

# Public Consultation Report

on the Counsellors and Psychotherapists Registration Board Standards of Proficiency for Counsellors and Criteria for Education and Training Programmes (Counsellors)

September 2025

Bord Chlárúcháin na gComhairleoirí agus na Síciteiripeoirí Counsellors and Psychotherapists Registration Board



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#### Introduction

#### About the Counsellors and Psychotherapist Registration Board

The Counsellor and Psychotherapist Registration Board has statutory responsibility for the registration of members of the professions; approval and monitoring of education and training programmes; establishing the code of professional conduct and ethics and standards of performance to which Counsellors and Psychotherapists must adhere to and recognition of qualifications gained outside the State.

#### **About CORU**

CORU is responsible for regulating health and social care professions. It comprises the Health and Social Care Professionals Council and the registration Boards established under the Health and Social Care Professionals Act 2005 (as amended).

CORU's role is to protect the public by promoting high standards of professional conduct, professional education, training and competence amongst the designated professions.

The designated professions under the Act are clinical biochemists, counsellors, dietitians, dispensing opticians, medical scientists, occupational therapists, optometrists, orthoptists, physiotherapists, podiatrists, psychologists, psychotherapists, radiation therapists, radiographers, social care workers, social workers and speech and language therapists.



#### The Public Consultation Process

#### **Background**

The *Health and Social Care Professionals Act 2005 (as amended)* provides for the establishment of Registration Boards by the Minister for Health, with responsibility for maintaining registers for the health and social care professionals named in the Act that are subject to statutory regulation.

Following a Department of Health public consultation process in 2016, the then Minister Health, Simon Harris TD, made the decision to designate the professions of counselling and psychotherapy for regulation. On 27 February 2019, the then Minister established the Counsellors and Psychotherapists Registration Board, determining there would be one Registration Board with statutory responsibility for two distinct registers: one register for counsellors and a second for psychotherapists.



The fundamental objective of each Registration Board is to protect the public by fostering high standards of professional conduct and education, training and competence among its registrants.

To this end, Part 5 of the *Health and Social Care Professionals Act 2005 (as amended)* makes provision for the approval of education and training programmes (Section 48) and the monitoring of the continuing suitability of education and training programmes (Section 49). The Act also makes provision for each Registration Board to *issue guidelines concerning the requirements for its approval of education and training programmes* [Section 48(2)]. There are two types of requirements set by a Registration Board:

• Standards of Proficiency: the threshold level of knowledge and skills required to enable a person to practise safely and, in so doing, keep the public safe; and



Criteria for Education and Training Programmes: the requirements around how
a professional education and training programme is designed and managed to
ensure that it can consistently produce graduates who meet the standards of
proficiency.

Collectively, these two documents are known as a Registration Board's pre-registration education and training requirements.

Both documents are comprised of requirements that have been set by the Health and Social Care Professionals Council – known as *Framework Documents* – which detail the standards and criteria that are common across all the professions CORU regulates. Each Registration Board adopts the Framework set by the Council and is able to tailor it to meet the specific requirements of each profession, ensuring that the standards and criteria set reflect the identity and practice of the profession.

Following its establishment, the Counsellors and Psychotherapists Registration Board began the process of setting its pre-registration education and training requirements. The Board undertook a detailed scoping and review exercise, reviewing existing accreditation standards – where they exist – in Ireland, alongside **Quality and Qualifications Ireland's** *Award Standards for Counselling and Psychotherapy*.

In particular, the Board examined comparator entry level standards of proficiency used internationally. Recognising that in many jurisdictions professional title is not regulated or the practice is not regulated as a discreet profession in and of itself, <sup>1</sup> as is proposed in Ireland, the Board reviewed entry level requirements drafted by national professional associations. The Board undertook this detailed scoping work with the aim of identifying the threshold requirements for entry into both professions internationally in order to evaluate this against the current practice in Ireland to ensure that the work of the Board was reflective of both international best practice and of practice in Ireland.

As part of its work, the Board considered the following:

- British Association of Counselling and Psychotherapy (BACP, UK): Criteria for the Accreditation of Training Courses (Gold Book) including OPT Criteria
- Health and Care Professions Council (UK): Draft Standards of Proficiency prepared by the Psychotherapists and Counsellors Profession Liaison Group, 2011
- Partnership of Counselling and Psychotherapy Bodies (PCPB, UK): Scope of Practice and Education Framework
- European Association of Psychotherapy (EAP, Pan-European Membership Body): European Certificate in Psychotherapy
- Canadian Counselling and Psychotherapy Association (CCPA, Canada): Standards of Practice

<sup>&</sup>lt;sup>1</sup> It is noted that in a number of jurisdictions, especially across Europe, the practice of psychotherapy is regulated as part of a scope of practice for other professions such as psychologists, doctors and psychiatrists.



College of Registered Psychotherapists Ontario (CRPO, Canada): Evaluation
 Criteria and Possible Outcomes and Professional Practice Standards

In exploring how international jurisdictions set and articulate threshold standards for entry into practice, the Board focused on:

- identifying the knowledge and skills required at the entry point into practice i.e. day
  one for a new graduate following successful completion of an education and training
  programme;
- the distinctions in the knowledge and skills required at the entry point into practice between counsellors and psychotherapists;
- the distinctions between threshold entry standards and standards of practice, recognising the examination of some *Standards of Practice* documents;
- trends in international standards and how these compared to the practice of the professions in Ireland; and
- the articulation of standards to ensure understandability and clarity of the intended outcome

To all of this research, the Board also considered and factored into its drafting the Government of Ireland's *Sharing the Vision: A Mental Health Policy for Everyone*, alongside the stakeholder feedback received from stakeholders to the Department of Health's 2016 public consultation process and relevant academic research in area of professional regulation.

