australian counselling and psychotherapy register.

Australian Register of Counsellors and Psychotherapists

- 3.63 The Australian Register of Counsellors and Psychotherapists (ARCAP) was established on 1 July 2010. ARCAP is the independent national professional self registration body recognised by the ACA and the PACFA for Australian counsellors and psychotherapists.⁵¹
- 3.64 Individuals gain registration with ARCAP after meeting the requirements set by the ACA and the PACFA. These requirements are explored in paragraphs 3.71 to 3.78 below.

Definitions of psychotherapist and counsellor

- 3.65 Work is ongoing to develop recognised definitions of 'ARCAP Counsellor' and 'ARCAP Psychotherapist'. The intention is to maintain the field of counselling and psychotherapy and not introduce divisions unnecessarily. In both cases, there are membership requirements set for entry to the Register which include both training and experience.
- 3.66 The draft proposal is that an ARCAP counsellor is someone who meets the membership requirements and is able to '...assess and respond holistically to the needs of people who may be individuals, families, couples, groups or communities of interest in their family, social and cultural contexts and to assist clients to resolve a wide range of issues affecting their emotional wellbeing and social functioning'.
- 3.67 An ARCAP Counsellor can practise in the field of counselling and psychotherapy. Counselling is taken to include '...the development and maintenance of an interpersonal professional relationship and activity in which one person endeavours to help another to understand and to focus upon specific problems or changes in life transactions including situations where specialised knowledge and method are needed'.
- 3.68 An ARCAP psychotherapist is an individual who meets the membership requirements and is able to '...to help clients to develop insight and understandings that mediate personal unsuit, disordered patterns of thinking and/or behaviour and promote positive personality growth and development'. Psychotherapy and counselling are seen as distinct in this area from treatments which use chemical or physical measures.
- 3.69 Psychotherapy is considered in this context as the '...application of focused inter-personal, intra psychic and/ or psychological theory based treatment applications that enable people to develop insight, self and inter-subjective understanding and to make changes in their lives within the framework of a contracted professional relationship'.

⁵¹ <http://www.ccaa.net.au/documents/pacfaenewsugust.pdf>

- 3.70 It is acknowledged that individuals registered with ARCAP may want to use one or both occupational titles within the services they provide and that there is considerable overlap between the draft definitions of these titles. However, it is suggested that in some areas psychotherapy has greater overlap with counselling at advanced levels of training rather than foundation levels of training. This includes in assisting individuals to remove, modify and respond to symptoms or problems.

Psychotherapy and Counselling Federation of Australia

Registration requirements

- 3.71 The PACFA hold a register of psychotherapists and counsellors. These individuals meet the registration criteria set by PACFA and agreed by the membership associations.⁵² Every psychotherapist or counsellor whose name appears on the PACFA register must belong to a PACFA membership association.
- 3.72 There are two categories on the PACFA register, Clinical and Provisional membership. Clinical membership is for individuals who are practising as autonomous and accountable professionals, whilst provisional membership is for individuals who do not yet meet the post training Clinical and supervision hours.⁵³
- 3.73 There are 3 different training and supervised experience pathways by which individuals gain clinical membership. One route is for individuals who have completed an undergraduate degree in counselling and/or psychotherapy and client contact. The second route is for individuals who have completed a relevant degree and then undertake specialist training in psychotherapy and counselling as well as client hours.
- 3.74 The third route is for individuals who do not meet the education requirements but can be admitted on the basis of prior learning, training and experience. They may have to undertake more hours of client contact and post-training supervision to meet the requirements.

Australian Counselling Association

Registration requirements

- 3.75 The ACA holds a national register of counsellors who meet the registration criteria. There are different levels of membership depending upon the individual's level of qualification, the number of years in practice and the number of hours of professional supervision. There are different charges for registration depending upon the level of registration. However, the different levels of registration do not currently seem to be reflected in the publicly available register.

