

# Feedback on the Eligible Course List

AUSTRALIAN INSTITUTE OF  
FAMILY COUNSELLING



aifc

**Mr Nicholas Marks**

**CEO**

Australian Institute of Family Counselling (aifc)

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MITCHELL, ACT 2911

# Introduction

The Australian Institute of Family Counselling (AIFC) thanks the Minister and the Department of education for the opportunity to have feedback on the Eligible Course List within the proposed VET Student Loans scheme. AIFC is a Not-For-Profit faith based niche provider employing approximately 60 staff and training approximately 500 students (EFTSL) nationally. AIFC has been operating as a Registered Training Organisation (RTO) since 2001 and a VET FEE-HELP (VFH) provider since 2010. We share the Minister's and Department's concerns over unethical practices and the need for Robust reform of student loans and the mechanisms and frameworks in which it operates to ensure an innovative, dynamic and flourishing outcomes driven VET Sector.

Within this submission we are specifically requesting that the AIFC courses be added to the Eligible Course List and demonstrate via our quality courses, unique position, skills shortage, accreditation and excellent employment outcomes evidenced from industry, the compelling reasons for course list inclusion; specifically:

- There is a demonstrated need, skills shortage and industry and student demand for Counsellors and Psychotherapists
- There are no courses for Psychotherapist on the Eligible Course List
- AIFC is the ONLY industry-accredited training provider in the VET sector which has both Australian Counselling Association (ACA) and Psychotherapy and Counselling Federation of Australia (PACFA) accreditation, and we deliver the ONLY three-year accredited Psychotherapist pathway in the entire VET sector. (See PACFA letter)
- AIFC are employment outcomes driven as evidenced within this submission by our accreditation focus, industry and employers. (See Hillson letter)
- AIFC have very high course and unit completion rates as noted within the submission

## DEMONSTRATED NEED

- The Government's Skilled Occupation List acknowledges there is a need for psychotherapists.
- There are no courses on the VET student loan eligible course list which address this skills need.
- Therefore, the number of trained psychotherapists will significantly decrease unless there are changes to the VET student loan eligible course list.
- Counselling is also an area facing skills shortages – evidence of this is the Diploma of Counselling (CHC51015) being on the eligible course list, as well as the NSW state skills shortage list.
- Adding the Diploma in Counselling (Christian) to the eligible course list would mean the only two courses at diploma level which meet the standards of the Australian Counselling Association would be on the list.

Within the context of 'social good', Australia's mental health is worsening. Mental health is a priority area for Government and the Australian community with 5th Mental Health Plan currently being drafted by the Minister for Health and Aged Care.

AIFC is an important player in both the education and training sector and in the area of mental health.

The courses to be added to the Eligible Course List are:

1. 10134NAT Graduate Diploma in Counselling and Integrated Psychotherapy (Spiritual)
2. 10487NAT Advanced Diploma in Counselling and Family Therapy
3. 10486NAT Diploma in Counselling (Christian)

AIFC only have one major intake per year in February and currently have many current (3 year pathway) and new incoming students effectively 'stranded' and confused for 2017 intake for which enrolments are now open.

We humbly request that these courses and for the compelling reasons detailed within this submission, be added to the Eligible Course List as soon as possible.

# Executive Summary

## INDUSTRY

- Counsellor and Psychotherapist listed as skills shortage occupations
- Currently no course on the Eligible Course list addressing Psychotherapist need in VET Sector
- Significantly worsening mental health of Australians effecting individuals, families and communities
- The peak professional bodies are the ACA and PACFA
- The Higher Education accredited alternative accredited 3 year pathway is 68% more expensive than AIFC.
- Faith based organisations are the largest provider of critical social services in Australia

