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Submission to Minister for Health

on Regulation of Counsellors and Psychotherapists

Statutory regulation of the profession of counselling and psychotherapy is both welcome and, in my view, essential. The IACP has campaigned tirelessly towards this end since 1986.

Since it is the profession that is being regulated, rather than the individuals, perhaps it is best dealt with as Counselling/Psychotherapy rather than 'Counsellors and Psychotherapists'.

I would recommend the designation and regulation of Counselling/Psychotherapy as ONE profession rather than two, as it would be almost impossible to differentiate between them, would create divisiveness, and could foster unnecessary competition.

I fully agree with the statements on pg. 9, (1) that "disagreements between professional bodies cannot allow the goal of registration, to protect the public, to be missed", (2) that "there needs to be a cohesive approach, which can only be agreed by the professions", and (3) that a facilitator and a time limit would help to secure agreement.

P 13 The combined title of Counsellor/Psychotherapist appears to me to be more satisfactory than the suggested "Counsellor and Psychotherapist" - the latter suggests difference rather than similarity.

(The idea of market research to see what the views of the general public are, is interesting. I have often found with clients that 'psychotherapy' is confused with 'psychologist', and imbued with a medical flavour, while 'counselling' is less threatening.)

The aim of both is to provide professional assistance to people who are distressed or in crisis, and both are also agreed that the relationship between the counsellor/psychotherapist and the client is of paramount importance.

Counselling/Psychotherapy

(pg 9) On the definition of "Counsellor" and "Psychotherapist", IACP states

"that essentially the work of both are the same", while the ICP states "that there is a very different standard for entry to the profession of psychotherapist."

Surely it is not ideal to define a profession in terms of the standards of entry to that profession? Since the regulation would be of the profession, the first step is to define this. Then - and only then - can the standards and details of training necessary for practitioners to do their job efficiently, and for the protection of the public, be put in place. The definition of the profession must be based on the work, what it aims to achieve, its goals, its *raison d'être*, rather than how a person is trained to do these.

P 27 - appendix 2 :

The current listed aims and objectives, from the two main practising bodies (IACP and ISP) are very similar : each lists what the work involves : many of these descriptions and aims are identical.

Both appear to align with "Part 1, Section 4 (3) of the Health and Social Care Professionals Act 2005 ... (see pg 7)

((Pg 28 ... (The British Association for Counselling and Psychotherapy appears to use these terms interchangeably.)

(Pg 27) A letter sent to CORU in March 2014 (from IACP ?) states :

" Counselling tends to deal more with immediate issues ... eg. Bereavement.

Psychotherapy tends to deal with deeper more long-term issues that may be rooted in the past... "

I find this difficult to accept as part of a definition of the work, as so often an immediate issue such as bereavement proves to be merely an introduction to deeper issues.

Also the letter opens with "Counselling/Psychotherapy" but the next sentence differentiates : "Counselling tends to " and "Psychotherapy tends to ... ". This would appear to be inconsistent.

Once the profession is defined, then the elements necessary for the practitioners to do their job efficiently, and for the protection of the public, would need to be put in place. Training standards and regulation of such standards is essential.

Q 5a p 13 In the context of Counselling/Psychotherapy, the question is asked should there be regulation of one or two professions, and are there sufficient differences there between the work, training and delivery of services to merit this ?

In my opinion there should be registration for ONE profession of "Counselling/Psychotherapy", and all of my experience since the foundation of IAC goes to uphold this opinion.

P 14 There is a suggestion that there could be 1 regulation board which would maintain 2 registers. This would demand a further agreed and inclusive definition of suggested differences between Counselling and Psychotherapy, and would merely reopen the debate.

Statutory Registration must include training requirements, and a single regulation board could then lay down the qualifications required to become a registered counsellor/psychotherapist, how best to define the theoretical and practical knowledge, and training, essential to the type of work.

(This would include a greater emphasis than most other professions on the importance of self-awareness and self-knowledge - basically essential for a profession which relies more on the use of self and the creation of a relationship, than on medicines or tools.) Standards for training courses "to ensure they do meet the standards of proficiency required" would also be included in the content of Statutory Registration.

Once again it is not sufficient to outline the current differences in training between Counselling and Psychotherapy. If a fundamental difference is postulated between the two, then it must be clearly stated.

Finally, I would recommend the designation and regulation of ONE profession (Counselling/Psychotherapy) rather than two which would be almost impossible to differentiate, would recreate divisiveness, and foster competition.

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