

Proposed designation, under the Health and Social Care Professionals Act 2005, of the professions of counsellor and psychotherapist

Submission by IAPTP: The Irish Association for Play Therapy and Psychotherapy

IAPTP CLG

The IAPTP: The Irish Association for Play Therapy and Psychotherapy is a professional body for humanistic and integrative play therapists (child and adolescent counsellors) and psychotherapists practising play therapy with clients throughout the life span including childhood, adolescence and adulthood. We set professional practice and training standards, maintain a register of trained and accredited practitioners, establish and enforce ethical frameworks, and promote high standards in the provision and operation of services.

We have 167 members including counsellors (Play Therapist members) and psychotherapists (Psychotherapists with a specialisation in play therapy). We have set stringent criteria for the training, and accreditation by our association, of both professions. While we require both categories of members to hold appropriate level 9 (or equivalent for those who entered training prior to late 2010) qualifications, we recognize that the psychotherapist level of training will be of longer duration, have wider depth and breadth of knowledge competencies, and will prepare the practitioner for clinical practice with clients with more significant clinical needs. Scope of practice considerations also arise.

1. Should the professions of counsellor and/or psychotherapist be subject to State regulation?

Yes. IAPTP fully support the regulation of both professions and have campaigned for this over the years.

2. Should the professions be regulated under the Health and Social Care Professionals Act 2005 or otherwise?

Yes. We believe that the Health and Social Care Professionals Act 2005 provides the best mechanism for the regulation of both professions.

3. If the professions are to be regulated under the 2005 Act would it be appropriate to regulate one or two professions under one registration board?

Two – counselling and psychotherapy are not the same profession.

4. The appropriate level of “grand parenting” qualifications to be set for existing practitioners having regard to the QQI Awards standards

Service users need to be protected by a stringent policy for grand parenting suitably qualified and experienced practitioners who demonstrate appropriate levels of knowledge, skills and competence.

Grand parenting to the Psychotherapist Register:

To date, in regard to psychotherapy, the Irish Council for Psychotherapy (ICP) have adopted the highest level of standards to match with those set by the European Association for Psychotherapy. The IAPTP: Irish Association for Play Therapy and Psychotherapy (IAPTP CLG) have also adopted these standards.

Accreditation as a psychotherapist with any professional body operating to the European Standards should be sufficient to demonstrate eligibility to enter the register. Likewise for any professional currently trained to the standard to be set by CORU as the permanent standard (which we suggest should be the same as the EAP standard).

Grand parenting to the Counsellor Register:

The situation is not as clear in regard to counselling as there is a dearth of professional bodies currently operating to a standard that would seem to be suitable in the longer term. To our knowledge, the IAPTP currently operates to the highest level in this area (Level 9 on the NFQ) in regard to our counsellor (play therapist) members. Our standards, for those who began training in child counselling/play therapy since late 2010, include the following minimums:

Total length: 2,800 hours, spread over a minimum of 7 years

- *First 3 years of general training in human sciences (medical, psychological, social, educational, etc.) or equivalence. Estimated length = 1,800 hours*

- Minimum of 2 years in a play therapy specific training programme, plus 2 years post-course practicum = 1,000 hours, incorporating the following:
 - 130 hours of **personal psychotherapeutic experience**, or equivalent in individual and/or group settings;
 - 300 hours of training in **skills and theory**;
 - 450 hours of supervised **clinical practice with clients**. Clinical practice will include practice with individual clients and may also include sessions with families and/or groups in a variety of private, statutory or voluntary services or settings which may include mental health settings, community services, social settings, and/or private practice;
 - 120 hours of **supervision** of an effective clinical practice of the trainee.

We suggest that the standards currently set by the IACP might also be considered as a suitable base for the grand parenting admission of counsellors to the register.

All applicants for entry to either register should show evidence of being a member of a suitable professional body (in Ireland or abroad) for at least 2 of the previous 5 years. CORU will need to consider the varying standards currently applied by professional bodies in accrediting practitioners and adopting standards for the grand parenting of existing practitioners. In any case where these standards are lower (or professional standards not as stringent) than those adopted for future applicants, or currently applied by ICP and IAPTP, it would seem prudent for CORU to require the applicant to demonstrate that they have achieved the standards of proficiency and have engaged in the necessary professional components (personal therapy to required amount and suitably supervised clinical practice in accordance with a suitable code of ethics). All course to be recognized as Schedule 3 courses would likewise need to meet the professional requirements and adequately assess the required learning outcomes (even if the training was not academically validated as this has not been the standard for the profession to date).

All other applicants would need to be independently assessed for competence.

5. The appropriate level of qualifications to be set for future applicants for registration having regard to the QQI Awards standards

Ideally both professions would require training at Level 9 on the NFQ. IAPTP see this as an absolute must for psychotherapists and as highly desirable for counsellors (with Level 8 as

the absolute minimum if level 9 is not adopted by CORU). All applicants should undergo a stringent selection process to assess suitability prior to being accepted onto a course offering a professionally recognized award.

Recommended training criteria:

Psychotherapist: Total length: 3200 hours, spread over a minimum of 7 years

A minimum of a 4 year psychotherapy specific postgraduate training (1400 hours), preceded by a suitable undergraduate degree (1800 hours) (e.g. medical, psychological, social, educational) or equivalence.

Level 9 psychotherapy award at the conclusion of the psychotherapy specific training.

Breakdown of 1400 hours to include, for example:

1. 250 hours personal psychotherapeutic experience (group and individual)
2. 500 – 800 hours theory or methodology
3. 300 – 600 hours/sessions supervised clinical practice
4. 150 hours supervision (group and/or individual)
5. Clinical placement in a mental or social health setting.

Counsellors: Level 9 training: Total length: 2,800 hours, spread over a minimum of 7 years

- A suitable undergraduate degree (1800 hours) (e.g. medical, psychological, social, educational) or equivalence.
- A minimum of a 2 year counselling specific postgraduate training, plus a 2 year pre-accreditation phase (1000 hours minimum between both of these).
- **Level 9 counselling award** at the conclusion of the counselling specific training.
- Breakdown of 1000 hours to include, for example:
 1. 130 hours personal psychotherapeutic experience (group and individual)
 2. 300 hours theory and methodology
 3. 450 hours/sessions supervised clinical practice in suitable setting/s
 4. 120 hours supervision (group and/or individual)

Alternative for Counsellors: - if minimum requirement for level 9 (as proposed above) is not accepted:

- Mature applicant – not a school leaver in any circumstances.
- A minimum of a 3 year, level 8, counselling training (minimum 1800 - 2400 hours total learner effort) plus a pre-accreditation phase. Minimums to be required:
 - 130 hours personal psychotherapeutic experience
 - 450 hours supervised clinical practice in suitable setting/s
 - 120 hours supervision (group and individual) which may include 50 hours clinical seminars/didactic supervision
 - 300 hours counselling specific theory and methodology
 - related subjects (e.g. psychology, developmental and personality theories, clinical distress, psychopathology, systemic theories etc).
- **Level 8 counselling award.**

6. The title or titles that ought to be protected for the exclusive use of registrants.

- Psychotherapist
- Therapeutic Counsellor

Contact Person: Eileen Prendiville

Contact number: 087 6488149

Email: childrenstherapycentre@gmail.com

Company Number: 540839.

Registered in Dublin, Ireland.

**Registered Office:
IAPT CLG,
Suaimhneas,
Main Street,
Tyrellspass,
Co Westmeath.**

**Mailing address :
17 Rossa Avenue,
Off Mulgrave St
Limerick City
Limerick**