⁵² <http://www.pacfa.org.au/nationalregister>

⁵³ <http://www.pacfa.org.au/nationalregister/cid/4/parent/0/t/nationalregister/l/layout>

- 3.76 There are four different levels of membership based on different levels of qualification. For example, level 1 is for individuals who have completed an accredited course at diploma level and undertake ongoing professional development and professional supervision. By contrast level 4 is for individuals who have completed a minimum of degree level programme and then at least 6 years of post-qualification counselling experience with professional supervision and ongoing professional development.
- 3.77 These levels of membership reflect the differences in training provision as counselling training is provided from diploma level to PhD level in some states.
- 3.78 In addition to allocating new members to different levels of registration, existing members have also been allocated a level of registration, based on the information they have provided to ACA. This means that it is possible for individuals to change their level of registration, depending upon their experience.

4. Discussion

- 4.1 In this section the HPC Executive has highlighted some points for discussion but this is not intended to be exhaustive.
- 4.2 There are several outstanding areas within the PLG's terms of reference, including whether there should be differentiation between psychotherapists and counsellors and the threshold level(s) of qualification for entry to the Register.
- 4.3 This paper looks at the international perspective on both of these issues and the information provided may help the PLG to consider these outstanding areas. However, broader issues around the different models of regulation and suitability of these models have not been considered as they are not within the PLG's terms of reference.
- 4.4 As can be seen from the information above, each of the countries identified have developed their own models for regulating psychotherapists and counsellors. The differences in models of regulation may be a result of the country's particular context and development including cultural, political, legal and historical factors. These issues are not discussed in this paper.
- 4.5 There are considerable differences in how both differentiation and the qualifications required to practise safely are approached internationally. In several of the examples given above, only one of the professions is subject to mandatory regulation. This can make it difficult to draw comparisons between the registration requirements.

Differentiation

- 4.6 Differentiating between psychotherapy and counselling is difficult in some of the examples given above because there is overlap between the

definitions. For example, the definition of professional counselling used in Arizona makes specific reference to the ability to use psychotherapy to assess, appraise, evaluate, diagnose and treat clients. Similarly, the definition of psychotherapy in Vermont makes reference to the provision of counselling services to clients.

- 4.7 In Ontario, there is a definition of both psychotherapy and counselling enshrined within relevant legislation. Under these definitions, the definition of psychotherapy can be summarised as the assessment and treatment of disturbances whilst the definition of counselling can be summarised as a communication about an emotional, social, educational or spiritual matter.
- 4.8 The draft definitions proposed for the Australian register follow similar models. Counselling incorporates a client-practitioner relationship and activities which allow the practitioner to help the client to understand and focus on specific problems. By contrast, psychotherapy is the application of focused based treatment applications within the client-practitioner relationship that enable people to make changes. As with the Ontario model, the definition of psychotherapy makes reference to treatment, which is not language used within the definitions of counselling.
- 4.9 However, it is important to stress that the distinction drawn between psychotherapy and counselling in this way is not consistent. For example, the definition of clinical mental health counselling in Vermont (which makes reference to psychotherapy) also refers to the application of principles to treat psychopathology.

Level of qualifications

- 4.10 Where psychotherapists are registered, the level of qualification for entry to the Register is usually set at a Masters degree or higher.
- 4.11 For counsellors however, there is considerable variation in the level of qualification for entry to the Register. Sometimes, as in Québec the level of qualification is set at Masters level. However, this requirement often relates to counselling which involves psychotherapy such as clinical mental health counselling (rather than counselling as distinct from psychotherapy).
- 4.12 By contrast, the current proposals on level of qualification for entry to ARCAP vary, reflecting differences in training provision. The Australian system recognises that there is some overlap between the practice of psychotherapy and counselling, hence why the variations in levels of qualification.

Conclusions

- 4.13 The PLG is invited to discuss the information contained in this paper and the discussion above.