



## **Draft Response to the call for submissions by the Minister for Health on the proposed regulation of counselling and psychotherapy from the Irish College of Humanities and Applied Sciences**

### **Introduction**

The Irish College of Humanities and Applied Sciences welcomes the opportunity to make a submission to the Public Consultation initiated by the Minister for Health in accordance with section 4(2)(b) of the [Health and Social Care Professionals Act 2005](#), on the proposed designation under the Act of the professions of counsellor and psychotherapist.

The College currently has over 350 students, the vast majority of whom are studying for Counselling and Psychotherapy related degrees from Level 7 to Level 9 on the National Framework of Qualifications. The College is strongly committed to the provision of quality assured tertiary education and all its academic awards are awarded by Quality Qualifications Ireland. Since it first began offering Level 7 HETAC (now QQI) awards in this field in 2006, approximately 700 students have graduated with QQI awards in Counselling and Psychotherapy related degrees between Level 7 and Level 9 on the NFQ. Its Counselling and Psychotherapy related awards are recognized for professional accreditation purposes nationally and internationally. In Ireland, the programmes are recognized for professional accreditation purposes by the Association of Professional Counsellors and Psychotherapists, Addiction Counsellors Ireland and the National Association for Pastoral Counseling and Psychotherapy. Internationally, many graduates have accepted for professional accreditation by the British Association for Counselling and Psychotherapy (BACP) in the UK, by the European Association for Psychotherapy in Malta and by State Licensing Bodies in the USA.

The College undertook an internal consultation process both across the Faculty and with its student body since the call for submissions was issued by the Department. This submission represents the outcomes of that consultation process.

We have set out responses to address each of the questions raised by the Department of Health in the call for submissions, which we hope are helpful.

The college has also encouraged students to make submissions to you on an individual basis

**Question 1 - Should Counselling and Psychotherapy be subject to State regulation?**

We firmly believe that these areas of professional practice should be subject to state regulation. This regulation should ensure in as far as practicable that persons who may use the services of professional counsellors and/or psychotherapists can be guaranteed that practitioners are qualified to a satisfactory level and thus enhance the safe engagement of clients. Likewise, this should equally provide comfort to practitioners that they are operating to nationally approved standards and to employers also.

Currently the titles of counselor and psychotherapists are not protected and therefore vulnerable members of society have no guarantee of the educational or professional standing of anyone purporting to use these titles. Also regulation within ones own professional structures of psychologists, psychiatrists, mental health nurses or social workers who practice counseling and psychotherapy is not adequate.

We also note problems with the criteria under HSE arrangements which require counsellor/ therapists working in the publicly funded health sector to have minimum qualifications.

**Question 2 – The role of the Health and Social Care Professionals Act 2005? |**

We believe that the setting of mandatory educational and professional standards under the **Health and Social Care Professionals Act (2005)** would be welcome and would address the current anomalies in the public interest. In particular, we believe that the fact that the primary focus of the Registration Boards of the Health and Social Care Professionals' Council is on protection of the public interest is important and provides public reassurance in relation to the proper function of professional regulation.

**Question 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?**

We believe, on balance, that it can conceivably be managed by one Registration Board. It should be undertaken in such a manner as to ensure that the public is clear on the educational and professional standards required of practitioners who wish to practice using either title. The essential point is that it is necessary to protect both titles, notwithstanding the divergent views on the distinctiveness of practice and overlaps between Counselling and Psychotherapy.

**Question 4 – Grand-parenting qualifications for existing practitioners, having regard to the QQI Awards standards**

It seems reasonable that an appropriate framework would be established to allow for access to registration by practitioners who are long established and practicing safely. However, they should be expected to demonstrate competence to the same level as those set out in the QQI award standards. We believe that those wishing to continue practicing as Counsellors should be required to demonstrate competence as set out in the QQI award standards at Level 8 and those wishing to continue practicing as Psychotherapists

at competence standards set out on the Award Standards at Level 9 on the NFQ.

**Question 5 - The appropriate level of qualifications for future applicants for registration, having regard to QQI Awards standards**

We propose that those wishing to use the professional title Counsellor be required to hold a Qualification at Level 8 on the NFQ awarded by QQI, an Irish University or international equivalent which meets the QQI Award Standards. These award standards are essential in ensuring an appropriate benchmark for equivalence in terms of content, knowledge and skills etc. It should not be assumed that qualifications at particular levels on the NFQ are equivalent in terms of content, structure, competence, skills etc..

Likewise, those wishing to practice as Psychotherapists should only be able to do so when educated to Level 9 on the NFQ and hold qualifications awarded by QQI, an Irish University or international equivalent which meets the QQI Award Standards and is listed by Coru as acceptable for registration.

**Question 6 - The title or titles to be protected for the exclusive use of registrants**

We suggest that the professional titles of Psychotherapist and Counsellor be protected and practitioners should be required to further identify either the specific modality or focus of interventions in which they have particular expertise.

Submitted on behalf of the Faculty and Students of ICHAS by

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