



**Submission to the Minister for Health
Regarding Statutory Registration of Counselling and Psychotherapy
from
The Irish Institute of Cognitive and Humanistic Psychotherapy**

Introduction

The Irish Institute of Cognitive and Humanistic Psychotherapy (IICHP) was formed in 1993 under its former title of Irish Institute of Counselling & Hypnotherapy. It has been an active member of the Psychological Therapies Forum (PTF) since its inception in November 2005 and subscribed fully to the [submission](#) to the Government in September, 2008 for the statutory regulation of Counselling and Psychotherapy (see **Appendix 1**). IICHP holds that the professions of both Counselling and Psychotherapy should be subject to state regulation in the interest of the protection of the public.

Question 1 - Should Counselling and Psychotherapy be subject to State regulation?

The Irish Institute of Cognitive & Humanistic Psychotherapy is strongly in favour of State regulation of Counselling and Psychotherapy. This, in our organisation's view, will be superior to any form of voluntary regulation in terms of public protection.

Question 2 – The role of the Health and Social Care Professionals Act 2005?

IICHP considers it essential that Counselling and Psychotherapy be regulated as professions under the Health and Social Care Professions Act 2005.

Question 3 - If the professions are to be regulated under the 2005 Act would be appropriate to regulate one or two professions under one registration board?

IICHP (under its former title of IICH) subscribed to the PTF 2008 submission to government, and agree that it is appropriate to regulate the two professions. They also agree with the PTF that there should be distinct educational requirements for each (see the PTF submission). We also agree that Counselling and Psychotherapy be regulated under one registration board.

Question 4 – Grandparenting qualifications for existing practitioners, having regard to the QQI Awards standards

The PTF has produced a document on Grandparenting with which we (IICHP) are fully in agreement (see **Appendix 1**).

Question 5 - The appropriate level of qualifications for future applicants for registration, having regard to QQI Awards standards

IICHP agrees with the position of the PTF that future applicants wishing to use the title Counsellor or Psychotherapist should only be eligible to do so when educated to QQI Levels 8 and 9 (or equivalent) respectively and when their professional training meets with CORU standards or equivalent.

Question 6 - The title or titles to be protected for the exclusive use of registrants

The IICHP suggests the use of the titles 'Counsellor' and 'Psychotherapist'. We realise that other professions use 'Counsellor' in their title (e.g. Legal Counsellor, Guidance Counsellor or Financial Counsellor). We suggest that, for clarity in these cases, the additional descriptor should be used. In terms of therapy, however, the single words 'Counsellor' and 'Psychotherapist' are well understood by the public and both names should be protected for this reason.

12th November, 2016
Dublin

Psychological Therapies Forum
- Counselling & Psychotherapy -

Public Protection

**Submission
on
The Statutory Registration
of
Counsellors
&
Psychotherapists
in Ireland**

(Final Document April 08)

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Conclusions & Recommendations

Sincere thanks are due to the many national organisations for Counselling & Psychotherapy in Ireland (Appendix 1) who participated actively in this process and shared of their clinical knowledge, organisational time and resources. Our thanks are due to Minister Tim O' Malley who prompted, informed and welcomed this submission. The group would also like to acknowledge the support and expertise received from Simonetta Ryan, Maeve O'Brien and Caroline Kelly of the Department of Health & Children. Special thanks to Mr Frank Scott Lennon who facilitated the submission process.

Throughout the fifteen meetings over the two and a half year period much debate and discussion took place. It has also established a clear consensus and pathway to the establishment of a state registration board for "Psychological Therapists".

The Health and Social Care Professionals Act 2005 facilitates the State to initiate a registration process, Section 27 of the Act states: "The object of the registration board of a designated profession is to protect the public by fostering high standards of professional conduct and professional education, training and competence among registrants of that profession." It is also quite clear that the role of "Psychological Therapist" falls within the scope of the Act as section 4 (3) (d) defines (for the purposes of the Act) a health or social care profession as: "any profession in which a person exercises skill or judgment relating to.....the care of those in need of protection, guidance or support."

The work of this group indicates a consensus among the 5000 Counsellors & Psychotherapists in Ireland to come under the remit of the Health and Social Care Professionals Act 2005. The group has formulated three specific recommendations which create a consensual and smooth pathway into the future, ensuring Ireland is at the cutting edge of “Psychological Therapy” whilst offering the optimal public protection.

Recommendation One

That the name of the proposed registration Board be: “PSYCHOLOGICAL THERAPISTS”.

Recommendation Two

That the titles “COUNSELLOR” and “PSYCHOTHERAPIST” be protected within the registration board.

