

The Irish Association for Counselling and Psychotherapy (IACP) Position Paper on Statutory Regulation and the difference between Counselling and Psychotherapy.

The intention of this document is to clarify IACP's position in relation to the following points:

- 1. IACP, as an Association, does not differentiate between Counselling and Psychotherapy.**
- 2. IACP sees no proficiency difference between Counselling and Psychotherapy.**
- 3. IACP recommends that Counselling and Psychotherapy should be regulated, by the State, with the same baseline academic and practice qualifications.**
- 4. Level 8 on the National Framework of Qualifications (NFQ) should serve as the baseline academic qualification for both Counselling and Psychotherapy.**
- 5. Other Important Regulatory Considerations.**

Introduction: As the possibility of regulation for the profession of Counselling / Psychotherapy in Ireland gains momentum at a political level, the Irish Association for Counselling and Psychotherapy (IACP) is carefully considering the implications this will have for the profession, practitioners and the public. CORU, the umbrella body made up of the Health and Social Care Professionals Council and 12 registration boards, has already begun the process of regulating some health and social care professions and, Quality and Qualifications Ireland (QQI), have recently published a draft consultation document on proposed academic standards for Counselling and Psychotherapy in Ireland. Furthermore, James Reilly TD - Minister for Health has given a public commitment to regulate Counselling and Psychotherapy, a position that is supported by many members of the Dáil. Regulation is to be strongly welcomed and will bring many advantages. For example, Counselling & Psychotherapy will become better understood and established and move to become part of the educational 'apparatus' of the state (e.g. to be offered in Universities), and will put an end to Counselling/Psychotherapy being viewed as an "add on" profession (as is currently reflected by HSE employment policies). In light of these most welcome developments, it is pertinent that the IACP carefully reviews and defines its position on the subject. The IACP is eager for regulation of the profession to come into effect as soon as possible. The IACP also wishes to ensure that there is agreement within the profession (including between Professional Associations) on the academic and practice standards at which regulation should be introduced. The IACP's priority is that that the baseline academic level suggested for regulation of a Counsellor/Psychotherapist, will be based on clear evidence and rationale.

What is the difference between Counselling and Psychotherapy?

A major question, that remains unanswered in any detail, is one that is most fundamental to the profession and the public. This question is: "What is the difference between Counselling and Psychotherapy?" IACP's position, as an Association, is that there is no difference between Counselling and Psychotherapy as we have found no practical or research evidence to support differentiation. On the IACP website, Counselling/ Psychotherapy are described in the following way:

“Counselling/Psychotherapy is for anybody. It can be of great support in times of crisis or change. Both counselling and psychotherapy involve the provision of professional assistance to people who are experiencing personal issues, in order to help alleviate those difficulties. Counselling tends to deal more with immediate issues that may have arisen more recently e.g. bereavement or relationship breakdown. Psychotherapy tends to deal with deeper, more long-term issues that may be rooted in the past e.g. a trauma, or, serious mistreatment where the effects of such are ongoing. Counselling and psychotherapy are terms that overlap heavily and are often used interchangeably. They incorporate the giving of attention and respect in a confidential relationship. It provides an opportunity to explore, discover and clarify ways of living more resourcefully towards greater wellbeing. Stress, Anxiety, Bereavement, Addiction and Relationship issues are some of the reasons why people engage the services of a counsellor/psychotherapist.”

As the largest Counselling/ Psychotherapy Association in Ireland, (3,500 members) we are well aware of the wide variety of views and ideas on this question. We recognise that the terms (and their usage) has evolved and adapted over time, and has been subject to a broad range of geographical and historical influences. The discussion of this subject has brought both helpful debate and strong disagreement. IACP appreciate that there are many differing but valid opinions and encourage all stakeholders to progress this matter by considering the variety of opinions on this issue and by engaging and contributing to further discussion. IACP will be formally requesting that its PTF partners re-engage fully in this discussion. IACP believes that this question has not yet been properly answered or explored by the Professional Associations (including IACP) or by the Psychological Therapies Forum (PTF) and that the original PTF decision, to discuss regulation of Counselling and Psychotherapy separately, was taken without any proper discussion or evidential base.

