

**Submission concerning the proposed regulation of  
Counsellors and Psychotherapists under the Health and  
Social Care Professionals Act 2005**

**On behalf of**

**Bodywhys: The Eating Disorders Association of Ireland**

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## **Introduction**

Bodywhys - The Eating Disorders Association of Ireland - is the national voluntary organisation supporting people affected by eating disorders, including friends and family members. Our work ranges from the provision of support services and information resources to the promotion of positive body image and media awareness in schools.

As with any submission that forms part of this consultation, we are conscious of writing from a specific perspective and will focus comments on the areas which are relevant to the work that we do in the field of eating disorders. People affected by eating disorders, along with family members, frequently contact Bodywhys in relation to treatments and with questions about counselling and psychotherapy. Bodywhys welcomes the opportunity to address the issue of the regulation of counselling and psychotherapy.

In particular, the Bodywhys submission addresses:

- Eating disorders and associated risks
- The role of counsellors and psychotherapists
- Risks in the absence of regulation
- Recommendations for regulation

Individuals working in this field may work directly with people affected by eating disorders, including children, adolescents, adults and family members. It is vital that practitioners are appropriately trained, qualified and accredited and sufficiently skilled in dealing with the serious and complex challenges associated with eating disorders.

Yours sincerely,

Barry Murphy  
**Communications Officer**



## **About Eating Disorders**

Up to 200,000 people in Ireland may be affected by eating disorders with 400 new cases emerging each year, representing 80 deaths annually.<sup>1</sup> According to the Health Research Board, in 2015, 12% of all admissions for under 18s to Irish psychiatric units and hospitals had a primary diagnosis of eating disorders.<sup>2</sup> Eating disorders are serious and complex mental health problems. They often feature severe disturbances in a person's thought processes and their relationship with food, their body and weight. This may lead to significant complications for a person's quality of life, and in their physical and mental health. Full recovery is possible, but it is often a complex process and an individual's support needs can vary from person-to-person.

## **Risks**

Individuals affected by eating disorders may be at risk in terms of their own safety.<sup>3</sup> This may include medically, psychologically, psychosocially and their capacity for insight and motivation. Eating disorders can also lead to risk in terms of mortality and suicidality.<sup>4,5</sup> Individuals affected by eating disorders may be extremely vulnerable, at risk or in crisis. In severe cases, immediate and ongoing medical intervention and supervision may be required.

Individuals affected by eating disorders may present with additional issues such as:

- Anxiety<sup>6,7,8</sup>
- Depression<sup>9,10,11</sup>
- Self-harm<sup>12,13,14,15,16,17</sup>
- Suicidal ideation and behaviour<sup>18,19</sup>

## **Role of Counsellors and Psychotherapists**

Professionally trained counsellors and psychotherapists play a crucial role in treating a person affected by an eating disorder. Psychotherapeutic treatments, which differ depending on the theoretical background and training of the psychotherapist, are the treatments of choice for people affected by eating disorders. It is well-documented that medical treatment alone is rarely sufficient in promoting full recovery and any

treatment strategy or treatment programme always involves the person with the eating disorder working with a trained and qualified psychotherapist.

A counsellor or psychotherapist must be appropriately qualified, accredited and have the experience and expertise to deal with serious psychological and psychiatric disorders such as the eating disorders categorised in the Diagnostic and Statistical Manual of Mental Disorders 5 (DSM-5).<sup>20</sup>

The potential damage and wasted opportunities that an unqualified or inexperienced counsellor or psychotherapist can incur if they work with someone with a serious psychiatric disorder is immense. As such, Bodywhys endorses and recommends the regulation of the fields of counselling and psychotherapy to the highest standard.

To state clearly, Bodywhys is concerned with the following two major risks in the absence of regulation:

- Risk 1: The current lack of regulation in the area of counselling and psychotherapy has resulted in many poorly qualified, and inexperienced practitioners self-identifying as ‘counsellors’ or ‘psychotherapists’, working with people who are seriously and dangerously mentally ill, in turn risking exacerbating the person’s problems and causing detrimental damage to their well-being.
- Risk 2: The current lack of regulation in particular in relation to the training and education requirements for those entering the field of counselling and psychotherapy is resulting in individuals with minimal training, and a lack of skills to safely manage working with seriously at risk clinical populations, including people with eating disorders.

### **Conclusion and Recommendation**

Bodywhys supports the regulation of ‘counsellors’ and ‘psychotherapists’ in line with The Health and Social Care Professionals Act 2005 which facilitates the State to initiate a registration process, stating: ‘The object of the registration board of a designated profession is to protect the public by fostering high standards of professional conduct and professional education, training and competence among registrants of that profession.’<sup>21</sup>

Bodywhys supports the protection of the terms 'counsellor' and 'psychotherapist' within the registration board.

