

**Proposed designation, under the Health and Social Care Professionals Act 2005, of the  
professions of counsellor and psychotherapist**

**Submission by the Children's Therapy Centre**

**Introduction**

The Children's Therapy Centre (CTC) is the longest established and foremost provider of professional play therapy, creative psychotherapy and related CPD training courses in Ireland. FETAC and HETAC (both now part of QQI) approved our quality assurance standards and registered us as an approved training provider: FETAC in 2007 and HETAC in 2010. We are a registered third level educational institute and deliver training both at level 8 and level 9 on the National Framework of Qualifications. Our psychotherapy courses are all at level 9 and include a postgraduate Diploma and an MA. We are also an APT (Association for Play Therapy) approved provider of play therapy training – the only one delivering such Internationally recognized training in Ireland.

**Answers to questions posed**

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

Yes, definitely. CTC fully support the regulation of both professions and we have been actively involved in seeking this for a number of years.

**2. Should the professions be regulated under the Health and Social Care Professionals Act 2005 or otherwise.**

We believe that the Health and Social Care Professionals Act 2005 provides the best mechanism for the regulation of both professions.

**3. If the professions are to be regulated under the 2005 Act would it be appropriate to regulate one or two professions under one registration board.**

Two – counseling and psychotherapy are two separate and distinct professions. While counseling skills are embedded in psychotherapy practice, the practice of counseling does not necessarily include a psychotherapeutic component.

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

We welcome CORU’s recognition of the need to ensure that service users will be protected by a stringent policy for grand parenting suitably qualified and experienced practitioners who demonstrate appropriate levels of knowledge, skills and competence. There will be a delicate balance between registering only suitable practitioners and recognizing the status of current practitioners. The challenge will be to identify those with skills equal to, or greater than, a standard to be subsequently required by CORU, even though the educational awards attained may not have been academically validated. To this end, when adopting standards for the grand parenting of existing practitioners, CORU will need to consider the varying accreditation and registration standards currently applied by professional bodies. This will involve considering both academic and professional standards. Unfortunately not all professional bodies apply the same standards: some are more stringent than others, particularly in regard to professional standards, including requirements in regard to clinical practice and personal development, which are crucial in the training of safe practitioners.

To date, in regard to psychotherapy, the Irish Council for Psychotherapy (ICP) have adopted the highest level of standards to match with those set by the European Association for Psychotherapy. The IAPTP: Irish Association for Play Therapy and Psychotherapy (IAPTP CLG) also adopted these standards. The Psychological Therapies Forum (PTF) recommended these standards in their submission to government in 2008. However, not all associations in the PTF have adopted the standards that they identified as the level required for safe practice at that time.

As the ICP currently operate to the highest international standards, CTC would suggest that registration with ICP (including the required accreditation with one of its sections) would stand as a suitable standard for those seeking grand parenting access to the CORU register of Psychotherapists. In essence this could mean making ICP a designated Competent Authority for the Republic of Ireland in regard to the title of Psychotherapist. It may be deemed necessary to include an independent assessment of competence for newly accredited



practitioners (e.g. less than 2 years) but this would be highly unlikely to be necessary for those with extensive supervised clinical practice post-accreditation. Holders of the European Certificate of Psychotherapy (ECP), awarded by the European Association for Psychotherapy, will already have demonstrated competence to the highest European standards.

For psychotherapist applicants accredited by alternative professional bodies, and where their standards are lower, or not as stringent, as those adopted by the ICP, it would seem prudent for CORU to require the applicant to have suitable training (including CPD), extensive experience of suitably supervised clinical practice, evidence of extensive personal therapy, and to demonstrate their knowledge skills and competence in some form of independent assessment.

Similar considerations to those outlined above would apply in regard to the register for counsellors. The IACP would seem to be the appropriate body for the counselor register – however the current standards (e.g. low requirements in regard to personal therapy, age of trainees at entry stage, entry criteria) would need to be reviewed. With these concerns in mind, CTC suggest that an assessment of competence would be required for any members with less than 5 years experience post-accreditation.

