

Proposal from Cork Counselling Services Ltd - 7 Fr. Mathew Street, Cork City

Response to the invitation from The Minister for Health, Mr Simon Harris TD,

**Proposal on the regulation of Counselors and Psychotherapists under the
Health and Social Care Professionals Act (2005)**

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The Counselling Centre is non-denominational and is committed to providing counselling and psychotherapy to the highest ethical and professional standards to all members of society.

The Counselling Centre was one of the first Centres in the country to provide a professional counselling service to members of the community regardless of their financial means, religious beliefs, cultural background, nationality, sexual orientation or educational background. From its foundation, the Centre's counselling services were in high demand, and in 1989 it was granted charitable status. Out of this history the Cork Counselling Centre Training Institute was born.

The Centre is now a fully functioning community based counselling service. Our Centre is one of the main professional services working with marginalized individuals within the community.

In the 1990s The Institute began to work with the Irish Association for Counselling & Psychotherapy (I.A.C.P.) and developed its own Diploma course in Counselling. This Diploma course was one of the first to receive I.A.C.P. Course Recognition in 1996. Over time interest in the programme has flourished. Consequently the Institute expanded its training into the comprehensive range of courses in Counselling & Psychotherapy that we offer today. Recently the Training Institute formed a collaborative partnership with Coventry University. We are proud to now offer this Degree programme validated by Coventry University. We currently provides professional training, supervision, and placements for third level students.

We are key stakeholders in the proposed move to statutory regulation being because we are: educators, an employer of Counsellors and Psychotherapists, we are practitioners and we have attended counselling and psychotherapy.

The Counselling Centre is an organizational member of The British Association for Counselling and Psychotherapy (BACP) and The Association for Agency-based Counselling in Ireland (AACI). Our staff are practitioner members of Irish Association for Counselling and Psychotherapy (IACP), The Irish Association of Humanistic & Integrative Psychotherapy (IAHIP) and The Psychological Society of Ireland (PSI). Our Diploma is accredited by IACP and the Degree is validated by Coventry University and accredited by Quality Assurance Agency for Higher Education (QAA). (UK equivalent of Quality and Qualifications Ireland).

Funding:

We receive part funding from:

- TUSLA - Child and Family Agency
- The Department of Health (Section 39)
- National Lottery Grant

Should there be Statutory Regulation?

Yes, we believe that there should be Statutory Regulation. However, we would like to submit a voice of reason that this will not protect against all scandals. Statutory Regulation is not a panacea for all problems.

We believe that minimum standards of education, commitment to a code of ethics and registration on a Professional Registration Board does not offer a guarantee of ethical or professional practice to vulnerable clients.

We believe that to have clarity on a professionals "title", one must have the required level of education and that the professional must have undergone the minimum amount of training.

We also stress that all recognised models and modalities of counselling and psychotherapy should be included on the Register. Research in this area shows that it not just the specific factors within modalities that causes the healing, but instead it is the quality of the relationship as experienced by the client that effects positive outcomes.

Mearns and Cooper (2005), state that "the relationship variables found to be promising and probably effective in terms of outcomes" (Mearns and Cooper, 2005: 4). They cite findings from study conducted in 2002 by a task force, commissioned by the American Psychological Association's (APA). The task force undertook a review of all the available data on the link between therapeutic outcomes and the therapeutic alliance in 2002 and concluded certain variables need to be in place in order for change to happen. The variables relevant to this study include congruence, mutual feedback, the level of (non-intimate) self-disclosure, goal consensus and collaboration, and finally the quality of the therapeutic relationship as experienced and communicated by the client during feedback.

The key finding was that "the therapy relationship makes substantial and consistent contributions to psychotherapy outcome independent of the specific type of treatment" (Mearns and Cooper, 2005:6)

We believe that Statutory Regulation should encompass all models of modality that are currently recognised.

If there should be Statutory Regulation should this come under the Health and Social Care Professionals Act 2005?

We agree that it is appropriate that Statutory Regulation should be registered under the Health and Social Care Professionals Act (2005). We believe that the four descriptors mentioned in relation to Health and Social Care professionals are appropriate to the Counselling and Psychotherapy professions. We are suggesting that there are two distinct professions: 1. Counselling, 2. Psychotherapy so it is appropriate to call them professions (with an s).

However, we suggest that there must be a number of special conditions and special considerations for the Counselling and Psychotherapy professions. The precedent for the inclusion of special conditions has been set by the social work profession.

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We believe that it is conceivable that Counselling and Psychotherapy can include special conditions and considerations under the Health and Social Care Professionals Act (2005).

Should there be one register or two registers under one registration board?

We believe that there should be two registers under the one registration board as we believe very strongly that these are two distinct professions. However, with the following conditions.

Special conditions that we would want included.