## AIFC

- Deliver the ONLY 3 year accredited pathway in the Australian VET sector
- ONLY VET provider that is industry accredited with ACA and PACFA
- Evidenced Employment Outcomes
- Unit completion >80%
- Course completion >70%
- Low course fees
- High Quality, small (<\$5mil) niche Not-For-Profit registered charity & training provider.
- Utmost integrity and Governance
- High student satisfaction
- Industry and student driven not profit driven

## 3 YEAR PACFA\* ACCREDITED PATHWAY

### DIPLOMA

10486NAT: Diploma of Counselling (Christian)

**ANZCO CODE:** 272199  
Counsellor (nec)

#### SKILLS SHORTAGE:

- Counsellor listed Eligible Course List
- 1st year of 3 year pathway

#### INDUSTRY RECOGNISED:

- ACA\*\* Level 1

### ADV. DIPLOMA

10487NAT: Counselling & Family Therapy (Christian)

**ANZCO CODE:** 272133  
Marriage & Family Counsellor

#### SKILLS SHORTAGE:

- 2nd year of 3 year pathway

\*3 years is minimum requirement for Psychotherapist and Counselling Federation of Australia membership  
\*\*Australian Counselling Association

### GRAD DIPLOMA

10134NAT: Counselling & Psychotherapy (Spiritual)

**ANZCO CODE:** 272134  
Psychotherapist

#### SKILLS SHORTAGE:

- Year 3 of Pathway
- On Skilled Occupations List

#### INDUSTRY RECOGNISED:

- ACA\*\* Level 1 (as a 1st year post grad course)
- PACFA year 3 graduate

## THE CHALLENGE

- **Removal of sole funding mechanism for any student to become a Psychotherapist in the VET sector to address the skills, social need and employment outcomes!**
- Limits industry (ACA) accreditation options for students in the VET sector
- Negatively impacts student outcomes and choice via a 'no option' or 'much more expensive option' through Higher Ed.
- Threatens AIFC viability as an industry and student driven niche provider
- Contrary to intent of the reforms
- Negative impact on 'social good'

## THE SOLUTION

- Addition of AIFC Diploma on Eligible Course List at band 2
- Addition of AIFC Advanced Diploma on Eligible Course List at band 2
- Addition of AIFC dual accredited Graduate Diploma on Eligible Course List in band 3 (Level 8 and higher delivery costs) on loan cap based on social good, uniqueness for industry, employment outcomes and student demand.

## THE BENEFITS

- Provides funding mechanism to address the skills shortage, employment outcomes and social need through low cost competency based training program via 3 year pathway.
- Does not establish any precedent that results with unforeseen flow on costs or other courses being added to the Eligible Course List.
- Provides important consistency between the ACA accredited courses & the Eligible Course List
- Aligns the Governments Skilled Occupations List & the Eligible Course List (currently 80% + aligned)

# Industry and Social Context

The current VET Student Loan Eligible Course list recognises the skills shortage and need for counsellors by the inclusion of the *Diploma of Counselling (CHC51015)*. There is also a recognised need for Psychotherapists (*ANZSCO code 272314*) per the Government's own **Skilled Occupation List**<sup>2</sup>. We note that there are no courses on the Eligibility list that address this skills need even though *10134NAT Graduate Diploma in Counselling and Integrated Psychotherapy (Spiritual)* is accredited by industry as resulting in the qualification of Psychotherapist<sup>3</sup> and is classified by ASQA with the relevant ANZSCO identifier (272314).

All of the courses offered by AIFC are purpose built to address the **worsening state of mental health** and wellbeing amongst Australian citizens and are crucial for the social good. Mental health is fundamental to our overall life satisfaction and wellbeing. Over the last three years, the number of Australians experiencing a mental or behavioural condition has increased by over 1 million people – with over 4 million Australians (17.5%) now reporting this. Anxiety related problems and mood (affective) disorders are those most commonly experienced for both males and females.