The Board prepared draft *Standards of Proficiency* and *Criteria for Education and Training Programmes* for both professions and published these proposals for public consultation. The Board invited feedback from stakeholders over an extended period of time, opening the process on Monday, 4 September 2023 and closing it on Friday, 1 December 2023. Two separate public stakeholder consultation processes were undertaken simultaneously: one process concerned the *Standards* and *Criteria* for Counsellors, and a separate process concerned the *Standards* and *Criteria* for Psychotherapists.

The consultation process sought to ensure that the draft requirements set by the Board are at the threshold level required for safe practice and entry to the professional register to ensure public protection and that they are proportionate and in line with the Board's obligations under Statutory Instrument 413 of 2022 which requires an assessment of proportionality to be conducted before the adoption of new or amending of existing regulations on professions, as required under Directive 2018/958 of the European Parliament and Council.

Following the close of the consultation process, the Board undertook a detailed review and revision process whereby it reviewed **all** of the submissions received before finalising, issuing and publishing its revised Standards of Proficiency and Criteria for Education and Training Programmes.



This report presents the proposals drafted by the Board, the feedback received and the Registration Board's response to it in respect of the *Standards* and *Criteria* for **Counsellors**.

#### **Publicising the Consultation Process**

A number of channels were used to publicise the consultation process and invite the submission of observations:

- An advertisement was placed in The Irish Times and Seachtain newspapers on 18
   September and 20 October 2023. (Appendix 1)
- Information on the consultation was hosted on the CORU website. (Appendix 2)
- An online feedback form was developed and a link to this form was included in the public consultation notice on the CORU website. (Appendix 3)
- CORU social media platforms were utilised throughout the consultation period, including X (formerly Twitter) and LinkedIn. (Appendix 4)
- An email highlighting the consultation process was issued to an extensive range of stakeholders including education providers of approved programmes and professional bodies.

People were invited to participate in the consultation process in a number of ways:

- visiting <u>www.coru.ie</u> and choose to complete an online feedback form, to print a copy
  of the form and post it, or email it to CORU
- emailing submissions to <a href="mailto:strategyandpolicy@coru.ie">strategyandpolicy@coru.ie</a>.
- posting written submissions to: Public Consultation, Strategy and Policy Unit, CORU,
   Infinity Building, George's Court, George's Lane, Smithfield, Dublin 7, D07 E98Y

#### **Supporting Guidance during the Consultation Process**

In advance of opening the consultation process, CORU held an Information Session webinar event on Friday, 1 September 2023, to which all stakeholders were invited and over 130 attended. This webinar was recorded and made available to all stakeholders via the CORU website, along with a copy of the PowerPoint presentation used during the session. (Appendix 5)

Alongside the launch of the consultation, CORU produced dedicated eBook resources (Appendix 6) and a Frequently Asked Questions section on the CORU website (Appendix 7) to support respondents in understanding the Board's draft requirements and assist in how to provide feedback to the consultation process.



## **Overview of Responses to Consultation**

#### **Response to the Consultation Processes**

Feedback was submitted through completion of an online questionnaire, hosted by SurveyMonkey, or through written form via email or hard copy submission. A total of 185 responses were received from stakeholders, specifically in relation to the draft *Standards of Proficiency for Counsellors* and *Criteria for Education and Training Providers (Counsellors)*. The table below provide a breakdown by type of response received:

Response Type	Total Number
Online Questionnaire	149
Email/Paper Submission	36
Total	185

Respondents were asked to identify if they were offering feedback on their own behalf or on behalf of an organisation:

Individual	164
Organisation	21

Feedback was received from the following respondents who agreed to include their names in the consultation report:

- Human Givens Network Ireland
- Addiction Counsellors of Ireland
- Irish Hospice Foundation
- National Association for Professional Counselling and Psychotherapy
- IICP College
- UCC
- Technological University of the Shannon
- Helplink
- Munster Technological University
- PCI College
- Finglas Counselling Service
- Northside Counselling Service
- ATCI Addiction Treatment Centres of Ireland
- ICHAS
- Accord
- ICPPD
- Therapists for Change
- Cork Counselling Services
- Irish Association for Counselling and Psychotherapy



- Dublin Business School
- Dublin Counselling and Therapy Centre



# **Acknowledgements**

CORU would like to extend its appreciation and thanks to all those that participated in the consultation process.



