

Please find below my responses to questions from the Minister for Health regarding the proposed regulation of counsellors and psychotherapists. I also have a comment on the response from CORU already submitted, specifically in relation to the segment below:

In relation to the response Question 1 part (b) as shown below from CORU to the Department of Health:

**Question 1 General Issues How the activities of Counsellors and Psychotherapists align with Part 1, Section 4(3) of the Health and Social Care Professionals Act 2005 (as amended) (the Act)**

...

**(b) the diagnosis, treatment or care of those who are injured, sick, disabled or infirm;**

*Response from CORU: Generally people attending are referred from other professions, such as medical practitioners, where a diagnosis may have been made. However, members of the public can refer themselves directly to counsellors/psychotherapists. Some counsellors and psychotherapists are involved in offering treatment and care to people who may be recovering from injury, sickness, disability or infirmity.*

My Comment: I would emphasise that counsellors and psychotherapists currently do not diagnose. They may have opinions based on experience and education, however they do not diagnose and do not follow a medical model of diagnosis and treatment. I believe it is important to keep this distinction between the fields of counselling and psychotherapy (whatever the new professional titles may be) and the fields of psychiatry or clinical psychology. This is a fundamental difference in practitioner – client relationship between the professions and should be maintained.

## **Appendix 1**

### **DEPARTMENT OF HEALTH**

#### **Public consultation**

#### **Proposed regulation of counsellors and psychotherapists under the Health and Social Care Professionals Act 2005**

**The issues which the Minister would like addressed by the submissions are as follows:**

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

Response: Currently it appears that anyone can give themselves the title 'Counsellor' and operate a private practice as such. People working under the titles of Counsellor, Psychotherapist, or a combination of both meet people who are vulnerable to being advised, directed, exploited. Lack of State regulation leaves clients unprotected against untrained or misguided people who can operate a Counselling clinic without regulation.

**☒ *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.***

Response: There is merit in having different levels of academic qualifications required for registration as a Counsellor and as a Psychotherapist. From the QQI academic levels outlined in Appendix 2 of the call for submissions, the following distinctions could be made under new professional titles:

Level 7 award the title of Counselling Therapist; Level 8 award the title of Counselling Psychotherapist; Level 9 award the title of Research Psychotherapist. The permission to practice under these titles would continue to be subject to ongoing quality control by the accrediting bodies.

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

Response: Any currently practising Counsellor or Psychotherapist who does not meet the levels 7 or 8, could be advised what part of the necessary training is currently missing from their qualifications, and given a period of time, for example 5 years, to reach the necessary level of training to qualify.

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

Response: As per my response above, I believe the minimum level of qualification should be Level 7, leading to the title of Counselling Therapist (equivalent to current Counsellor).

I would wish to ensure that knowledge of psychopathology, and knowledge of the DSM method of diagnosis, does not lead to psychotherapists being qualified or required to diagnose and treat mental health conditions as per the DSM. Psychotherapists and accrediting bodies should be diligent about avoiding being drawn into meeting the client through the perspective of diagnosis and treatment. There is great value for clients in psychotherapy retaining different status from psychiatry or clinical psychology in this regard. The psychotherapist's office is a place for exploration, understanding and healing, not for diagnosis and labelling.

Any practitioners who do not reach Level 7 academic level of qualification, and do not wish to work towards Level 7 building on their previously attained qualifications, could be awarded another distinct title, to be determined. It should be clear to the public that these practitioners have not trained to the minimum level required to be registered for practice as Counsellor.

However, a practitioner who specialises in another form of therapy for example physical therapies, who also attains Level 6 or below in the QQI awards standards for Counselling and Psychotherapy, could be given recognition for that distinct training under separate titles.

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

Response: Level 7 award the title of Counselling Therapist; Level 8 award the title of Counselling Psychotherapist; Level 9 award the title of Research Psychotherapist. The permission to practice under these titles would continue to be subject to ongoing quality control by the accrediting bodies.

Part of each professional title could also indicate the theoretical model in which the Psychotherapist has specialised in her practice, for example Counselling Psychotherapist (Humanistic Integrative).

Responses submitted by:

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