

The Hon David Coleman MP
Assistant Minister to the Prime Minister for Mental Health and Suicide Prevention

By email
Minister.coleman@health.gov.au
cc Minister.Hunt@health.gov.au

15 November 2021

National Mental Health Workforce Strategy – Consultation Draft August 2021

Dear Minister Coleman,

As members of the Mental Health Working Group of Allied Health Professions Australia, we wish to express our concern about the recent consultation on the National Mental Health Workforce Strategy.

Allied Health Professions Australia (AHPA) is the recognised national peak association representing Australia's allied health professions. AHPA's Mental Health Working Group represents the various peak national bodies for allied health professionals providing mental health services. Member professions include psychologists, social workers, mental health occupational therapists, music therapists, counsellors, psychotherapists, speech pathologists and creative arts therapists.

It is important to understand that allied health practitioners work with a person-centred and holistic model of mental health shaped by the needs of the client. Taking this approach necessitates including an emphasis on physical health, prevention, and early intervention from the time of first diagnosis or appearance of signs of subclinical mental health issues.

This means that in addition to the professions listed above, occupations such as diabetes education, physiotherapy, general occupational therapy and exercise physiology are also members of our Working Group. They should be included as part of the mental health workforce, not simply in a secondary manner as professions who may encounter mental health issues in their treatment of patients for 'physical' conditions.

We have outlined above the various roles of allied health in the mental health workforce because the Consultation Draft's assertion that the need for mental health treatment outstrips supply relies on a narrow definition of mental health professional work. If the overall aim is to develop the workforce, then decision makers must consider the full breadth of professionally trained workers already available in public and private settings. The Consultation Draft and the associated Background Paper are not informed by a clear recognition and understanding of the full range of relevant allied health expertise and skillsets, and their key roles in person-centred mental health care.

As another example, the Consultation Draft emphasises a lack of clarity in scopes of practice and misalignment with regulation. These are not key challenges for allied health professions. Our practitioners are generally either regulated through the Australian Health Practitioner Regulation Agency or are self-regulated as members of National Alliance of Self Regulating Health Professions.

More broadly, the consultation lacks a nuanced understanding of mental health workforce challenges and the need for appropriately tailored solutions to address problems of equity and access, including for allied health. Consequently, the Consultation Draft cannot be regarded as a workforce strategy that is fit for purpose. AHPA and various members of the Mental Health Working Group have detailed our concerns in submissions on the Consultation Draft.

Finally, the consultation appears to have been outsourced to private consultants. This may explain the Consultation Draft's failure to sufficiently draw upon and integrate the broader context of previous mental health inquiries, and to iterate implementable actions. The format for online submissions, including a lack of provision for footnotes, certainly suggested that the framers are not familiar with the standard of health policy expected by stakeholder organisations.

We are particularly disappointed with the quality of consultation with key stakeholders because as you are well aware, a professionally trained and sufficiently staffed mental health workforce is of increasingly critical national importance.

We seek an urgent meeting with you to further discuss our concerns.

Kind regards



Dr Chris Atmore
Manager, Policy and Advocacy