### Issues emerging from the Consultation Process

#### **Consultation Questionnaire**

The consultation questionnaire was divided into 5 sections:

- Part One Feedback on profession-specific Standards of Proficiency (Standard 5.9 onwards) under Domain 5: Professional Knowledge and Skills. Respondents were asked to consider each of the standards and identify whether they considered it to be set at threshold, partly threshold level or not threshold for entry into practice. Respondents who indicated the standard was either partly or not threshold were asked to provide a rationale to aid understanding of their response.
- **Part Two** Respondents were asked to consider if there were any omissions in the proposed *Standards of Proficiency* and, if so, explain their rationale and propose wording to rectify the omission.
- Part Three Feedback on profession-specific Criteria for Education and Training Programmes (Criterion 1.1 and Criterion 2.2). Respondents were asked to consider both criteria and identify whether they considered them to be set at threshold, partly threshold level or not threshold for entry into practice. Respondents who indicated the criterion was either partly or not threshold were asked to provide a rationale to aid understanding of their response.
- **Part Four** Respondents were asked to consider if there were any omissions in the proposed profession-specific *Criteria for Education and Training Programmes* and, if so, explain their rationale and propose wording to rectify the omission.
- Part Five Respondents were provided with an opportunity to provide any additional feedback or comment to be considered by the Counsellors and Psychotherapists Registration Board.

Email responses received were in the form of free text and did not follow the same structure as the questionnaire. When analysing these submissions, feedback against relevant standards or criteria was extrapolated and included with the questionnaire feedback for those same standards and criteria, thereby ensuring all feedback received – regardless of the means of submission – was reviewed and considered by the Board.

Please note that in the feedback presented below, the quantitative score for each standard and criterion reflects the responses to the online questionnaire only.

What follows below is the considered response of the Registration Board to the feedback received against each of the standards and criteria. This response is captured in two forms:

 firstly, the noting of high-level themes that consistently emerged through the consultation feedback; and



• secondly, the Board's rationale for any amendments and/or additions made to the Standards of Proficiency and Criteria for Education and Training Programmes. This section details the response of the Board to both the qualitative and quantitative feedback received and what – if any – changes were made to the standard or criterion in light of this feedback.



#### High Level Thematic Issues emerging from Qualitative Feedback

In reviewing the feedback received from stakeholders, which was specifically identified as a response to both the proposed *Standards* and *Criteria* for counsellors only and more broadly to the *Standards* and *Criteria* for both professions, the Counsellors and Psychotherapists identified a number of overarching themes that emerged in the qualitative feedback received. These overarching, high-level thematic issues are identified below as a preface to the individual standard and criteria feedback that follows.

#### Issue One: Breadth and Variety of Perspectives

Across the consultation responses for both professions there emerged a variety of different perspectives that spanned views of the areas of practice for both professions or whether there were differences between both professions, oftentimes underpinned by viewing of the professions through the lens of different modalities of practice. Indeed, a frequent comment from respondents was a recognition that there was not a single viewpoint within and between the professions of counselling and psychotherapy. This fragmentation of opinion was borne out through the consultation responses.

While the Board recognised and acknowledged the differing opinions and perspectives presented by stakeholders, it agreed that its responsibility under the *Health and Social Care Professionals Act 2005 (as amended)* was to act on the direction set by designation of two professions:

- firstly, to establish two distinct registers one for counsellors and one for psychotherapists – that each have distinct and differentiated pre-registration education and training requirements for entry; and
- secondly, in setting these pre-registration education and training requirements, to ensure that they could be applied through various modalities of training/practice.

#### **Issue Two:** The Role of the Standards of Proficiency

Throughout the feedback received, respondents frequently identified that the draft *Standards of Proficiency* did not reflect the nature of their current practice as existing and experienced counsellors.

The Board emphasised in reviewing this feedback that the role of the *Standards of Proficiency* is to set the *threshold* knowledge and skills that an individual must have on *day one* of their practice in order to be safe and competent to enter into practice.

In setting these *threshold* knowledge and skills, the Board recognised that proficiency to practice a profession can be described on a continuum. The *threshold* represents the point on this **continuum** that is the minimum level of proficiency for safe and effective practice.

For every professional, their knowledge and skill evolve over time and will change through their experience, engagement in continuing professional development, additional post-qualifying training. This means that the *Standards of Proficiency* set by the Board may not fully reflect how an existing practitioner sees his or her current practice. This is because the *Standards* set only the knowledge and skills needed on **day one** for practice. They are not meant to wholly reflect



the practice of existing practitioners. The *Standards* are used as a tool to determine readiness for entry into practice. They do not define the knowledge or skills for existing practitioners.

#### Issue Three: The Role of the Criteria for Education and Training Programmes

There was also an understanding presented through the consultation feedback that appeared to consider both the *Standards* and *Criteria* as separate documents that worked in isolation. This was particularly evident in feedback around the regulatory requirements set in the *Criteria*.

As the Board reviewed the feedback provided and worked on rearticulating its *Standards* and *Criteria*, it reaffirmed the connectedness between both documents, particularly highlighting that the *Criteria* cannot be used without the *Standards*. It noted that it is the *Standards of Proficiency* that are used as the metric to determine eligibility for the registration of new graduates when registers are opened. Therefore, while the *Criteria* may state that a minimum number of practice placement hours might be required as part of an education and training programme, ultimately before a student qualifies from an education programme he or she must have demonstrated achievement of **all** the *Standards*, even if this requires more exposure to practice placement.

In addition, the Board noted that a significant volume of responses to the consultation were concerned that its pre-registration education and training requirements would be applied retrospectively to existing practitioners. As noted in the response above to Issue Two, the purpose of both the *Standards* and *Criteria* is to set the requirements for new entrants into the profession at the time the registers open. For existing practitioners, there is provision in the *Health and Social Care Professionals Act 2005 (as amended)* to make registration applications (when the register opens) through the grandparenting process, also known as the Section 91 registration pathway.

