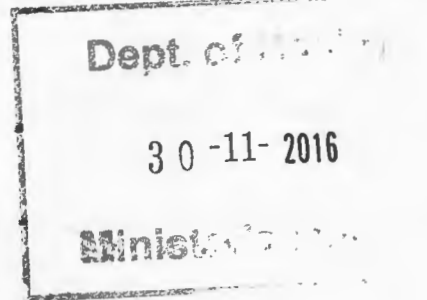


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Department of Health
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28 November 2016

Dear Mr Davies

Proposed regulation of counsellors and psychotherapists under the Health and Social Care Professionals Act 2005

The British Association for Counselling & Psychotherapy (BACP) welcomes the opportunity to respond to this important consultation on the proposed regulation of counsellors and psychotherapists in the Republic of Ireland.

BACP is the leading and largest professional body for counselling and psychotherapy in Europe, with a membership of over 40,000 practitioners, drawn from the various professional disciplines in the field of counselling and psychotherapy and based in a range of settings. We have just under 2,000 direct members across the Island of Ireland as well as a reciprocal agreement with the Irish Association for Counselling and Psychotherapy (IACP), where we offer recognition to their accredited members.

We fully share your views that public safety needs to be paramount and believe that members of the public have a right to choose a counsellor or psychotherapist with every confidence that they have appropriate training and experience and are bound by a robust ethical framework and conduct procedures.

We understand that the Health and Social Care Professionals Council advocated in their Ministerial advice that Government could undertake accreditation of existing voluntary registers of professional bodies, similar to the situation in the UK. We are pleased to use our experience of the UK system to help inform your thinking on how you strengthen the current system in Ireland.

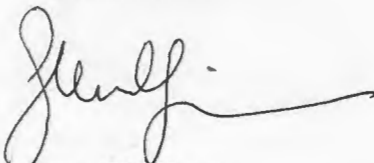
In 2012, UK Government signalled a move away from extending statutory regulation in favour of accrediting registers held by organisations representing health & social care professions. The Health and Social Care Act 2012 (HM Gov, 2012) changed the name of the Council for Healthcare Regulatory Excellence (CHRE) to the Professional Standards Authority for Health and Social Care (the Authority) and gave it new powers to accredit voluntary registers. The BACP Register is currently accredited by the Authority and has been independently assessed and approved by it as meeting their standards. We believe the accredited register programme has successfully raised both standards and quality across the field of counselling and psychotherapy, ultimately improving public protection.

BACP would like to offer some examples of how enhanced protection is realised at a UK level by highlighting some of the core requirements of our own registrants:

- Registrants on the BACP Register (and the IACP Register in ROI) exceed the minimum level of competence that a client has a right to expect from a practitioner. This helps to protect the public by ensuring rigorous standards in the practice of talking therapies.
- All our members are bound by the Ethical Framework for the Counselling Professions, and within this, the robust Professional Conduct Procedure.
- All BACP and IACP members have an ethical responsibility to undertake CPD. BACP believes that counselling and psychotherapy are professions that require a commitment to lifelong learning. CPD is vital for members to maintain and develop their skills throughout their careers and to ensure that they retain their fitness and competence to practise safely and effectively.
- BACP considers that regular clinical supervision is necessary to ensure reflective, competent, ethical practice and for the protection of the practitioner and the public. The minimum standard of supervision for maintenance of BACP Accreditation is 1.5 hours per month of practice.
- Our core practitioner training in counselling and psychotherapy is based on internationally recognised standards of quality and competence. Underpinned by a coherent rationale and philosophy, the course is designed to train individuals to be reflective, competent and ethical counselling/psychotherapy practitioners. The training encompasses a definable mix of Knowledge based learning, Therapeutic competences and research awareness.
- Furthermore, our registrants who go on to gain accredited status have demonstrated that they have undertaken a core practitioner training in counselling/psychotherapy that provides at least 450 hours of timetabled learning, have been in practice for at least three years and have completed 450 hours of supervised practice.

We very much welcome your decision to develop a robust approach that has public protection at its heart and if we can be of any further assistance, please don't hesitate to contact me.

Yours sincerely



Steve Mulligan
Policy and Engagement Lead – Four Nations