Whilst over 1 in 10 (11.7%) of Australians aged over 18 report that they experience high or very high psychological distress, this is most pronounced amongst younger Australians, rising to 15.4% of those aged 18-24. Females are more likely to experience these high or very high levels of psychological distress, impacting 13.5% of females, and 1 in 5 females (20%) aged 18-24<sup>4</sup>. The issues of greatest concern for young Australians are coping with stress, school or study problems, body image and depression<sup>5</sup>.

Greater complexity occurs for those with a co-existing mental and behavioural condition. Over 1 in 8 (13.3%) experience a co-existing mental health condition with two or more physical conditions.

Addressing this growing issue will require a strategy that includes well trained, properly accredited Counsellors and Psychotherapists. Accreditation in Australia is only possible through **two peak professional bodies**:

1. The Australian Counselling Association (ACA)
2. The Psychotherapy and Counselling Federation of Australia (PACFA)

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<sup>1</sup> Redesigning VET FEE-HELP Discussion Paper May 2016

<sup>2</sup> Department of Education and Training's Skilled Occupations List "identifies occupations that would benefit from skilled migration for the purpose of meeting the medium to long-term skill needs of the Australian economy." Ref: <https://www.education.gov.au/skilled-occupations-list-sol>

<sup>3</sup> Please refer to attached letter dated 7th September 2015.

<sup>4</sup> ABS, 4329.0.00.004 - *National Health Survey: Mental Health and co-existing physical health conditions*, Australia, 2014 – 15

<sup>5</sup> ABS, 4364.0.55.001 - *National Health Survey: First Results, 2014-15*, Mission Australia 2015 Youth Survey Report

The table lists all the industry (PACFA) accredited providers of three year training for membership

## INDUSTRY (PACFA) ACCREDITED PROVIDERS OF THREE YEAR TRAINING FOR THE MEMBERSHIP

Course Provider	Sector	Total Cost*
Think: Colleges Pty. Ltd trading as Jansen Newman Institute	Higher ED	unavailable
University of Southern Queensland	Higher ED	\$52851
Australian College of Applied Psychology	Higher ED	\$49200
University of Sunshine Coast	Higher ED	\$45867
Christian Heritage College	Higher ED	\$38280
University of Notre Dame Australia	Higher ED	\$37725
<b>Australian Institute of Family Counselling</b>	<b>VET</b>	<b>\$27100</b>

\* Includes student and government contribution

NOTE: Average cost of Higher Education course = \$45,520 (68% more than AIFC)

Faith-based charities make an enormous and arguably under-recognised contribution to Australia's social infrastructure and social well-being.<sup>6</sup> As the largest provider of Faith Based counselling training in Australia, AIFC is uniquely and strategically placed to assist these organisations<sup>8</sup>. AIFC graduates fulfil a range of roles both inside outside the Church for the social good and benefit of individuals, families and communities.

### KEY ATTRIBUTES OF AIFC ARE:

- A **high quality** industry recognised **niche provider** (<\$5m in revenue) that **ONLY** delivers counselling and psychotherapy courses. Hence we have not and do not offer courses just because they receive Government funding rather we are *industry and student driven*.
- The **ONLY** VET provider that is industry accredited with the Australian Counselling Association (ACA) and Psychotherapy and Counselling Federation of Australia (PACFA) (see attached letters) delivering the **ONLY** 3 year accredited pathway for students in the *entire VET sector*.  
Evidences employment outcomes
- Unit completion rates over **80%** and course completion rates over **70%**
- One of the 7 (out of 54) providers delivering Diploma of Counselling courses approved by the Australian Counselling Association (ACA)
- A **Not-For-Profit** Organisation registered as a Charity with the ACNC – no profiteering or price gouging
- **Low course fees** – AIFC offer some of the most affordable counselling training to students in Australia
- Operating with **utmost integrity**, strict governance, a very effective board of directors, leadership team and recognised as having high calibre teaching and training staff.
- **High student satisfaction** and employment and financial outcomes – see next page

