



HGI Submission to Minister Simon Harris – Department of Health - Ireland

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

The Human Givens Institute (HGI) submission on the proposed designation, under the Health and Social Care Professionals Act 2005, of the professions of counsellor and psychotherapist.

The HGI provided the following response on November 30th 2016 to the Department of Health.

If you have any feedback on this submission, please contact:

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FOREWORD

On behalf of the community of Human Givens practitioners in Ireland, we are pleased to respond to the invitation of the Minister for Health Mr Simon Harris TD to submit proposals in respect of the proposed designation of the professions of Counsellor and Psychotherapist. This initiative allows a wide ranging conversation about the role, skill-set and professional credentials applicable to therapists in practice in Ireland. We believe this will facilitate a wider public awareness of the purpose and benefits of psychotherapy in general as well as instilling confidence in the professionalism of future registered practitioners. We are pleased also to showcase the growth and evolution of Human Givens therapy, its success in training thousands of professionals in the UK, as well as gaining an evidence base for therapeutic efficacy, and its central connection with the psychotherapy community in Ireland since its inception.

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INTRODUCTION

The Human Givens Institute (HGI) welcomes the opportunity to contribute to the discussion on introducing statutory oversight regarding the competence, conduct and qualifications of counselling and psychotherapy practitioners. It is an appropriate and timely development which aims to improve the health and wellbeing of people in Ireland, thus contributing to the success of the Department of Health Statement of Strategy 2015 – 2017, which also recognises the importance of protecting the public and includes a commitment to delivering services of the highest quality to ensure patient safety.

EXECUTIVE SUMMARY WITH KEY RECOMMENDATIONS

This submission from the Human Givens Institute (HGI) responds to the set of specific questions outlined by Minister Harris with regard to the critical challenge of protecting the public by ensuring high standards of professional conduct and professional education, training and competence in the counselling and psychotherapy professions.

It profiles the Human Givens Institute as the professional membership body for Human Givens therapists, a school of evidence based psychology and psychotherapy, which is accredited under the Accredited Voluntary Register (AVR) programme as part of the UK Professional Standards Authority for Health and Social Care.

The Human Givens Institute fully supports the government's proposal to introduce statutory oversight of the counselling and psychotherapy professions under the Health and Social Care Professionals Act 2005.

Key recommendations include;

- that the preparatory stage relating to the statutory registration of the profession would involve a two-step approach. This would include establishing a voluntary register with a set of criteria to assess applications to the register and demonstrate professional best practice.
- that future applicants for registration have minimum relevant qualification at Level 8 on the National Framework Qualifications and engage in appropriate continuous professional development.

We look forward to the opportunity of contributing further to the development of a robust and professional counselling and psychotherapy service.

THE HUMAN GIVENS INSTITUTE

Founded in 2002, the Human Givens Institute (HGI) is a professional body and organisation with an international presence.¹ It was established in conjunction with the development of the Human Givens approach to psychotherapy to function as a professional body for holders of the Human Givens Diploma wishing to practise Human Givens therapy. The Human Givens approach is concerned with unifying the most effective forms of counselling and psychotherapy into a truly bio-psycho-social model and with the dissemination of this knowledge to society as a whole. The HGI supports and promotes all aspects of Human Givens therapeutic practice, including professional standards, continued professional development, the ethical behavior of members and research. It holds an accredited voluntary register of qualified therapists.²

The Human Givens approach to counselling and psychotherapy

The Human Givens approach was developed by Joe Griffin, an Irish psychologist and Ivan Tyrrell, an English psychotherapist. It is based on an organising idea which grew out of a firm resolve to bring clarity to the discipline of psychotherapy and to make it more reliably effective, moving away from dogma and unproven theory to focus on tested techniques and approaches from a variety of associated disciplines. It is a brief solution-focussed psychotherapy based on a strengths model. It draws from the best of person-centred counselling, motivational interviewing, cognitive behavioural therapy, psycho-educational approaches, interpersonal therapy, imaginal exposure and hypnotherapy, based on scientific evidence about what works and why.

