

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

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## **Introduction**

This is a period of growing interest in issues related to Counselling & Psychotherapy and its regulation in Ireland. The roles of Counsellor and Psychotherapist are now recognised as being part of any best practice holistic response to the health and social care needs of our population.

It is imperative that the public shall be protected by promoting high standards of conduct, education, training and competence among the professions of Counselling and Psychotherapy. This protection is currently offered through a process of self-regulation. All of the bodies outlined in Appendix 1 provide codes of ethics and practice which their members must abide by. Each organisation also provides standards which a person must achieve before they are accredited as a Counsellor or Psychotherapist. Whilst this form of self-regulation indeed provides protection to clients of those organizations, it falls short of optimal protection as under our common law system it is possible for any person to take the title Counsellor or Psychotherapist and practice accordingly without the required training and competence.

This current anomaly does not lend itself to good clinical governance and the maintenance and improvement of high standards of patient/client care. The Health and Social Care Professionals Act 2005 creates a mechanism to drive forward the clinical governance agenda. It creates a framework through which practitioners are accountable for continually improving the quality of their services and safeguarding high standards of care by creating an environment in which excellence will flourish and optimal protection is offered to the public.

The Health and Social Care Professionals Act 2005 facilitates the State in providing optimal protection to clients who wish to avail of Counselling & Psychotherapy. Section 4 (3) (d) of the Health and Social Care Professional Act 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.”*

This definition quite clearly allows for the professions of Counsellor and Psychotherapist to fit within the spectrum and compass of the act. The agreement of all the participating groups in this process to opt for a registration board for Counsellors & Psychotherapists is a critical milestone in achieving this objective, as is the decision of all groups to adopt the name of “*Psychological Therapist*” to cover both professions.

The establishment of a State registration process for “*Psychological Therapists*” would close the common law loophole and consequently ensure higher levels of protection for the public. 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.*”

This submission has been written in the context of this interest and in response to a request from the Department of Health and Children. It follows an initial Forum on regulatory issues held at the Camden Court Hotel on November 10<sup>th</sup> 2005.

No national statistics exist on the numbers of Counsellors & Psychotherapists in Ireland or on the associations that represent them. This submission gives the views of the majority of Counsellors & Psychotherapists through the associations that represent or regulate them. The Counselling and Psychotherapy organisations behind this submission (Appendix 1) have a combined membership of over 5000 professionals and thus the recommendations from the group carry an authority on behalf of the vast majority of Counsellors and Psychotherapists in Ireland and facilitates the Department of Health & Children in expediting the process of State registration.

The Plenary Group met on fifteen occasions between November 2005 and April 2008. This plenary group was assisted and informed through the work of numerous

working groups throughout this period. The commitment and dedication of the participating organisations to this process is evidenced by the fact that over 150,000 EURO in professional and service fees was invested by the various groups in creating this submission.

The initial meeting was addressed by Mr Tim O'Malley, Minister of State at the Department of Health & Children. The Minister expressed an enthusiasm for the professions of Counselling & Psychotherapy to structure themselves in a format which would facilitate statutory recognition of both professions. He encouraged the group to formulate a submission to expedite and facilitate the professions to come under the auspices of the Health and Social Care Professionals Act 2005.

## STEPWISE SYNOPSIS OF THE PROCESS:

Date	Action
November 2005	<p>All groups agreed to submit a position paper outlining details of their organisation, including:</p> <ul style="list-style-type: none"> <li>Scope of practice and membership numbers</li> <li>Basic Training requirements</li> <li>Range of competencies</li> <li>Professional Development</li> <li>Post-training experience</li> <li>Supervision</li> <li>Personal therapy requirements</li> <li>Ethics &amp; Practice</li> </ul> <p>Regulation of Members, including issues around professional misconduct</p> <p>Indemnity insurance requirements</p>
Nov 2005	<p>Two separate working groups were established to examine in detail the theory and practice underpinning the professions of Counselling &amp; Psychotherapy.</p>
November 2005 – April 2006	<p>Detailed analysis of Health and Social Care Professionals Act 2005.</p>
April - September 2006	<p>Communications with Department of Health &amp; Children. Discussion and consensus that the two professions had enough similarities to come under one registration board titled "<i>Psychological Therapist</i>". This title was brought back to the executive of each organisation and received unanimous backing.</p> <p>The Act permits a Board to establish categories which in this case would protect the professional titles of Counsellor and Psychotherapist.</p>

