The Irish Association of Cognitive Analytic Therapy (ICAT)

The Irish Association of Cognitive Analytic Therapy (ICAT), established in 2006, is the representative and membership organisation for Cognitive Analytic Therapy and Cognitive Analytic Therapists in Ireland. It is a national organisation member of the International Cognitive Analytic Therapy Association (ICATA). The association offers the following opinion in 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

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

The Irish Association of Cognitive Analytic Therapy, recognises existing self regulatory mechanism in this area but in the public interest, welcomes proposals to enhance regulation.

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

The Irish Association of Cognitive Analytic Therapy is mindful of the fact that the Health and Social Care Professionals Act 2005 and CORU is the evolving regulatory framework for a number of professional practice areas and believes that the inclusion of the professional practice area of counselling and psychotherapy within this statutory framework is likely to afford the best current mechanism for clarity to and protection of the public when availing of psychotherapeutic services in either the public or private sectors.

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.

The Irish Association of Cognitive Analytic Therapy acknowledges that differing levels of training and competence exist in this field. The experience of those availing of counselling and psychotherapeutic services will be influenced by the training and experience of the therapist consulted. ICAT believes that it is important that information regarding the training and competencies of those working in this field is available to the public in a clear and accessible fashion.

The terms counselling and psychotherapy can be viewed as referring to a similar activity that varies in depth and breadth. The nature of what happens in the counselling/psychotherapeutic experience between client and therapist can, in addition to the level and type of training of the service provider, also be influenced by factors such as

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the context within which a service is being sought, client readiness and the nature of presenting distress among other factors. Client's experience of 'counselling' or 'psychotherapy' may therefore not be easily defined on the basis of whether they attended a 'counsellor' or 'psychotherapist'.

Public and to some extent professional confusion, certainly currently exists with this work area. Due to an overlap in some competencies, practices and work settings, public differentiation between professionals such as Counsellors, Therapists, Psychotherapists, Counselling and Clinical psychologists and Psychiatrists can be confusing. Other mental health professionals such as psychiatric nurses, mental health social workers and occupational therapists working in mental health may have undertaken further trainings in psychological therapies and practice these in the course of their work. ICAT does not believe that this confusion is likely to be easily resolved by the establishment of one or two registers.

ICAT also considers that, as represented by the QQI Award standards, training in this field can be viewed as occurring on a spectrum that is not easily divisible into two register clusters. The Irish Association for Cognitive Analytic therapy has in recent years, adopted the International Association of Cognitive Analytic therapy's flexible but linked three stage, modular structure to CAT training with Stage 1 as a post graduate skills certificate taking six months to a year to complete and serving as part one of a two stage independent practitioner training or as part one of a three stage psychotherapy or specialist training. Stage 2, is typically a post graduate practitioner diploma taking eighteen months to two years to complete and comprising the most common form of additional qualification for someone with a core mental health profession. However it also serves as part two of a three stage programme of leading to accreditation as an independent CAT psychotherapist or a variety of specialist or advanced qualifications. This may represent specialist modular clinical, consultative, research and academic routes to qualification to the equivalent of an academic, research or clinical Masters Degree. Modules at the stage 3 level include supervisor training, specialist clinical applications of CAT, CAT Trainer or accreditation and CAT psychotherapist.

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

The Irish Association of Cognitive Analytic Therapy supports a fair and safe means of 'grand parenting' for those existing practitioners who may have qualified at a time that the current standards in Counselling and Psychotherapy training, as outlined in the QQI Awards, were not available. Perhaps a grand parenting mechanisms could be considered for those who

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have been practicing for a recent, set period of time, based on minimum QQI Awards Standards and with the provision of a structure of supervision and/or CPD to facilitate equivalence.

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

The PSI recognises the 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

The Irish Association for Cognitive Analytic Therapy on balance supports the protection of the title Counsellor/Psychotherapist with entry level requirements not less than QQI Award standard 7 and a further mechanism within the register for the clear identification of those trained to QQI Award standards 8 and 9. However ICAT would welcome involvement in further discussion on this and the matters raised above.