

Headspace Plus and YSCC Draft Models of Care Consultation

Psychotherapy and Counselling Federation of Australia Submission

05 June 2026

This response is written by the Psychotherapy and Counselling Federation of Australia (PACFA), the leading national peak body for the tertiary-qualified counselling and psychotherapy profession.

PACFA welcomes the opportunity to contribute to the consultation on Headspace Plus and the Youth Specialist Care Centres (YSCC). This submission highlights the role of counselling and psychotherapy in strengthening a person-centred, accessible, and sustainable mental health system for young people.

In this response the terms “counsellor” and “psychotherapist” can be used interchangeably to refer to tertiary qualified allied health professionals registered with PACFA as Certified Practising Counsellors (entry level), Registered Clinical Counsellors (full Scope of Practice) and Registered Clinical Psychotherapists (extended Scope of Practice). PACFA Registrants are fully qualified allied health practitioners as recognised by PACFA’s full membership of Allied Health Professionals Australia (AHPA). PACFA is a qualifying member of the National Alliance of Self-Regulating Health Professions (NASRHP).

For more information about clinical competencies of these workforces refer to Clinical competencies for Certified Practising Counsellors and Clinical Competencies for Registered Clinical Psychotherapists. (hyperlinks)

Recommendations

PACFA welcomes the inclusion of counsellors and psychotherapists among the clinicians delivering care through the Headspace Plus initiative, recognising the vital role these professionals play in providing accessible, developmentally appropriate mental health support for young people.

However, the current definition for clinician in the Glossary of Terms privileges Australian Counselling Association (ACA) registration, noting PACFA as an equivalent. This does not accurately reflect the current registration landscape for



counselling and psychotherapy. PACFA holds the highest registration standards in Australia, and the only mental health counselling body to be a full member of Allied Health Professions Australia (AHPA). Greater utilisation of PACFA registered counsellors within Headspace Plus and YSCC will lead to a higher trained and accountable workforce.

PACFA notes that counsellors and psychotherapists bring a diverse range of evidence-based therapeutic approaches and a strong focus on early intervention, engagement, and continuity of care, key components in improving youth mental health outcomes. PACFA recommends that this inclusive, multidisciplinary approach be consistently applied in the design and implementation of Youth Specialist Care Centres.

Ensuring that counsellors and psychotherapists are embedded within these centres will strengthen service capacity, enhance treatment choice for young people and their families, and support more holistic, person-centred care pathways. Counselling in the YSCC model can be particularly effective for young people with emerging mental illness, and in multidisciplinary care teams for young people with complex needs or severe mental illness. Replicating this model will also promote workforce sustainability and maximise the effectiveness of the broader youth mental health system.

National Standards for Counsellors and Psychotherapists

Counselling is an underutilised asset in the mental health workforce and can play a significant role in prevention, early intervention and recovery. In October 2025, PACFA welcomed the [National Standards for Counsellors and Psychotherapists](#) published by the Australian Department of Health, Ageing and Disability.

The implementation of these standards, over the next three to five years, will promote greater access to registered counsellors in a wide range of clinical settings and will contribute to a more sustainable mental health system. This project will confirm counsellors and psychotherapists as a health and mental health workforce, signifying a turning point for the profession in addressing barriers to workforce utilisation and increasing our capacity to support Australians in distress.

PACFA's high standards align closely with those established in the National Standards, and we are proud to see the quality and professionalism of our members recognised as the benchmark for the industry. This confirmation of counsellors and psychotherapists as a key part of the mental health workforce will assist in providing flexible and multidisciplinary healthcare that meets the needs of the community.

1. Response to Workforce Glossary

The current definition for clinician in the Glossary of Terms does not accurately reflect the level of training, experience and ongoing development that PACFA Registrants uphold. The definitions within ‘clinician’ and ‘Counsellor and Psychotherapist’ fails to acknowledge the incoming National Standards for Counsellors and Psychotherapists, or the higher standards of PACFA. Given the focus of Headspace Plus and YSCC to work with young people at a transformative time in their lives, PACFA recommends prioritising PACFA registered counsellors that meet rigorous registration requirements and ongoing professional standards.

PACFA holds the highest registration standards in Australia and is the only mental health counselling body to be a full member of Allied Health Professions Australia (AHPA) and qualifying member of the National Alliance of Self-Regulating Health Professions (NASRHP). In contrast to less rigorous entry pathways found elsewhere, PACFA’s model ensures a high level of practitioner training and accountability, by requiring our registrants to hold tertiary qualifications, and maintain supervision and continuing professional development standards. As an organisation, PACFA operates as an independent non-profit without corporate conflicts of interest. Utilising PACFA registered counsellors within Headspace Plus and YSCC will enable the utilisation of a higher trained and accountable workforce.