September 2006 – March	<p>The legislation requires clear criteria around minimum baseline qualifications that individuals must have in order to be registered. The two groups set about articulating criteria for each category (Counsellor and Psychotherapist) to include:</p> <p>Baseline academic qualification for entry and exit from training.</p> <p>Baseline experiential requirements – Clinical hours, Personal Therapy and Supervision.</p> <p>Baseline Grandparenting arrangements for access to registration within the two year window as set out in the Act.</p>
April - June 2007	Draft Recommendations & final submission
June 2007 – April 2008	Consultation Process with all the organisations

## 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.

## **Recommendation Three**

That the following criteria are adopted for recognition and registration as Psychological Therapist.

### ***PSYCHOTHERAPIST (PSYCHOLOGICAL THERAPIST)***

#### **Baseline academic qualification for entry to training is:**

1. Degree or equivalent in human sciences (medical, psychological, social, educational etc).
2. Interview

#### **Baseline qualification and experience for registration as psychotherapist:**

Minimum four years of training in specific psychotherapy modality at master's level (1,400 hours) to include, for example:

1. 250 hours / sessions personal psychotherapeutic experience
2. 500 – 800 hours theory or methodology
3. 300 – 600 hours / sessions supervised clinical practice with clients/patients
4. 150 hours/sessions supervision
5. Clinical placement in a mental health or psycho-social setting.

#### **Criteria for grandparenting practicing psychotherapists**

Academic:

M.A. / post Graduate or equivalent psychotherapy training

Experiential:

1. 250 hours/sessions of personal psychotherapeutic experience and/or other modality-appropriate reflective process
2. 500 hours/sessions (minimum) of supervised client work in professional practice for not

less than five years.

3. 150 hours/sessions of supervision – ratio 1:10
4. Membership of a recognised professional psychotherapy body\* and subscribe to their code of ethics and practice.

\*such bodies must be existence for a minimum of four years

### **Counsellor (Psychological Therapist)**

Baseline academic qualification for Entry to training is:

1. a - Entry Level 1 –Leaving certificate or equivalent  
b - Entry Level 2 – relevant Degree or equivalent accredited prior learning considered.
2. Interview

### **Baseline qualification and experience for registration as Counsellor:**

Minimum 4 years training in specific counselling and psychotherapy modality Minimum 1250 hours to include:

600 hours of academic training including theory over minimum of 4 years

400 hours of supervised clinical practice with clients/patients during training

100 hours supervision (Supervision ratio 1:4)

150 hours Personal development experience to include minimum of 100 hours of personal psychological therapy.

Leading to a degree or recognised accredited equivalent in Counselling

(Training body responsible for undergraduate)

### **Criteria for grandparenting practicing Counsellors:**

1. Membership of a recognised professional counselling body\* and subscribe to their code of ethics and practice.
2. 500 hours (minimum) of supervised client work in professional practice for not less than five years.
3. 50 hours of supervision – ratio 1:10
4. Evidence of Continuing Professional development

\*such bodies must be existence for a minimum of four years.

## **APPENDIX 1**

ACCORD Marriage & Relationship Counselling Service

The Association for Psychoanalysis and Psychotherapy in Ireland (APPI)

The Irish Association for Cognitive Analytical Therapy (ICAT )

The Irish Association of Alcohol and Addiction Counsellors (IAAAC)

The Irish Association of Christian Counsellors (IACC)

The Irish Association for Counselling & Psychotherapy (IACP)

The Irish College of Psychiatrists (as of Jan 01, The College of Irish Psychiatrists)

The Irish Council for Psychotherapy (ICP) incorporating;

*Cognitive Behavioural Therapy (CBT)*

*The Irish Analytical Psychology Association (IAPA)*

*The Irish Association of Humanistic & Integrative Psychotherapy. (IAHIP)*

*The Irish Constructivists Psychotherapy Association (ICPA)*

*The Irish Forum for Psychoanalytic Psychotherapists (IFPP)*

*The Irish Forum for Child & Adolescent Psychotherapy (IFCAPP)*

*The Irish Group Analytic Society (IGAS)*

*The Irish Psychoanalytic Association (IPAA)*

*The Northern Ireland Institute Of Human Relations*

*The Irish Institute of Counselling & Hypnotherapy*

The Irish Gestalt Society (IGS)

The Family Therapy Association of Ireland (FTAI)

Marriage and Relationship Counselling Service (MRCS)

## APPENDIX 2

### HETAC FAN

