

THE INSITITUTE OF INTEGRATIVE COUNSELLING AND PSYCHOTHERAPY

Response to Request for Public Consultation

Regulation of Counsellors and Psychotherapists

20 November 2016



This document is hereby submitted to the Department of Health in response to the proposal to regulate counsellors and psychotherapists under the Health and Social Care Professionals Act 2005.

1. Contextual Background of Submitting College

The Institute of Integrative Counselling and Psychotherapy (IICP) is an independent provider of Higher Education (HE) in the field of Counselling and Psychotherapy. IICP commenced operation in 2003. Thirteen years later, the institute has more than 400 learners on professionally and academically validated programmes. We hold academic validation from Quality and Qualifications Ireland (QQI) and professional body recognition from the Irish Association for Counselling and Psychotherapy (IACP), Ireland's largest professional body.

The location of the IICP in Killinarden arose from desire on the part of the founder, Dr. Marcella Finnerty, to locate the college in a community. This had also been the motivation of Pat Jennings, a probation officer with the Department of Justice Equality and Law Reform who had urged Dr. Finnerty to open the college with a view to establishing an affordable, counselling service for Tallaght. The area is a large suburb of Dublin, made up of a wide variety of social and economic groups. While counselling and psychotherapy are often thought of as processes that happen between two individuals in a therapy room, IICP placed itself in a broader context from the outset. IICP considers that training in counselling and psychotherapy is an interdisciplinary endeavour, a combination of art and science to include, amongst others, the disciplines of philosophy, psychology and sociology. The history of counselling and psychotherapy has been influenced and is inevitably intertwined with the social, political, economic and cultural climates within which it is formed. It is of particular relevance in times of crises or transition and can also be of help in problem solving. The recent rapid socio-economic and technological changes have resulted in the erosion of traditional social structures such as family, work, and community. As a result, the sense of purpose, belonging, and security associated with these structures, has been lost for many. It is in this context that the IICP operates its training programmes and counselling agency, in collaboration with its sister organisation, the Village Counselling Service. Core to the ethos of IICP is the desire to continue to make links with and to situate its training and service delivery within a geographical area affected by educational and social disadvantage and marginalisation.

2. Current Position on Regulation of Counsellors and Psychotherapists

Counsellors and psychotherapists are not currently designated under the Health and Social Care Professionals Act 2005 (the 2005 Act). While counsellors and psychotherapists are subject to relevant Irish legislation, the title of counsellor and psychotherapist is not presently protected. IICP welcomes the regulation of the profession and appreciates that regulation under the Health and Social Care professionals Act 2005 will ensure that protected titles are introduced and will be restricted to those who are granted registration under the act. IICP understand that regulation will involve the creation of registration boards, a committee structure to deal with disciplinary matters and the Health and Social Care Professionals Council, who will hold overall responsibility and oversight of the regulatory system. These bodies, collectively, are known as CORU.

3. IICP's Position on Regulation

As previously stated, IICP strongly welcomes the onset of regulation in Ireland. This process will strengthen the profession and has the potential to unify a field that has, historically, been fragmented. Additionally, and more importantly, regulation will support the safety and protection of the public and enhance the reputation of the profession. Clients attending counsellors and psychotherapists can be particularly vulnerable and regulation will ensure that those therapists they engage with are suitably qualified and have attained the adequate academic and professional training.

3.1. The number of professions to be regulated

In the call for submissions on the proposal, clarification is sought on the number of professions to be regulated. IICP contend that counselling and psychotherapy are essentially the same profession. The debate about whether there are any notable differences between psychotherapy and counselling has been ongoing for many decades and opinions differ, each side making justifiable claims for holding their particular viewpoint. IICP strongly advocates for one profession. Separating the professions is likely to lead to elitism, and could potentially set us back 100 years. There exists, within the realms of counselling and psychotherapy, some 400+ modalities of therapy, but in essence, all are involved in helping clients by listening, supporting, processing painful emotions, guiding and utilizing evidence based practice to assist clients in attaining their therapeutic goals.

Colin Feltham (1995) has pointed out that the process of distinguishing any practice is “highly political and the issues are often more about power, status, and financial reward, than the clarification of distinctive identities and practices, and the disinterested pursuit of best practice with each ‘equal but different’ forms of practice.” In addition to this Michael Jacobs speculates: “Just as psychoanalysis spawned psychotherapy, but has largely been overtaken by it, so psychotherapy may find itself in a similar position vis-à-vis counselling” (Bond, 2000).

IICP asserts that there has been an abject failure to differentiate between the professions, although arguments have been made based on modality, length of training and qualification level. In this submission we aim to set out our counterargument against these claims.

3.2. Regulation under the 2005 Act

As previously stated, IICP recognises the need for regulation. We are fully supportive of the proposal that the profession of counselling and psychotherapy would be regulated under the Health and Social Care Professionals Act 2005.

3.3. Consideration to Board Make Up and Quantity of Boards Required

As IICP are of the firm position that counselling and psychotherapy are one profession, we contend that it would be appropriate that it would be regulated under one registration board. That said, we appreciate that this is a consultative process and would like to point out that should the Minister and Department of Health decide to register the professions separately, it could be argued that two registration boards will be required. If not, inevitably, the tensions that are present in the field will emerge at board level and the makeup of the registration board could be an issue. For example, the council and board structure suggests that there is one member from each of the designated professions. If two professions are to be registered, then in the interest of fairness, there would need to be one representative (education) from *each* profession and one member-representative from *each* designated profession. The elephant in the room is that there is a divide in the profession, with each faction considering their own position. This would need to be carefully considered if the counselling and psychotherapy are not regulated as one profession.

