



Submission by the HSE Directors of Counselling group on the public consultation on the proposed regulation of Counsellors and Psychotherapists under the Health and Social Care Professionals Act 2005

Preamble

The HSE Directors of Counselling group (DOC group) from the Health Service Executive offer the following submission in the public consultation exercise on the Statutory Registration of Counsellors and Psychotherapists invited by the Minister for Health on the 31-8-16. The DOC group oversee the HSE's **National Counselling Service** (NCS) for adults who have experienced abuse in childhood.

The NCS has received over 35,000 referrals since it was established in 2000 and at any one time there are over 1000 clients in counselling of varying lengths of time. The DOC group also oversee the HSE's **Counselling in Primary Care Service** (CIPC). CIPC has received over 40,000 referrals since it was established in 2013 with over 2000 clients in counselling at any point in time and an average of 4,000 counselling hours delivered nationally around the country each month. Both CIPC and the NCS operate to HSE declared national academic standards and professional accreditation quality standards for service provision. The NCS and CIPC are the largest example of safe and high quality counselling and psychotherapy services being provided on a statutory basis.

The DOC group, as a consequence of their collective clinical experience over the years in establishing and operating CIPC and the NCS, are very familiar with the challenges for service provision arising from concerns about the variation in professional standards and training courses which were formally articulated in "**A Vision for Change**" in 2006. **This DoH policy document** noted that the "diversity of therapies, proliferation of training bodies and representative organisations and the lack of statutory regulation were the main impediments for making clear recommendations about promoting counselling and psychotherapy in mental health and primary care services" (DOHC 2006).

The DOC group were represented on the QQI working group which led to the publication of the "Award Standards in Counselling and Psychotherapy" in 2014 which is acknowledged as a major milestone on the road to statutory registration. The DOC group also acknowledge the publication by CORU of the recent "*Response to the Minister for Health on Regulation of Counsellors and Psychotherapists*"

The following submission is informed by the direct experience of establishing academic, professional and standardised clinical standards in the current unregulated environment. The variety of professional organisations and diversity of academic and professional trainings continues to present a challenge for setting standardised and safe quality standards in service provision. The same variety and diversity must also represent a bewildering challenge for any member of the public seeking the services of a counsellor or psychotherapist. The current number of professional organisations is not only unnecessary in a country the size of Ireland; but it also can impede the continuing development and evolution of counselling and psychotherapy as professions. A clear distinction needs to be made between counsellors and psychotherapists legitimate need to organise themselves into groups around a particular philosophical or therapeutic orientation and the regulatory requirements that need to be in place to ensure the provision of counselling or psychotherapy services that are of high quality, safe and effective.

The DOC group are concerned that in the run up to Statutory Registration the quality standards in service provision achieved in the NCS and CIPC are not only maintained but further developed. The learning involved also has an application in other areas of counselling service provision and psychotherapy service provision in the non-statutory sector. The submission is laid out by responding specifically to each of the bullet points in the order in which they were published in the Public Consultation Invitation. This submission does not address issues associated with the statutory registration of counselling psychologists and clinical psychologists which is subject to a separate statutory registration process. As this submission deals with the subject of generic counselling and psychotherapy, it also does not address issues related to the specialist field of addiction counselling which has its own distinct professional organisation "The Addiction Counsellors of Ireland" (ACI). Accredited membership with the ACI acknowledges that a counsellor is specifically trained and experienced in the field of addiction. The DOC group does not consider a standalone specialist training in addiction counselling sufficient to work in a generic counselling and psychotherapy services like the NCS or CIPC. The DOC group equally does not consider a standalone specialist training in addiction counselling as sufficient for entry onto the register for counsellors and psychotherapists which is the subject of this submission. This does not in any way preclude generically trained IACP accredited counsellors or ICP accredited psychotherapists who have chosen to work in the specialist field of addiction.

The issues on which the Minister sought feedback are listed as follows:

Whether the professions of counsellor and/or psychotherapist ought to be subject to State regulation.

The DOC group support the view that the separate but related professions of counsellor and psychotherapist should be subject to State regulation to protect the public, maintain public confidence and regulate professional standards.

If so, whether the professions ought to be regulated under the Health and Social Care Professionals Act 2005 or otherwise.

Given the criteria listed in Section 4. 3 (a) (b) (c) and (d) of the Health and Social Care Professionals Act 2005, the DOC group feel it is appropriate for the separate professions of counsellor and psychotherapist to be regulated under the 2005 Act.

If the professions are to be regulated under the 2005 Act whether it would be appropriate to regulate one or two professions under one registration board.

The DOC group are of the view that given the close relationship between the professions of counselling and psychotherapy, there is a rationale for one registration board. However it is essential that the board is constituted in such a manner so as to possess the necessary range and depth of expertise to carry out the separate statutory functions reflecting the separate professional and academic requirements of counselling and psychotherapy.

The appropriate level of “grand parenting” qualifications to be set for existing practitioners having regard to the QQI Awards standards

The DOC Group, in setting standards in the broader unregulated environment, approached this by designating two particular professional organisations for the purposes of standards of qualifications relating to the recruitment of counsellors and psychotherapists. The **Irish Association for Counselling and Psychotherapy** (IACP) were designated for the purposes of dealing with the profession of counselling. The **Irish Council for Psychotherapy** (ICP), which is an umbrella body for five different subgroups in psychotherapy, were designated for the purposes of dealing with the profession of psychotherapy.

