



**Submission to the Department of Health
on the proposed regulation of
Counsellors and Psychotherapists under the
Health and Social Care Act 2005.**

**By the Irish Association of Creative Arts
Therapists (the IACAT)**

30th November 2016

INTRODUCTION

The Irish Association of Creative Arts Therapists (the IACAT) is the professional body for art therapists, dramatherapists, dance movement therapists and music therapists in Ireland. This professional body was established in 1992 and currently has circa 500 members working across a range of health, social care and educational settings across Ireland. Since 1992, the IACAT has campaigned to the Department of Health and the Health Service Executive for the registration and regulation of its members. In 2016 this situation still remains unresolved. The IACAT is committed to ensuring the delivery of the best possible psychological services to the public and once again call for urgent action on behalf of the Irish State to ensure registration and regulation of arts therapists in Ireland.

IACAT RESPONSE

The IACAT wishes to respond to the Minister for Health's call for submissions on the proposed regulation of counsellors and psychotherapists. While the IACAT welcomes the timely registration of these health practitioners, we wish to draw the Minister's attention to implications that this will have for both service users and arts therapists in Ireland.

As per Appendix 1, the Minister has called for responses in relation to "*the title or titles that ought to be protected for the exclusive use of registrants*". Related to this in Appendix 2, we note reference to the title of 'Art Psychotherapist':

Equally in the UK, there are a number of Art Therapists, who are known as Art Psychotherapists, who are registered under the Creative Therapies by [the] HCPC. This will need further investigation (p.13).

It is our understanding from the quoted text above that there is a proposal to protect the title of 'art psychotherapist'. However, we wish to strongly highlight that in Northern Ireland and remaining parts of the UK, the title of 'art psychotherapist' is not listed under the existing voluntary register for counsellors and psychotherapists. Instead this title is protected for the

use of the collective body of ‘arts therapists’, who are state - registered and regulated by the Health and Care Professions Council (the HCPC) since 1999. In this instance, ‘arts therapists’ is an umbrella term for art psychotherapists, art therapists, dramatherapists and music therapists. In Northern Ireland and remaining parts of the UK our registered counterparts may use the titles ‘art therapist’ and ‘art psychotherapist’ interchangeably.

The IACAT is deeply concerned that an untenable situation will prevail if it is the case that ‘art psychotherapists’ are regulated and registered under the professional grouping of counsellors and psychotherapists while simultaneously, the title of ‘art therapist’ would remain unprotected and unregulated. Such circumstances would be most misleading to the general public and to our service users. This is also potentially damaging to ‘art therapists’ who are members of IACAT and who could potentially be perceived as somewhat inferior to regulated ‘arts psychotherapists’ who in neighbouring jurisdictions are professional counterparts.

The IACAT wishes to highlight that many of its members have trained in the UK and have registered with the HCPC. Likewise, many graduates of the three Master’s level training programmes in Ireland have been successful in HCPC registration. These training programmes include the MA in Music Therapy (University of Limerick), MA in Dramatherapy (National University of Ireland, Maynooth) and, the MA in Art Therapy (Crawford Training College, Cork Institute of Technology). The IACAT has a good working relationship with the HCPC in the UK, which supports us in our campaign to attain state regulation and registration in Ireland. In preparation, the IACAT has closely consulted with the HCPC and CORU to devise a revised ‘Principles of Professional Practice and Code of Ethics’ to which all IACAT members have agreed adherence.

CONCLUSION

In the interests of ensuring coherency of titles among the general public and health providers, the IACAT requests that the Minister of Health takes immediate action to concurrently begin the separate statutory registration and regulation process for creative arts therapists in Ireland. The IACAT has outlined how future protection of the title ‘arts psychotherapist’ without title protection of ‘art therapist’ will be problematic in terms of public perception not only in the Republic of Ireland but also in Northern Ireland and the UK.

As a united body of arts therapists, the IACAT has carried out substantial preparatory work for the process of state regulation and registration. Once again, we call upon the Minister to move this process forward, whilst demonstrating how IACAT members meet inclusion in the Health and Social Care Professional’s Act 2005 (see Appendix 1).

