



AASW

Australian Association
of Social Workers

Modernising WA's Workers Compensation Laws

Consultation on implementation proposals for regulations
and administrative instruments

DECEMBER 2023

About the Australian Association of Social Workers

The Australian Association of Social Workers (AASW) is the national professional body representing more than 15,000 social workers throughout Australia. The AASW works to promote the profession of social work including setting the benchmark for professional education and practice in social work, while also advocating on matters of human rights to advance social justice.

Acknowledgements

This submission has been developed in consultation with our members who are working in Western Australia as Accredited Mental Health Social Workers (AMHSWs) and social workers in various social work areas of practice, including private practice. We are grateful for their time and insights to ensure that policy is informed by practice.

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Executive Summary

Currently, AMHSWs are not a recognised allied health provider with the Western Australia worker's compensation scheme (WorkCoverWA). AMHSWs are highly trained and educated mental health professionals and are valued individuals in multidisciplinary teams across Australia providing mental health treatment to those who need it. The AASW strongly advocates for the inclusion of AMHSWs as a compensable allied health service for injured workers in Western Australia.

Recommendations

The AASW recommends:

- That the regulations prescribe Accredited Mental Health Social Workers (AMHSWs) as a compensable allied health service for injured workers in Western Australia.
- That a separate fee schedule be developed for AMHSWs as a compensable allied health service provider, as per the powers of Ministerial order in Western Australia.

Background information

Accredited Mental Health Social Workers (AMHSWs) are highly trained and educated mental health professionals that provide valuable services to injured workers involved in the Western Australia worker's compensation scheme.

The Australian Government has recognised the AASW as the statutory assessing authority for the accreditation of AMHSWs for Medicare Australia since 2004 and continues to recognise AMHSWs as equal to other allied health professionals, such as psychologists, in providing specific government funded mental health programs, such as the Better Access initiative.¹

To be accredited, AMHSWs must satisfy the following criteria:

- Hold a current membership with the AASW.
- Graduate from an AASW accredited 4-year Bachelor degree or 2-year Master's degree in social work, which includes 1000 hours of supervised placement experience.
- Adhere to the AASW Code of Ethics²
- Meet the strict AMHSW credentialing criteria, including at least 2 years full time equivalent (FTE) post-qualifying supervised social work practice experience in a mental health setting within the last 5 years, totaling 3,360 hours (this is on top of their baseline social work qualification, as mentioned above).
- Meet the standards in the AASW Practice Standards for all social workers³
- Provide proof of how their practice meets the AASW Practice Standards for Mental Health Social Workers⁴ and demonstrate their experience in providing focused psychological strategies.
- Provide a referee statement and evidence of recent employment in therapeutic clinical practice.
- Complete 30 hours of continued professional development each year of practice, including 20 hours linked to the mental health field of practice, and 10 hours linked to Focussed Psychological Strategies.
- Be subject to regular AASW and Medicare CPD audits.
- Commit to staying up to date with relevant professional approaches and knowledge.

AMHSWs are highly valued members of Australia's mental health workforce delivering clinical social work services in mental health settings and utilising a range of evidence-based strategies. AMHSWs work with people across the lifespan (including children, adults, and older persons) and provide a unique contribution to the mental health space in their holistic approach to working with a person. The advanced training that is expected of AMHSWs prepares and provides them with the skills for working with people across the mental health spectrum, ranging from early intervention to very complex presentations and co-morbidities. AMHSWs are trained and educated professionals, meeting some of the highest standards of professional regulation in

¹ Australian Government, [Better Access Initiative](#), 2023.

² Australian Association of Social Workers, [Code of Ethics](#), 2020.

³ Australian Association of Social Workers, [Practice Standards](#), 2023.

⁴ Australian Association of Social Workers, [Practice Standards for Mental Health Social Workers](#), 2014.

Australia. Accordingly, the profession of social work has a clear role and provides a unique contribution in the continuum of mental health services.

Responses to the implementation consultation papers

Implementation Consultation Paper 9: Medical and Health Expenses Compensation

Recommendations:

- That the regulations prescribe Accredited Mental Health Social Workers (AMHSWs) as a compensable allied health service for injured workers in Western Australia.

As previously described, AMHSWs are a group of highly skilled mental health professionals who support people experiencing mental health issues. This may involve using a range of different psychological strategies. AMHSWs provide individual counselling, family, and group therapy.