IACP has been exploring this question further and by looking at research, evidence and international practice. In summary, so far, IACP has noted that:

- **QQI:** In the recently published “**QQI Awards Standards for Counselling and Psychotherapy**”, no attempt was made to differentiate between Counselling and Psychotherapy, in any way, and QQI has presented standards that can be applied to either or both terms. Additionally, no attempt was made to define either or both terms. QQI state that it will be up to the professional organisations and the Regulator to make any distinction.
- **Internationally:** We have found that many international organisations do not specify a difference. For example, the Canadian Association for Counselling and Psychotherapy (CCPA – 5,000 members) and the British Association for Counselling and Psychotherapy (BACP – 39,000 members) do not differentiate between Counselling and Psychotherapy.
- **BACP Research:** The BACP have found no empirical evidence that there is a difference between Counselling and Psychotherapy. In terms of role, value and effectiveness, BACP believe that each occupational area has equal value. BACP’s research committee is an independent group, comprised of psychiatrists, psychologists, counsellors and psychotherapists from the UK and overseas and including several non BACP members and is tasked with offering independent advice on research issues to BACP. In 2006, the committee found there was “No theoretical, practical or research rationale for distinguishing between counsellors and psychotherapists.” (BACP Research Committee

Report, 2006). In other words they were unable to differentiate between the two on the basis of evidence.

- **Interchangeable usage of Terms:** We have found a high level of overlapping and interchanging of the terms counselling and psychotherapy by a wide variety of Practitioners, Course providers (including in the advertising of courses), Agencies and Associations throughout the profession, both in Ireland and Abroad.
- **Member Identification:** 73% of IACP members identify themselves as both Counsellors and Psychotherapists (2009 Research).
- **QQA:** The QQA (UK Quality Assurance Agency for Higher Education) found no reliable evidence of a significant difference. The QQA Benchmark statement on Counselling and psychotherapy states: “Despite numerous attempts by organisations and individuals to distinguish between the knowledge base, skills, responsibilities and activities associated with counselling and psychotherapy, **there is no reliable evidence that indicates any significant difference.** It is clear that the descriptive title given to professional psychological therapists depends largely on the core theoretical model to which they adhere, the setting in which they practise, and to some extent on the training they have received. Both terms are used to describe the explicitly contracted therapeutic process through which personal concerns are described, explored and processed. The term counselling has its origins in the word counsel, meaning 'to advise', but in contemporary professional practice advice is not part of normal practice
- **Membership Survey:** IACP has started to approach this question in more depth, and in August 2013, we surveyed our membership about the difference between Counselling and Psychotherapy, receiving over 700 responses. The questions asked in this, first survey on the subject, can be seen in Appendix 1. The responses to the survey showed that a majority of respondents (70%) answered “Yes” to the “Yes or No” question about whether they believed there was a difference. However, a low percentage (as little as 13% in some cases) provided supplementary information, or views, to questions 2, 3 or 4 (which asked for evidence and rationale to support the differences). The main suggested differences related to “depth” of therapeutic work, length of training & therapy and the developmental stage from which some client issues came. Throughout the responses, no empirical evidence (specifically requested) was forthcoming and none, whatsoever, in an Irish context. In other words, a majority of respondents felt there were some differences in practice and education, but had no supporting evidence relating to client outcomes. To complicate matters, there was a high level of overlapping in the answers. For example, therapeutic theory and practice techniques and client issues were cited, by different respondents, as issues and practice matters that were applicable to either or both Counselling and Psychotherapy. IACP listens to the voice of its members and the feelings expressed in the survey highlight to us the clear need for research in this area. We look forward to the Research arm of our Association engaging further with this topic.

Having carefully considered the information above (Historical developments & definitions, QQI's position; International research; Members identification and, Members views and information) the IACP Board concluded that little, if any, research has been done on the subject and that no evidence, whatsoever, exists to support the idea of a proficiency difference. The IACP Board also believes that the basis for suggesting regulation at different level appears unsound. Therefore, the **IACP clearly also state that, as an Association, we see no Proficiency difference between Counselling and Psychotherapy**. It is on this basis that IACP will continue its push for the statutory regulation of counselling and psychotherapy. IACP welcomes and will openly consider any empirical evidence produced that supports a difference.