These two organisations were chosen for the following reasons:

- They are both long established (IACP since 1981 and ICP since 1990) and have been intrinsically involved with the development of counselling and psychotherapy in Ireland
- The size and membership of both organisations is sufficiently large so as to have sufficient resources to oversee the maintenance of an accredited register, a code of ethics, a complaints procedure and a mechanism for setting standards for training courses
- Both professional organisations are regarded by the DOC group as having demonstrated satisfactory standards of probity in respect of their internal governance when discharging these functions
- Both organisations have reciprocal arrangements with equivalent organisations in the UK in relation to professional accreditation (IACP with the British Association for Counselling and Psychotherapy and the ICP with the United Kingdom Council for Psychotherapy) and both are also affiliated to organisations in a European context
- Both are regarded by the DOC group as having a proper balance and integration of academic standards and professional clinical standards

Whilst it is recognised that both the IACP and the ICP are currently consolidating their professional standards in preparation for statutory registration, the proper balance and integration of academic standards and professional clinical standards is regarded by the DOC group as a crucial requirement for practitioners.. The QQI Awards Standard Document also emphasises this where it states that “meeting the educational standards entitles a person to an educational qualification but entitlement to practise requires a person to meet (and continue to meet) a distinct professional standard” (QQI 2014).

The DOC group acknowledge the in depth analysis of the range of issues around grandparenting in the CORU document “*Response to the Minister for Health on Regulation of Counsellors and Psychotherapists*”. The DOC group also note the observation in the document that the changes in the Health Miscellaneous Act 2014 allows for CORU to use the HSE listed qualifications such as those listed for CIPC (see Appendix 1) to open professional registers. Whilst the listed qualifications for CIPC are more closely aligned with the psychotherapy register in that a dual layer qualification is required, the DOC group endorses this position as a good starting point for statutory registration of psychotherapists. It also builds on the progress achieved to date in CIPC and the NCS by utilising existing professional standards and IACP and ICP as the two professional accrediting organisations whilst acknowledging further work needs to be done on clarifying the grandparenting requirements for the counselling register.

The DOC group considers it important for counsellors and psychotherapists who are not currently accredited with the IACP or the ICP to utilise the time available between now and statutory registration to review their current professional status in the context of the accreditation standards required by both organisations. The DOC group would also like to see the IACP and the ICP actively explore how counsellors and psychotherapists not currently accredited with them, can be facilitated to meet the accreditation standards. This may involve a purposefully designed “top up” professional training or a period of supervised practice or a combination of both.

The appropriate level of qualifications to be set for future applicants for registration having regard to the QQI Awards standards

The DOC group consider that for the profession of counselling, given the current standards in the profession, an IACP accredited degree in counselling at QQI Level 7 is considered appropriate. However the DOC group consider that, once the statutory register for counsellors is fully established, the standard should be raised to a degree in counselling at QQI Level 8 as soon as is feasible.

The DOC group consider that for the profession of psychotherapy, given the current standards in the profession, a dual layer qualification consisting of a degree in human sciences or equivalent at QQI level 7 **plus** an ICP accredited postgraduate qualification in psychotherapy. However the DOC group consider that, once the statutory register for psychotherapists is fully established, the standard for the second layer qualification should be raised to an ICP recognised postgraduate degree in psychotherapy at QQI Level 9 as soon as is feasible.

The DOC group would also like to see a reorganisation in the IACP and ICP recognised professional training courses in both counselling and psychotherapy. This would involve including sufficient supervised clinical placement hours within the course itself so that when the trainee successfully graduates, they are eligible to register with the relevant statutory register and can proceed to practice as a counsellor or psychotherapist.

In tandem with the move towards statutory registration and the establishment of the registration board, the availability of practitioners will also depend on the availability of sufficient IACP recognised training courses in counselling and sufficient ICP recognised training courses in psychotherapy in third level training institutes. The DOC group recommend that significant planning and investment needs to be undertaken in the area of training to ensure that sufficient practitioners will be available to meet the staffing requirements of statutory funded services and non-statutory services.

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

The DOC group that the titles “Counsellor” should be protected for the exclusive use of the profession of counselling and the term “Psychotherapist” should be protected for the exclusive use of the profession of psychotherapy

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Director of Counselling

(On behalf of the HSE Directors of Counselling Group)

Appendix 1

HSE's Counselling in Primary Care Service - Eligibility Criteria for Counsellor/Therapists

1. Hold a Level 7 qualification (QQI) in a relevant human science discipline or equivalent in a health and social care profession or health related profession.

Plus either 2a and 2b or 2c and 2d as follow:

2.
 - (a) Hold a degree or post-graduate qualification in counselling, or psychotherapy recognised by one of the following, as appropriate: the Irish Association for Counselling and Psychotherapy (IACP), a relevant body within the Irish Council for Psychotherapy (ICP)
 - (b) Have full accredited membership with one of the following: IACP or relevant body within ICP.

or

 - (c) Hold a post-graduate qualification in counselling psychology or clinical psychology recognised by the Psychological Society of Ireland (PSI),
 - (d) Be *fully registered with* the clinical or counselling psychology division of PSI.
3. Have a minimum of two years relevant post qualification experience (This requirement may not apply in respect of some full-time post-graduate qualifications)