

PCI College Regulation Submission

1. Should counselling and psychotherapy be a regulated profession?

PCI College fully endorses the regulation of counselling and psychotherapy as a profession with our rationale centred on the following four primary considerations:

1. The protection of public safety
2. The protection of counsellors & psychotherapists', including trainees', safety
3. Recognition, reputation and equality with other helping/social care professions
4. Adherence to minimum professional standards

Each of these primary considerations will be addressed in more detail throughout this document.

2. Should the profession of counselling and psychotherapy be regulated under the Health and Social Care Professionals Act (2005)?

The existing legislation under the Health and Social Care Professionals Act (2005), which promotes and ensures effective functioning of health and social care professions, is where the regulation of the profession of counselling and psychotherapy needs to be placed. Affiliation with other social care professionals, such as psychologists, is appropriate, and the necessary structures are already in place for effective governance of same. Counsellors and Psychotherapists clearly belong in this broad field of health and social care on the basis of the services provided by our profession – in the broadest terms, the care for, and the alleviation of, mental suffering.

3. Should the number of professions to be regulated be one or two?

We, PCI College, are the leading provider of education and training in the field of counselling and psychotherapy in Ireland. With 25 years of experience in the field, as the first 3rd level College to introduce a B.Sc. (Honours) Degree in Counselling and Psychotherapy to Ireland in 1991 and having trained over 1,200 qualified counsellors and psychotherapists over the past 25 years, we hold firmly that counselling and psychotherapy are interchangeable terms to describe the same practice (the alleviation of mental suffering) and therefore we strongly advocate for the regulation of one profession only.

It is our position that regulation of the single profession of counselling and psychotherapy is essential in order to strengthen and protect it and that a separation will both divide and harm the profession making access to services more complex and challenging for those in need of the highest quality mental health care. We note that the protection of titles is named as a particular topic to be addressed in the request for submissions and, in that regard, we state

in Section 5 of this document our case for protecting two titles with the potential for a third title.

As a College with over 25 years of experience in the field, it is our position that the focus should remain on minimum standards of education in the field. The minimum standard should be to honours degree level, University validated/NFQ level 8 that meets the requirements of a national, independent, regulatory body. Please refer further to Section 5 below.

The Irish Association for Counselling and Psychotherapy (IACP), the largest professional body in Ireland for the profession of counselling and psychotherapy similarly support this position. "... there is no difference between counselling and psychotherapy, as we have found no practical or research evidence to support differentiation." (IACP, 2015, pg 3).

The British Association for Counselling and psychotherapy (BACP), a professional body with over 32,000 members, also support a single profession position. In response to the UK's proposed regulation of the profession of counselling and psychotherapy, the BACP are on record as follows:

The proposal to differentiate between counselling and psychotherapy is out of step with research and other developments in the field of the psychological therapies for example New Ways of Working and IAPT. The work undertaken by Skills for Health to develop National Occupational Standards for the Psychological Therapies does not differentiate between counselling and psychotherapy. (BACP, 2009, Introduction, para 4)

BACP takes an evidence-based position that there is no difference between counselling and psychotherapy. This is based on research undertaken by BACP's independent research committee, which comprises international scholars of counselling and psychotherapy, from psychiatry, psychology and counselling and psychotherapy professions. (BACP, 2009, Introduction, para 5)

The QAA (Quality Assurance Agency for Higher Education) Benchmark Statement for Counselling and Psychotherapy (2013), which is currently applied within all counselling and psychotherapy training programmes within the UK Higher Education sector, further advances this position.

Despite numerous attempts by organisations and individuals to distinguish between the knowledge base, skills, responsibilities and activities associated with counselling and psychotherapy, there is no reliable evidence that indicates any significant difference. (QAA, 2013, 2.3)

We will now address further the question as to the number of professions to be regulated under the points outlined in Question 1:

1. The protection of public safety

A key focal point of the proposed regulation must be the best interest of the public. The regulation of a single profession will strengthen that profession as a whole and in turn better protect the public who avail of its services in counselling and psychotherapy. This will also be achieved, inter alia, through minimum standards for training and development to become a counselling psychotherapist, as discussed below.