What Academic Level should Counselling and Psychotherapy be regulated at?

The IACP Executive Board IACP recommends that both Counselling and Psychotherapy should be regulated at the same baseline academic and practice qualifications. The IACP Board has reviewed the QQI Awards document and the stated educational outcomes and has decided, on the basis of this expert information, **that level 8 on the NFQ is the most appropriate baseline academic level at which Counselling / Psychotherapy should be regulated**. IACP encourages and supports all practitioners to further their education and to educate themselves to higher academic levels (e.g. 9, 10). However, given the stated learning outcomes, we believe that the standard at level 8, is academically sufficient preparation for practitioners. IACP aims to work with PTF partners to develop detailed precise practice standards for Counsellors/Psychotherapists. IACP's medium term plan is to have counselling and psychotherapy properly connected to the education 'apparatus' of the state and not be seen as an "add on" profession (as it seems to be viewed by the HSE's current recruitment process). This will happen through discussion with the departments of Education, Health, the HSE and successful regulation outcomes.

Other Important Regulatory Considerations for the Profession

While IACP propose having the same baseline academic and practice standards, for both counselling and psychotherapy, we believe that there are other important regulatory considerations that are the PTF's responsibility to consider and advise on. We look forward to working with our PTF colleagues on the following topics:

Reducing public confusion:

- Currently, there is much public confusion about titles and functions within mental health. For example, the differences between; Psychiatry, Psychology, Counselling, Psychotherapy, Psychoanalysis and Social workers practising Counselling, are unclear to the majority of the general public. Regulatory proposals need to define the academic and practice levels (with empirical evidence and concise definitions of scope and practice). To suggest regulating without detailed engagement in this task (this currently remains undone), would add to an already confusing environment.

- The PTF needs to meet with Counselling Psychologists to discuss co-operation and development in relation to the overlapping areas of our professions and how the public can be best informed. For example, discussion needs to take place about the use of the title and term “Psychological Therapist”.
- When selecting a Therapist, clear evidence based information relating to scope and proficiency needs to be provided. The current PTF proposal to regulate at different levels indicates a proficiency difference – i.e. where one can be viewed as “better” than the other, or able to deal with matters that the other cannot. No evidence exists to support this and IACP believes this would add to public confusion.
- Agreed Definitions: Currently, multiple definitions and perceptions of counselling and psychotherapy exist. For example, various estimates (up to 400) of the number of types of Psychotherapy exist. Adding to the confusion is the fact that the practice of Psychotherapy was originally restricted to Medical Doctor’s (until the mid-20th century). Also, the general, psychological counselling, that IACP accredits (at an equal level to Psychotherapy), is sometimes confused with counselling qualifications in one area only (e.g. guidance counselling qualifications or specific ‘addiction only’ counselling qualifications) that are not accredited by IACP. IACP believe that the PTF need to work together to define the terms and inform the public. Until this is done in a unified way, the existing confusion aids those individuals and groups who seek to blur the lines about their qualifications and status.
- Where no evidence of a proficiency difference exists, regulating at the same level (e.g. level 8) helps the public by making it easier to understand that practice and outcomes are the same.

Increasing Public Safety:

- The current PTF proposal to regulate Psychotherapists at Level 9 on the NFQ would place members of the public at risk by indicating a level of competence that is currently not required or delivered in training. Currently, in many cases, practicing Therapists (from multiple Associations’) may have a Level 9 qualification, but may not have a level 8 qualification, in the same area. IACP wants all Counsellors /Psychotherapists to be better qualified rather than higher qualified and believe this can be achieved by regulating at an academic baseline level of level 8.
- The current situation is that standards of training are so variable that separate titles would not be a reliable guide to the skills and competence of the practitioner. (IACP recognise that it is this situation that Regulation seeks to address and supports the overall aim.)

- Where no proficiency difference exists, having the same baseline academic and practice qualifications for Counsellors and Psychotherapist, is a safer and better way in which to regulate Counselling and Psychotherapy.

