



Psychotherapy & Counselling  
Federation of Australia

26 June 2020

Minister the Honorable Dan Tehan  
Minister for Education  
Via email: [dan.tehan.mp@aph.gov.au](mailto:dan.tehan.mp@aph.gov.au)  
Cc: The Hon Greg Hunt, Minister for Health

Dear Minister,

**Re: Higher Education Reform Package**

I am writing to raise concerns about the impact of the proposed higher education reforms on the future of the mental health workforce.

The Higher Education Reform Package focuses public investment in higher education on national priorities. However, it overlooks current shortfalls in the mental health workforce and contradicts the Morrison government's commitment to addressing mental health and suicide prevention as national priorities.

As a peak body for the counselling and psychotherapy profession, PACFA has grave concerns that the proposed increased prices to study counselling or psychotherapy will deter students from studying to enter these health professions. This will have a devastating impact on our profession while also contributing to workforce shortages in the mental health sector.

The cost of studying counselling or psychotherapy will go up from \$6,805 to \$14,500 per year. The same price increase will apply to social work and psychology. Only Clinical Psychology has been prioritised in the Higher Education Reform Package, but this is not an adequate response to address the training needs of the Australian mental health workforce. The mental health workforce is a diverse and multi-disciplinary workforce, not just a workforce of Clinical Psychologists.

PACFA welcomes the Government's commitment to Higher Education reform but we believe more work is needed to ensure the Reform Package supports mental health as one of the Government's national priorities.

I have prepared the attached briefing paper to advise you of the issues that need to be considered as you progress work on the Higher Education Reform Package and I will be approaching your parliamentary colleagues within Government and the Opposition to raise this crucial workforce issue.

I also request the opportunity to meet with you to discuss our concerns and to propose improvements to the Reform Package. I am available at your convenience for a zoom meeting.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Maria Brett', written in a cursive style.

Maria Brett  
PACFA CEO

**Psychotherapy & Counselling Federation of Australia Inc**

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# Briefing Paper: The impact of the proposed Higher Education Reform Package on the mental health workforce

Under the proposed Higher Education Reform Package, training to enter a mental health profession will be at significantly higher costs for students. This will act as a disincentive for diverse mental health specialisations and have a serious impact on Australia’s capacity to meet exponential growth demands for mental health services and to address current and projected workforce shortages.

The Higher Education Reform Package focuses public investment in higher education on national priorities. However, it overlooks mental health which has been identified by the Morrison government as a very high priority for Australia.

Current mental health policy initiatives include:

- The [Productivity Commission Inquiry into the social and economic benefits of improving mental health](#). The Productivity Commission is due to hand down its report in June 2020.
- The [Fifth National Mental Health and Suicide Prevention Plan](#). The Fifth Plan represents commitment from all governments to work together to achieve integrated planning and service delivery of mental health and suicide prevention related services.
- Development of the [National Mental Health Workforce Strategy](#), which commenced in January 2020. The Strategy will consider the quality, supply, distribution and structure of the mental health workforce. It will identify practical approaches that could be implemented by Australian governments to attract, train and retain the workforce required to meet the demands of the mental health system in the future. It includes a working group looking at Workforce Training and Education.

Training to enter the mental health workforce, including training in counselling or psychotherapy, should be prioritised in the Higher Education Reform Package. This would result in reduced costs to train in all mental health professions, not increased costs.

## Classification of mental health training pathways

Under the Australian Standard Classification of Education (ASCED), all training pathways for the mental health workforce, including counselling and psychotherapy, are classified under “Society and Culture”. Counselling (including psychotherapy) as well as Social Work and Psychology are three alternative pathways to the mental health workforce and all fall within Funding Cluster 1 and Student Contribution Band 4.

**Table 1: Australian Standard Classification of Education (ASCED)**

<b>09</b>	<b>SOCIETY AND CULTURE</b>
<b>0905</b>	<b>HUMAN WELFARE STUDIES AND SERVICES</b>
	090501 Social Work
	090513 Counselling (& psychotherapy)
<b>0907</b>	<b>BEHAVIOURAL SCIENCE</b>
	090701 Psychology

Source: Australian Bureau of Statistics, [Australian Standard Classification of Education](#)

## Cost of training for the mental health workforce

The cost of training to enter the mental health workforce will be significantly higher than for other health professions that are classified under “Allied Health” or “Other Health” in the ASCED. The impact on the mental health professions, in comparison with a selection of other health professions, is highlighted in Table 2 below.

**Table 2: Comparison of education costs for different health professions**

<b>ASCED Classification</b>	<b>Student contribution Current – per year</b>	<b>Student contribution Current – per year</b>
<b>09 SOCIETY AND CULTURE</b>		
090501 Social Work	\$6,804	\$14,500
090513 Counselling (& psychotherapy)	\$6,804	\$14,500
090701 Psychology	\$6,804	\$14,500
090701 Clinical Psychology	\$6,804	\$3,700
<b>06 HEALTH</b>		
061701 Physiotherapy	\$9,698	\$7,700
061711 Massage Therapy	\$9,698	\$7,700
069903 Human Movement	\$9,698	\$7,700
061901 Naturopathy	\$9,698	\$7,700

There is a perverse impact when entire classification categories from the ASCED are allocated to clusters and bands in the proposed Higher Education Reform Package. For example, counselling and psychotherapy, along with other mental health professions, will experience a price increase of \$7,696 per year for their education (up 113%), while Massage Therapy and Naturopathy will experience a decrease of \$1,998 (down 20.6%).

No clear rationale has been provided for decreasing the cost to training in other health professions, while increasing the cost of training for the mental health professions.

Only Postgraduate training in Clinical Psychology has been prioritised in the Higher Education Reform Package, even though it would also be classified under “Society and Culture” under the ASCED. Clinical Psychology education will experience a price decrease of \$3,104 (down 45.62%). However undergraduate psychology training would be at a very high cost (\$14,500 per year, like all other mental health training options) in order to enter postgraduate Clinical Psychology training.

It is not adequate to only prioritise Clinical Psychology in the Higher Education Reform Package as the mental health workforce is a diverse and multi-disciplinary workforce, not just a workforce of Clinical Psychologists.

### **Recommendations:**

1. All mental professions, including counselling and psychotherapy, should be treated in the same way as Clinical Psychology in the Higher Education Reform Package (Cluster 2 for Commonwealth Contributions and Band 1 for Student Contributions).
2. The Taskforce responsible for recommendations to Government on the National Mental Health Workforce Strategy should liaise with the Department of Education around the Higher Education Reform Package in relation to the future costs of training for the mental health workforce.