In protecting clients from the dangers of fragmentation in the profession, we look to the evidence that shows counselling and psychotherapy to be umbrella terms for the same practice, with no difference in aims or outcomes in the two terms. It has been found and it is accepted that the common aim of counselling and psychotherapy is to develop a greater understanding of self and foster an opportunity to live and act authentically with a view to developing a greater, more fulfilling, quality of life.

Counselling and psychotherapy are ways of responding to a wide range of human needs. Counselling and psychotherapy provide opportunities for those seeking help to work towards ways of living in more satisfying and resourceful ways. (COSCA, 2004, pg 1).

The QAA (2013) identify and explain this in the following statements:

Counselling and psychotherapy are umbrella terms that cover a range of talking therapies. They are delivered by trained practitioners who work with people over the short or long term to help them bring about effective change and enhance their well-being. (QAA, 2013, 2.4)

Counsellors and psychotherapists work towards the relief of psychological suffering and to support clients in developing their self-awareness, self-worth and self-confidence in order to manage their lives more effectively. (QAA, 2013, 2.7)

Counsellors and psychotherapists strive to develop their own skills, knowledge and competence in order to provide the most effective service to their clients, while also maintaining their own well-being. They also engage with the psychotherapeutic community through supervision, continuing professional development and research in order to monitor their own practice and contribute towards a growing knowledge base. (QAA, 2013, 2.7)

It is recognised that there is a variety of models of theory within counselling and psychotherapy; however we must acknowledge that a variety of styles does not signify a variation in standard or a difference in outcome within the practice of counselling and psychotherapy. This is a strong plank in the structure of confidence in our profession and, by extension, a key element in protecting our clients.

We strongly contest the introduction of a two-tier system, which would be harmful to the public and the profession. In an era where variety and choice is embraced and where it is accepted that there can be many routes to reach the same destination of mental wellbeing, integration of the field will serve as a protective factor for those in need of such services. Introducing a two-tier system, a divisive approach, will alienate vulnerable members of society and restrict access to support under specific categories.

This has potentially far reaching and complex implications. For example, a categorical split in the profession may place limits on client access; there likely will be need for increased resources to facilitate dual governance; one can envisage a complex process of referral from one profession to another and finally, but not exhaustively there will be a need to manage, in the future, presently unquantifiable complexities inherent in the maintenance of dual professions.

2. The protection of counsellors & psychotherapists', including trainees', safety

All training providers in the field of counselling and psychotherapy have a duty of care toward their trainees in terms of their safety and wellbeing. Regulation will significantly enhance the ability of training providers, like PCI College, to meet the responsibilities in offering high standards of health and safety. These protective factors would be similar for all Colleges and Training Organisations delivering training in counselling and psychotherapy.

Currently, qualified counsellors and psychotherapists and trainees in the profession are guided and protected by a code of ethics; however the work of counselling and psychotherapy can be an ethical minefield with a difficult landscape to navigate. Counsellors and psychotherapists work within models of best practice, which include membership of an accrediting body, attending regular supervision, upskilling in the form of continuing professional development and an ongoing commitment to their own mental health and wellbeing.

However, this is not enough in itself to protect the counsellors and psychotherapists of Ireland, including those in training. Professional bodies alone do not have the power to fully protect members of the public. As a profession, we require statutory regulation and the protection of titles in order to fully protect potentially vulnerable members of society and ourselves as professionals. Regulation will in turn, protect trainee Counsellors and Psychotherapists by demanding high quality training and standards and a clear path to the attainment and maintenance of these protected titles.

3. Recognition, reputation and equality with other helping/social care professions

The work of counselling and psychotherapy directly involves supporting people with their many difficulties,- relationship issues, mental health challenges, addictions, personal development and growth needs, and the regulation of good mental wellbeing with the goal of living productive, satisfactory and meaningful lives. Our professional practice therefore

deserves effective recognition, distinct reputation and absolute equality with other helping/social care professions.