FOR FURTHER INFORMATION PLEASE CONTACT -

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APPENDIX 1



To: Dr. James Reilly, TD
Minister for Health
Hawkins House
Dublin 2

From: Rebecca O'Connor & Triona McCaffrey
Irish Association of Creative Arts Therapists
P.O. Box 4176
Dublin 8

14th January 2013

Dear Minister Reilly,

Thank you for your letter dated 18th July 2012 and your response to parliamentary questions regarding our request for the statutory recognition and registration of creative arts therapists in Ireland. As you have acknowledged, creative arts therapists work in a variety of healthcare and educational settings in Ireland but the profession is not, as yet, subject to statutory registration or recognition within the publicly funded health sector. This prevailing situation puts some of the most vulnerable people in our society at risk as anyone can claim they are a creative arts therapist and purport to be providing clinical services. Additionally, once a graduate begins work in one of the creative arts therapies there are no regulations to govern their competent practice, and no way to ensure that should they become unable to perform effectively that there is any way to veto their continued contact with vulnerable persons.

The Irish Association of Creative Arts Therapists (IACAT) is the professional body for music therapists, art therapists, drama therapists and dance movement therapists in Ireland. In your letter you stated that your department's priority is to develop statutory registration for the twelve professions designated under the Health & Social Care Professional's Act (HSPCA) 2005 and establish regulatory frameworks for these in the first instance. However, we urgently request that you extend statutory registration arrangements so as to include the creative arts therapies as the thirteenth profession in this Act.

Your letter referred to section 4 of the HSPCA. This section defines a health and social care profession, and sets out the criteria for inclusion of further professions. Each of these criteria is responded to below; outlining how creative arts therapists meet HSPCA inclusion criteria.

- a) *Music therapy, art therapy, dramatherapy and dance movement therapy have a defined scope of practice that is client centred, evidence based, accountable and competency based adhering to the IACAT Code of Ethics. The creative arts therapies professions, worldwide, have spent over sixty years developing practice, theory and research.*
- b) *Creative arts therapies are established as mainstream, clinical interventions throughout the world often with a presence on multi-disciplinary teams. In 1992 IACAT established itself as the professional body representing a significant proportion of creative arts therapists in Ireland.*

- c) *It is obligatory for all IACAT members to have successfully completed an internationally recognised creative arts therapy training programme. Many of IACAT's members are graduates of one of the three creative arts therapies training programmes in the country, all of which are postgraduate programmes namely; MA in Music Therapy- University of Limerick, MA in Dramatherapy -National University of Ireland, Maynooth and, MA in Art Therapy at Crawford Training College, Cork Institute of Technology. Graduates of these trainings who gain registration with the Health and Care Professions Council (HPCC) in the UK testifies to the European equivalency of these Irish trainings.*
- d) *IACAT Code of Ethics outlines the requirement that each creative arts therapist has a requisite to complete continuous professional development (CPD) to maintain standards of excellence in their clinical practice thus ensuring client safety. Thus, all IACAT members have a commitment to CPD.*
- e) *IACAT registered members are authentic clinical practitioners. The unsatisfactory situation that prevails whereby creative arts therapists currently are not statutory regulated means that there is a high degree of risk to the health, safety and welfare of the public from those claiming to be qualified practitioners and who have not completed a recognised training nor are they registered members of IACAT. This recognition process has been protracted over many years yet the number of people falsely claiming to be creative arts therapists working with vulnerable populations is increasing thus heightening the degree of risk to the general public. In order to support IACAT's commitment to the safety of clients it is vital that the profession is statutory regulated and supported by the Department of Health.*
- f) *We wish to request a meeting with you in the immediate future to discuss any other factors that you may consider relevant in relation to the statutory regulation and registration of creative arts therapists.*

IACAT are committed to ensuring delivery of the best possible service to the health, safety and welfare of the public. We ask that you share in our concern to protect and guide members of the public so that they are confident that creative arts therapists in Ireland are a regulated, registered profession pertaining to the highest standards of accreditation and international standards of practice. We urgently request that you extend statutory registration arrangements so as to include the creative arts therapies as the thirteenth profession in the Health & Social Care Professional's Act (HSPCA) 2005.

We look forward to meeting with you in the near future to discuss this important issue further.

Yours Sincerely

Rebecca O'Connor

Triona McCaffrey

IACAT Chairperson

*IACAT Professional Representation and
Statutory Recognition Group.*

CC: Enda Kenny, TD, Taoiseach

Ginny Hanrahan, CORU

Laverne McGuinness, HSE Integrated Service Directorate