

Public Consultation
Professional Regulation Unit
Department of Health
Hawkins House
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D02VW90

Psychological Society of Ireland
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30th November 2016

To whom it may concern

Please find the submission

“Proposed regulation of Counsellors and Psychotherapists under the Health and Social Care Professionals Act 2005.”

from the Psychological Society of Ireland.

We would be pleased to answer any queries you may have or to elaborate on our submission if required.

Yours sincerely,



Dr Anne Davis
President
Psychological Society of Ireland



Psychological Society of Ireland

Response to the call from The Minister for Health, Mr Simon Harris TD for submissions regarding the proposed regulation of Counsellors and Psychotherapists under the Health and Social Care Professionals Act 2005

The Psychological Society of Ireland (PSI) is the learned and professional body for Psychology in the Republic of Ireland. Established in 1970 the Society currently has almost 3000 members.

This submission is made in light of the above proposal and has largely confined its comments to the key considerations for the profession of Psychology and the counselling and psychotherapeutic practice that is delivered by the profession of Psychology. The Psychological Society of Ireland has specifically addressed its responses to issues concerning the discipline of Psychology and has expanded less on the issues that may be more appropriately fully addressed by a psychotherapy organisation or academic body providing counselling and psychotherapy training on those issues.

QUESTIONS POSED IN THE INVITATION FOR SUBMISSIONS

1. Whether the professions of Counsellor and/or Psychotherapist ought to be subject to State regulation

Yes, we agree

Commentary:

In the interest of protection of the public, the PSI welcomes proposals to introduce regulation in this area. However the PSI would recommend strongly that due to those common areas of practice of Psychologists and Counsellor/Psychotherapists that the following points be considered with regard to how regulation is best executed.

The delivery of psychological therapies (counselling/psychotherapeutic practice) is a central and defining activity of many Psychologists whose training and work contexts involves the application and delivery of psychological services in a variety of health and social care settings, in both the public and private sector. This refers predominately to those trained as Counselling and Clinical Psychologists but may also apply to those Psychologists who hold other post graduate qualifications in psychology which incorporate training in counselling and psychotherapy. For one example, within the HSE statutory services alone, almost 900 Psychologists are currently employed in many contexts including primary care, mental health, disability and acute hospital settings, with contractual responsibilities to deliver a range of assessment, formulation, consultation and intervention services including psychological therapies and psychotherapeutic interventions. Indeed in many teams and service contexts it is only through Psychology service provision that psychotherapeutic services are available. The above HSE Psychologist employment numbers do not include those Counselling and Clinical Psychologists employed in the existing, nationally consolidated Department of Health grade of Counsellor/Therapist, the eligibility criteria for which long recognises the competencies of counselling and clinical psychology to work in this capacity.

While many Psychologists may choose to advance and specialise the psychotherapeutic element of their practice with further post qualification training, their existing Doctoral level training in Counselling or Clinical Psychology (or equivalent) incorporates a breadth and depth of knowledge and skill acquisition in the area of counselling/psychological therapy/psychotherapeutic practice. This incorporates academic, supervised clinical practice and self-knowledge development components to QQI Award standard equivalent/Fetac level 10 (maximum level). With undergraduate and postgraduate degrees in Psychology, incorporating training in the provision of a range of Psychological Therapies, Counselling and Clinical Psychologists have the capacity to draw on a broad knowledge base in formulating an understanding and responding to clients' needs and distress. Key to this is the flexible tailoring of psychological interventions best suited to the individual; to the client's presenting needs and to the particular context in which biopsychosocial issues are manifesting themselves and for which help is required.

In summary, The Psychological Society of Ireland respectfully highlights that account needs be taken of the existing practice of, and role played by, psychologists in service delivery across the broad spectrum of psychological, counselling and psychotherapeutic services, both public and private, in the regulation of the counselling and psychotherapy profession.

The PSI also fully supports CORU's strong recommendation that the regulation of Psychologists should be complete before progressing with the opening of a register for Counsellors and Psychotherapists. This is advised on the basis that the regulation of the professions in this sequence, beginning with Psychology, offers a better means of addressing the complexities that may arise due to the common areas of practice of these professions. While PSI appreciates that CORU does not seek to regulate scope of practice, if protection of the titles 'counsellor and/or psychotherapist' were to be done in advance of addressing the title 'Psychologist' it could subsequently prove to be problematic for the regulation of the title 'Psychologist' particularly in view of the well-established professional title of 'Counselling Psychologist' which is exclusive to Psychologists.