Counselling and psychotherapy is a profession specifically designed to improve quality of life and enhance mental wellbeing. Today, our profession has neither legal protection, official interdisciplinary recognition nor equality. This feeds into the stigma of mental health issues in Ireland and the stigma attached to seeking support for same. It diminishes and demoralises the profession and it limits access to vital funding.

Regulation of counselling and psychotherapy would strengthen the profession by ensuring equality across like-minded disciplines, providing recognition from a legal perspective and bolstering reputation with a view to reducing the stigma attached to attending mental health supports.

4. Adherence to minimum professional standards

At the cornerstone of this regulation we must adopt a minimum standard of training for counselling and psychotherapy. In doing so, we can ensure competence by endorsing training that adheres to minimum standards across the board. Many UK organisations, as our closest neighbours with similar systems and structures in place, such as COSCA (Counselling and Psychotherapy in Scotland) and QAA (Quality Assurance Agency for Higher Education), recognise the need for this also.

Consequently, counsellors and psychotherapists undergo lengthy training, often lasting several years. Their work is always supervised by another practitioner who helps them to process and reflect on the issues of concern to their clients. (COSCA, 2004).

As the leading provider in counselling and psychotherapy training in Ireland, PCI College recognises the variation in style between therapeutic modalities within this profession and we also recognise the familiar and similar threads that bind all models of counselling and psychotherapy together. This can be acknowledged without introducing a hierarchy of skill sets and approach.

The practice of counselling and psychotherapy is underpinned by a body of knowledge which is complex and diverse. Much of this knowledge is common to all therapeutic orientations as well as being shared with the discipline of psychology itself (for example that relating to philosophy and ethics, research evidence, theories of human development and growth, and learning theory). In addition, different therapeutic orientations are rooted in their own discrete body of knowledge, while including a core set of therapeutic skills, competencies and interventions.

The QAA Benchmark Statement for Counselling and Psychotherapy (2013) acknowledges overlapping and transferrable skills within counselling and psychotherapy, for example,

relationship building, communication, formulation, reflective practice, to name but a few. A comprehensive overview of these can be found within the QAA document, available at the following link:

<http://www.qaa.ac.uk/en/Publications/Documents/Subject-benchmark-statement-counselling-psychotherapy.pdf>

Protection of vulnerable people and public safety is at the heart of the proposed regulation and the way to ensure and enhance this is to adopt minimum training standards, while acknowledging a variety of modalities, rather than adopting a two tier approach which potentially could create a hierarchy between counselling and psychotherapy, despite there being no empirical evidence to support doing so. As the leading provider of counselling and psychotherapy in Ireland, we have long recognised the need for stringent academic standards in the field and this is reflected in our Bachelor of Science (Honours) Degree in Counselling and Psychotherapy which is University Validated and placed at NFQ Level 8. Further recommendations in the application of minimum standards of qualifications will be discussed under question 5.

4. Titles to be protected – one or two?

In line with the comments made under point 3, we recognise that the titles of counsellor and psychotherapist are historically used to describe the same practice and that both titles encompass a wide and broad range of expertise with extensive overlap, including the same aims and outcomes. Therefore we strongly advise that both titles are protected.

We also recognise, however, the opportunity presented by regulation to explore and examine the potential to find a mutually acceptable and all-encompassing title that might be offered as a compromise between opposing arguments regarding titles to be protected.

In order to better capture the essence of the work of counsellor and psychotherapist, founded on our 25 years of experience in the field, reflecting the actual practice of professionals and the very real experience of those who come for help with their current psychological distress, PCI College proposes a new, additional title of Counselling Psychotherapist to be protected. This new title encompasses the intricacies of the various roles of counsellor and psychotherapist and reflects our position that the original terms are historically used to describe the same practice and as such are both equivalent and interchangeable. This new, additional title of Counselling Psychotherapist, equally must be protected with a focus on minimum standards of education for a professional qualification.