The organising philosophy is the premise that everyone has emotional needs and when these are met, mental wellness is achieved. Each client has also got a unique set of resources (both internal and external) and it is through utilising these resources effectively that we get these emotional needs met.

Therapy is therefore focussed on understanding the problem, identifying resources and supporting the client to use their resources more effectively.

The HG approach has also brought its own new insights to the field of psychotherapy eg. into the cycle of depression (as a result of Joe Griffin's dream research), which have increased our understanding of the causes and drivers of many mental health issues and are another reason why HG therapy is proving efficacious.

¹ <http://www.hgi.org.uk>

² <http://www.hgi.org.uk/therapist-register/register-qualified-human-givens-therapists>

Human Givens therapists are trained to use positive images and language at all times in order to maintain the client's sense of autonomy and optimism.

Disseminated and taught since 1997, this new school of psychology and psychotherapy has proven efficacious, adaptable and practical in nature. It continues to grow in popularity because members of the public have found it in practice to be brief and effective, with lasting results. One of the drivers in developing the Human Givens approach was to make more accurate information available to the public on what to look for (and avoid) in effective counseling/psychotherapy. The model is increasingly applied across a broad spectrum of society and is influencing areas outside of psychotherapy, ranging from education, coaching, community development and social work, to international diplomacy and the corporate world. It attracts professionals from a variety of disciplines including psychiatry, psychology, medicine, education, business, sport, international politics, social work and occupational therapy.

The Human Givens approach has also been successfully transferred to schools and other educational environments. In organisational settings, the Human Givens approach has been used both for specialist occupational health and more generally to improve organisational performance.

The Human Givens Institute is fully committed to evidence-based psychological practice to ensure that practitioners continue to develop best practice and that service user's access a high standard of care.

“The HG approach is informed by NICE guidelines and the evidence upon which they are based ... the approach is a bona fide treatment that significantly contributes to assisting service users in primary care to move towards recovery.”³

Human Givens therapy has been extensively evaluated in a community setting, where it has averaged significant reliable improvement in 70% of clients. So far, practice based and matched comparator trials have been undertaken. The Institute holds a library of research evidence available on request and an increasing number of formal research projects into the efficacy and benefits of the human givens (HG) approach are now being published.⁴ For further information see Appendix 3

³ Andrews, W., Twigg, E., Minami, T. and Johnson, G. (11 February 2011) ‘Piloting a practice research network: A 12-month evaluation of the Human Givens approach in primary care at a general medical practice.’ *Psychology and Psychotherapy: Theory, Research and Practice*.

⁴ <http://www.humangivenscollege.com/research>

Presence in Ireland and the UK

The Human Givens Institute has had a presence in Ireland since 2004, when the first Human Givens practitioners qualified. Over 200,000 people, comprising members of the general public and professionals, have attended Human Givens workshops and seminars, in Ireland and the UK. At the present time there are over 350 fully qualified Human Givens therapists.

Of particular note is the developing relationship between the Human Givens Institute and College and the Irish Health Service Executive (HSE). Since 2010, the HSE South East has run over 50 seminars and two full Human Givens Diploma courses. Approximately 1,500 primary care staff have completed various Human Givens training events.

The HSE has reported that ‘This has been amongst our most useful and most successful Mental Health Training initiatives’⁵. Further information regarding the project is outlined in Appendix 1.

HGI Experience of registration with the UK Professional Standards Authority

In September 2015, the Human Givens Institute applied to the UK Professional Standards Authority for Health and Social Care for accreditation under its Accredited Voluntary Register (AVR) programme. In early 2016, following a rigorous assessment and inspection process, the HGI learned that its application had been successful. As an organisation that has been through such a process, the HGI is well-placed to understand the advantages of this approach in terms of public protection and confidence in the profession. In this context it is noteworthy that the PSA places strong emphasis on public protection, a factor which is also central to the ethos of Human Givens therapy.