Appendix 2 – Background and Current Work of the PTF

The Psychological Therapies Forum (PTF) was established in 2005 at the behest of the Minister of State with responsibility for Mental Health, Mr. Tim O'Malley T.D. to formulate a position regarding the future regulation of counselling and psychotherapy in Ireland. The PTF currently comprises nominees from nine professional associations involved in the practice and voluntary regulation of counselling and psychotherapy in Ireland. The Forum is independently facilitated by Mr. Frank Scott-Lennon. It normally meets in plenary sessions four times per year and other work is regularly undertaken by small working groups on an ongoing basis. The work of the PTF is funded by donations from its member associations and the participation of members is voluntary. The work is focused on professional standards and practice and well as regulation. **The ethos of the PTF is that this work supersedes the interests of any single member association.**

The current members of the PTF are identified below and their nominated representatives. All members support this submission in response to the call for Public Consultation.

Name	Nominee of
Mary Johnston	ACCORD
Kathleen Meagher	Addiction Counsellors Ireland (ACI)
Jim Meaney	Association of Professional Counsellors & Psychotherapists (APCP)
Denis Ryan	Association of Professional Counsellors & Psychotherapists (APCP)
Eve Watson	Association of Psychoanalysis and Psychotherapy of Ireland (APPI)
TBA (Poss. Joanne Mahon)	Irish Association of Christian Counsellors (IACC)
Derval Ryan	Independent Expert
Rhoda Draper	Irish Institute of Cognitive and Humanistic Psychotherapy
Eileen Prendiville	Irish Association for Play Therapy & Psychotherapy (IAPTP)
Orla McHugh	National Association of Pastoral Counselling & Psychotherapy (NAPCP)
Liam Lally	National Association of Pastoral Counselling & Psychotherapy (NAPCP)

Appendix 3 – Definitions of Counselling and Psychotherapy

The PTF sought to synthesise international definitions of both counselling and psychotherapy and presented a consensus position on both, incorporating in each case a statement on both the core elements of counselling and psychotherapy in a definitional sense, as well as the focus of professional activity in both complimentary disciplines. In summary, the key definitional distinctions and implications for professional practice relate to the capacity and preparedness of practitioners to understand and manage a continuum of complexity.

In essence, counselling is primarily concerned with supporting individuals to achieve insight and greater self awareness in order to make decisions around aspects of their lives in a holistic way, including moments of crisis be they social, cultural and/or emotional within a relational context, with the overall aim of counselling being to help clients recognise opportunities to help them live in more satisfying and rewarding ways as individuals and as members of society.

We contend that the counselling process is characterized therefore by relational efforts directed to support, empower and facilitate clients change through the application of recognized cognitive, affective, expressive, somatic, spiritual, developmental, behavioural, learning, and systemic principles.

Psychotherapy, involves the comprehensive, deliberate and planned treatment of complex impairments, such as those identified above, by means of scientific or evidence based psychotherapeutic methods, delivered through a therapeutic relationship, with the objective of mitigating or eliminating the established symptoms and/or to change disturbance patterns of behaviour, cognitions, emotions and/or attitudes in the treated person”.

Psychotherapists’ intervene in cases where there are serious levels of impairment of thought, cognition, mood, emotional management, perception or memory that may seriously impact on the person’s judgement, insight, behaviour, communication or social and interpersonal functioning.

Commonality and Distinction

While both the terms “counselling” and “psychotherapy” are frequently used interchangeably there are educational and professional distinctions between both areas of practice. Consequently a registration board will need to comprise individuals who hold a nuanced understanding of the issues of commonality and distinction.

Appendix 4 – Proposed Membership of Inaugural Registration Board

Proposed membership structure of an inaugural registration board could include experts with the following types of expertise with 8 members from the professions and 9 from other stakeholder domains of interest and expertise;

Professional Interest Members

- 4 Representatives practising in the professions (2 from Counselling and 2 from Psychotherapy)
- 2 Representatives engaged in the education and training of persons in the practice of the profession (1 from counselling and 1 from Psychotherapy)
- 1 Representative with management/clinical Supervisory expertise in counselling/psychotherapy services in the public health and/or social care sector
- 1 Representative management/ Clinical Supervisory expertise in counselling/psychotherapy services in the voluntary or private sector providing health or social care.

Public Interest Members

- 1 Representative of Academic Awarding Bodies (QQI or Universities) involved in the education and training of persons in the practice of the profession
- 1 Representative of employment agencies involved in the practice of the profession in the public health and social care sector
- 1 Representative of employment agencies involved in the practice of the profession from the voluntary or private sector.
- 4 Representatives of the interest of the general public
- 2 Representatives of Client Advocacy Groups.