<sup>6</sup> Australian Charities and Not for Profit Commission *Australia's Faith based charities* report 2015

<sup>8</sup> Please see attached letter dated 20 October 2016 from Hillsong CityCare

# Evidenced Outcomes

*“My aifc journey has been transformative to say the least. I began first year in my early 40’s and with much trepidation. I was delving into the VET sector after several failed attempts at mature age entry into university bachelor programs. With low self-confidence and anxiety issues, I began the **aifc 3-year program**, unsure if it too would end prematurely. The course, while not only providing me with a high level of academic knowledge, understanding, and hands on experience, has consistently encouraged me to further self-discovery at a personal level, while greatly contributing to my spiritual growth and development. My journey is far from complete, as I’m now employed by aifc as a tutor. Being employed in this capacity not only brings deep personal satisfaction, but has **provided the security to make the move from receiving Disability Support Pension to relying solely on my earnings**. As a tutor with aifc, I am privileged to sow into the lives of those whom I tutor, the seeds of hope and renewal which were sown into me”*



**Melissa Dewis, AIFC Tutor**

**96%**

of aifc students said aifc has greatly increased their knowledge and understanding of the counselling profession.

**85%**

of aifc students said their communication skills have improved while studying.

**88%**

said their study with aifc has increased their faith.

**80%**

of students rated the aifc teachers as very good / outstanding

**80%**

students rated the quality of the aifc courses as very good / outstanding

aifc has a Net Promoter Score (NPS) of over

**50**

points from its students  
(A score over 0 is considered a positive score)



**CITYCARE**

Senator Simon Birmingham

Minster for Education and Training  
107 Sir Donald Bradman Drive  
Hilton SA 5033

20 October 2016

Dear Senator Birmingham

I write as a national employer of Counsellors in the Community Services sector in response to the recently published Eligible Course list for the new VET Student Loans scheme.

Hillsong CityCare is a registered public benevolent institution of Hillsong Church in Australia. Hillsong CityCare offers a breadth of community programs and services to to strengthen families, empower young people and foster social inclusion in Australia. These include Emergency Relief, Transitional Housing, Life Skills training, Advocacy and Counselling Services.

Our Counselling Services is one of our key community programs and has been operating in Sydney since 2006. In 2015, we have provided 3,933 hours of free and subsidised counselling to our community who need to access this support. Due to the great feedback of our counselling services and increasing need for affordable counselling support from our local communities, we have recently expanded this service to Brisbane and Melbourne.

Our ability to provide affordable professional counselling services has largely been due to the partnerships we have built with educational institutions who provide counselling courses. Over the past 5 years we have enjoyed an excellent relationship with the Australian Institute of Family Counselling (AIFC) as our preferred training partner of our counselling interns. Whilst we do have some trainees and employees from other education providers, we find the AIFC students and graduates to be the most employable with the highest level of practical vocational skill. We have placed over 100 AIFC graduates during the third year of their training course and currently engage 12 AIFC graduates (20% of our counselling workforce) on a paid or volunteer basis. Through this partnership with AIFC we have been able to provide free counselling services to disadvantaged communities who would not been able to access counselling service.

Over the course of our partnership with AIFC, many of the students completed the full three years of their training program which are made up of the three Accredited Courses below:

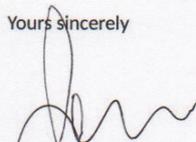
- 10486NAT Diploma of Counselling (Christian)
- 10487NAT Advanced Diploma of Counselling and Family Therapy
- 10134NAT Graduate Diploma of Counselling and Integrated Psychotherapy (Spiritual).

Whilst our clients come from a range of faith backgrounds and we do not discriminate in service delivery, it is vital for us that our employees are aligned with our values as a faith-based organisation. Our experience with the calibre of their vocational skills and character of AIFC graduates has enabled us to confidently make this service available to those most in need.