#### Issue Four: Impact on Different Modalities

A commonly identified theme that emerged through consultation responses was the reflection of specific modalities of training/practice in the *Standards of Proficiency*.

In articulating its *Standards*, the Board worked to write high-level, outcomes-focused standards that were concerned with the articulating the knowledge or skill a student must have achieved in order to practice as a 'counsellor' or 'psychotherapist' rather than as a 'counsellor' or 'psychotherapist' working through a specific modality.

This principle of ensuring that the requirements set were focused on the high-level outcome of learning as part of an education and training programme (the *what* of learning) rather than prescribing the means through which this learning must take place (the *how* of learning) guided the work of the Registration Board.

The Board concluded that this approach provided flexibility to education providers in the design of their education and training programmes (in that they can still design a programme through the lens of a particular modality), while also ensuring that there is a consistent standard set across all modalities of practice and ultimately providing the mechanism through which it is possible to protect the professional titles: 'counsellor' and 'psychotherapist'.



Issue Five: Distinctions between counsellors and psychotherapists

Throughout the course of feedback, respondents raised concerns around the distinctions articulated in the draft *Standards of Proficiency* between the role of the counsellor and the role of the psychotherapist.

In considering these responses, the Board noted two key principles that guided its work in reviewing and revising its draft *Standards* for both professions:

- the designation of two distinct professions by the Minister for Health, each with its own register, requires that the Board establish distinct and separate *Standards* for entry to that register. It is not possible for a Board to use the same standards for entry onto different registers. Therefore, the Board is required to set distinct and separate *Standards* for counsellors and psychotherapists; and
- the Standards of Proficiency, as has been identified under Issue Two above, set the threshold requirements at the point of entry into practice on day one as either a counsellor or psychotherapist. They do not define the practice of a counsellor or psychotherapist after that point. All registered practitioners will be subject to a Code of Professional Conduct and Ethics that will require them to work within the scope of their knowledge, skills and competence. As such, the Standards of Proficiency should not be read through the lens of a current practitioners experience and practice but rather through the lens of a graduate entering in to practice on day one, recognising that his or her knowledge and skills will develop over the course of practice.

#### Issue Seven: Reading the Standards as a Holistic Document

Throughout the consultation feedback, oftentimes respondents identified in feedback against an individual standard that it did not capture all elements or components of an area of practice – for example, a standard concerning boundaries in a therapeutic relationship that did not specifically address the role of the practitioner within that therapeutic alliance was raised.

While the Board agreed that the role of the practitioner – and his or her personal involvement – within the therapeutic relationship was a vital element of safe professional practice, it highlighted that each standard should not be read in isolation. The Board noted where, in other standards, this skill was identified.

Therefore, the Board emphasised throughout its review process that each of the standards taken together articulate the *standard of proficiency* required of an individual seeking entry into practice.

#### Re-Sequencing of the Standards of Proficiency for Counsellors

In addition to the Board's consideration of the articulation of each individual standard, it also reviewed the sequencing of the standards with the aim of thematically organising the *Standards of Proficiency* document. To this end, the Board structured the profession-specific standards around five broad areas:

1. Foundational Knowledge and Skills for Counselling Practice



- 2. The Counselling Process
- 3. The Counselling Relationship
- 4. Self-Reflexivity in the Counselling Process
- 5. Other Key Proficiencies for Counselling Practice

Where standards have been reviewed and rearticulated, there are a number of instances where they have been resequenced as well. This accounts for change of numbering identified in the rearticulated standards included in the table below.



#### Part One: Feedback on Profession-Specific Standards of Proficiency under Domain 5: Professional Knowledge and Skills

**Standard 5.9:** Be able to outline typical presentations from mild to severe presenting concerns and be able to treat presenting concerns, within the limits of their knowledge skills and competence or refer to another professional.

#### **Registration Board Response**

While the Board acknowledged that the majority of respondents considered this standard as meeting threshold standards, upon review of its articulation it concluded that it was attempting to achieve two distinct aims:

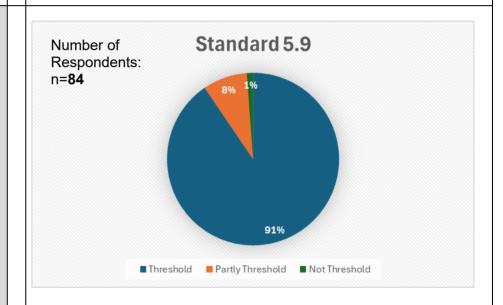
- Recognise that counsellors require knowledge of a range of presentations in order to assess if they, at entry to the register, can work with the presenting issue; and
- Articulate the scope of practice that a counsellor, at entry to the register, can work within.

The Board agreed to divide this standard into two distinct standards.

**Standard 5.9:** Work therapeutically with mild to moderate psychological issues in order to target and address an identified presenting issue

This standard is written to emphasise the scope of presentation types a counsellor, at entry into practice, can work with: mild to moderate psychological issues. The phrase 'in order to' is used in the construction to direct attention on the practice of counselling at the entry level: the presenting issue.

**Standard 5.10:** Know and be able to recognise in service user presentations the continuum of mental wellbeing from mild to severe and complex psychological distress in order to identify service user suitability for the therapeutic intervention offered.



