



College of Psychiatrists of Ireland (CPSYCHI)

Irish Association for Counselling and Psychotherapy (IACP)

Psychological Society of Ireland (PSI)

Joint Position

Legislation Required to Prohibit Artificial Intelligence (AI) Therapy

Banning AI therapy in Ireland on a legal basis is urgently needed; it cannot be a replacement for therapy or a therapist or counsellor.

The advent of artificial intelligence (AI) has dramatically and rapidly changed the way we interact with technology. While there are undoubted benefits to this technology, it also introduces new dangers and risks, particularly in relation to AI therapy and AI companions. This is especially evident in the areas of mental health, mental illness and psychotherapy, as evidenced by recent tragedies in which people using AI therapists have gone on to complete suicide. It is, of course, important to differentiate between AI therapy and on-line therapy provided by appropriately trained professionals.

The following are particular areas of concern:

- People who are mentally ill, distressed or vulnerable may choose to engage with AI therapy as an alternative or addition to evidence-based therapy with a properly qualified therapist or counsellor. Aside from lacking the necessary skills, the AI therapist may validate thoughts of self-harm or suicide and fail to reflect appropriate context and lead to or prompt the individual to die by suicide. Furthermore, the AI therapist does not have the legal or ethical obligation to alert others of risk, nor does it have the ability to do so. Those suffering from delusions (believing things that aren't true) or paranoia may have their erroneous beliefs confirmed or elaborated upon by an AI therapist which could lead to tragic outcomes should they act on their beliefs, harming themselves or others.
- Healthy relationships are the foundations of being a healthy human. Lifelong behavioural and/or relational patterns that can drastically impact and harm our mental health may stem from our upbringing or environment. Therapy is a place we can go to identify, challenge and change these patterns. Outcomes of therapy rely on many factors, but the most important is the therapeutic alliance. Plainly put, the therapeutic alliance is the real human relationship between therapist and client. It requires empathy, honesty, congruence, collaboration and an ability to tolerate difficult emotions. Therapy requires genuine connection with in the moment feedback of what is emotionally happening in the space or knowing when to leave space for developing emotion. This helps clients identify emotions and build emotional tolerance in a safe environment. It requires well trained professionals to identify, process and hold what's happening in the room. It is achieved by human connection. There is no evidence that AI can achieve this. More importantly, a person using an AI therapist is not trained to know what good process is and what it is not. This makes them extremely vulnerable at a time when they need genuine human connection.

- Our psychological wellbeing depends on meaningful interpersonal connection and belonging. Replacing human therapy with AI therapy risks normalising substitute artificial relationships for real human connection. It also reinforces withdrawal from actual human relationships. It can deepen a dependency on artificial interaction and undermine opportunities to build real and valid relationships. At a time when loneliness is recognised as a public health concern, policy should strengthen human connection and not replace it with simulated interaction.

This position does not reject AI in a broader sense.

AI has legitimate uses, including providing information/signposting, approved/regulated psychotherapeutic tools and administrative support.

This position does not oppose the possible use of AI in training and educational contexts.

For example, where the AI functions as a simulated client for the therapist or counsellor to practice and improve engagement skills on specific areas. Such bounded uses may enhance competence and confidence when appropriately used.

The concern addressed here is the replacement of human therapists and counsellors with autonomous AI systems in the delivery of counselling and psychotherapy to the public.

AI systems develop rapidly and scale quickly. Without clear legal boundaries, AI Therapy could become normalised before adequate safeguards, evidence and accountability frameworks are in place.

Appropriately trained, accredited and regulated therapists cannot be replaced or augmented by artificial intelligence. Allowing this to happen or, worse still, become commonplace will undoubtedly pave the way for further tragedy and suffering. For these reasons and those above, our organisations call for legislation banning the use of AI therapy in Ireland.

References:

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Resources:

College of Psychiatrists of Ireland www.irishpsychiatry.ie

Irish Association of Counselling and Psychotherapy www.iacp.ie

Psychological Society of Ireland www.psychologicalsociety.ie

Health Service Executive HSE <https://www2.hse.ie/mental-health/>