AMHSWs are skilled at undertaking assessments and interventions for injured workers. This is because they have expert relationship building, counselling and interviewing skills, which enables them to obtain the necessary information to determine the most appropriate treatment.

AMHSWs work with people across the lifespan and use a range of evidence-based interventions to help people with mental health disorders, including the following focused psychological strategies:

- Cognitive Behavioural Therapy
- Interpersonal Therapy
- Relaxation training
- Parenting training
- Interpersonal skills training

Other therapies that can be provided are:

- Relationship counselling
- Family therapy
- Bereavement counselling
- Psychotherapy
- Eye Movement Desensitisation Reprocessing (EMDR)
- Dialectical Behaviour Therapy (DBT)
- Prolonged Exposure (PE)
- Trauma-Focused Cognitive Behavioural Therapy (TF-CBT)

In Western Australia as of November 2023, there are **192** AMHSWs, in various areas of the state.

Qualifications and experience

Key findings from our survey of AMHSWs last year are as follows:

- 50% of respondents have been social workers for more than 20 years.
- 70% have achieved a level of education above a bachelor's degree.

- 75% of respondents have 10 or more years' experience working in a mental health setting.
- 45% have held the mental health credential for more than 7 years.

Availability

Currently, counselling and clinical psychologists are the primary mental health treatment provider for worker's compensation schemes in Western Australia. However, there is a critical shortage of psychologists, with the Australian Psychological Society stating that 75 per cent of West Australian psychologists had waitlists and nearly one in four were unable to take on new clients.⁵ This is particularly critical in regional, rural, and remote areas, with the Australian Institute of Health and Welfare reporting that there are only 376 psychologists operating in areas outside metropolitan Perth in Western Australia.⁶ Areas outside the metropolitan area in Western Australia are also rated as either high or very high concern regarding relative need of, and access to, mental health care, according to the *Mapping Mental Health Care* tool developed by the National Centre for Social and Economic Modelling in partnership with Mental Health Australia.⁷

As per our survey of AMHSWs conducted last year, we found the following points in relation to accessibility of mental health care provision:

- 46% of respondents were either in regional, rural or remote areas
- 76% of respondents had a waiting list of 2 weeks or less
- 54% of respondents provide telehealth services.

The growth rate of the number of AMHSWs becoming accredited has also been steadily increasing, with an average increase of 5% each year.

Recognising AMSHWs as an allied health service provider with WorkCover WA will increase access for injured workers, particularly those who find it difficult to access other mental health professionals for treatment. Increasing the diversity of available mental health professionals also increases the opportunity for client-practitioner fit. This is vital to recovery, as research has shown that the quality of the therapeutic alliance is more predictive of positive outcomes than the type of intervention.⁸

Unique value of AMHSWs in worker's compensation schemes

As AMHSWs have a foundation in social work alongside specialist expertise in mental health, their practice focuses on a holistic, whole-of-person and life-course approach. This approach sets them apart from other health professionals who have a biomedical understanding of health, by complementing this approach with addressing the social and environmental determinants of

⁵ [The system is broken: Psychologists feeling the strain of 'critical shortage' | APS \(psychology.org.au\)](#)

⁶ [Workforce - Mental health - AIHW](#)

⁷ [MAPPING MENTAL HEALTH CARE \(arcgis.com\)](#)

⁸ Ardito, R. B., & Rabellino, D. (2011). Therapeutic alliance and outcome of psychotherapy: historical excursus, measurements, and prospects for research. *Frontiers in psychology*, 2, 270. [Therapeutic Alliance and Outcome of Psychotherapy: Historical Excursus, Measurements, and Prospects for Research - PMC \(nih.gov\)](#)

health. In undertaking a comprehensive assessment with injured workers, AMHSWs are also able to identify and address needs where early intervention may support an earlier return to work. This can help to avoid increased worker's compensation claim expenses associated with a delayed return to work.

AMHSWs also use strength-based approaches in their assessments to identify an individual's strengths and resilience. These can be both internal factors, such as skills and knowledge, and external factors, such as family, social, and community supports. Mobilising an individual's personal and social resources is a crucial part of recovery and this is an area of AMHSW expertise.

A strength of the social work perspective allows the AMHSW to collaborate with other agencies, practitioners, and allied health professionals to provide a streamlined case management approach to achieve best practice outcomes. AMHSWs can also identify and address systemic barriers which may be impeding an injured worker's recovery.