This standard reflects that at the very foundation of practice is a need to know about the range of potential psychological distress a service user could present with so that the practitioner can decide whether the presentation is within their scope of professional practice at the point of entry into practice. The Board concluded that this was essential for public protection.



Standard 5.10: Be able to practise counselling that is within counsellor's level of skill, knowledge and professional judgement.

#### **Registration Board Response**

The Board acknowledged that the majority of respondents considered this standard as meeting threshold standards.

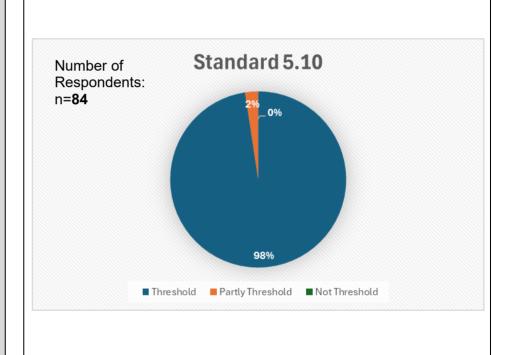
The Board noted feedback that suggested the standard should be clearer on the recognition by a counsellor, at entry into practice, of when a presenting issue is beyond his or her scope of practice.

While the Board identified a number of standards that already reflect this skill (Standards 1.1, 5.10. 5.19), it concluded that the area that needed to be captured in the standard was the next step of the process when a presentation is deemed to beyond the counsellor's professional scope: the making of the referral and the skills associated with this.

A revised standard was therefore drafted then that focused on the single outcome of referring to another professional or service if appropriate.

The Board agreed the following wording of the standard:

**Standard 5.23** Be able to refer to another professional or service where appropriate.





**Standard 5.11:** Be able to demonstrate the ability to use counselling skills to convey empathic understanding and to be informed by and connect compassionately to the perspective of the service user.

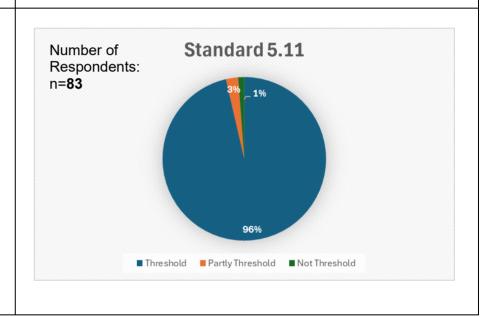
#### **Registration Board Response**

The Board noted the high percentage of respondents who were of the opinion that the proposed standard was set at threshold level for entry into practice.

In reviewing the articulation of the standard, however, the Board agreed revised wording to provide greater clarity around the intended skills-based outcome required from the standard.

The Board agreed the following wording of the standard:

**Standard 5.25** Be able to apply counselling skills to convey empathetic understanding of and compassion for the service user's perspective.





Standard 5.12: Be able to use counselling skills to build therapeutic relationships including the ability to demonstrate active listening skills.

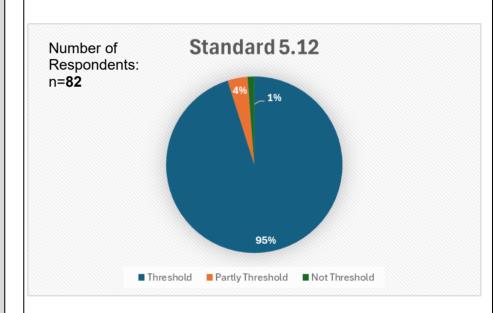
#### **Registration Board Response**

The Board acknowledged that the majority of respondents to the consultation considered the draft standard to be set at threshold level for entry into practice. The Board considered the qualitative feedback submitted by a number of respondents.

In light of feedback received and a review of the draft standards holistically, the Board took the decision to rearticulate the standard on counselling skills, combining two existing draft standards: – the above standard on 'effective listening skills' and a second on being able to *initiate and manage the therapeutic engagement by developing rapport and trust in the context of short term counselling intervention*. Both existing standards used the same construction around skills being applied to the establishment and maintenance of the therapeutic relationship – i.e. they had the same outcome (that skills would be used to manage the therapeutic relationship). This reflected a level of repetition it was felt could be eradicated if the specific skills being articulated in each standard were combined into a single standard.

There are two qualifiers used in the standard which frame how the skills are to be applied in practice. The principal requirement is that the counselling skills applied in practice are connected directly with service user engagement. The second qualifier is that the skills are used to 'establish and develop' the relationship, recognising the service user engagement component.

The articulation uses 'including' which identifies the key skills that need to be addressed but is not definitive.



The Board agreed the following revised wording for this standard:

**Standard 5.24** Apply counselling skills – including listening skills, rapport and trust building – to establish and develop a therapeutic relationship in order to facilitate service user engagement with the agreed counselling aims.



**Standard 5.13:** Be able to analyse the theories of therapeutic relationship dynamics and be able to establish, build, maintain and conclude a therapeutic relationship with a service user.

#### **Registration Board Response**

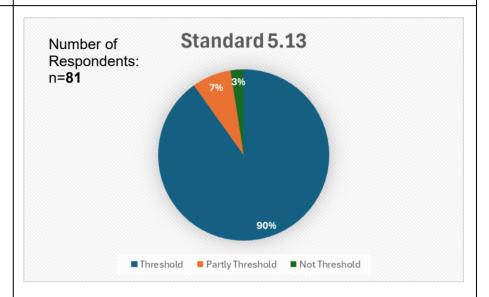
The Board noted that the majority of respondents, as part of the quantitative metric of the consultation process, were of the opinion that the standard was set at threshold level for entry into practice.