### **Registration and regulation for Psychotherapist**

Bodywhys supports the following baseline and hour requirements for registration as a psychotherapist (which are in line with the European Association for Psychotherapy, the Irish Council for Psychotherapy and the Psychological Therapies Forum).

### **Qualification at baseline level 9 of the National Framework of Qualifications.**

In total a minimum of **3,200 hours** of training and education over 7 years as follows:

- A Degree or equivalent in human sciences (medical, psychological, social, educational, etc)
- Interview
- Minimum of four years continuous training in a specific psychotherapy modality at master's level (1400 hours) to include:
  - 250 hours / sessions personal psychotherapeutic experience
  - 500-800 hours of theory and methodology
  - 300-600 hours / sessions supervised clinical practice with clients/patients
  - 150 hours / sessions of supervision
  - Clinical placement in a mental health or psycho-social setting

### **Registration and regulation for Counsellor**

Bodywhys recommends that for the regulation of counsellor the following standards are adopted (in line with the Psychological Therapies Forum proposal).

A baseline academic qualification for entry to training is:

- Entry level 1 – leaving certificate or equivalent
- Entry level 2 – relevant degree or equivalent prior learning
- Interview

In addition to this, the **minimum** baseline requirement being:

- A minimum 4 years training in a specific counselling and psychotherapy modality of 1250 hours to include:
- 600 hours of academic training including theory over minimum of 4 years
- 400 hours of supervised clinical practice with clients/patients during training
- 100 hours supervision (supervision ratio 1:4)
- 150 hours of personal development experience to include minimum of 100 hours of personal psychological therapy.

Bodywhys is concerned that some inexperienced or unqualified counsellors and psychotherapists may be working with individuals affected by eating disorders whilst having limited direct knowledge of the complications and risks associated with the issue.

Bodywhys strongly urges that the recommendations outlined above in accordance with the Irish Council for Psychotherapy<sup>22</sup> (ICP) and Psychological Therapies Forum<sup>23</sup> (PTF) are implemented in full. In particular, the baseline qualifications and experience requirements for registration as a counsellor or psychotherapist.

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<sup>1</sup> Department of Health & Children (2006) *A Vision for Change: Report of the Expert Group on Mental Health Policy*

<sup>2</sup> Daly, A. & Craig, S. (2016) *Activities of Irish Psychiatric Units and Hospitals 2015 Main Findings*. Health Research Board.

<sup>3</sup> Treasure, J. (2009) *A Guide to the Medical Risk Assessment for Eating Disorders*.

<sup>4</sup> Chesney, E., Goodwin, G.M. & Fazel, S. (2014) Risks of all-cause and suicide mortality in mental disorders: A meta-review. *World Psychiatry*, 13(2), 153-160.

<sup>5</sup> Arcelus, J., Mitchell, A.J., Wales, J. et al. (2011) Mortality rates in patients with anorexia nervosa and other eating disorders: A meta-analysis of 36 studies. *Archives of General Psychiatry*, 68(7), 724-731.

<sup>6</sup> Swinbourne, J., Hunt, C., Abbott, M. et al. (2012) The comorbidity between eating disorders and anxiety disorders: Prevalence in an eating disorder sample and anxiety disorder sample. *Australian and New Zealand Journal of Psychiatry*, 46(2), 118-131.

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<sup>17</sup> Peebles, R., Wilson, J.L. & Lock, J.D. (2011) Self-Injury in adolescents with eating disorders: Correlates and provider bias. *Journal of Adolescent Health, 48*(3), 310-313.

<sup>18</sup> Crow, S.J., Swanson, S.A., le Grange, D. et al. (2014) Suicidal behaviour in adolescents and adults with bulimia nervosa. *Comprehensive Psychiatry, 55*(7), 1534-9.

<sup>19</sup> Suokas, J.T., Suvisaari, J.M., Grainger, M. (2014) Suicide attempts and mortality in eating disorders: a follow-up study of eating disorder patients. *General Hospital Psychiatry, 36*(3), 355-357.

<sup>20</sup> American Psychiatric Association (2013) *Desk Reference to the Diagnostic Criteria from DSM-5*.

<sup>21</sup> Health and Social Care Professionals Act 2005

<sup>22</sup> Irish Council for Psychotherapy (2015) *Position paper on statutory registration and the distinction between the related professions of counselling and psychotherapy*.

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<http://www.psychotherapycouncil.ie/wp-content/uploads/2016/07/ICP-Position-Paper-January-2015.pdf>

<sup>23</sup> Psychological Therapies Forum (2008) *Submission on the Statutory Registration of Counsellors and Psychotherapists in Ireland*.