The PCI College B.Sc (Honours) degree in Counselling and Psychotherapy specifically and expertly trains students to navigate various options available to the client in the therapeutic space. The journey of the client is hard to predict at the outset and will often change from initial expectations. We thus train our therapists to work with the dual processes and interventions necessary to provide an effective service to the client based on their needs

without limiting, setting ceilings for practice or disrupting the existing alliance that may be actively supporting improvement in the client's mental wellbeing. There is need to ensure that all of these skills are present in the work with clients.

Therefore our strongly informed recommendation is that the historic titles of Counsellor and Psychotherapist are protected, as is the newly proposed title of Counselling Psychotherapist.

5. What is the appropriate level of qualification for the profession?

As outlined under question 3, PCI College, as a University Validated, level 8 provider of counselling and psychotherapy training, with 25 years of experience as the leading provider of training in the field, continue to promote the importance of the degree standards, mentioned previously, for counselling and psychotherapy training.

This training must be robust with high academic, experiential and practice based integrity. The training must also be recognised by a national, independent regulatory body. It is essential that an appropriate B.Sc (Honours) qualification must include the following components:

- University validation/NFQ Level 8
- Accreditation of an independent regulatory body
- A minimum of 510 hours of class contact time
- A minimum of 50 hours of personal therapy
- A minimum of 100 hours of one to one client work
- A minimum of 20 hours of clinical supervision
- A minimum of 24 hours of CPD workshops
- A minimum of 36 hours of group supervision

Within this programme of study, it must be a requirement to incorporate a strong reflexive element, inclusive of group process and personal and professional integration, a strong emphasis on experiential learning, assessed and moderated academic components, including research in the field, and an underpinning in 3 main theoretical orientations with an option to study one main orientation at an advanced level.

There must also be clear and transparent procedures and pathways to monitor students' progression, engagement, reflexive ability, readiness for client work and ongoing monitoring while engaged in that same client work.

Specific selection criteria must be in place as a pre-requisite for entry onto such a course. This must incorporate an introductory certificate course (minimum 100 hours or equivalent), and/or extensive prior experience in the field, completed application form and assessment by an interview panel consisting of at least 2 core trainers. A level of maturity

and ability to engage in reflexive process must also be demonstrated as part of this intake assessment.

A course designed to meet the above criteria meets best practice guidelines as set out by the IACP for a qualification in counselling and psychotherapy.

Following completion of such a course, a professional qualification can be achieved which must lead on to professional recognition by an independent accrediting body. This would involve engaging in client work, in a pre-accredited status, with a view to achieving professional accreditation by completing a minimum of 450 hours of client work.

To explore this in context, we need to address the question as to why we believe this minimum qualification is sufficient. The main answer comes from recognising that a four year degree program is only one part of the overall and considerable effort and investment required to become an accredited professional in a soon-to-be-regulated field.

Let's look at the overall accreditation context at present and then present our proposed change:

Pathway to Accreditation (Current)

