

## Public consultation

### Proposed regulation of Counsellors and Psychotherapists under the Health and Social Care Professionals Act 2005

#### Submission from Association of Professional Counsellors and Psychotherapists (APCP)

##### Introduction and Context

Q1: Whether the professions of counsellor and/or psychotherapist ought to be subject to State regulation.

Q2: If so, whether the professions ought to be regulated under the Health and Social Care Professionals Act 2005 or otherwise.

Q3: If the professions are to be regulated under the 2005 Act whether it would be appropriate to regulate one or two professions under one registration board.

Q4: The appropriate level of “grand parenting” qualifications to be set for existing practitioners having regard to the QQI Awards standards.

Q5: The appropriate level of qualifications to be set for future applicants for registration having regard to the QQI Awards standards.

Q6: The title or titles that ought to be protected for the exclusive use of registrants.

## **Introduction to APCP (Association of Professional Counsellors and Psychotherapist),**

APCP is a National organisation based in Limerick ([www.apcp.ie](http://www.apcp.ie)) established upon separating itself from its predecessor in 2010 - National Counselling Institute of Ireland (NCII). APCP is a company limited by Guarantee and currently holds charitable status, No: CHY1234. APCP has a voluntary Board of Directors and an independent Executive Committee which reports to a membership of 400+ counsellors and psychotherapists. The Association is actively involved in the Psychological Therapies Forum and members are actively involved at a national level with other professional activities supporting the development of professional standards in both fields of practice. [Counselling and psychotherapy]. We are also in continual collaboration with other Associations in relation to equitable recognition of practitioners and to the adherence of standards within the profession in accordance with the anticipated statutory regulation of the professions.

Membership occurs across two main divisions, namely a Counselling section and a Psychotherapy section. In order for applicants to attain full accredited membership of the Association they are required to have obtained a minimum of a Bachelor's Degree in Counselling in the case of Counselling membership and a minimum of a Master's Degree in a Psychotherapy related area in the case of the Psychotherapy Division. In both cases applicants are required to have built up a clinical practice under supervision and are also required to engage in on-going continuous professional development to ensure their skills and knowledge meet the exacting standards as set down for each of these emerging professions.

The main function of the APCP is to act in the best interest of professional practice, and to ensure professional standards in the fields of counselling and psychotherapy and in doing so ensure public protection through the establishment and maintenance of these standards.

APCP aims to become a membership association that acts in the interests of the public and contributes positively to clients' growth and well-being and also to the wider society in the domains of counselling and psychotherapeutic practice.

**Question 1 - Whether the professions of counsellor and/or psychotherapist ought to be subject to State regulation.**

APCP are strongly supportive of State regulation of the professions of counselling and psychotherapy. APCP believe that the regulation of counselling and psychotherapy protects the public interest. It is our belief that the state regulation of these professions will increase public confidence in these professions and the ability of these professions to regulate their profession, practice and code of conduct.

**Q2: Whether the professions ought to be regulated under the Health and Social Care Professionals Act 2005 or otherwise.**

APCP believe that the professions of Counselling and Psychotherapy should be regulated under the Health and Social Care Professionals Act (2005). APCP welcomes the proposal to regulate the Counselling and Psychotherapy professions within a statutory framework as this action chooses public interest over that of any professional interests.

**Q3: 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?**

APCP hold the position that it is necessary in the public interest that in order to protect the client that it is both appropriate and necessary to regulate all persons using the professional titles of counsellor or psychotherapist. APCP agrees that one registration board may be the most appropriate way to manage the registration process.

**Q4: Grand-parenting qualifications for existing practitioners, having regard to the QQI Awards standards**

APCP holds the position that Quality Assurance and high professional standards is key in these professions so as to protect the client and establish public confidence. Therefore any introduction of any new professional qualification standards/requirements means that the status of current professionally accredited practitioners needs to be appropriate to these high standards so that they are recognised and regularised within the new statutory framework.

**Q5: The appropriate level of qualifications for future applicants for registration, having regard to QQI Awards standards**

It is the APCP position that those wishing to use the title Counsellor or Psychotherapist should only be eligible to do so when they have attained the appropriate QQI Level and a professional standard that meets criteria stipulated by CORU. It is also APCP's position that those wishing to use the title Counsellor or Psychotherapist, should only be eligible to do so when they have attained level 8 and 9 respectively and when their professional training/supervision meets the QQI standards

**Q6: The title or titles to be protected for the exclusive use of registrants**

APCP propose the protection of the professional titles of Psychotherapist and Counsellor.

Submitted by APCP

Jim Meaney Chairperson on behalf of APCP

0871625045

[jimmeaneyccs@gmail.com](mailto:jimmeaneyccs@gmail.com)