⁵ HSE correspondence to HGI in support of PSA application. Copy available on request

QUESTIONS POSED BY MINISTER HARRIS FOR CONSIDERATION

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

The Human Givens Institute (HGI) welcomes the recent commitment by the Minister for Health on the regulation of psychotherapy and counselling. Ireland needs a clear and effective regulatory structure based on international best practice. In the same context, An Taoiseach, Enda Kenny TD made clear that, “there will be new attention put on our psychological and emotional wellbeing as a country”.⁶ Effective regulation of psychotherapists and counsellors would contribute towards the success of this initiative.

People in distress deserve to receive the best possible service and regulation would mark a significant step in the right direction. The HGI supports the government strategy for health reforms in recognising that, “professional regulation puts protection of the public at the heart of process by promoting high standards of professional conduct and professional education, training and competence among registrants.”⁷

As noted, the HGI has achieved accreditation with the Professional Standards Authority (PSA) in the UK. Consequently, the organisation is confident that its policies and procedures are fit for purpose and that its members operate in accordance with established best practice for the profession. Whilst PSA accreditation applies only to UK practitioners, human givens practitioners in Ireland adhere to the PSA-approved HGI policies, procedures and associated standards.

Recommendation

The HGI recommends that the professions of counsellor and psychotherapist be subject to state regulation.

The HGI, in line with CORU, recommends a two-step approach in preparing the professions for state regulation, i.e. accreditation of a voluntary register followed by a later transfer of registrants onto approved statutory registers under the 2005 Act.

⁶http://www.taoiseach.gov.ie/eng/News/Taoiseach's_Speeches/Speech_by_An_Taoiseach_Enda_Kenny_TD_Nomination_of_Members_of_the_Government_Dail_Eireann_06_May_2016.html

⁷ Future Health, A Strategic Framework for Reform of the Health Service 2012 – 2015

2. Whether the professions ought to be regulated under the Health and Social Care Professionals Act 2005 or otherwise.

Recommendation

HGI recommends including both counsellors and psychotherapists under the Health and Social Care Professionals Act 2005. The definition of the health or social care profession, Section 4(3), under the Act encompasses the activities of counsellors and psychotherapists, particularly in relation to the following health or social care activities:

- (a) the preservation or improvement of the health or wellbeing of others;
- (c) the resolution, through guidance, counselling or otherwise, of personal, social or psychological problems.⁸

3. Whether it would be appropriate to regulate one or two professions under one registration board.

The HGI uses the titles of counsellor and psychotherapist interchangeably. This flexibility is based on the recognition that these terms are in turn understood and used interchangeably by the public. Since the aim of any psychological intervention should be the effective alleviation of suffering, the HGI does not make a distinction between these titles in the interest of meeting the needs of clients and the public.

Recommendation

HGI recommends regulating one profession under the registration board.

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

As recommended earlier under Q.1, HGI recommends a two-step approach to registration *i.e.* accreditation of voluntary registers of certain professional bodies followed by the transfer of registrants on the approved voluntary registers to statutory registers under the 2005 Act.

The criteria for an individual's acceptance onto the voluntary register of a professional body needs to be developed by an overarching body such as CORU, in consultation with relevant stakeholders.

HGI would recommend the following for inclusion in any such criteria:

⁸ <http://www.irishstatutebook.ie/eli/2005/act/27/enacted/en/pdf>

Existing practitioners should have a *minimum* relevant qualification equivalent at Level 7 on the National Framework of Qualifications. In the absence of a Level 7 qualification, an agreed Recognition of Prior Learning (RPL) mechanism to be developed whereby prior learning and experience can be formally identified, assessed and acknowledged against a set of agreed competencies, standards, proficiencies and learning outcomes.

CORU already has in place a robust system for approving and monitoring education and training programmes. This system could be adapted for use in relation to any counselling and psychotherapy programmes that currently are not clearly aligned to the National Framework of Qualifications.