The Board considered the qualitative feedback provided and in light of it reviewed the intended outcome of the standard. The intention of this standard was as a skills-based requirement, focused on the skills of establishing, building and concluding a therapeutic relationship. It was deemed not necessary to include a knowledge-based requirement – as originally presented with the phrase 'theories of therapeutic relationship dynamics' – for two reasons:

- such theories of relationship dynamics that underpin therapeutic relationships are inherent to the successful achievement of this standard and, therefore, do not need to be explicitly stated as the achievement of the standard would be impossible without them; and
- existing standards already capture the knowledge base of theories that underpin and inform the therapeutic relationship for example: 5.10, 5.11, 5.13 and 5.14

Furthermore, having reviewed the standards holistically, the Board agreed that its original standard 5.18 concerning professional and ethical boundaries was more appropriately integrated with the skill of establishment, building and concluding of the therapeutic relationship.

To this end, the Board agreed to divide this standard into two distinct standards as follows, with revised articulations:



**Standard 5.16:** Be able to establish, build and maintain a therapeutic relationship with a service user safely and ethically, recognising and managing professional and ethical boundaries.

**Standard 5.22:** Be able to evaluate service user progress against agreed counselling aims and collaboratively, with the service user, agree when to conclude the therapeutic relationship, ensuring this is achieved in a safe and ethical manner.



Standard 5.14: Be able to collaborate with the service user to set specific goals for change; to re-contract goals and timeframes as necessary.

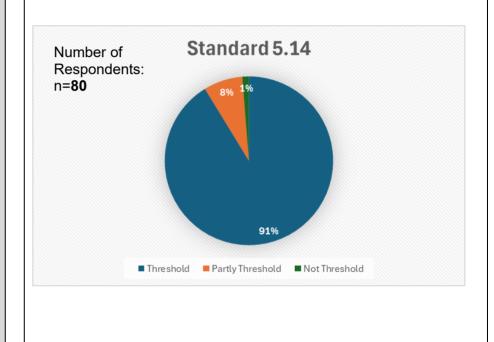
#### **Registration Board Response**

The Board recognised that the significant majority of respondents considered the draft standard to be set at threshold level.

On the basis of the feedback received and having considered the intention of the standard as originally drafted, the Board changed reference of 'goals' to 'aims', recognising that the concept of 'goals' could be interpreted as modality specific. The Board also noted qualitative responses to the reference to 'change' and agreed with respondents that this was not appropriate in this standard. It agreed, using the phraseology adopted across all other standards, to refer instead to 'the identified presenting psychological issues' and that the aim of counselling intervention is to 'target' and 'address' these presenting issues.

The Board agreed the following revised wording to this standard:

**Standard 5.20** Be able to collaborate with the service user to set specific aims to target and address the identified presenting psychological issue and recontract aims and timeframes as necessary.





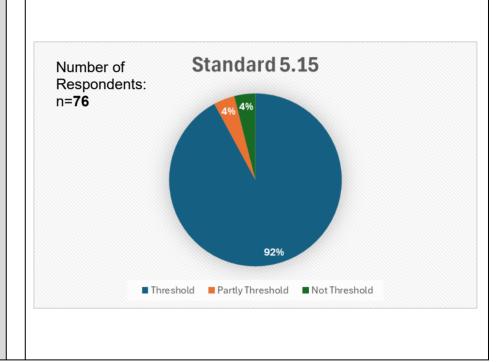
Standard 5.15: Be able to recognise and manage the dynamics of power and authority as experienced in the therapeutic relationship

#### **Registration Board Response**

The Board highlighted the high level of support received from stakeholders that this standard was set at threshold for entry into practice.

Having reviewed the qualitative comments received, the Board concluded that the standard, as articulated, should be read in the context of all other profession-specific standards that are concerned with the managing of a therapeutic relationship – i.e. that power and authority should be read and understood in the context of knowledge of intersecting psychological factors in service user presentations, the key skills of empathetic understanding and listening skills, along with requirements around ensuring professional and ethical boundaries.

In examining the feedback received against this standard through the lens of these other standards, the Board concluded that no amendments were needed to this standard.





Standard 5.16: Be able to orient service users to the counsellor approach and explain the responsibilities of the counsellor in a therapeutic relationship

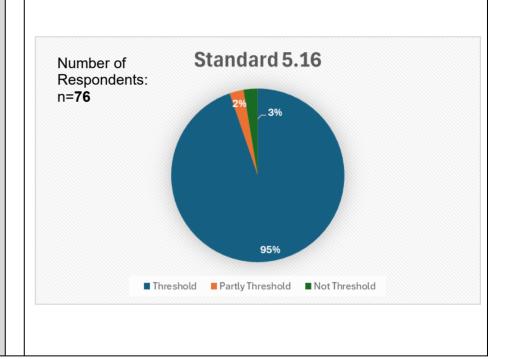
#### **Registration Board Response**

While noting the majority of respondents were of the opinion that the standard was set at threshold for entry into practice, the Board reviewed the qualitative feedback provided by stakeholders in the context of the intended outcome of the originally drafted statement.