We suggest that the Registration Board is called "The Counselling and Psychotherapy Registrations Board" and that the register is owned by the counselling and psychotherapy practitioners. We believe that this should not get handed over to one representative or governing body. Counselling is foremost about empowerment and self-responsibility. Quality assurance is by way of peer-review. These same principles should be upheld in the governance of the professions. We agree that a minority portion of the Board also be formed on individuals who are not counselling or Psychotherapy practitioners.

We suggest that a client representative should also be included as this gives emphasis on power and responsibility. It is shocking to us, that at the moment that there is no provision made for a client representative. We believe that the profession is about asking the client regarding issues that affect them. We believe that the client is paramount and that they are the expert. By having a client as a member ensures that their voice is heard directly.

Our suggestion is that a national organization is formed to represent and to advocate on behalf of Counselling and Psychotherapy clients and that this organisation has two representatives on the Board. In addition we suggest that the Board must be made up of specific specified individuals and that both Counsellors and Psychotherapists are equally represented.

We suggest that two members of the general public should sit on the board that have no connection with Counselling and Psychotherapy services.

We suggest that each recognized modality be proportionately represented on the Board: These modalities include:

- Child and Family counselors / psychotherapist
- Psychodynamic
- Integrative and Humanistic
- Cognitive Behavioral
- Neurobiological
- Addiction

We do not agree to your recommendation that there should be a Manager on the Board from either the Private Sector or the Voluntary Sector - in addition to the Public Sector. We believe that the Voluntary Sector in this profession is profoundly different to the Private Sector. We believe that the three Sectors have a distinctly

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different identity. Therefore, there should be representatives from the Private, Public and Voluntary Sectors.

Finally, we suggest that the power and ownership of the Register needs to stay with the professionals and any changes should be agreed by with the professionals. It is the Practitioner who should set the education and accreditation standards, the codes of ethics, the disciplinary procedures and it should be they who govern the Register along with some extremal Board members.

What is an appropriate level for Grand Parenting?

The existing standards of qualifications and accrediting should determine the level for Practitioners, where the Practitioner is accredited by a recognised or governing body. This standard of professional regulation should be implemented. We should stress that accrediting bodies must be independent from training institutes.

What is an appropriate qualification level for future applicants to the register?

We do not believe that the standards of qualifications outlined by Quality and Qualifications Ireland (QQI) for Counselling and Psychotherapy should be standards for entry onto the Register. We believe that the QQI criteria are not sufficient as they stand at present.

As these guidelines are academic guidelines only, this leave a number of dangerous gaps between them and required standards for practice. We believe that academic qualification are not enough alone to make a safe and ethically based practitioner and that there must be much more integration of personal development and the relevance of personal development to practice.

We suggest that the QQI guidelines are further developed in line with the Quality Assurance Agency for Higher Education (QAA) (guidelines which are the British equivalent). We believe that the QAA guidelines are more developed and more relevant to the Counselling and Psychotherapy professions in the Republic of Ireland.

We are in agreement that the minimum education for Counselling should be a Level 8 (Hons) Degree and for Psychotherapy should be a Level 9 Masters but there still needs to be an emphasis on personal development.

Historically across Europe, the Counselling and Psychotherapy professions grew from practice based institutes and training within community settings (which have over the years become formalized places of learning). We believe that Education, Knowledge and Practice are equally important in Counselling and Psychotherapy training. However, the point is that whilst Universities can educate counsellors and psychotherapists some recognition needs to be made of community based training institutes so that the profession does not become cut off from its community based practice.

We would like to note a misunderstanding relating to CORU and their response to the Minister for Health on Regulation of Counsellors and Psychotherapists. Counsellors and Psychotherapists commit to attending supervision for the duration of their career. Maintaining ethical standards of practice relies upon the practitioner

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taking responsibility for their work by regularly attending supervision. Furthermore, we believe that students are responsible for their own work under supervision from the beginning of their practice.

What titles should be protected?

We believe that that both titles of

- Counsellor and
- Psychotherapist should be protected.

We believe that the two professions are Counselling and Psychotherapy. We recognise that this may cause difficulties with other professions such as: Guidance Counselling and Finance Counselling. However, we believe that it should be stated in the Health and Social Care Professionals Act (2005) defining and excluding or including that Counselling and Psychotherapy is what is been included and that does not include allied professions such as suggested.

We also believe it is not correct to refer to Counselling and Psychotherapy professions in a “care” or “caring” capacity. We believe that one does not attend counselling to be “cared” for. However, one does attend counselling to engage in therapeutic work. Titles which include terms such as “care” undermines the clients self of power and responsibility and undermines the therapeutic work and therapeutic themes of Counselling and Psychotherapy.

Signed on behalf of the Cork Counselling Services:

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