To be accepted under a grandparenting clause, existing practitioners with a relevant qualification should be able to demonstrate that they have been in professional practice for a minimum of two years within the previous four years, prior to applying for inclusion on the voluntary register.

The set of criteria to evidence that existing practitioners have engaged in *professional best practice* is not limited to but would include the following:

- Adherence to a recognised body of knowledge
- Continued membership of a governing body
- Adherence to a professional code of ethics
- Are covered by professional indemnity insurance
- Undertake appropriate clinical supervision
- Engage in continuous professional development
- Adhere and be subject to a comprehensive complaints process.

The above would mean practitioners have an interim period of up to five years to demonstrate a commitment to Continuous Professional Development (CPD) and supervision, address any identified gaps relating to required competencies and professional standards. Such a process would also afford practitioners the opportunity to develop their capacity for critically reflective practice. Professional bodies would be obliged to address any gaps in their members' knowledge and competencies and, where necessary, support them to achieve acceptance onto the voluntary register.

At the same time, the arrangement presents a valuable opportunity to support counsellors and psychotherapists to undertake outcome informed practice, utilising recognised psychometric measures. See Appendix 3.

The two-step approach as described would also provide an opportunity for the development of a standard code of ethics and professional conduct that the range of counselling and psychotherapy modalities in Ireland could subscribe to. A central focus

of such a code would be the protection of the physical, psychological and emotional well-being of service users.

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

Response

HGI acknowledges the excellent work undertaken by QQI (Quality and Qualifications Ireland) in publishing academic standards applicable to qualifications in Counselling and Psychotherapy.

HGI appreciates that whilst QQI has established academic standards, there is also a need to establish agreed professional standards. A set of criteria and standards of proficiency needs to be developed as a framework for use by the proposed registration board. Higher education providers need to integrate a full appreciation of this framework into course curricula.

The HGI Diploma in Human Givens in its present form is the equivalent of a Level 7 on the UK Quality Assurance Agency for Higher Education (QAA) framework. This Diploma can readily be mapped onto the Irish National Framework of Qualifications.

HGI have also had a Master's programme which was accredited through a UK Higher Education Institute at Level 8 on the UK Quality Assurance Agency for Higher Education (QAA) framework. Based on an evaluation of the Masters programme HGI is seeking to establish a collaborative partnership with an Irish Higher Education Institute to develop an accredited Masters programme at Level 9 of the Irish National Framework of Qualifications. Again, the academic standards established by QQI (Quality and Qualifications Ireland) will be an invaluable resource in this endeavour.

Recommendation

HGI recommends that future applicants for registration have minimum relevant qualification at Level 8 on the National Framework Qualifications.

HGI recommends that a Continuing Professional Development model be developed which will be used by the Registration Boards in setting their requirements for continuous professional development for their professions.

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

Recommendation

The HGI, as a strongly client centred service, recommends that market research is undertaken with a view to better understanding and appreciating the public's perception of the two titles counsellor and psychotherapist . This analysis would help inform the decision as to which titles need to be protected.

The HGI's experience of, and rationale for, using both terms interchangeably would indicate an inclination for protecting both the titles Counsellor and Psychotherapist.

APPENDICES

APPENDIX 1 - THE SOUTH EAST HEALTH SERVICE EXECUTIVE (HSE) AND HUMAN GIVENS

The Human Givens approach was introduced to the HSE in 2012 with an initial series of seminars and workshops open to all modalities working within the HSE. After several months this pilot programme was integrated into the training of those delivering nursing, addiction counselling, palliative care, and psychology services. Since then, over fifteen hundred service providers have attended over 50 human givens workshops and seminars and the HSE has run two full Human Given Diploma level programmes. To date, a number of service providers have completed practitioner level training and are qualified to deliver Human Givens therapy across all modalities within the HSE.