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

Yes, we agree it should be under the Act

Commentary:

The Psychological Society of Ireland acknowledges that the Health and Social Care Professionals Act 2005 and the evolving CORU regulatory framework to support this Act addresses key regulatory issues and invites considered attention to academic standards as outlined by QQI and to practice standards consistent with skills, competence and experience. Many of its precepts are already enshrined in the codes of ethics and practice to which the Psychological Society of Ireland and the existing counselling and psychotherapy bodies already hold their registered members to account. Regulation under the Health and Social Care Professionals Act 2005, therefore, provides a helpful initial framework for standards and regulation and offers further protection to the public who use counselling and psychotherapy services.

As the proposal for the registration is being developed, we are cognisant of the fact that due consideration needs to be paid to those areas of practice where the practice of psychologists and counsellor/psychotherapists overlaps so that both appropriate recognition of commonality and important distinctions of functions are addressed.

3. If the professions are to be regulated under the 2005 Act whether it would be appropriate to regulate one or two professions (e.g. counsellor and psychotherapist or Psychotherapist or Counsellor/Psychotherapist) under one registration board

We believe they should be under one registration Board

Commentary:

The PSI recognises that this has been, and continues to be, a matter of considerable debate and variation in other jurisdictions. It would appear that members of the public and indeed referrers typically tend not to draw or appreciate a distinction between ‘counsellors’ and ‘psychotherapists’ in terms of seeking or referring for services. These terms are often used interchangeably by the public and professionals alike. While acknowledging the questions and concerns of all their colleagues in the counselling and psychotherapy professions the PSI queries whether two separate titles in such allied professions as counselling and psychotherapy might just maintain rather than reduce confusion for the public. The primary issue may be that eligibility for registration under either of these titles be equivalent if they were to be regulated under one register. The PSI do acknowledge that differing levels of training and competence exist in this field and that services available to the public will vary dependant on the training and experience of an individual and the importance of this information being clearly made available to the public.

Regardless of whether the terms Counsellor or Psychotherapist are united or registered separately subsequent to the registration of Psychologist, it is important that Psychologists who wish to make visible their specific counselling and psychotherapy and other psychological therapy skills may do so in tandem with their primary registration as Psychologists so that Counselling Psychology and Clinical Psychologist and Psychologists who are practicing Psychotherapists may find their counselling and psychotherapy registration within their profession of Psychology rather than having to engage in dual and sometimes triple registration for the purpose of conducting or being employed in counselling and psychotherapy practice.

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

Commentary:

The issue of ‘grand parenting’ for existing practitioners may be dealt with best as an evolving multidisciplinary collaborative consultation based on minimum QQI Awards Standards taking into account a system of equivalence for those who have been practicing for a fixed period. Additionally, consideration might be given to those currently engaged in training, undertaken in good faith to lead to subsequent counselling or psychotherapy practice. The provision of a structure of supervision and/or CPD to facilitate equivalence might also be considered as a fair means of ‘grand parenting’ those who may have qualified at a time that the current QQI Awards in Counselling and Psychotherapy were not available.

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

Commentary:

The PSI recognises the thorough and comprehensive nature of the QQI Awards standards developed to date.

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

Commentary:

The Psychological Society of Ireland would support the protection of the title Psychologist for the exclusive use of registrants who are psychologists. In the light of the existing confusion in terminology between psychology, counselling and psychotherapy and often psychiatry, it is extremely important for the purpose of public protection that the term Psychology, Psychologist and any nomenclature containing 'Psychology' or derivatives is clearly delineated exclusively for those who are registered members of the profession of Psychology. It is for this reason and in the best interests of the public that The Psychological Society of Ireland remains opposed to titles such as 'Psychological Therapist'.

As stated above, while PSI appreciates that CORU does not seek to regulate scope of practice, the existing well established professional title of 'Counselling Psychologist' and the PSI membership list of its evolving Division of Psychotherapy needs to be considered in light of the issue of shared language in the event of protection of the title of 'Counsellor' and 'Psychotherapist'.

We would reaffirm that Psychologists who wish to make visible their specific counselling and psychotherapy and other psychological therapy skills may do so in tandem with their primary registration as Psychologists, where applicable.

The Psychological Society of Ireland
30 November 2016