Good Governance: As a professional body, IACP seeks to have optimal governance in place not only within our own Association, but within the profession as a whole. It is important that no, unwarranted or unfair advantages / disadvantages are given to any one group for reasons of protectionism or vested/conflicted interest. IACP considers that:

- Those saying there is a difference, without producing evidence, run the risk of being seen as having a vested interest (for example, wanting to charge more) in creating an artificial difference.
- It would be unfair to Psychotherapists & Counsellors to regulate at different baseline academic and practical standards in the absence of empirical evidence.
- It is the responsibility of the PTF members to ensure that equal time and voting rights are given to all groups at the table regardless of whether they are representing Counselling only, Psychotherapy only, or both (e.g. IACP). At present there is a lack of equality and at times a resistance to change this. We look forward to working with our PTF partners to redressing this imbalance. Until this situation is addressed, the PTF runs the risk of being seen as a protectionist group, looking to serve the interests of one group only.
- IACP considers that empirical evidence is necessary for a regulatory difference to be suggested as otherwise, a person describing themselves as a Psychotherapist might find themselves in a situation that clients decide not to go to them for therapy as the public believe they cannot do X or Y.
- Also, a person describing themselves as a Counsellor might find themselves in a situation that clients decide not to go to them for therapy as public believe they cannot do X or Y.
- The implication of this public confusion could lead to a reduction of work for Counsellors and Psychotherapists [based on the current draft PTF Submission Document (2007) being accepted by the Government] as it would infer evidence based client outcome differences, for which there is not support.

Confusion within the Profession: IACP believes that a declaration of a proficiency differentiation (through regulating at different levels) runs the risk of confusing and negatively impact the profession and would, in effect, create a division in the therapeutic field that does not exist in the workplace. Additionally;

- IACP believes that no proper consideration of the impact on the delivery of services (by agencies, courses, private practitioners etc..) if differentiation was to be agreed, has taken place. IACP believe that the effects of such would also negatively affect the clients and public. IACP believes the PTF need to discuss this subject.
- IACP believes that the profession needs to consider the legal and insurance implications of regulation on the stakeholders (Private Practitioners, Agencies, Professional bodies, Training bodies etc...). In particular, the impact of any proposal to differentiate between the two would need additional consideration.
- IACP believes that the profession needs to consider the implications of regulation on inter-agency and inter-Association and International agreements (e.g. reciprocity agreements between Counselling and Psychotherapy organizations). In particular, the potential negative impact of any proposal to differentiate between the two would need additional consideration.
- IACP acknowledges that the current situation is far from ideal, with highly variable standards in training and practice and applauds the principle of public protection. However, the current PTF proposal does not reflect or improve upon the provision of therapeutic services as it exists, but attempts to create an artificial distinction between Counselling and Psychotherapy.

If you have any comments or suggestions relating to this the content of this document please email liz@iacp.ie

IACP Executive Committee - Sept 2013.

For Further reading about the difference between Counselling and Psychotherapy please see: *“Counselling and Psychotherapy: A perspective on past history, current trends, and possible future directions”*. Marcella Finnerty, 2006. Eisteach Article.

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- IACP:** Irish Association for Counselling and Psychotherapy
- BACP:** British Association for Counselling and Psychotherapy
- CCPA:** Canadian Association for Counselling and Psychotherapy
- QQI:** Quality and Qualifications Ireland
- PTF:** Psychological Therapies Forum
- CORU:** Health and Social Care Professionals Council

Appendix 1

IACP Membership Survey Questions 2013

IACP surveyed our membership in August 2013 about the difference between Counselling and Psychotherapy, receiving over 700 replies. The questions asked were as follows:

1. Do you believe there is a difference between Counselling and Psychotherapy? **Yes** or **No**.

If **Yes**, please articulate the difference you see in the following areas: (For each question, **please include specific examples and provide a rationale for the differences**. Please also include any supporting evidence, e.g., Research, on which you base the difference).

2. Education & Training: _____
3. In Practice (i.e. the difference, in clinical practical terms, between what a Counsellor and a Psychotherapist can do): _____
4. Are there any client issues that only a Counsellor (as distinct from a Psychotherapist) can work with? - Yes / No Please state _____
5. Are there any client issues that only a Psychotherapist (as distinct from a Counsellor) can work with? - Yes / No Please state _____

Please note: This, first, survey did not seek views on proficiency differences.