Submission to the Department of Health on the Proposed regulation of Counsellors and Psychotherapists under the Health and Social Care Professionals Act 2005

November 2016
1. Introduction

Let’s Get Talking welcomes this opportunity to make representations concerning the proposed regulation of Counsellors and Psychotherapists under the Health and Social Care Professionals Act 2005.

As requested, we provide the current document to briefly outline our position on the key issues for consultation as outlined in Appendix 1.

1.1 About Let’s Get Talking

Let’s Get Talking is a national charity providing non-set fee counselling and psychotherapy support in the community. It was established in 2013 with the opening of its first centre in Galway City. A further centre has since opened in Dublin in 2015. Let’s Get Talking centres will open in Athlone and Donegal in 2017.

Let’s Get Talking has an inclusive and secular ethos, committed to embracing the modern and now diverse nature of Irish Society. The elimination of barriers to access to mental health services around issues of race, class, gender, nationality, sexual orientation, ethnicity, and culture are paramount.

Our mission is to ensure access to high quality mental health services to all who need them in our community. Our mandate is informed by one important ethic – namely equity. Each client of the service is treated according to their needs and not what they can afford to pay. This ethic is realised through our commitment to our non-set fee policy. Our vital mission is also achieved by complimenting rather than competing with existing service, by adding value and filling existing gaps in public services.

Let’s Get Talking requires all Counsellors and Psychotherapists working at Let’s Get Talking centres to be registered with a recognised accrediting body, (e.g. Irish Council for Psychotherapy (ICP), the Irish Associations of Counsellors and Psychotherapists (IACP), Association of Professional Counsellors & Psychotherapists (APCP), Addiction Counsellors of Ireland (ACI), etc.). It is well known that there is competition and politicking between the various accrediting bodies. Our policy does not demonstrate favour to any one accrediting body over another. Let’s Get Talking prioritises a counsellor/psychotherapist's qualifications and competencies over membership of an accrediting body during the recruitment process.
2. Issues for Consultation

Let’s Get Talking is in favour of statutory regulation for Counsellors and Psychotherapists and maintain that the professions ought to be regulated under the Health and Social Care Professionals Act 2005.

It is our position that the Counsellors and Psychotherapists should be regulated under one registrations board. Many of the 5,000 practitioners in Ireland are both qualified and experienced in the provision of both counselling and psychotherapy. To create two distinct registrations boards for the professions would cause confusion for those accessing services. It is preferable for the one registration board to clearly define the difference between the work of counsellors and psychotherapists and register both professions under two separate registers. Those with appropriate qualifications will be registered under both the counsellor and psychotherapist register. This will empower members of the public to make the best possible decision for them when choosing a counsellor and/or psychotherapist.

Let’s Get Talking believes there should be two stage approach to statutory regulation of the profession. At present the accrediting bodies have one central function of ensuring practitioners’ compliance with ethical and clinical standards.

In Stage One, we propose a voluntary registration process be carried out, over a three year period, by the existing counselling and psychotherapy accrediting bodies in Ireland. However, these accrediting bodies should adopt an integrative approach on their policy for registration between them, including ensuring that registrants across accrediting bodies comply with QQI minimum standards.

It is our position that a Level 8 QQI Award should be the minimum qualification for applicants to the Statutory Regulator. Currently, there are many counsellors and psychotherapists have substantial experience in the field and demonstrate a high level of competency but do not meet the proposed minimum qualification level. We propose that once counsellors and psychotherapists in this category register with the Voluntary register, they are referred to an Assessment of Professional Competency Board. This Board should comprise of members of the various current accrediting bodies who maintain the voluntary register and can assess professional competency in the area of counselling and/or psychotherapy.

Stage Two will involve the transfer of registrants to one single Statutory Registration Authority with the sole function of setting, maintaining, and where necessary enforcing professional standards.
Lets’ Get Talking would see the future role of the accreditation bodies, either in their existing or amalgamated form, becoming the recognised representatives of the counselling and psychotherapy profession.

Contact Details

This submission has been prepared by:

Let’s Get Talking Counselling & Psychotherapy
Liosban House, Tuam Road, Galway
Tel: 00 353 91 765 500
Email: letsgettalkinggalway@gmail.com
Web: www.letsgettalkinggalway.ie
CHY20901