It is for this reason that we are deeply concerned that the AIFC courses are no longer eligible for loan funding even though they are industry accredited and deliver excellent employment outcomes in an area of desperate skills shortage.

We would like the Minster to review this decision and appeal to his better judgement to include the three courses listed above on the Eligible Course list to ensure we can continue to receive high quality AIFC graduates in order to serve our community with the social good that comes from high quality counselling support.

Yours sincerely

  
Jason Allen  
Chief Operating Officer  
Hillsong CityCare

# The Challenge

By the exclusion of AIFC's three courses, the published list of VET Student Loan Eligible courses **removes the sole funding mechanism for any students to become a Psychotherapist in the Australian VET sector**. This will **adversely impact the current skills shortage** in Counsellors and Psychotherapists as it will cause some students to miss out completely and others to train in the Higher Education Sector at **far greater cost to government**, industry and the student themselves.

In the Minister's interview with Michelle Grattan (October 5 2016) a commitment was given to *"not throw the baby out with the bath water"* by ensuring the new program is *"a scheme that can support small, private providers in niche areas... as long as they are offering subjects, Diplomas in areas of actual employment outcomes"*. As a niche, not-for-profit provider, AIFC only offers courses in Counselling and Psychotherapy. A significant reduction in student enrolments has the very real potential to jeopardise the viability of AIFC as an RTO which is clearly contrary to the minister's stated intent. This would affect critical supply of employable graduates to the social services sector limiting their capacity for social good.

## Eligible Courses

We appreciate the government's desire to focus the VET student loan scheme toward courses which meet skills shortages and have strong employment outcomes. It is clear that employment outcomes are stronger where courses meet industry recognition compared to those that do not. Specifically, AIFC is requesting the Minister add the three courses that comprise our unique three year pathway to the Eligible Course list:

### 10134NAT GRADUATE DIPLOMA IN COUNSELLING AND PSYCHOTHERAPY (SPIRITUAL)

- **ANZSCO Code:** 272314 Psychotherapist (after 3 years)

The Department of Education and Training's Skilled Occupations List identifies 21 Skilled Occupations relevant to the non-trades VET sector at Diploma level or above<sup>10</sup> including Psychotherapy (ANZSCO code 272314).

There are twenty-seven *current* courses at Diploma level or above classified by ASQA as meeting one of these 21 Skilled Occupations<sup>11</sup>. Twenty-two of these (81%) appear on the Eligible Course list for VET Student Loans. The full list of relevant Skilled Occupations and the mapping to the twenty seven courses can be found at Appendix I.

The addition of the remaining 5 courses (including *10134NAT Graduate Diploma in Counselling and Psychotherapy (Spiritual)*) to the Eligible Course list would ensure absolute consistency between the Department's Skilled Occupations List for the non-trades VET sector and the Department's list of Eligible Courses for VET Student Loans.

As can be seen in Appendix I, these 5 courses relate to only two Occupations, of which Psychotherapy is of specific interest. If the Department is reluctant to add all 4 courses based solely on meeting Skills shortage, then it may choose to only add *10134NAT Graduate Diploma in Counselling and Psychotherapy (Spiritual)* as it is the only course that is externally accredited by industry (both ACA and PACFA) and therefore will lead to the strongest employment outcomes.

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<sup>10</sup> The 21 courses are those assessed by VETASSESS as found at: <https://www.border.gov.au/Trav/Work/Work/Skills-assessment-and-assessing-authorities/skilled-occupations-lists>

<sup>11</sup> These courses were identified by searching the 10,359 accredited courses and qualifications listed on [training.gov.au](http://training.gov.au).

