28-11-2016

Dear Minister Harris,

Kindly find attached submission on behalf of the Institute of Guidance Counsellors for your attention. Please do not hesitate to contact us if we can be of any assistance in this important consultation process.

Le gach dea-ghui,

Betty Mc Laughlin,

National President, IGC

**Preliminary Remarks and Background:**
The journey to a professional body’s regulation, as per the above proposed regulation of counsellors, allowing its members to be registered, began some years ago. To date, the IGC has not entered into this voluntary regulation process, so is unable, at this moment to be included within the above statutory regulation process. Therefore the current position is that the title ‘Guidance Counsellor’ is not protected under law.

**IGC Response:** The points (1-6) below detail our responses to those items requested by the Minister summarised in Appendix 1 of the document. The Minister asked us to consider the following:

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

   **Response:**
The IGC agrees that the profession of Counsellor, and specifically ‘Guidance Counsellor’, ought to be subject to regulation. Our members are already subject to state regulation under Department of Education and Skills requirements around entry qualifications, the requirement for on-going supervision and for continuous professional development - (CPD is funded annually by DES). Continuing accreditation with, and membership of, the IGC is dependent on meeting each of the above requirements in addition to those set down by the Institute itself. CPD and up-skilling must relate to all areas within which GC’s operate – i.e. personal, social, educational and vocational guidance.

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

   **Response:**
The practise of guidance counselling involves a holistic approach which constantly moves between spheres - social, personal, health, educational etc. The IGC consider it imperative, given the nature of the service provided by its members, that alternative modes of regulation be explored, as referred to in the above question in the term: “or otherwise”. This exploration ideally would include inter-departmental involvement; for instance Health, Education and Justice. We are currently in the process of exploring how this can be achieved with all stakeholders.

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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.

Response:
While guidance counsellors certainly use counselling skills, which may indeed be therapeutic for the client, they do not claim to be either counsellors or psychotherapists in the sense in which these terms are used in this document.

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

Response:
The IGC as a regulated statutory body has each of the following already in place:

- Code of Professional Conduct
- Charitable Status (registered company 2014)
- Core Competencies and Professional Practice Manual (completed - to be launched in early 2017)
- Vision Document
- Annual General Meeting and National Executive Structure
- Requisite Professional Oversight including an external auditor and legal advisor
- Our registered members are overseen by Quality and Membership Committee
- Continuous CPD funded by the DES and other professional organisations. CPD is available to all members through both locally through their 16 branches, and nationally.
- DES and IGC membership requirements for attendance at five supervision sessions per annum with a qualified supervisor
- We are engaged in consultation with a wide variety of interagency organisations

As a national body ever vigilant to the needs of our clients, the IGC constantly engages in scrutinising our professional procedures to ensure best practice. With this in mind we continuously review and evaluate the following:

- Governance within the organisation, including further reorganisation of management committees, risk management and business practices.
- The requirement of its members for on-going supervision, professional indemnity, particularly within the private sector, and CPD, and the logging of same with the professional body.
- Currently working on Framework documents on CPD (informed by COSAN document)
- On-going review of education, competency development and skills training.
- The development of policy in relation to member acceptance to the register or removal from it.
- Regular review of the IGC Code of Professional Conduct and Code of Ethics.
- Regional branch network of professional support and vehicles for on-going professional development.

As the IGC has yet to enter approved voluntary registration for the professional body, the issue of “grand parenting” does not arise at this moment in time.

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

Response:
The IGC currently recognise applicants for membership who have attained a minimum of Level 8 QQI award (many of our members already hold QQI Level 9 awards)
6. The title or titles that ought to be protected for the exclusive use of registrants.

Response:
The title to be protected is “Counselling”, and within this, the specialisation of “Guidance Counselling” and the title “Guidance Counsellor”. [Please note that the IGC does not recognise the title “Career Guidance Counsellor” as referred to in the proposal document - Appendix 2, page 13.]

Le gach dea-guil, 

Betty McLaughlin 

National President

[Signature]