PACFA registration enables Headspace Plus and YSCC to identify and recognise counsellors who have completed accredited tertiary training and uphold high professional and ethical standards. To be registered with PACFA, practitioners must meet the following requirements:

- ‘Certified Practising Counsellors’ must have completed an accredited course or equivalent (this mandates that the course must be Bachelor or postgraduate level, (AQF 7-9) and include a placement and clinical supervision).
- ‘Registered Clinical Counsellors’ must have completed the above plus an additional 750 hours of client contact and 75 hours of clinical supervision over more than two years. This recognises the experience of senior counsellors.
- ‘Registered Clinical Psychotherapists’ must be a clinical member of PACFA as above and have completed significant specialised psychotherapy training as well as personalised therapy.

PACFA recommends the following amendments to the Workforce Glossary:

<p>First Nations practitioners (dual role i.e. a Mental Health Clinician who is First Nations)</p>	<p>First Nations practitioners deliver their primary role while also bringing lived, cultural and community knowledge as First Nations people into everyday practice. They support culturally safe engagement, care and outreach for First Nations young people and families and strengthen integrated care pathways through culturally informed practice within the multidisciplinary team.</p>
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	Includes registered counsellors who are also members of the College of Indigenous Healing Practices of the Psychotherapy and Counselling Federation of Australia.
Clinician	<p>Clinicians refer to staff including Social Workers, Occupational Therapists who have completed an undergraduate or Master’s degree; Psychologists (fully registered general psychologist and Provisional psychologist); Division 1 registered nurses i.e. General (APHRA) performing mental health activities who have not completed mental health post graduate training.</p> <p>Counsellors or Psychotherapists whose skills, training and experience are equivalent to the requirements outlined within Career Stage 2 or 3 as outlined in the National Standards for Counsellors and Psychotherapists and is registered with the Psychotherapy and Counselling Federation of Australia (PACFA) or Australian Counselling Association (ACA).</p>
Counsellor/ psychotherapist	<p>Counsellors or Psychotherapists who met the requirements for Career Stage 3 as outlined in the National Standards for Counsellors and Psychotherapists and are registered with the Psychotherapy and Counselling Federation of Australia (PACFA) or Australian Counselling Association (ACA).</p> <p>Psychotherapists who met the requirements for Career Stage 3 as outlined in the National Standards for Counsellors and Psychotherapists and are Registered Clinical Psychotherapists registered with the Psychotherapy and Counselling Federation of Australia (PACFA).</p>

2. Response to Components of Draft Models

Counsellors and psychotherapists are highly trained experts in talk therapies (often referred to as psychotherapies). Working with people across the lifespan they provide evidence-based interventions to build self-awareness, enable psychological connection and reduce distress. Counsellors work with individuals, couples and groups in a wide range of settings including crisis centres, primary health care, schools, acute settings, rehabilitation and private practice.

Counselling is flexible and adaptable to the needs of the client and their careers and supports, particularly in targeting programs to children, families and relationships. Workforce data from 2020 illustrates that over 35% of counselling practitioners already work with young people or children showing high demand and expertise, yet less than 6% are employed in education/youth focused settings.

Flexibility to allow for local implementation

PACFA supports flexible funding arrangements to ensure that Headspace Plus and YSCC can commission services that best meet community needs.

Counsellors have the capacity and experience to play a much larger role within community focused mental health services and contribute to addressing a broad

range of mental health concerns. Unfortunately, however, current funding mechanisms often limit the effective utilisation of the available counselling workforce.

This is particularly relevant for rural, regional and remote areas where access to support can be lower than metropolitan areas. A workforce survey conducted in 2020 reported that almost a third of PACFA counsellors were located outside of metropolitan areas. PACFA represents more than 12,000 members nationally, and greater utilisation would significantly expand the size and diversity of the mental health workforce across both private and public settings. Workforce surveys have indicated that approximately 60% of counsellors could see new patients within two weeks, and 25% could see new patients within 24 hours. This represents a highly qualified and capable mental health workforce going underutilised, at the expense of rural and regional communities who need timely access to mental health support.

Current commissioning structures limit the provision of counselling to non-counselling trained professionals, such as psychologists. This unnecessarily limits all talk therapy provision to the non-person-centred paradigm of diagnosis and symptom management. Counselling can be effective for a wide range of mental health related needs that do not align with diagnosis, such as grief and loss, alcohol and other drug abuse, stress and anxiety, depression-associated malaise, school counselling, early intervention for suicide risk, family therapy, crisis support, domestic violence and relationship counselling.