The HSE's *A Vision for Change 2006* states "...the consensus among users and service providers was that psychological therapies should be regarded as a fundamental component of basic mental health services, rather than viewed as additional options that are not consistently available." ⁹

This view was reiterated in the Independent Monitoring Group's consultation meetings held in 2012, as well as in Mental Health Reform's consultation meetings conducted in 2011.

A Vision for Change recommends that "all individuals should have access to a comprehensive range of interventions and care for disorders that do not require specialist mental health services."

There is also adequate evidence demonstrating that psychotherapy is an effective treatment. An Irish review ¹⁰ of the evidence has found that psychotherapy, either alone or in combination with other treatments/support, is effective for a wide range of mental health diagnoses in adults, young people and children. The average success rate for participants in psychotherapy is 65-72%.

Service users

Service users accessing Human Givens psychotherapy become an active agent in the therapeutic process; and the overriding response from them has been positive and enthusiastic. Examples of feedback are:

⁹ A Vision for Change, Department of Health (2006)

¹⁰ The Effectiveness of Psychotherapy: A Review of Research prepared for the Irish Council of Psychotherapy, Dublin: Irish Council of Psychotherapy. Carr, A. (2007).

'I am less inclined to attend the accident and emergency department, because I can now manage my anxiety.' (Male, Waterford).

'This therapy has helped me cope and work on my relationship difficulties'
(Female, Wexford).

It is expected that beginning in January 2017, a comprehensive service user satisfaction rating feedback mechanism, combined with a three monthly check-up on service users' emotional and mental health progress, will be introduced across services. The resulting feedback will enable service providers to gain a more flexible and solution focused approach, with the wellbeing of the service users and their families at the centre of their work. A future target for Human Givens practitioners working within the HSE is to deliver therapy in the service user's place of residence where the individual cannot make an agreed appointment at a location such as a health centre.

The service provider

Anecdotal evidence indicates that HSE staff delivering Human Givens therapy report less stress, fewer days lost due to burnout, and a greater capacity to see and engage with many more service users, thus decreasing waiting lists. This has significant ramifications for the future wellbeing of staff and for those in training, as well as service users. It is also noteworthy that staff using the Human Givens approach within the National Health Service in the UK have reported less stress.

At present, the attendance at Human Givens workshops and seminars indicates that this training is proving to be the most popular training programmes offered by the HSE. It is also at below cost per student per training day when compared to other training in this field. All the Human Givens trained service providers adhere to the Human Givens Institute Code of Ethics and Conduct, CPD and supervision requirements.

Cost effectiveness

Those delivering Human givens therapy within the HSE attest that in general the required number of sessions for an individual is six to eight, as opposed to 20-25 offered by other modalities. The cost effectiveness of this model of treatment is at present under assessment.

APPENDIX 2 - PSA EXPERIENCE

The Professional Standards Authority (PSA) is an independent statutory agency set up in the United Kingdom to help protect the public through their work with organisations that register and regulate people working in the health and social care professions.

The PSA is accountable to the UK Parliament. PSA reports help the UK Parliament monitor and improve the protection of the public. The Parliamentary Health Committee uses PSA performance review reports to question the regulators they oversee about their work. The PSA also encourages organisations to improve the way they register and regulate health and care practitioners in the UK.

In early 2016, the Human Givens Institute's Register of Qualified Therapists was accredited by the Professional Standards Authority under its Accredited Voluntary Register (AVR) scheme.

As part of the rigorous application process, the HGI was required to critically examine all its policies and procedures under each of the 11 Standards as set out below:

- Standard 1 – Register in a health or social care occupation
- Standard 2 – Commitment to public protection
- Standard 3 – Understanding of risks and risk management
- Standard 4 – Financial sustainability
- Standard 5 – Capacity to inspire confidence
- Standard 6 – The knowledge base for the occupations on the register
- Standard 7 – Governance
- Standard 8 – Setting of standards for registrants
- Standard 9 – Education and training
- Standard 10 – The management of the register
- Standard 11 – Complaints and concerns.

As an organization with first-hand experience of the PSA application process, the HGI is well-placed to understand the advantages of the approach.