"I saw a client after a work safety incident. Using Impact of Event Scale (IES), Depression and Anxiety Scale (DASS) and the PCL-5 (PTSD Checklist for DSM 5), EMDR, nightmare rescripting and exposure through talk therapy, we were able to get a reduction in her symptoms, have her return to work and start working back up to her full roster prior to the incident. "AASW Member

AMHSW service provision is 'reasonably necessary' as per the legislation

- 1) Member feedback indicates that they have received referrals from GPs to provide mental health treatment, and that this has continued post initial referral, following positive outcomes as assessed by the GP. Members have also stated that they have had requests from injured workers to provide treatment, however they have been unable to provide treatment as AMHSWs are not a recognised allied health provider with WorkCover WA.
- 2) Member feedback has also indicated that their service provision has alleviated the worker's injury and supported a return to work. For example, a member worked with an injured worker who was experiencing PTSD. The member used the Impact of Event Scale (IES), Depression and Anxiety Scale (DASS) and the PCL-5 (PTSD Checklist for DSM 5) to monitor their symptoms and over the treatment period. The member worked with the injured worker's goals using exposure therapy in a graded way, which supported their return to work and reconnection back into their community. The member also received positive feedback from the injured worker's case manager regarding the treatment provided by the member.
- 3) AMHSW service provision is clinically appropriate as they use evidence based interventions such as Focused Psychological Strategies as outlined in [MN.7.1 – Provision of Individual Focussed Psychological Strategies by Allied Health Providers](#) where AMHSWs are providing services via the Better Access Scheme alongside psychologists. The use of these interventions is also supported by the Fourth Edition of *Evidence-based Psychological*

Interventions in the Treatment of Mental Disorders, as distributed by the Australian Psychological Society.⁹

Recognition in other schemes across Australia

AMHSWs are recognised providers with the following schemes:

- Worker's compensation schemes across Australia including [ReturnToWorkSA](#), [WorkSafe Victoria](#), [SIRA NSW](#), [WorkCover QLD](#)
- Traffic accident schemes including [TAC Victoria](#), and [SIRA NSW](#)
- Victim support services including [Victim Services NSW](#), [Victim Assist QLD](#), [VOCAT Victoria](#)
- Private health insurers such as [Bupa](#), [HCF](#), [Teacher's Health Fund](#), and actively working towards others
- Medicare including the [Better Access Scheme](#) (same service provided as psychologists), [Chronic Disease Management](#), [Non-directive Pregnancy Counselling](#)
- [Department of Veteran Affairs](#) (including [Open Arms](#))
- [National Disability Insurance Scheme](#)
- Various Employee Assistance Program providers
- [National Redress Scheme](#)

Alignment with the Clinical Framework

An important point to make is that the scope of AMHSW practice aligns strongly with the [Clinical Framework For the Delivery of Health Services](#), which is endorsed by WorkCover WA.

Principle One – Measure and demonstrate the effectiveness of treatment

As per the Mental Health Practice Standards¹⁰, AMHSWs engage with the person via assessment, intervention, and treatment planning as well as progress and outcome monitoring. Our survey of AMHSWs in 2022 also shows that AMHSWs use a range of outcome and assessment measures, including the following:

- Depression Anxiety and Stress Scale (DASS-21)
- Kessler Psychological Distress Scale (K10)
- Posttraumatic Stress Disorder Checklist (PCL-5)
- Alcohol Use Disorders Identification Test (AUDIT)
- Generalised Anxiety Disorder Assessment (GAD-7)
- Adverse Childhood Experiences Scale (ACEs).
- Beck Depression Inventory

⁹ Evidence-based Psychological Interventions in the Treatment of Mental Disorders, Fourth Edition, Australian Psychological Society, accessed via [evidence-based-psych-interventions.pdf \(psychology.org.au\)](#)

¹⁰ Australian Association of Social Workers, [Practice Standards for Mental Health Social Workers](#), 2014.

- World Health Organisation Disability Assessment Schedule (WHODAS 2.0)
- Dissociative Experiences Scale (DES-II)
- Others depending on the needs of the person.

Principle Two – Adopt a bio-psycho-social approach

As per the AASW Mental Health Practice Standards,¹¹ AMHSWs undertake comprehensive bio-psycho-social assessments and case formulation addressing the physical, psychological, and social aspects of the person and their situation, which is the unique foundation of the social work scope of practice. A bio-psycho-social assessment ensures the AMHSW has a comprehensive and holistic understanding of the person's situation. It is by understanding the impact these factors have on a person's wellbeing that AMHSWs can develop tailored interventions to improve the person's wellbeing and functioning.