In order to meet the organisational Value of Professional Excellence' and meet the staffing standards imposed by industry in delivering a Post Graduate course, AIFC currently prices the Graduate Diploma at \$11,200. We would therefore recommend that the course be in band 3 or have a loan cap of \$12,000 based on \$10,000 from band 2 with the small additional amount being a Minster's exemption based on the high social good and delivery costs of the course.<sup>12</sup>

**Recommendation 1:** That *10134NAT Graduate Diploma in Counselling and Integrated Psychotherapy (Spiritual)* be added to the VET Student Loan Eligible course list to align it with the Skilled Occupations List with a loan cap of \$12,000. This course is the only current qualification at Diploma level or above which meets a skills shortage of Psychotherapists (ANZSCO Code 272314) as identified by the Department of Education and Training's Skilled Occupations List and is accredited by external industry bodies

**As this course is the only one accredited by industry and classified by ASQA as Psychotherapy (ANZSCO code 272314) there is no downside to government, nor could this decision set a precedent requiring other courses to be added to the Eligible Course list.**

Further support for the inclusion of this Course on the Eligible Courses list is provided by letters of support from both PACFA and the ACA.

At present AIFC has approximately 200 Diploma Students and 150 Advanced Diploma students – many of whom are planning to complete the 3 year course culminating in the Graduate Diploma in 2017 or 2018. If the eligible course list remains unchanged these students will face a funding dead-end at the end of 2016.

## 10487NAT ADVANCED DIPLOMA IN COUNSELLING AND FAMILY THERAPY

- **ANZCO Code:** 272133 Marriage and Family Counsellor (after 2 years)

Whilst *10487NAT Advanced Diploma in Counselling and Family Therapy (Christian)* is a stand alone course, its most important function in terms of addressing a skills shortage and training pathways is as a 1 year bridge (or 'link') between the 1 year Diploma and the 1 year Graduate Diploma, creating a three year training program which ultimately leads to qualification as a Psychotherapist.

According to ASQA accreditation documentation:

- Entry into 10487NAT Advanced Diploma in Counselling and Family Therapy is only possible after completion of 10486NAT Diploma of Counselling (Christian)
- Completion of the 10487NAT Advanced Diploma in Counselling and Family Therapy is the only VET pathway into the 10134NAT Graduate Diploma in Counselling and Integrated Psychotherapy (Spiritual)

As can be seen above, the most significant skills shortage/employability impact the Advanced Diploma has is that it represents the 2nd year of a 3 year accredited course with PACFA. However topics including relationship counselling, addictions, children and youth and stress management create Family Therapists who deliver significant social good in their practice even prior to completion of the third year.

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<sup>12</sup> In applying for this exemption we note provision on page 12 of the VET FEE HELP Redesign *Regulation Impact Statement* (page 12)

**Recommendation 2:** That *10487NAT Advanced Diploma in Counselling and Family Therapy* be added to the VET Student Loan Eligible course list in band 2 as it is necessary for entry into the *10134NAT Graduate Diploma in Counselling and Integrated Psychotherapy (Spiritual)*

**As this course is the only one that can be utilised as the 2nd year bridge in the 3 year training pathway, there is no downside to government, nor could this decision set a precedent requiring other courses to be added to the Eligible Course list.**

In assessing this course for eligibility we would ask the Minister take into consideration the fact that there is no AQF level 6 (Advanced Diploma) course in counselling available to providers within any Training Package.

### **10486NAT DIPLOMA OF COUNSELLING (CHRISTIAN)**

- **ANZCO Code:** 272199 Counsellor (nec.) (after 1 year)

Counselling is clearly a skills shortage area. The *Diploma of Counselling (CHC51015)* is on the Eligible Course list and it appears on various State skills shortage lists (e.g., NSW). AIFC's *Diploma of Counselling (Christian) (10486NAT)* addresses the same skills shortage need and one of only three Diploma level course in Counselling that are approved by the Australian Counselling Association. Therefore, the addition of the *10486NAT Diploma of Counselling (Christian)* to the Eligible course list would further align the Eligible Course list with the list of **only three courses** at Diploma level identified by the Australian Counselling Association as meeting their standards.

