As a Key Stakeholder, Play therapy Ireland wish to submit representations concerning the regulation of Play Therapists through the proposed Regulation of Counsellors and Psychotherapists under the Health and Social Care Professions Act 2005.

Submitted on 29/11/16 by the CEO of PTIrl: Bernie Kelleher

It seems to us that the needs of children are being overlooked at the current stage of consultation. This is a vulnerable client group of an estimated population of 127,552 that must have at least the same priority as adults. Another reason for top priority is that many adult psychological problems stem from childhood so early treatment will bring an additional social benefit. We do not think that the public will react favourably if children are left out at this stage.

Who and What are Play Therapists?

Play Therapists are professionals trained to work with children who have psychological, emotional and/or mental health issues, which have an adverse effect upon their health, wellbeing, learning and quality of life. Play Therapy is also an effective way of helping children who are worried or unhappy. In the process of growing up, most children experience difficulty adjusting at some time. Some need more help than others. Unlike adults, many children cannot or do not want to talk about these issues. They don't know the words to describe how they are feeling or what they are thinking. Our registrants practise the Integrative Holistic model of Play Therapy, the only children’s therapy model supported by a quantified clinical evidence base.

The model integrates:

- Working with conscious and unconscious processes
- Using non-directive and directive approaches
- The therapeutic use of a wide range of creative arts media, as well as toys
- Psychological theory with neurobiological evidence
- Children’s emotional well-being with other school, centre or agency objectives
- Research with practice

The model’s holistic approach considers many aspects of the child’s learning ability, communication skills, creativity, social relations and spirituality.

Play Therapy uses metaphors and fantasies, which have been shown to be a more effective way of communication when dealing with the emotions. Many children, especially the younger ones, cannot or do not want to talk about their problems. On average, the child talking takes up only 7% of the session time.

In the main, the child rather than the therapist chooses from a wide range of creative arts media including drawing and painting, musical instruments, sand tray play/worlds, clay, puppets, dressing up/role play, games, dancing/movement and therapeutic stories. Some children choose only one medium for the whole session but most use two or three. The Play Therapist must be able to communicate with the child in whichever medium the child has chosen, (rarely through talking) and then ground them safely at the end of each session. There are some circumstances when the therapist may have to work directly, for example to ‘nudge’ a child out of repetitive play, which is impeding progress. However considerable experience is needed to make these types of decisions safely.

Children encounter their world at an experiential rather than a cognitive level. Creative arts reach the unconscious, using the medium of play to communicate with the child without talking. Those trained specifically in the PTIrl/PTUK model are more likely to be more effective in working with children than those with a counselling and psychotherapy background. This in essence is where Play Therapy is unique from their counterparts in therapeutic interventions for adults. Therefore, Play Therapy needs to be regulated, as it is in the UK, recognised in its own right as a distinct profession, ideally with protected titles.
Another big benefit of including Play Therapy Ireland’s registrants at this first stage is our three years of experience of regulation. This is evident through the existing Register of Play and Creative Arts Therapists, managed by Play Therapy UK and accredited by the UK Professional Standards Authority.

**The effectiveness of play therapy**

All of our registrants are required, as a part of their annual revalidation, to submit data upon the clinical outcomes of their work with children, as observed by parents and referrers (not the therapist). The psychometric instrument used is the Goodman Strengths and Difficulties Questionnaire (SDQ), which is used by the UK surveys of Children's mental health in the UK.

SDQ results in Ireland based on children that have received play therapy, delivered to PTIrl/PTUK standards show the following:

- 75% of children show a positive change as observed by referrers
- 77% of children show a positive change as observed by parents.

**Play Therapy Ireland**

Play Therapy Ireland (PTIrl) is affiliated to Play Therapy International (PTI) which has affiliated organisations in 12 countries. Play Therapy International has over 1700 registrants. PTI was set up in 2002 to administer standards for play therapy across the globe. PTIrl has currently 198 registered play therapists. Ireland has more play therapists per head of population than any other country. The UK has 900 play therapists.

Play Therapy Ireland’s mission is to promote the use of play and creative arts therapies as ways of enabling children to reach their full potential by alleviating social, emotional, behavioural and mental health problems.
**Play Therapy Training**

In order to qualify as a Play Therapist, APAC (Academy of Play and Child Psychotherapy) provides a three-stage programme at level QQI 9 in Ireland validated by the National University Ireland (Galway) and by Leeds Beckett University in the UK (UK QAA Level 7). This programme includes Certificate, Diploma and MA courses. The Certificate and Diploma courses are two thirds experiential and one third theory based.

APAC was established in 1998. Since then, it has grown to become the largest and most successful provider of play therapy training in the world, operating in Africa, Asia, Australasia, as well as Europe. Play Therapy International has set de facto world standards in play therapy practice and training. The structure of the courses are standardised throughout the world, providing the same training in different countries. The course directors are trained internationally with thirteen training venues, all delivering the same course content. Learning objectives are based on PTUK’s competence framework, which in turn is based on the quantified clinical evidence base.

The British Council for Therapeutic Intervention with Children (BCTIWC) audits the processes used by PTUK to accredit the APAC courses.