Workforce required to adequately deliver these models of care

PACFA-registered counsellors are best placed to provide mental health services within Headspace Plus centres. PACFA has been concerned about the ability for unregistered and undertrained counsellors to provide mental health services, as they do not possess the training, supervised practice, or professional regulation required to deliver high-quality therapeutic supports. These practitioners are particularly ill-suited to providing therapeutic services to highly vulnerable or complex clients such as people with disabilities.

The vocational counselling workforce consists of practitioners trained through the TAFE or private training sector at Diploma or Certificate levels (AQF Levels 5 and 6 or below), particularly since 2010. These programs are typically shorter in duration, often taking weeks or months rather than years, and focus on developing foundational counselling skills. Designed to prepare “paraprofessionals,” they result in markedly different competencies, scopes of practice, and professional identities when compared with degree-qualified counsellors. This can result in inconsistent standards of care and limited accountability on the practitioner.

PACFA recommends that counsellors delivering supports within the Headspace Plus and YSCC models hold tertiary-level qualifications and are subject to robust professional accountability, including adherence to a Code of Ethics and professional conduct procedures. These standards are already met by PACFA's registered practitioners. In addition to our ethical and practice safeguards, registrants are provided with consistent professional development opportunities to expand their practice and access to quality supervision. Only PACFA accredited courses meet NASRHP requirements including sector-led curriculum and placement requirements that align with the National Standards for Counsellors and Psychotherapists. No other registration body has met these requirements.

Integration with existing mental health and other relevant services.

Without diversity in the commissioning of care there will not be effective mixed team models of care. At present, counsellors and psychotherapists are overlooked for roles that align squarely with their expertise, with positions instead assigned to psychologists, social workers, or occupational therapists.

Registered Counsellors represent an affordable alternative for multi-disciplinary teams across a broad range of service settings and patient cohorts. A mixed-team model would be more effective with a diverse range of practitioners working within their scopes of practice to provide multidisciplinary care to patients. Enabling the participation of counsellors in multidisciplinary health care would allow other allied health professions to work more productively within their defined scopes of practice. The outcome would be a flexible, stepped approach to mental health care that is responsive to the young person's needs.

PACFA's full membership of Allied Health Professions Australia (AHPA) and qualifying membership of NASRHP, means that PACFA counsellors are recognised as allied health professionals.

Delivering evidence-based services for young people

PACFA counsellors provide therapeutic support grounded in strong professional standards, including ongoing development and established procedural safeguards, and are supported by a robust evidence base in their practice. Counsellors and psychotherapists draw on the best of psychological and neuroscientific research, combining it with philosophical understandings of the human condition, lived experience, and practical skills. A 2020 study by Converge International¹ found that counsellors outperformed psychologists in several key areas, including building rapport, understanding client issues, and achieving better outcomes, while also

¹[Converge Australia, \(2020\) Counselling Efficacy Between Professions: White Paper](#)

receiving fewer complaints, a finding consistent across employee assistance programs.

The greatest strength of counselling, particularly for young people, is the potential to deliver a range of evidence-based therapeutic approaches. This includes modalities such as cognitive behavioural therapy, delivered in a relational and flexible way that does not depend on formal diagnosis. For example, a study in the UK found that young people experiencing disordered eating greater found improved outcomes from experiencing person-centred counselling.² Expanding access to person-centred counselling within Headspace Plus and YSCC is essential, particularly given that 27% of eating disorders impact people aged 10 – 19.³

In this context, strengthening the role of PACFA counsellors within youth-focused services represents a practical and evidence-informed approach to improving mental health outcomes. Headspace Plus and YSCC can better meet the needs of young people through increasing access to flexible, accessible, and developmentally appropriate care. Recognising and utilising the tertiary-trained counselling workforce not only builds on established capability, but also ensures that service delivery remains effective, responsive, and grounded in approaches proven to support positive outcomes for young people.

Further information

Please see our website for further information on PACFA's work and publications. For further information about how the Department of Health, Disability and Ageing could utilise PACFA members, or the clinical practice of counselling and psychotherapy, please contact:

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² Ward, S., Daughtrey, N., Constable, C., & Bell, J. (2024). Exploring young people with eating difficulties and their caregivers' experiences of person-centred counselling. *Counselling and Psychotherapy Research*, 24(3), 1120–1132. <https://doi.org/10.1002/capr.12757>

³ <https://eatingdisorders.org.au/eating-disorders-a-z/eating-disorder-statistics-and-key-research/>