Due to AIFC's exclusive focus on Counselling and Psychotherapy it continues to be the lowest cost VET FEE HELP provider of Diploma level, ACA accredited Counselling training. In this vein, AIFC requests the inclusion of the *10486NAT Diploma of Counselling (Christian)* with a band 1 loan cap of \$5,000. The present Eligible Course list offers a loan cap of \$10,000 for CHC51015 Diploma of Counselling leading to ACA membership. The addition of the *10486NAT Diploma of Counselling (Christian)* would create a lower cost option.

Moreover, the *10486NAT Diploma of Counselling (Christian)* is the first year of the three year training pathway toward accreditation as a Psychotherapist which has been identified by the Department as a Skilled Occupation.

**Recommendation 3:** That *10486NAT Diploma in Counselling (Christian)* be added to the VET Student Loan Eligible course list in band 2 as it:

1. Is the only other Diploma course recognized by the Australian Counselling Association for membership
2. Creates a low cost mechanism for attaining Industry Membership
3. Is necessary for entry into the *10134NAT Graduate Diploma in Counselling and Integrated Psychotherapy (Spiritual)*

**As this course is the only one that can be utilised as a first year year bridge in the 3 year training pathway and is the one of only two listed Diploma level alternatives with ACA, there is no downside to government, nor could this decision set a precedent requiring other courses to be added to the Eligible Course list other than 10401NAT Diploma of Narrative Approaches for Aboriginal People (Counselling, Group and Community Work) which is certainly also worthy of inclusion although it is not an AIFC course.**

## APPENDIX I - MAP OF SKILLED OCCUPATIONS TO VET COURSES SHOWING VET STUDENT LOAN ELIGIBILITY

Occupations listed on the Skilled Occupations List for which VETASSESS is the assessing authority		Current Courses at Diploma level or above mapped to ANZSCO Code	
ANZSCO name	ANZSCO Code	Course Code	Course Name
Construction Project Manager	133111	CPC60212	Advanced Diploma of Building and Construction (Management)
Project Builder	133112	CPC50210	Diploma of Building and Construction (Building)
		CPC50308	Diploma of Building and Construction (Management)
Production Manager (Mining)	133513	RII50115	Diploma of Surface Operations Management
		RII50215	Diploma of Underground Metalliferous Mining Management
		RII50315	Diploma of Minerals Processing
		RII50915	Diploma of Underground Coal Mining Management
		RII60115	Advanced Diploma of Metalliferous Mining
		RII60215	Advanced Diploma of Extractive Industries Management
		RII60315	Advanced Diploma of Underground Coal Mining Management
		RII60715	Advanced Diploma of Surface Coal Mining Management
Medical Administrator	134211	NIL	
Primary Health Organisation Manager	134213	NIL	
Welfare Centre Manager	134214	CHC62015	Advanced Diploma of Community Sector Management
Internal Auditor	221214	NIL	
Actuary	224111	NIL	
Land Economist	224511	NIL	
Valuer	224512	NIL	

Landscape Architect	232112	NIL	
Cartographer	232213	NIL	
Other Spatial Scientist	232214	NIL	
Agricultural Consultant	234111	10024NAT	Graduate Certificate in Applied Agricultural Production
Agricultural Scientist	234112	NIL	
Forester	234113	FWP50116	Diploma of Forest and Forest Products
		FWP60116	Advanced Diploma of Forest Industry Sustainability
Orthotist or Prosthetist	251912	NIL	
Audiologist	252711	NIL	
Psychotherapist	272314	10134NAT	Graduate Diploma of Counselling and Integrated Psychotherapy (Spiritual)
		10193NAT	Graduate Certificate in Grof Depth Psychotherapy
		10505NAT	Graduate Diploma of Arts Psychotherapy
		10572NAT	Graduate Diploma of Dramatherapy
Civil Engineering Draftsperson	312211	FWP50216	Diploma of Timber Truss and Frame Manufacture
		FWP50316	Diploma of Timber Truss and Frame Design
		RII50515	Diploma of Civil Construction Design
		RII60515	Advanced Diploma of Civil Construction Design
		52724WA	Advanced Diploma of Civil and Structural Engineering
		52725WA	Diploma of Civil and Structural Engineering
Civil Engineering Technician	312212	RII50415	Diploma of Civil Construction Management
		RII60615	Advanced Diploma of Civil Construction

