Written Submission on the Proposal to Regulate Counsellors and Psychotherapists
under the Health and Social Care Professionals Act 2005

Public Consultation,
Professional Regulation Unit,
Department of Health,
Hawkins House,
Dublin 2, D02 VW90.

Dear Sir/Madam,

- On August 31, 2016, Minister for Health, Simon Harris TD, called for submissions on the Proposal to Regulate Counsellors and Psychotherapists under the Health and Social Care Professionals Act 2005. Within a week, The Times Online, Ireland edition, published on Monday, September 5, 2016, an article by Ellen Coyne on an undercover interview conducted on a counsellor from a crisis pregnancy counselling agency, The Women’s Centre, run by Eamonn and Agatha Murphy, at 9 Berkeley Street, Dublin 7. It is very difficult not to regard these 2 events as related.

- On that same day, September 5, 2016, RTÉ 1, Radio and Television, ran a Pravda-like trial by media of The Women’s Centre. Grave exception was taken to claims that the counsellor made regarding the link between abortion and breast cancer, and abortion and subsequent abuse of other children in the family of a woman who has an abortion. 3 prominent pro-
abortion medics were interviewed during the day who attempted to debunk those claims. The medics are Dr Peter Boylan, President of the Institute of Obstetricians and Gynaecologists; Dr Seán Daly, consultant obstetrician at the Coombe Maternity Hospital; and Dr Rhona Mahony, Master of Hollis Street Maternity Hospital.

- No attempt was made to give a fair hearing to the medical evidence for the claims made by the counsellor from The Women’s Centre. All 3 medics interviewed are on record as supporting the liberalization of the law on abortion. Dr Peter Boylan, in fact, helped to draft the Labour Party policy on the Repeal of the 8th Amendment, and was present at the launch of that policy before the most recent General Election. Evidence in favour of the counsellor’s claims are to be had in the attachment, a Chinese meta-analysis; and in Dr Philip G. Ney’s book, *Deeply Damaged* (Pioneer Publishing: Victoria, Vancouver Island, 3rd edition 2015).

- The Private Member’s Bill, introduced at First Stage by Deputy Brendan Howlin, Leader of the Labour Party, on October 19, 2016, was dealt with at Second Stage on Thursday, November 17, 2016. Minister for Health, Simon Harris TD, said during the debate on Second Stage that he’d be supporting Deputy Howlin’s Bill, but nevertheless that he had discovered various flaws in it.

- Deputy Howlin’s Bill is the latest effort in the attempt to shut down those genuinely pro-life crisis pregnancy counselling centres that don’t conform to pro-abortion thinking within the medical and paramedical professions. When the Travel [13th] Amendment, and Information [14th] Amendment to *Bunreacht na hÉireann*, were being proposed to the electorate in 1992,
they were done so on the basis that the Republic of Ireland shouldn’t become a police state. As things stand the Crisis Pregnancy Agency/HSE Crisis Pregnancy Programme have worked in practice to facilitate abortions abroad, as only 2 of the 16 agencies associated with it don’t themselves facilitate what is, in effect, abortion referral, but even the 2 exceptions, apparently, are required to refer to those agencies who are willing to give abortion-facilitating advice and information. Yet the original 8th Amendment contains the words ‘and, as far as practicable, by its laws to defend and vindicate that right [right to life of the unborn]’. And unless, and until, it is changed by the electorate in a referendum, it remains the law of the land. Ministers are required to respect the Constitution.

- The CORU Response called for by the previous Minister for Health, Dr James Reilly, shows conclusively that the matter of regulating counsellors, in particular, is far from settled in several countries, and that it has thrown up difficulties that are difficult to resolve. Minister Harris seems to favour a fast-track approach to regulation in that he rejects the CORU Response’s recommendation that a two-speed approach be adopted to progressing the matter.

- Psychology, and psychiatry even, are considered by many scientists as ‘soft sciences’. All too often true science is damaged by scientism, *i.e.* the belief that science is a religion, in fact, and has dogmas. But we know that even in the ‘hard sciences’ fashions come and fashions go. There have been changes of opinion over the decades about how to treat bad cholesterol, whether statins are of any use, whether eggs are good or bad for you; how to treat diabetes — by tablets, or by injection of insulin, on the one hand;
or by proper diet and exercise on the other. Any of us who have been touched by suicide within our larger family will realize how difficult that is to predict. I personally know of a case where a schizophrenic killed his father in the most brutal fashion, and boasted about it in the local pub afterwards. His psychiatrist, a short while before, had had the bright idea of lowering the dose of the schizophrenic’s medicine, because the psychiatrist didn’t consider him to be a serious risk to anyone. I regularly see the schizophrenic in the centre of Dublin City, though he is meant to be a patient in Dundrum Mental Hospital.

- The regulation of counsellors should not be entangled with the political issue of whether abortion should be liberalized further or not. Unless we are to become a Cuban-like Trotskyite banana republic, approaches to crisis pregnancy counselling that don’t find favour with prominent pro-abortion medics, should not be subject to irrational censorship, and should be allowed to continue their activities, as they have saved many many lives from abortion over the years. The State, for its part, should take seriously its duty to defend and vindicate the Constitutional rights of the unborn. It would seem at present that the HSE Crisis Pregnancy Programme is an obstacle to that. It should also respect the Constitutional rights of genuinely pro-life counsellors and others, as set forth in *Bunreacht na hÉireann*, Article 6.1°.i, Article 44.2.1°, and Article 44.2.3°; this last one, especially, as it covers the freedom from disabilities and discrimination on the grounds of religious profession, belief, or status.

Your sincerely,

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Treasurer/Secretary,

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Wednesday, November 30, 2016.

in conjunction with Richard Greene, Chairman, ADFAM.