The Board reviewed its original articulation, in particular the phrase: 'orient service users to the counsellor approach'. The Board agreed to revise the wording to more clearly articulate the outcome of the standard to be that the practitioner is able to explain his or her role to the service user and to establish the parameters of the work that can be undertaken by the counsellor.

The Board agreed the following rearticulation to this standard:

**Standard 5.17**: Be able to appropriately communicate the role and responsibilities of the counsellor in the therapeutic relationship.





#### Standard 5.17: Be able to initiate and manage engagement by developing rapport and trust

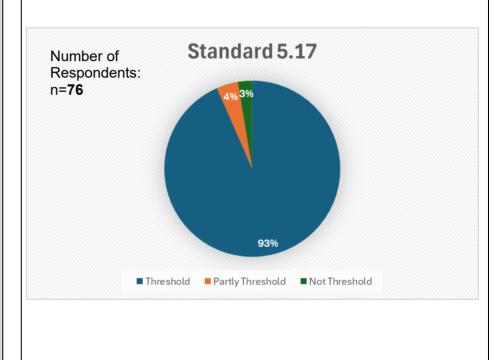
#### **Registration Board Response**

While the majority of respondents were satisfied that this standard was set at threshold level for entry to the register, the Board reviewed all of its standards holistically and considered this standard in light of the originally drafted standard 5.12 (above) and this standard.

The Board concluded that both standards were concerned with the skills needed to establish and maintain a therapeutic relationship and, in terms of assessment of skill, were concerned with the same outcome of learning. The Board agreed that such repetition could be reduced if both standards were combined into a single standard.

The Board agreed the following wording:

**Standard 5.24:** Apply counselling skills – including listening skills, rapport and trust building – to establish and develop a therapeutic relationship in order to facilitate service user engagement with the agreed counselling aims.





Standard 5.18: Be able to identify professional and ethical boundaries with service users and be able to identify and manage any associated challenges

#### **Registration Board Response**

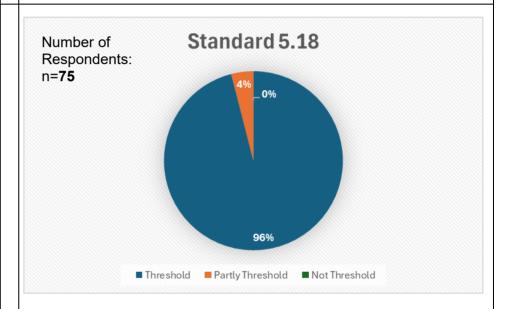
The Board acknowledged the significant majority of respondents were of the opinion that the draft standard had been set at threshold for entry into practice.

As identified above, in its response to standard 5.13, the Board concluded that the skills articulated in standard 5.18 were more appropriately integrated with the skill of establishment, building and concluding of the therapeutic relationship. As such, it was agreed to the different standards – as originally drafted – into a single standard. The Board noted that the combination of both elements provided a strengthening to the requirement and a level of robustness that combined the process of engagement with a service user with the professional and ethical requirements that underpins such engagements.

Therefore, the Board agreed the following rearticulation:

**Standard 5.16** Be able to establish, build and maintain a therapeutic relationship with a service user safely and ethically, recognising and managing professional and ethical boundaries.

The original drafting of the standard combined the issue of 'professional and ethical boundaries' with 'identifying and managing challenges'. As articulated, the identification and management of challenges were bound with the management of professional and ethical boundaries.



The Board concluded that, as a learning outcome, if a student is able to demonstrate that he or she is able to *recognise and* manage professional and ethical boundaries that the identification and management of challenges – should they arise – is part of the demonstration of this skill. Therefore, the Board did not feel that 'challenges' needed to be explicitly articulated in the revised draft.



**Standard 5.19:** Be able to critically reflect on the role of the counsellor in the therapeutic process and be able to manage personal involvement in, and contribution to, the process of counselling

#### **Registration Board Response**

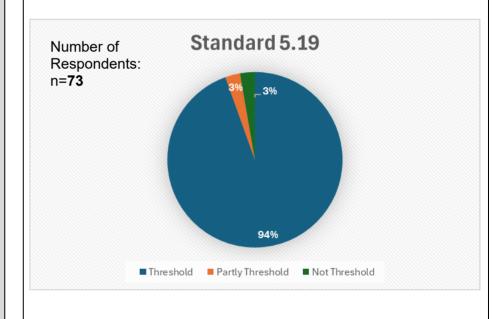
The majority of respondents to the quantitative question presented in the questionnaire considered the draft standard to meet the threshold level for entry into practice.

The Board also considered the qualitative feedback provided by stakeholders and highlighted that the intention of this standard concerned specifically the two skills of being able to *reflect* on the role of the counsellor in the therapeutic process and *manage* potential personal involvement in – and, by extension, contribution to – the process of counselling. The Board emphasised that this standard should be read in conjunction with other standards, such as 5.33 concerning personal emotional responses and 5.35 around recognition of conscious and unconscious dynamics in clinical supervision.

The Board concluded that the standards should be read holistically and that it is not possible – or desirable, for the purposes of training and assessment – to craft standards that attempt to capture all elements of practice into a single statement.

The Board agreed then that only a minor amendment to the articulation of this standard to aid succinctness of articulation (removal of the second: 'be able to') was required:

**Standard 5.32** Be able to critically reflect on the role of the counsellor in the therapeutic process and manage personal involvement in, and contribution to, the process of counselling.