\*Psychotherapist and Counselling Federation of Australia

\*\* Australian Counselling Association

**Industry Accreditation**

PACFA\* & ACA\*\*

NIL

NIL

NIL



Psychotherapy & Counselling  
Federation of Australia

20 October 2016

Senator Simon Birmingham  
Minister for Education and Training  
107 Sir Donald Bradman Drive  
Hilton SA 5033

Dear Senator Birmingham

I write to confirm PACFA's accreditation of AIFC's three year training pathway as meeting the minimum requirements for membership of our Professional Association and professional registration via the PACFA National Register.

Whilst this pathway is comprised of three separate VET courses it is important to emphasise that PACFA does not provide any recognition until all three courses are completed:

	PACFA Accredited 3 year Institution approved articulation	ANZSCO code:
<b>Year 1</b>	10486NAT Diploma of Counselling (Christian)	272199 Counsellor (nec.)
<b>Year 2</b>	10487NAT Advanced Diploma of Counselling and Family Therapy	272133 Marriage and Family Counsellor
<b>Year 3</b>	10134NAT Graduate Diploma of Counselling and Integrated Psychotherapy (Spiritual)	272314 Psychotherapist

The Psychotherapy and Counselling Federation of Australia (PACFA) enjoys a long standing relationship with AIFC. For many years they have been producing high quality, **eminently employable graduates** who have joined the PACFA National Register and become members of PACFA.

As there are no VET Training Package courses that meet PACFA's Training Standards, we rely on organisations like AIFC to accredited and deliver their own courses. To date AIFC is the only VET provider to have done so and we are very thankful for their efforts. **All other PACFA accredited courses are Higher Education based or outside the VET sector which means AIFC is the only provider who can assess counsellors and psychotherapists using competency based assessment.**

PACFA would like to formally request the Department of Education to consider the revision of the list of eligible courses to include the three courses listed above to ensure there are no financial barriers for people who would like to enter our profession through the Vocational Education and Training sector.

Yours sincerely

Maria Brett  
Chief Executive Officer

**Psychotherapy & Counselling Federation of Australia Inc**  
290 Park Street, Fitzroy North VIC 3068

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Psychotherapy & Counselling  
Federation of Australia

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Kim Copeland  
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Australian Skills Quality Authority  
GPO Box 9928  
Melbourne  
Victoria 3001

7<sup>th</sup> September 2015

Dear Ms Copeland

I would like to provide my support for the *Graduate Diploma on Counselling and Integrated Psychotherapy (Spiritual)* submitted for your assessment by the Australian Institute of Family Counselling

I write to you as a member of the Psychotherapist and Counselling Federation of Australia (PACFA) board and as chair of the Professional Development Committee. It is our desire that the *Graduate Diploma on Counselling and Integrated Psychotherapy (Spiritual)* form the third year of a three year articulated pathway of training, meeting our 2014 Training Standards.

We understand Phil Henry has been involved in the development of this course as a trusted industry advisor and Senior member of the Christian Counselling Association of Australia as one of our Member Associations. We have every confidence in Phil's ability to represent the needs of our industry.

It is my professional opinion that graduates of this program will be well placed within the Counselling or Psychotherapy vocation.

Kind Regards

Mr Rob Salmon  
BACC, MCouns.  
CCAA Clinical & Supervisor, PACFA & ARCAP Registered Member  
PACFA Executive – Treasurer