The HGI's experience of the PSA approach to accreditation is that its focus is firmly on the protection of the public. This was seen as the most important criterion and the standards set for accreditation are clearly designed to ensure that accredited organisations have effective public protection measures in place.

A copy of the HGI's accreditation report can be seen on the PSA website at:

<http://www.professionalstandards.org.uk/docs/default-source/accredited-registers/panel-decisions/human-givens-institute.pdf?sfvrsn=0>

APPENDIX 3 - RESEARCH & OUTCOME MEASUREMENT

The World Health Organisation (WHO), the American Psychological Association (APA, 2005), the Canadian Psychological Association (CPA, 2012), and the National Institute for Health and Care Excellence (NICE, 2005a, 2005b, 2006) all recommend that psychotherapy should be evidence-based, demonstrating its effectiveness on an on-going basis.

Human Givens therapy has been extensively evaluated in a community setting, where it has averaged significant reliable improvement in 70% of clients. So far, practice based and matched comparator trials have been undertaken. The HGI holds a library of research evidence. A typical article from a peer-reviewed journal is:

<http://www.emeraldinsight.com/journals.htm?articleid=17053912>

The Human Givens Approach and Research

Human Givens (HG) therapy has been shown to be effective in primary care. In a quasi-experimental study of the effectiveness of Human Givens therapy in the treatment of mild to moderate depression in primary care [1], HG was judged more effective than a control treatment, with clients recovering within one to two sessions as compared with four to six for the control group.

It has also been shown to be effective in a general practice in the UK [2] and in a five-year evaluation of its effectiveness across different work contexts, via a practice research network [3]. HG was seen to generate positive outcomes quickly with recovery reached within 5-6 sessions on average [3].

And the first research undertaken in Ireland has recently been conducted at The Dublin Human Givens Centre. In this study, 82% of the clinical population (as defined by a research community accepted measure, CORE-10) demonstrated 'reliable improvement' over an average of 3 sessions, while 71% of the clinical group recovered and reliably improved in 3.2 sessions on average. This is the largest percentage of recovery yet via Human Givens Therapy using similar outcome measures, and over a shorter session number than the comparable studies in the UK. [4]

The HGI would recommend:

The adoption of routine outcome measurement as a basic tool in primary care, whether in public or private practice, to monitor therapist effectiveness and pre-empt and prevent client drop-out and deterioration, thus optimising treatment outcome,

accountability, and the maintenance and encouragement of high standards. This is in line international aims and illustrations of best practice [WHO, APA, NICE and CPA].

For professional representative psychotherapy bodies in Ireland to agree a set of accepted standard national validated and reliable outcome measures for all psychotherapists to use in routine outcome measurement. For those to be fed into a practice-research-network at the level of the regulatory body, or nationally, to develop a national treatment outcome database. This would facilitate, foster and serve people in need on this island; policy makers in determining service need, treatment shape, and future service design; researchers in ready data provision facilitating the potential to answer diverse research questions of direct clinical relevance; and a database against which international benchmarking could serve national and international interests.

To incorporate routine outcome measurement in training and supervision strategies across psychotherapy approaches to encourage directed and deliberate practice to support psychotherapist development and effectiveness, and thereby, client experience and treatment outcome.

[1] Tsaroucha et al., 2012

[2] Andrews et al., 2011

[3] Andrews et al., 2013

[4] Edwards et al, 2016. Awaiting publication.

See: http://dublinhumangivens.ie/?page_id=362

and click link to 'Thesis – the effectiveness of HG Therapy'.

APPENDIX 4 - HGI CODE OF ETHICS AND CONDUCT POLICY

See: <http://www.hgi.org.uk/about-hgi/ethics-and-conduct>

APPENDIX 5 - HGI CHECK LIST FOR AN EFFECTIVE THERAPIST

See: <http://www.hgi.org.uk/therapist-register/effective-counselling-psychotherapy-checklist>