

Response of the
National Association for Pastoral Counselling & Psychotherapy
(NAPCP)
to Minister for Health's Invitation for Submissions regarding the
Statutory Regulation of Counselling / Psychotherapy

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

The National Association for Pastoral Counselling & Psychotherapy (NAPCP) supports the regulation of counselling and psychotherapy by the state. Clients, who are often in a very vulnerable state, need the protection offered by statutory regulation. It is important that all practitioners in this field are adequately trained, supervised and keep up-to-date with developments in their field of practice. Since it was founded in 1994, NAPCP has accredited members that meet the professional standards prevailing at the time, thus safeguarding best practice and ensuring its members deliver a high quality standard of care.

It is in the public interest and also in the interest of the profession that statutory regulation be introduced as soon as possible. We favour statutory regulation over voluntary regulation.

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

NAPCP agrees that counselling/psychotherapy ought to be regulated under the Health and Social Care Professionals Act 2005.

Question 3: 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?

NAPCP has been an active member of the Psychological Therapies Forum (PTF) since its inception and contributed to the Report by the PTF that was submitted to Government in 2008. NAPCP considers it appropriate that counselling and psychotherapy be regulated under one Registration Board.

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

The introduction of any new professional qualification means that the status of current practitioners needs to be recognised and regularised within the new statutory framework. This is especially important when the registration process is such that registration bestows professional privileges.

Grand-parenting is based on the following principles:

- a) That high standards of professional practice are assured and maintained through an agreed and transparent structured process, the primary purpose of which is to protect service users.
- b) That a process will be identified which will afford current practitioners the opportunity to demonstrate appropriate levels of knowledge, skills and attitude necessary to prove competent, ethical practice. This may be achieved through a range of methods including reports from current and past accredited supervisors, membership of a professional accreditation body, evidence of relevant CPD and in certain circumstances an independent assessment of competence.

Four routes have been identified for enabling the transition of existing practitioners:

Route One: Approved Qualification:

This is a qualification approved by the Registration Board by bye-law. If you hold an approved qualification you do not need to provide details of any other qualification with your application.

Route Two: Schedule 3 qualification:

This is a qualification listed in Schedule 3 of the Health and Social Care Professionals Act 2005 for existing practitioners under Section 91. A person holding a Schedule 3 qualification does not need to provide details of any other qualification.

NAPCP proposes that:

- a) Professional training programmes that operated in the past, and which do not meet the proposed standards, be included in the list of Schedule 3 qualifications, given that successfully completing such programmes has historically been the long-established, traditional training route for counsellors and psychotherapists in Ireland.
- b) That providers of training programmes that do not meet the proposed standards be given sufficient time to either bring their own courses up to the new agreed standard or arrange linkage with other providers whose courses already meet the new standard.
- c) Students currently enrolled on training courses that do not meet Schedule 3 standard, and recent graduates of such courses, may need special grand-parenting arrangements.

Route Three: Letter of Recognition/Accreditation:

This is a qualification gained outside of the Republic of Ireland which has been recognised by the Registration Board for the profession or other designated Competent Authority in the Republic of Ireland. A person holding a Letter of Recognition/Accreditation for an international qualification, does not need to provide details of any other qualification.

Route Four: Working in the Profession without Holding any of the Qualifications Recognised by CORU

A person who has none of the recognised qualifications listed above and who has been working as a counsellor/psychotherapist would be required to:

a) Provide Proof of Professional Practice:

Provide evidence that s/he was practising in the profession in the Republic of Ireland for a period of *not less than 2 years during the five years prior to the opening of the register*. A line manager / supervisor or HR manager must complete a *Proof of Professional Practice Form* for each employment in this period.

If Self-Employed:

If self-employed in the five years up to the opening of the register, provide evidence to demonstrate your engagement in the profession for a period of not less than **2 years during the five years prior to the opening of the register**. The following is a list of provisions for private practitioners to prove engagement in the practice of the profession (in the five years prior to the opening of the register):

- i. Make a ***self-declaration*** regarding their practice ***and***
- ii. Provide proof of ***professional indemnity insurance and***
- iii. Provide a ***Supervisor's report and***
- iv. Make a self-declaration of commitment to abide by an agreed ***Code of Ethics and***
- v. Provide ***3 other items of proof*** from the following list in order to satisfy the Board regarding their work in this field:
 - Copy of trading accounts
 - Proof of operational business addresses
 - Proof of membership of professional body
 - Details of proof of continuous professional development
 - Client confirmations
 - Proof of contracts for service
 - Promotional materials for private practice
 - Publications by the applicant in relation to the profession
 - Professional Lectures / Presentations relevant to the dissemination of knowledge and development of the field of counselling and psychotherapy

The Registration Board may choose, at its discretion, to request further details and proof in order to satisfy itself of professional engagement.

b) Provide Career History:

- **General Information:** The information you provide may be used for verification purposes. You must give brief details (if available) of your

entire working career since leaving school, including work outside of your profession. Reasons for leaving may include career advancement, career change or termination.

- **Professional practice:** Existing practitioners must use the career history section to show they have been engaged in the practice of the profession in the Republic of Ireland for a period of not less than 2 years in the 5 years prior to the opening of the register for the profession in the Republic of Ireland. Describe your main duties and responsibilities and examples of the kind of work you typically carry/carried out on a daily basis.
- **‘Engaged in the practice of the profession’** will also include those in management, education and research directly related to the profession. Applicants for registration from the categories of management, education and research must demonstrate accountability and the ability to lead/manage/educate/research while demonstrating best practice through actions and knowledge.
- **Proof of Professional Practice Form:** A HR Manager or Line Manager / Supervisor must complete this form for each employment in the relevant five year period. The purpose of the form is to provide testimony by an employer of your engagement in the profession during the required five year period prior to the opening of the register for your profession. It should be signed and stamped by the organisation. We may contact your current/previous employers to confirm some or all of the information provided.
- **Professional body membership:** Give details of all professional bodies of which you are a member. The Registration Board may contact the professional body to confirm your membership and good standing.

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

There are areas of commonality as well as differences between different modalities of counselling and psychotherapy. Therefore those practicing counselling or psychotherapy would be expected to acquire and demonstrate their competence to intervene at varying levels of complexity, through different levels of education and training. There are divided opinions between accrediting bodies and within accrediting bodies regarding the appropriate level of qualifications to be set for future applicants for registration. In those circumstances NAPCP leave it to CORU to decide.

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

Therapeutic Counsellor **or** Psychotherapeutic Counsellor

Psychotherapist