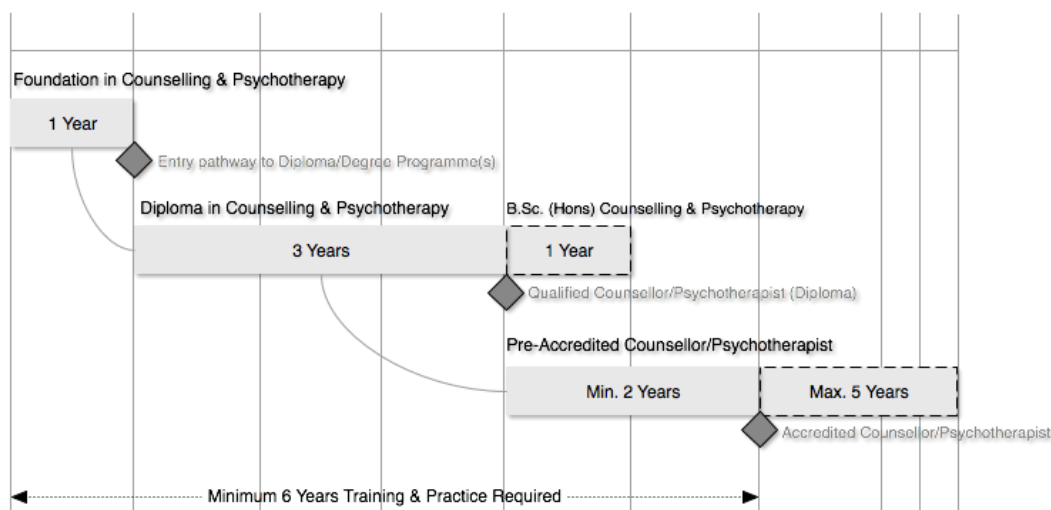


Figure 1 - Current Pathway to Accreditation

Ultimately, the goal for counsellors/psychotherapists is to become accredited with a body independent of its training provider. This has enormous benefits for governance, quality and professional regulation.

Our proposal would see the journey to becoming accredited from six years to seven as follows:

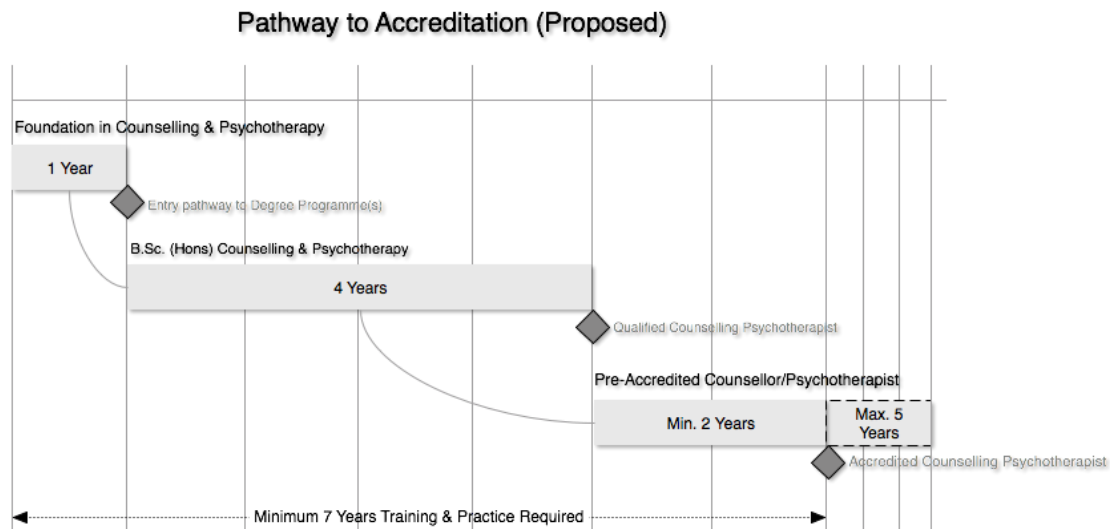


Figure 2 - Proposed Pathway to Accreditation

The above outlined pathway towards a professional qualification and accreditation demonstrates the robustness and capability with which Counsellors/Psychotherapists/Counselling Psychotherapists are equipped. This is a direct result of training to high level, with minimum standards, and extensive practical experience pre- and post-qualification.

We believe in the ethos of lifelong learning for counsellors & psychotherapists. Not only is it best practice and an ethical obligation to engage in continuing professional development over the course of one's career, we also believe in the need for specialisation and ongoing research within the field enabling our profession to change and adapt to the growing body of knowledge and its application to the alleviation of psychological suffering.