**Where do we Currently Practice?**

The employment potential for Play Therapists has grown consistently in Ireland. The profession’s success is gaining popularity and respect due to the effectiveness of the therapy. Play Therapists are currently employed in a range of different settings including but not limited to:

- Child and Family Centres.
- Child and Adolescent Mental Health Teams.
- Community Care Teams.
- Residential Care Services for children in care.
- Primary schools.
- Special schools.
- Family Resource Centres.
- Private practices.
A child is referred to a Play Therapist through numerous channels including:

- The Health Service Executive.
- Parents.
- The school system.
- Public Health Nurses
- Other Agencies.

We believe it is essential that Play Therapy is regulated in its own right. This is emphasised by the fact that Play Therapists come from multi-disciplinary backgrounds including:

- Social workers.
- Family Support Workers
- Public Health Nurses
- Psychologists
- Teachers
- Social Care workers
- Nurses

Play Therapy Ireland contends that professionals working in the above-mentioned fields of expertise are ideally placed to practice as Play Therapists. Further to this, it is also our contention that as Play Therapy is fundamentally a non-talking therapy and is practiced through play, the postgraduate training extends professionals knowledge and skills into therapeutic capacity and intervention.

**How we Measure our Outcomes.**

Play Therapy International uses a standard measurement tool, the Strengths and Difficulties Questionnaire (SDQ) developed by Robert N. Goodman of Kings College, London. The use of this measurement tool has become standard practice by all PTI play therapists including the UK and Play Therapy Ireland. The SDQ is a measure of a child’s mental health. It is a questionnaire filled out by parents, teachers and the child themselves if appropriate. The SDQ is filled pre therapy and again when the therapy has finished. SDQ is the tool used by PTI play therapists in assessing referrals and monitoring the child’s progress. This SDQ data is submitted by play therapists when revalidating their membership and this data is used as part of the evidence based...
research to show the successful outcomes of play therapy intervention. PTI now has Goodman’s Strengths and Difficulties Questionnaire (SDQ) data for over 26,000 cases capturing pre and post intervention scores from both parents and referrers in 30 countries including Ethiopia and South East Asia. Overall 77% to 84% of children attending Play Therapy showed positive change. The most used service delivery channel is primary schools.

**Play Therapy Register:**

In “Response to Minister for Health on Regulation of Counsellors and Psychotherapists”, CORU recommended that in order to prepare for statutory registration a **two-step approach to statutory registration** should be carried out.

Step One:- CORU recommended that Ireland adopt the UK called Accredited Registration (AR) model. Play Therapy Ireland are in a unique position in this regard as we are already on the register in the UK and have been actively using the AR system since 2013. A lot of work has been done to ensure that members of play therapy Ireland are ready to be statutory regulated nationally.

Step Two- after a specified period of time, the professional bodies on the approved voluntary register would be transferred to Coru.

**In 2012, PTUK was chosen by the PSA to participate in the pilot programme to develop and test the proposed standards and procedures. This put PTUK to the forefront of regulation. PTUK’s Register of Play and Creative Arts Therapies was one of the first AR’s to be approved in April 2013. PTUK’s Register of Play and Creative Arts Therapists was accredited by the PSA. This was the first recognition at national government level of play therapy as a distinct profession. Coru could use PTIrl’s existing governance and regulation in this regard as a ready made and time proven case study of the success of this scheme.

Harry Cayton Chief Executive of the Professional Standards Authority said

.... *the scheme offers enhanced consumer protection to anyone looking for health and social care services and gives Play Therapy registrants the opportunity to demonstrate their commitment*”
The Standards met by the PTUK Accredited Register include:

- A register of Play Therapy International members. Membership has to be revalidated on a yearly basis using a specifically designed records management system. This database provides evidence of accountability and professionalism for all PTUK and PTIrl registered play therapists. It also provides data and evidence to validate the benefits of play therapy for each registered play therapist and the profession as a whole.
- Having an active risk management system.
- Having sufficient finances to enable it to fulfill its voluntary register functions effectively including setting standards, education, registration, complaints and removal from the register.
- Setting appropriate standards for registrants.
- Clinical governance. This is the process of managing the quality of the play therapists clinical work and safeguarding the effectiveness of the therapeutic work.
- Evidence based practice.
- Adhere to a strict ethical framework to standardise practice in all countries. This informs the practice and decision making of each member of PTIrl.

PTIrl and PTUK members are required to apply the principles of clinical governance to their practice. Play Therapy Ireland welcomes the PSA’s Self Assessment Tool that is currently being used in the UK. Coru included the 37 standards issued by the PSA in their document entitled ‘Response to Minister for Health on Regulation of Counsellors and Psychotherapists’. PTIrl welcomes this tool advocated by Coru as we are currently meeting all 37 standards.

**Proposal**

We are urgently seeking government backed regulation to protect children from unsafe and ineffective practice. PTIrl has three years experience of operating within an AR and the systems required to implement the standards developed by PTUK to use the principles of ‘Right Touch Regulation’. Therefore, we propose that Play Therapy Ireland becomes a pilot project to test the introduction of standards, required by Coru in order to advance the process towards state regulation.
Appendices
Useful websites:
www.playtherapy.ie
www.playtherapy.org.uk
www.apacorg.uk
www.playtherapyregister.org.uk/