

The Australian Psychological Society Ltd

**Submission to the**

**Consultation Process for the**

**National School Chaplaincy Program**

**Dr Monica Thielking,  
Psychologists in Schools Advisor  
[m.thielking@psychology.org.au](mailto:m.thielking@psychology.org.au)**

**David Stokes, Senior Manager Professional Practice  
[d.stokes@psychology.org.au](mailto:d.stokes@psychology.org.au)**

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The Australian Psychological Society (APS) is thankful for the opportunity to provide a written submission to the National School Chaplaincy Program (NSCP) discussion paper.

The APS is the largest professional association for psychologists in Australia, representing more than 19,000 members. A significant number of members are school psychologists who provide a counselling, assessment and specialised support service to students in Australian government, independent and Catholic primary, secondary and special schools.

### **The need for psychological services in schools**

The APS believes that there has never been a greater need than now for a nationwide system of comprehensive psychological support services for Australian children and young people. Research shows that a concerning number of students are experiencing poor psychological health due to a range of factors. It has been reported that three quarters of individuals with a mental illness experienced their first symptoms before the age of 25. Mental illness, family stress and breakdown, being a witness to domestic violence, or living with the trauma of sexual or psychological abuse are just some reasons why students require expert psychological intervention. The consequences of not providing early intervention to such students are considerable and may place students at greater risk of:

- Poor educational outcomes
- Failing to complete school
- Poor peer and adult relationships
- Mental illness (especially in later life)
- Increased risk taking behaviors
- Binge-drinking, alcohol dependence and drug use
- Homelessness
- Criminal behaviour
- Self-harm and suicide

The APS believes that psychologists are one of the most qualified professional groups to provide early intervention services to students who are experiencing poor psychological health or who are coping with difficult personal or family issues. School psychologists also work collaboratively with school staff, families and external health and welfare services.

Psychologists:

- Have a minimum of six years of Australian Psychology Accreditation Council (APAC) training in child and adolescent development, cognition and learning, human behavior, personality, counselling, psychological assessment, diagnosis, evidence-based interventions and ethical practice. A significant number of psychologists have Masters or Doctoral level qualifications.

- Are members of a highly regulated and legislated profession that must practice safely, competently and ethically. As psychologists are governed by the Australian Health Practitioner Regulation Agency (AHPRA) strict standards and policies govern psychologists' professional conduct, especially in regards to a client's right to an expert and confidential service. Significant sanctions can be imposed on those who err professionally. Each year, in order to remain registered, psychologists must complete 30 hours of continuing professional development, of which 10 of these hours must be peer supervision. Psychologists are mandated by law to report another psychologist if they believe that they are unfit to practice.
- Have a professional association which requires them to follow Codes of Ethics and Professional Guidelines which offer clear guidelines on client-psychologist relationships, competency, record keeping, access to files, confidentiality, informed consent and other issues related to ethical and professional practice.
- Are scientist-practitioners. This means that their work is evidence-based and supported by a long-standing, rigorous body of peer-reviewed psychological research.
- Are trusted by students to provide a confidential and effective service.
- Are highly valued by teachers, school administrators and parents for the work they do with students and the support that they provide to school communities in general.

### **Concerns about the NSCP**

On a number of occasions since the establishment of the NSCP, the APS has been contacted by members who are concerned about chaplains who have been employed in schools to provide mental health counselling to students. This has occurred either instead of or in replacement of school psychologists. Although the APS is aware that school chaplains represent an alternative approach to student support in government schools in the way of spiritual and religious guidance, the APS believes that, when chaplains work outside of this role, the risks to both students and schools are immense and will ultimately result in significant costs both financial and human.

The APS has in the past broadly communicated these concerns to the former Commonwealth Minister for Education, The Hon Julia Gillard, as well as to nearly every State or Territory Minister for Education. The recent announcement of another \$165 million over three years towards the NSCP, in the absence of any reliable safeguards to limit the role of school chaplains, is unacceptable. The main concerns of the APS include:

- That the government is supporting a scheme which allows unregistered and unqualified school chaplains to work outside their boundaries as spiritual and religious personnel;
- That there is clear evidence that school chaplains are engaging in duties for which they are not qualified;

- That there is clear evidence that church organisations and ministries are supporting school chaplains' in their boundary violations;
- That the NSCP promotes a combination of religious guidance and mental health service provision, which is in contrast to mainstream evidence-based service provision;
- That the government is complicit in encouraging dangerous professional behaviour by funding school chaplains independently of other services carried out by professionals who are both qualified and registered.

### **Unregistered and unqualified school chaplains**

The educational requirements of school chaplains are somewhat variable and are insufficient to provide any service other than spiritual guidance or informal support. Furthermore, unlike school psychologists who must be registered with AHPRA, school chaplains have no such regulatory body and are largely unregistered.

According to the Department of Education, Employment and Workplace Relations (DEEWR) NSCP Frequently Asked Questions resource page, for the purpose of this program, a school chaplain is a person who is recognised:

- by the local school, its community and the appropriate governing authority as having the skills and experience to deliver school chaplaincy services to the school and its community; and
- through formal ordination, commissioning, recognised qualifications or endorsement by a recognised or accepted religious institution or a State/Territory government approved chaplaincy service (DEEWR, 2010).