While this is larger than the type of Registration Board currently established by CORU for other disciplines, it is probably warranted at this juncture given the level of diversity of modalities and specialisms in both counselling and psychotherapy and the range of ‘vested’ interests.

Appendix 5 – Grandparenting

Four routes have been identified for enabling the transition of existing practitioners:

Route One: Approved Qualification:

This is a qualification approved by the Registration Board by bye-law. If you hold an approved qualification you do not need to provide details of any other qualification with your application.

Route Two: Schedule 3 qualification:

This is a qualification listed in Schedule 3 of the Health and Social Care Professionals Act 2005 for existing practitioners under Section 91. A person holding a Schedule 3 qualification does not need to provide details of any other qualification.

We propose that:

- Professional training programmes that operated in the past, and which do not meet the proposed standards, be included in the list of Schedule 3 qualifications, given that successfully completing such programmes has historically been the long-established, traditional training route for counsellors and psychotherapists in Ireland.
- That providers of training programmes that do not meet the proposed standards be given sufficient time to either bring their own courses up to the new agreed standard or arrange linkage with other providers whose courses already meet the new standard.
- Students currently enrolled on training courses that do not meet Schedule 3 standard, and recent graduates of such courses, may need special grandparenting arrangements.

Route Three: Letter of Recognition/Accreditation:

This is a qualification gained outside of the Republic of Ireland which has been recognised by the Registration Board for the profession or other designated Competent Authority in the Republic of Ireland. A person holding a Letter of Recognition/Accreditation for an international qualification does not need to provide details of any other qualification.

Route Four: Working in the Profession without Holding any of the Qualifications Recognised by CORU

A person who has none of the recognised qualifications listed above and who has been working as a counsellor/psychotherapist would be required to:

- **Provide Proof of Professional Practice:**

Provide evidence that s/he was practising in the profession in the Republic of Ireland for a period of *not less than 2 years during the five years prior to the opening of the register*. A line manager / supervisor or HR manager must complete a *Proof of Professional Practice Form* for each employment in this period.

If Self-Employed:

If self-employed in the five years up to the opening of the register, provide evidence to demonstrate your engagement in the profession for a period of **not less than 2 years during the**

five years prior to the opening of the register. The following is a list of provisions for private practitioners to prove engagement in the practice of the profession (in the five years prior to the opening of the register):

- Make a **self-declaration** regarding their practice **and**
- Provide proof of **professional indemnity insurance and**
- Provide a **Supervisor's** report **and**
- Make a self-declaration of commitment to abide by an agreed **Code of Ethics and**
- Provide **3 other items of proof** from the following list in order to satisfy the Board regarding their work in this field:
 - Copy of trading accounts
 - Proof of operational business addresses
 - Proof of membership of professional body
 - Details of proof of continuous professional development
 - Client confirmations
 - Proof of contracts for service
 - Promotional materials for private practice
 - Publications by the applicant in relation to the profession
 - Professional Lectures / Presentations relevant to the dissemination of knowledge and development of the field of counselling and psychotherapy

The Registration Board may choose, at its discretion, to request further details and proof in order to satisfy itself of professional engagement.

- **Provide Career History:**

- **General Information:** The information you provide may be used for verification purposes. You must give brief details (if available) of your entire working career since leaving school, including work outside of your profession. Reasons for leaving may include career advancement, career change or termination.
- **Professional practice:** Existing practitioners must use the career history section to show they have been engaged in the practice of the profession in the Republic of Ireland for a period of not less than 2 years in the 5 years prior to the opening of the register for the profession in the Republic of Ireland. Describe your main duties and responsibilities and examples of the kind of work you typically carry/carried out on a daily basis.
- **'Engaged in the practice of the profession'** will also include those in management, education and research directly related to the profession. Applicants for registration from the categories of management, education and research must demonstrate accountability and the ability to lead/manage/educate/research while demonstrating best practice through actions and knowledge.

- **Proof of Professional Practice Form:** A HR Manager or Line Manager / Supervisor must complete this form for each employment in the relevant five year period. The purpose of the form is to provide testimony by an employer of your engagement in the profession during the required five year period prior to the opening of the register for your profession. It should be signed and stamped by the organisation. We may contact your current/previous employers to confirm some or all of the information provided.
- **Professional body membership:** Give details of all professional bodies of which you are a member. The Registration Board may contact the professional body to confirm your membership and good standing.