**A SUBMISSION BY APACS**

**About APACS**

Australian Psychologists and Counsellors in Schools (APACS) is a national professional association for school psychologists, school counsellors and guidance officers. APACS has over a thousand members across Australia who work in school settings as school psychologists, guidance officers and school counsellors. APACS provides leadership and support to its members in school psychology, educational guidance and counselling in schools. Most members are registered psychologists with both educational and psychology training.

**Response to the Mental Health Draft Report**

In Recommendation 17, it is concerning that two premises appear to lack evidence and lead to a simplistic conclusion:

1. The Productivity Commission found no evidence of a need for more psychologists as Australia “has one of the largest workforces, per population, of psychologists in the world.” (Report Overview, p. 29) Nevertheless, there is a recommendation that the Australian Government amend the MBS so that (private) psychologists and other allied health professionals are subsidised for various services. There is no mention of the role of school psychologists. This is particularly puzzling given that early identification, prevention and intervention would often be school based. We would respectfully ask the Commission to re-consider our initial submission for increasing school psychologists and counsellors.

2. It is proposed that “all schools (primary and secondary, over a certain size, or in groups, when small or geographical spread) should be required to provide a suitably trained full-time senior teacher with responsibility for the mental health and wellbeing of students, including maintaining links to mental health support services in the local community. This approach has been trialled and is being rolled out across UK schools with early signs of success.” (Report Overview, p. 12) The evidence of the success of this program in the UK is very limited and in its very early stages of implementation ([Department for Education (UK) Mental health and behaviour in schools Nov 2018](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/755135/Mental_health_and_behaviour_in_schools__.pdf)). Also, the education system context in the UK is very different from that of Australia. The draft recommendation based on this tenuous evidence is for “a dedicated school wellbeing leader, who will oversee school wellbeing policies, coordinate with other service providers and assist teachers and students to access support.” (Report Overview, p. 86) If existing resources are deployed in such a way, this means that personnel with limited training will be managing the complexity of mental health issues. In addition, schools are highly complex organisational systems and require personnel with expertise in change management and organisational behaviour to collaboratively lead programs and systems to support positive mental health and wellbeing outcomes for children and young people. School psychologists have the specialist skill set to do this.

The results of the draft recommendations would mean that the opportunity to enhance these direct services to students and their families through school psychologists has been overlooked. APACS would welcome the opportunity to present further information on the capacity of school psychologists to support and enhance child social and emotional wellbeing and mental health, through prevention measures, early identification and response and collaborative intervention for those students who develop mental health issues.

**We would like to reiterate**

In its initial submission to the Productivity Commission on Mental Health (submission 419), APACS outlined the vital role that in situ school psychologists, counsellors and guidance officers perform in schools regarding mental health, operating at a whole school, targeted and individual student basis.

The roles and responsibilities of school psychologists include:

* providing in situ evidenced-based counselling therapies for individuals and groups of students;
* making informed contributions to systemic universal programming for schools in relation to student wellbeing (e.g., mental health literacy education and prevention programs for school communities like resilience programs, self-care programs, and study skills programs);
* providing training and advice for school staff in early identification of mental health issues and referral pathways; and
* are the resources within school settings for keeping abreast of new research and can inform the professional learning and development of teaching staff and provide evidenced-based information to families and school communities. [https://www.psychology.org.au/for-the-public/about-psychology/What-does-a-psychologist-do/Psychologists-in-schools].

Given the science-practitioner training of school psychologists and ethical standards required of the profession, they are in an ideal position to support student mental health and wellbeing in schools from K-12. These skills include:

* taking a scientific approach to child and adolescent development including mental health assessment and interventions (for example, anxiety, depression);
* providing expert evidence-based psychological interventions for personal issues (for example, bullying, trauma, grief, loss, relationship difficulties, sexuality issues, identity issues, drug and alcohol problems and transition difficulties);
* delivering of mental health literacy education and prevention programs for school communities (for example, resilience programs, self-care programs, study skills programs);
* developing and delivering wellbeing interventions and programs and staff support and professional development in the educational and psycho-social development and mental health of children and young people;
* having knowledge and skills in learning and cognitive assessment and interventions (for example, intellectual disability, learning disability);
* conducting behavioural assessment and interventions (e.g., Autism Spectrum Disorder, Attention Deficit Hyperactivity Disorder);
* communicating knowledge and skills in teaching and learning practices in schools
* delivering mental health literacy education and prevention programs for school communities (for example, resilience programs, self-care programs, group therapy programs);
* understanding of the policies and procedures that guide the effective management of critical incidents in school communities;
* providing expert advice about systemic procedures and practices in the school setting (for example, mental health and wellbeing, behaviour management, pastoral care and peer support programs); and
* having a careful regard for professional and ethical psychological practice, with a strong duty of care for children and young people, and a commitment to providing confidential and evidence-based service. This means that confidentiality, informed consent processes and high standards of record keeping are in place so that young people and families feel safe in divulging personal information (Campbell & Colmar, 2014; Kimber & Campbell, 2013).

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School psychologists are in an ideal position to work with administrators to design, implement, and garner support for comprehensive school mental health programming and school mental health programs, which have been shown to improve educational outcomes by decreasing absences, decreasing discipline referrals, and increasing test scores (President’s New Freedom Commission on Mental Health, 2003). Further, Australia is only one of 10 countries identified as potentially fulfilling all five criteria to qualify as having a nationally established school psychology service These criteria are: (a) identifiable professionals in the role; (b) regulations requiring registration or credentialing; (c) professional associations; (d) university programs to prepare school psychologists and (e) university programs at doctoral level (Jimerson, Skokut, Cardenas, Malone, & Stewart, 2008).

The main roles, activities and tasks of school psychologists are described as “*Prevention* (e.g., information and psycho-education for students, student programs for wellbeing, information to parents and teachers, health promotion); *Assessment* (e.g., educational, psychological, diagnostic); Intervention (e.g., counselling, mental health service provision, intervention for learning and behaviour); *Collaboration* (e.g., consultation, critical incident management, referral to community agencies); and *Management* (e.g., administration, record keeping, research and evaluation, supervision and mentoring).” (Jimerson et.al., 2008, p.5)

Australia is in an ideal position for improving mental health provision for children and young people through schools involving school psychologists working collaboratively with school leaders and school community to enhance their knowledge and skills.

APACS therefore asks the Commission to consider our original recommendations again to take a coordinated national approach which would include:

1. An urgent review of each state and territory’s current provisions of school psychologists and counsellors. This should be across all sectors: primary, secondary, state and independent schools. This should be conducted in line with prevalence of mental health needs in schools and the demands of school psychology services to meet these needs.

2. The creation of a national standard and accreditation board for school-based psychology and counselling services, mandating qualifications and training. In addition, there should be national mandates for schools to provision students adequately with appropriately qualified personnel when it comes to mental health programs or services of prevention, detection and intervention.

3. An urgent review of school psychologist workload and responsibilities and clear mandates for schools regarding these roles in school practice.

4. An investment of financial capital to update the system of school psychology services to meet the current health and wellbeing needs of schools and society. This will mean additional psychologist/counsellors in schools and a cessation of wasteful spending on staff unqualified to occupy titles in schools if they are ill-equipped for the purpose of professional student mental health support. APACS supports the view of the Australian Psychological Society that the more favourable ratio of school psychologists to students is critical to meeting the needs of all students and particularly the estimated one in seven students with mental health problems.

5. That the training provisions for school psychologists and counsellors be examined so that these above positions can filled.

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President APACS

23/01/2020

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