Although the DEEWR NSCP guidelines state that "school chaplains cannot provide services for which they are not qualified, for example, counselling services or psychological assessment, or medical assessment" (NSCP FAQ, 2010), it also states that school chaplains are employed to 'support' students for issues such as "grief, family breakdown and other crisis situations" (2010, p.2). From a psychological perspective, 'grief, family breakdown and other crisis situations' can be highly complex situations requiring a sensitively handled psychological intervention. How an individual deals with these is determined by their personality, background, relationships, supports, mental health condition, ability to cope, cognitions etc.

The Victorian based Christian education and chaplaincy organisation ACCESS Ministries require chaplains to have a degree in one of teaching, theology or counselling, and some formal training and practical experience in another of these fields. They also require chaplains to have completed a 36-hour 'school chaplaincy' course, where counselling is only one component of the course (ACCESS Ministries course brochure, 2010). Not all chaplains are actually endorsed at this level, and although this may be a sufficient standard for chaplains engaged in spiritual guidance work or informal support, it is not a sufficient standard for the provision of counselling services to psychologically vulnerable students in need of more specialised interventions.

In fact, at a time when the provision of health services is under increasing scrutiny and subject to rigorous legislation (e.g., Health Practitioner Regulation National Law Act 2009, 2009 NSW Coroner's finding regarding Rebekah Lawrence), the liberties accorded to, and lack of controls on, the NSCP is anomalous at best and dangerous at worst.

The fact that the DEEWR NSCP Code of conduct does not specify that chaplains may support students who are experiencing these issues only under the guidance of and in conjunction with specialised psychological services is very dangerous. This should be rectified.

### **Chaplains engaged in duties for which they are not qualified**

*“At the moment...., in the last week I've got two grade 5 kids on suicide watch (Chaplain)”*  
(ACCESS Ministries, 2009, p.5)

In 2009 the National School Chaplaincy Association (NSCA) published a report titled *The Effectiveness of Chaplaincy as Provided by the NSCA to Government Schools in Australia* (Hughes & Sims). This report was provided as evidence for why the Commonwealth should further fund the NSCP. The report is overly supportive of chaplains in schools and contains many flaws in its research methodology. It makes many unsubstantiated claims throughout the report about the overwhelming need for a chaplains in schools, lacks a control group which leads to highly biased, overly positive and questionable conclusions, includes unashamed and unsubstantiated criticisms of other professions that also provide welfare services to students, uses effectiveness ratings based on a sample of principals who have employed a school chaplain and one of the authors does not declare their affiliation with the Christian Research Association. Despite these problems, the report serves to confirm that schools are publicly admitting to the employment of chaplains for the provision of counselling services to psychologically vulnerable students in need of more specialised interventions.

Hughes and Sims (2009) asked chaplains to report on the frequency by which they deal with various student issues. The study reveals that 72% of chaplains indicated that they deal with student mental health and depression issues, 50% deal with student alcohol and drug use, 62% deal with physical and emotional abuse and neglect, 44% deal with students who are considering suicide or who are self-harming, 40% deal with issues of student sexuality, and 81% deal with issues around grief and loss. The authors also asked chaplains and principals to assess their level of effectiveness on a number of role outcomes. Alarming, the lowest rating given by both chaplains and principals was on the item titled: 'referring students to specialist assistance'. Given the nature of duties that chaplains are engaged in and which are reported in this study, this latter result is totally unacceptable.

It is not surprising that role confusion is evident in students and parents as demonstrated by an ACCESS Ministries (2009) study which found that “the majority of students and parents answered that they were 'neutral' as to whether they felt the role of the chaplain was different to that of a counsellor. Responses from students showed that for personal and school-related problems, they preferred to see a chaplain” (p. 5). The APS considers this finding very concerning in light of the training required to become a chaplain and also in light of the many professional and ethical issues that need to be considered when engaging in a student-counsellor relationship. Besides having a background in psychology and well-

develop skills in assessment, diagnosis and therapy, adherence to principles such as informed consent, adequate record keeping, secure file management, confidentiality, maintaining boundaries, avoidance of dual or multiple relationships and referring to more specialised services when issues are beyond one's expertise are essential. Finally, a thorough understanding of relevant legislation that impact on the provision of counselling services to minors is extremely important in order to protect the safety of the client, the professional and the school (i.e., Health Records Act, Privacy Act, Mandatory Reporting requirements, Child Protection laws).

### **Church's support of boundary violations**

The APS is concerned that influential church organisations and ministries are supporting school chaplains' explicit boundary violations by promoting the role of chaplains as including the provision of mental health and psychosocial interventions. These concerns are confirmed by visiting the ACCESS ministries website and accessing their promotional material on the role of chaplains in schools which they state is: "for the kids at risk in your school community".

Their claims include:

"...our chaplains provide a professional, confidential and spiritual presence for your school. The chaplain's role can include the formation and implementation of programs targeting core and specific school issues, for example bullying, eating disorders or truancy.