PCI College believe such specialisation should be reserved for Level 9 and above. Specialised training is necessary in order to gain a more in depth understanding of theoretical concepts and their application when working with particular client groups, such as Children & Adolescents, Addiction and Family Therapy. Such individualised training should be retained for Level 9 and a qualification in counselling and psychotherapy should be reserved at Level 8, adopting the minimum standards as outlined above. This specialised training is not hierarchical, but an effective broadening of competence and skill.

6. Grand-parenting qualifications for existing practitioners

We recommend a grand-parenting scheme for existing practitioners. It is advised, based on best practice models, that grand-parenting is available to those who meet the following minimum criteria:

- Level 7 (NFQ) Diploma
- Accreditation with a national, independent accrediting body

It is also advised that international professionals with equivalent training should be considered. The criteria applicable for international professionals should be:

- Level 8 Degree
- Accreditation with their national, recognised professional organisation

In Conclusion:

PCI College believes that, whatever the decisions or the outcome, the most important thing for both the profession and the public is regulation of the field. We look forward to healthy debate but do not want to see the questions posed dividing the field and stalling progress, when we all ultimately want, and need, the same thing – regulation.

It is the PCI College position that regulation of the profession of counselling and psychotherapy is essential and that the focus should remain on minimum standards of education in the field, which should be upheld to honours degree level and meet the standards of a national, independent, regulatory body.

PCI College, with 25 years of experience as the leading educator in the field, recognises that Counsellor and Psychotherapist are historic concepts to describe the same practice and that there is a case for a merging of these titles. Therefore, we propose the regulation of the protected titles of Counselling, Psychotherapist and Counselling Psychotherapist.

PCI College has outlined the rationale for successful regulation of the profession under the following headings:

1. The protection of public safety.

PCI College believe that a two tiered structure would be divisive to the profession and shift the focus away from the duty of care to protect both the vulnerable public, who have a right to avail of support in the form of counselling and psychotherapy from qualified professionals, and those that have successfully completed the required level of training to facilitate same.

2. The protection of counsellors & psychotherapists', including trainees', safety

PCI College is invested in upholding the integrity of the profession and those who practice within it. True protection can only fully be achieved in this regard by way of statutory regulation. This gap can only be filled by regulation to ensure both client safety and the safety of people embarking on this rewarding career.

3. Recognition, reputation and equality with other helping/social care professions

It is owed to the public, as a matter of safety, and to the profession itself that counselling and psychotherapy is recognised, valued and equated with other social care professions in Ireland. This will work towards reducing stigma and increasing interdisciplinary recognition and equality.

4. Adherence to minimum professional standards

We acknowledge the robust and intensive training our graduates and others from reputable institutions have undertaken to become counsellors & psychotherapists and believe this should be recognised.

We believe the focus of regulation should centre around the standard of training at an honours degree level. We have outlined the important specifics for inclusion on such a training course. We believe the proposed training model and subsequent pathway towards professional accreditation, ensures standards and appropriate qualification with an option for specialisation at postgraduate level and above.

We also advocate the introduction of a grand-parenting scheme, with minimum standards, to compliment this regulation process.

PCI College strongly believes the implementation of regulation as outlined above will strengthen the profession as a whole and safeguard all clients of counselling and psychotherapy and qualified professionals of the field in the future.

The imperative at this stage is to introduce regulation as soon as possible for the benefit of all stakeholders.

References

BACP (2009). *BACP response to HPC Consultation.*
<http://www.bacp.co.uk/news/?newsId=1603&start=84>

COSCA (2004). *Counselling and psychotherapy: COSCA's description* Stirling: Cosca

IACP (2015). *The Irish association for counselling and psychotherapy position paper on statutory regulation 2015* <https://www.irish-counselling.ie/files/UserFiles/IACP-Position-Paper-on-Regulation-and-the-Difference-between-Counselling-and-Psychotherapy-April-2015.pdf>

QAA (2013). *Benchmark statement for counselling and psychotherapy.*
<http://www.qaa.ac.uk/en/Publications/Documents/Subject-benchmark-statement-counselling-psychotherapy.pdf>