3.4. Education Considerations for Existing Practitioners

While the QQI Awards Standards for Counselling and Psychotherapy were published in 2014, prior to that, training providers designed their programmes based on the criteria set by the professional body to which they were affiliated. Notably, in most cases, this process was a rigorous one, and the awarding of professional body accreditation to a course was a hallmark of quality assurance. IICP clearly recognizes the need to have an academic qualification as well as professional one. It is important that both aspects, academic and professional, are given due consideration. However, there is, of course, scope for education providers to have an academic qualification in Counselling

and Psychotherapy validated by QQI that is unsuitable for professional practice. Moreover, it is possible for education providers without academic validation to offer a professional programme that lacks academic rigour. That said, due process must be given to the training providers that have created many of the therapists who are working in the field today. Historically, a Diploma level qualification was required for accreditation with the main professional bodies in Ireland. IACP have informed education providers that a Level 8 Degree will be the minimum education requirement from 2018. That said, there are many competent, well-trained therapists operating in practice in Ireland who hold a Diploma Level qualification. IACP suggests that graduates from IACP recognised Diplomas should be grand-parented into the CORU scheme, or at the very least, be given the opportunity to evidence competencies as a therapist. Likewise, training providers who do not have academic validation should be given ample time and opportunity to achieve this.

3.5. Education Consideration for Future Practitioners

Arguments have been made that psychotherapy training is longer than counsellor training, however it must be noted that the phased nature of training can differ from one professional body to the next. For example, in order for graduates of our BA (Hons) Degree programme to obtain full accreditation with IACP, they have to achieve the following:

PHASE ONE TRAINING - STUDENT CONTACT HOURS	
Duration: 4 Years	ECTS Credits: 240
Theory Lectures Contact Hours	230 Direct Lecturer: Learner Contact Hours
Personal Development Lectures Contact Hours	90 Direct Lecturer: Learner Contact Hours
Skills Training Lecturers Contact Hours	188 Direct Lecturer: Learner Contact Hours
Group Work Lecturers Contact Hours	52 Direct Lecturer: Learner Contact Hours
Subject Specialism Lectures Contact Hours	55 Direct Lecturer: Learner Contact Hours
Research Methods Lectures Contact Hours	90 Direct Lecturer: Learner Contact Hours
ASIST (Applied Suicide Intervention Skills Training)	15 Direct Lecturer: Learner Contact Hours
TOTAL LECTURER: LEARNER CONTACT HOURS	720 HOURS

PHASE ONE TRAINING - ADDITIONAL COURSE CRITERIA	
Personal Therapy Sessions	50 Hours of Personal Therapy (minimum)
Group Therapy Sessions x 10	20 Hours of Group Therapy
Supervised Clinical Hours	120 Hours of Clinical Work (Minimum)
Supervision Sessions	25 Hours of One-To-One Supervision (Minimum) 10 Hours Group Supervision (Minimum)
TOTAL HOURS FOR ADDITIONAL CRITERIA	225 HOURS

PHASE TWO TRAINING - PREACCREDITATION CRITERIA	
Supervised Clinical Hours	450 Hours of One-to-One Clinical Work
Supervision Session	45 Hours of Supervision Sessions
TOTAL HOURS FOR ADDITIONAL CRITERIA	225 HOURS

This is in addition to the many hours of self-directed learning, study, reading, and practice that students do as part of their degree programme. Notwithstanding the hundreds of hours that learners will spend researching, reading and practicing, in order to achieve their degree, plus IACP

accreditation, they will engage in 1,170 hours of direct contact with lecturers, supervisors, therapists and clients.

An argument has been made that the level of qualification should differentiate between counsellors and psychotherapists. Some training providers and professional bodies are suggesting that counsellors should be required to have a Level 8 Degree and psychotherapists a Level 9 Masters. IICP completely disagrees with this, as we do not view the professions as being distinct from one another. Furthermore, this proposed differentiation will set the field back to an era when 'psychotherapy' was for the wealthy, and training as a psychotherapist was only accessible to those with substantial financial resources. Historically in Ireland, a Diploma has been the basic qualification for practice. While other professional bodies claim that their diploma programmes are at post-graduate level, it could be argued that this is a gross over-exaggeration, as many of said 'post-graduate' programmes are not academically validated and have no alignment with the National Framework of Qualifications (NFQ). Therefore, a quick review of the main professional bodies' websites will demonstrate that while many of these training providers describe themselves as 'post-graduate', in practice, they are not accredited academically. They have simply self-selected the designation of 'post-graduate' with no real evidence that their graduates are exiting with attainment of Level 9 (post-graduate) learning outcomes in the field of counselling and psychotherapy.

The QQI Counselling and Psychotherapy Award Standards suggest that a level 8 qualifications is the point at which learners move from 'supervised practice with volunteers' to independent and professional practice with real clients.

IICP argue that setting a minimum level for registration as a counsellor and psychotherapist at level 8 on the NFQ will establish the level of qualification on a par with other health care professionals such as nurses and social care workers.

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

- Counsellor and Psychotherapist
- Counsellor
- Psychotherapist
- Therapist