One-on-one or group sessions can greatly assist students at risk...

With the increase of ethnic diversity in our schools, cyber-bullying, mental illness, depression, and related deaths, our chaplains now more than ever, find their roles as imperative for the wellbeing of school communities..." (ACCESS Ministries, 2010).

This conceptualisation and promotion of the NSCP feeds into false ideas about how the program can be implemented within schools as demonstrated in the following advertisement for a school chaplain. This school required their chaplain to:

- Develop student programs and support groups to deal with student issues such as self esteem, gender issues and bullying;
- Counsel students on issues such as family conflict, peer relationships, individual wellbeing issues, grief and loss, school issues, crisis intervention; and
- Conduct mediation sessions for students and families in conflict.

### **Combination of religious guidance and mental health service provision**

In the words of Scripture Union Australia (SUA) a major provider of chaplains in schools:

*"SUA is part of a global movement that has been working for the cause of the Christ since 1867 and is currently in over 130 countries.*

*Working with the churches, Scripture Union aims:*

- a. **to make God's Good News known to children, young people and families** and
- b. *to encourage people of all ages to meet God daily through the Bible and prayer so that they may come to personal faith in our Lord Jesus Christ, grow in Christian maturity and become both committed church members and servants of a world in need.*

*Scripture Union pursues these aims through a variety of specialist ministries around the world in obedience to our Lord Jesus Christ and in reliance on the Holy Spirit. In Australia, SU operates in every state and territory and mobilises thousands of volunteers each year to engage young people and families in holiday programs at beaches and in urban or rural townships, camps, secondary and primary schools, through sports, recreation, outdoor education and **school chaplaincy**" (2010).*

The APS believes that it is questionable for the government to allow the practice of individuals, whose primary concern is to 'make God's Good News known to children, young people and families', to counsel students with mental health issues. In contrast, school psychologists are trained to allow clients to find their own meaning, personal strengths and resources and to support individuals regardless of faith. Psychologists respect an individual's cultural and spiritual background and do not try to influence or promote a set of beliefs or values: "The general principle, respect for the rights and dignity of people and peoples...including the right to autonomy and justice" (APS, Code of Ethics, 2007, p. 6). All advice or guidance is carefully considered against a strong body of evidence and is always made in the best interests of the client. This method of engagement with clients is strongly supported by research as being effective in producing positive outcomes for clients.

The APS supports the SUA, ACCESS Ministries and all other religious organisations to fulfill their missions within appropriate boundaries. However, the APS strongly opposes the use of chaplains or any other untrained individual to "help students find a better way to deal with issues ranging from family breakdown and loneliness to drug abuse, depression and suicide" (SUA QLD, 2010).

### **Government's role in allowing unsafe practices to occur**

The employment of chaplains instead of psychologists can occur because principals and teachers are generally time-poor and students with mental health issues take up a considerable amount of teacher's time, energy and resources. The opportunity for the presence of one more adult in a school, whose sole purpose is to provide a listening ear and caring advice is a very attractive offer to time-poor teachers and principals. In fact an Access Ministries report titled *The Value of Chaplains in Schools* (2009) states that "the capacity of chaplains to help relieve pressure from principals and staff is an invaluable aspect of their role" (2009, p.5) .

In addition to being time-poor, schools are also limited in their access to funds to employ additional non-teaching staff. A government supported initiative such as the NSCP is understandably going to appeal to school principals. Although there is a provision under the current scheme for principals to use the funding to employ non-chaplains (if a local chaplain cannot be found), the current funding arrangements are not realistically sufficient to employ other professionals. Principals communicated this in Hughes and Sims (2009) study by

reporting that “they could certainly not replace the chaplain with anyone else for the same level of payment” (p. 46). In addition, some principals may not fully understand the complexity and level of training required to provide support to students with mental health issues and so would see the NSCP as a cheap alternative to employing suitably qualified professionals. This attitude would certainly be influenced by NSCP supporters, such as Hughes and Sims (2009), who essentially claim in their report, that when it comes to student welfare, chaplains can just about do anything!

The APS believes that with all the evidence of chaplains working outside of their roles, the government is complicit in allowing dangerous professional behavior. By injecting a further \$165 million into the NSCP is also, in many ways, not meeting their obligations to provide early intervention services to students with mental health needs from professionals who are both qualified and registered to do the job properly.

### **The need for an immediate modification of the NSCP**

In regards to the NSCP, the APS proposes that:

- Strict rules are enforced on the NSCP to ensure that chaplains do not work outside of their role as providers of religious guidance and informal student support. Chaplains should not be employed to counsel students, especially on issues related to mental health or other complex personal problems. Chaplains should be given adequate training on referral processes and every school should have access to school psychologists to provide psychological assessment and intervention services.
- The NSCP Code of conduct be amended so that chaplains may support students who are experiencing mental health issues only under the guidance of and in conjunction with specialised psychological services.
- The government seriously reconsiders both the amount of funding allocated and worthiness of a scheme that lacks credible evidence and which supports the practice of unregistered and unqualified individuals working with students who have mental health issues and other complex issues.

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