It is crucial that those grand parented to the register can demonstrate achievement of learning outcomes, (whether their training was academically validated or not) and also meet professional requirements including engagement in sufficient suitably supervised clinical practice and extensive engagement in personal psychotherapeutic process.

It is suggested that grand parenting would be available to those holding:

1. Qualifications (academic and professional standards) that would meet the criteria set for future applicants to the specific register (counselor or psychotherapist) or
2. Holders of the European Certificate in Psychotherapy (ECP)
3. Membership (for specified durations – see above) of an appropriate professional body. In essence this would mean making suitable professional bodies the designated Competent Authorities for the Republic of Ireland:
  - a. for psychotherapists this could be the ICP or another equivalent professional body whose requirements for accreditation match with the European Association for Psychotherapy standards;

- b. for counsellors this could be the IACP or another body with similar (or higher) standards.
- 4. Membership (for specified durations – see above) of an alternative appropriate professional body:
  - a. for psychotherapists this would be a body (e.g. IAPTP) whose requirements for accreditation match with the Irish Council for Psychotherapy (ICP) and European Association for Psychotherapy (EAP) standards;
  - b. for counsellors this would be a body with similar or higher standards to those of the IACP (e.g. the IAPTP operate higher standards for entry to their register of play therapists (child and adolescent counsellors)).
- 5. For applicants (to psychotherapist and counselor registers) whose professional membership may be with a body with lower standards than those above, an individual assessment of competence would be necessary.
- 6. Schedule 3 qualifications would address standards of proficiency matters plus professional and personal development matters.
- 7. Suitable professional membership and a qualification (from Ireland or abroad) not lower than listed Schedule 3 qualifications. (plus assessment of competence if not an accredited member of ICP or IACP as appropriate)
- 8. Proof of professional practice (at least 2 years out of previous 5 years) should include proof of accredited membership of an appropriate professional body (includes a suitable code of ethics), supervised clinical practice, ongoing CPD, continuous and appropriate insurance cover,

Other applicants would need to be independently assessed for competence.

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

**Psychotherapist:** Total length: 3200 hours, spread over a minimum of 7 years

A minimum of a 4 year psychotherapy specific postgraduate training (1400 hours), preceded by a suitable undergraduate degree (1800 hours) (e.g. medical, psychological, social, educational) or equivalence, with a **level 9 psychotherapy award** for psychotherapists at the conclusion of the psychotherapy specific training.

Breakdown of 1400 hours to include, for example:



1. 250 hours personal psychotherapeutic experience (group and individual)
2. 500 – 800 hours theory or methodology
3. 300 – 600 hours/sessions supervised clinical practice
4. 150 hours supervision (group and/or individual)
5. Clinical placement in a mental or social health setting.

**Counsellors:** Total length: 2,800 hours, spread over a minimum of 7 years

A minimum of a 4 year counselling specific training period (1000 hours minimum), which may include a direct training period (minimum of 2 years) and a pre-accreditation phase with specific training/CPD requirements during both phases.

Counselling specific training would only be open to mature applicants and an interview should be part of the application process. This training is not suitable for the CAO system: entry requirements would demand prior suitable professional experience and/or training. Ideally this training will be preceded by a suitable undergraduate degree (1800 hours) (e.g. medical, psychological, social, educational) or equivalence, with a **level 8 or level 9 counselling award** at the conclusion of the counselling specific training.

Breakdown of 1000 hours to include, for example:

1. 130 hours personal psychotherapeutic experience (group and individual)
2. 300 hours theory or methodology
3. 450 hours/sessions supervised clinical practice in suitable setting/s
4. 120 hours supervision (group and/or individual).

**Note: The 1000 hour training period suggested above would only be suitable for mature applicants with relevant prior training and experience.**

**Level 9 would be the ideal academic level to be required but may not be feasible.**

**6. The title or titles that ought to be protected for the exclusive use of registrants.**

- Psychotherapist
- Therapeutic Counsellor (or Counselling Therapist)

**Submitted by:**

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**Signed:**



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