AMHSWs also undertake comprehensive risks assessments as a part of their assessment process, identifying and assessing relevant indicators in order to minimise risk to the person or to others. This includes risk of self-harming behaviour, the person's vulnerability to domestic violence and other safety issues in the home and living environment, including child safety, and the potential for the person's capacity to harm others.¹²

Principle Three – Empower the injured person to manage their injury

AMHSWs adhere to the AASW Code of Ethics 2020, which includes engaging in participative collaborative, open and empowering processes.¹³ Social work is inherently a practice-based profession that promotes the empowerment of people.¹⁴

AMHSWs also support people to take responsibility for their own recovery and wellbeing and to define their goals and wishes, as per the AASW Mental Health Practice Standards, standard 1.3a.¹⁵

Principle Four – Implement goals focused on optimising function, participation and return to work

As part of the comprehensive bio-psycho-social assessment process and case formulation, AMHSWs work with the injured worker to develop a mutual understanding and agreement about the assessment and interventions as part of the service plan. Part of this process involves setting measurable goals as agreed with the injured worker.¹⁶ AMHSWs also undertake a case

¹¹ Australian Association of Social Workers, [Practice Standards for Mental Health Social Workers](#), 2014.

¹² Ibid.

¹³ Australian Association of Social Workers, [Code of Ethics](#), 2020.

¹⁴ Ibid.

¹⁵ Australian Association of Social Workers, [Practice Standards for Mental Health Social Workers](#), 2014.

¹⁶ Ibid.

management or similar function, where short term and long term goals are identified. AMHSWs work with injured workers to understand how they can support these goals, including advocacy to obtain the resources required to achieve their goals.¹⁷

Principle Five – Base treatment on the best available research evidence

As per the AASW Mental Health Practice Standards, standard 5.2, AMHSWs develop and implement one or more evidence-based, therapeutic interventions with the person.¹⁸ This includes identifying the evidence base for therapeutic, including psychosocial, intervention. AMHSWs also undertake additional training as necessary, including at an advanced level in specialised therapeutic interventions.¹⁹ AMHSWs use evidence-based interventions such as Focused Psychological Strategies as previously described.

The use of evidence-based treatment for psychological injuries also improves cost-effectiveness as it improves health, social and return to work outcomes, reducing waste in health services.²⁰

Alignment with best practice

As per the report released by Safe Work Australia named [*Taking Action: A best practice framework for the management of psychological claims in the Australian worker's compensation sector*](#), AMHSWs align with the following aspects of best practice:

- Telehealth models have been shown to prevent delays in receiving care, support coordinated care, and facilitate collaboration across professions. This is particularly beneficial to rural communities where access to treatment provides is difficult.²¹
- Bio-psychosocial approach to treatment and rehabilitation and early intervention has been shown to improve recovery at work and return to work outcomes.²²
- Holistic and collaborative work with other stakeholders involved in the injured worker's recovery, including supportive employer engagement, which has been shown to measurably improve outcomes.²³

¹⁷ Ibid.

¹⁸ Ibid.

¹⁹ Ibid.

²⁰ [Taking Action: A best practice framework for the management of psychological claims in the Australian workers' compensation sector \(safeworkaustralia.gov.au\)](#)

²¹ Ibid.

²² Safe Work Australia, [Taking Action: A best practice framework for the management of psychological claims in the Australian workers' compensation sector \(safeworkaustralia.gov.au\)](#)

²³ Ibid.

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- Ongoing CPD as part of accreditation requirements, ensuring AMHSWs are kept up to date with current effective treatments for psychological injuries, ensuring that evidence underpins the treatment they provide.²⁴

Implementation Consultation Paper 25: Fees Order for Allied Health Services

Recommendations:

- That a separate fee schedule be developed for AMHSWs as a compensable allied health service provider, as per the powers of Ministerial order.

The AASW strongly advocates for AMHSWs to be added onto the fee schedule, aligning with the rationale presented in this submission. The AASW recommended fee per hour for social workers in private practice is **\$270 per hour**. This fee was developed using multiple data sources, including member consultation, comparisons and benchmarking, CPI rates and other relevant information.

Conclusion

The AASW appreciates the opportunity to provide feedback on the proposed regulations and implementation of the *Workers Compensation and Injury Management Act 2023*. We welcome further collaboration with WorkCover WA to discuss our submission and how AMHSWs can be recognised as an allied health provider for injured workers in Western Australia.

²⁴ Ibid.

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