Standard 5.20: Be able to articulate the necessity of engaging in clinical supervision to support, sustain and improve practice

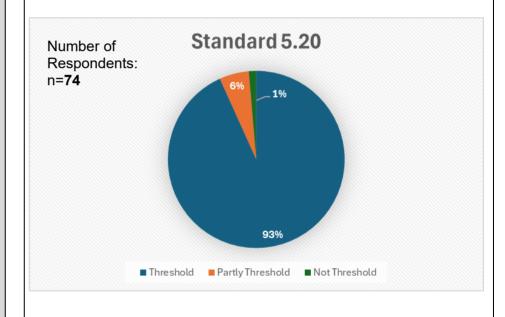
#### **Registration Board Response**

The Board acknowledged that the majority of respondents considered the standard to be set at threshold level. The Board considered the qualitative feedback that the standard should be amended to focus on 'demonstrating engagement in regular supervision', emphasising a mandatory requirement to attend clinical supervision.

The Board concluded that the intended outcome of the standard was a knowledge-based standard, not a skills-based standard. The Board agreed that it was not a skill to attend clinical supervision; the skill is found in the managing of the clinical supervision process. It was highlighted that these skills were captured under other standards, including: 5.33 around the recognition of personal, emotional responses (and the role of supervision in this process) and 5.35 concerning the ability to critically reflect on the presence of conscious and unconscious dynamics in clinical supervision.

The Board considered the original articulation of this standard through the lens of the intended learning outcome and its assessability. It concluded that its original wording around being able to 'articulate' did not adequately capture its intended outcome which was to require more considered and critically thinking (a higher order thinking skill than 'articulate') of the role and importance of clinical supervision. Therefore, the Board agreed to make minor amendments to the articulation of the standard:

**Standard 5.34:** Be able to critically reflect on the necessity of engaging in clinical supervision to support, sustain and improve practice.





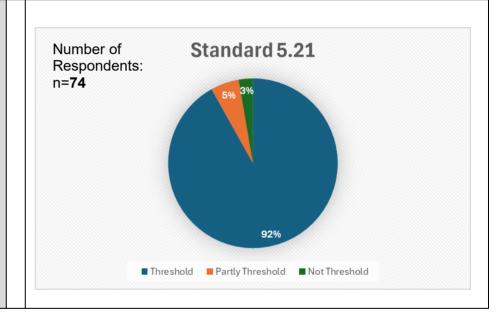
**Standard 5.21:** Be able to recognise personal emotional responses, vicarious trauma and the need to develop effective self-care strategies and burnout prevention

#### **Registration Board Response**

Noting the number of respondents who indicated the standard was drafted at threshold, the Board also noted the qualitative feedback suggesting that the issue of self-care and burnout should either be separated out from the recognition of personal emotional responses as a distinct standard or should be deleted completely from the standards.

The Board concluded that both areas – personal emotional responses and self-care and burnout prevention strategies – were essential for entry into practice to ensure safe and effective practice. It also concluded that there was an inherent relationship between personal emotional responses and the need to develop strategies to manage such responses.

On the basis of this rationale, the Board concluded that no amendment was necessary to the originally drafted standard.





**Standard 5.22:** Be able to demonstrate skill in the technologies and communication methods required for the delivery of counselling in a virtual setting and be able to apply these therapeutically and safely while protecting service user privacy and confidentiality

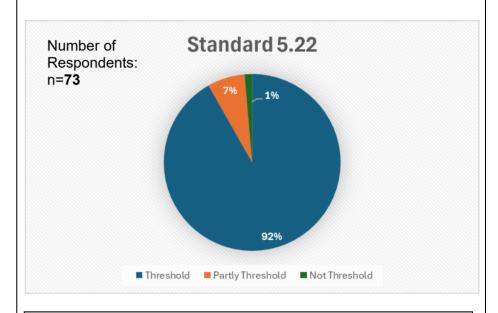
#### **Registration Board Response**

While the Board acknowledged that the majority of respondents considered this standard as meeting the threshold for entry into practice, it also noted qualitative feedback suggesting that it was not.

The Board emphasised that the *Standards of Proficiency*, when set, apply only to new or recent graduates at the time a register opens and are not applied retrospectively to existing practitioners (for whom there is an alternative registration pathway).

More broadly, when considering the education and training of future practitioners, the Board noted that future graduates will be autonomous practitioners who will have the opportunity to work across a range of settings – including private practice – and in light of the increased used of technology in the delivery of therapeutic services, it was essential that this standard be retained for public protection purposes. While some respondents noted that there are specific dynamics to the delivery of online therapeutic services, the Board noted that the articulation of the standard requires that practitioner are able – at entry to practice – to apply such services therapeutically and safely while ensuring service user privacy and confidentiality.

Upon review of the articulation of the standard, the Board made a minor amendment to its articulation (removal of the second 'be able to'). The revised articulation agreed by the Board is:



**Standard 5.36:** Be able to demonstrate skill in the technologies and communication methods required for the delivery of counselling in a virtual setting and apply these therapeutically and safely while protecting service user privacy and confidentiality.



**Standard 5.23:** Be able to appraise theories and research on mental health and obstacles to wellbeing and be able to use these to facilitate improved treatment outcomes

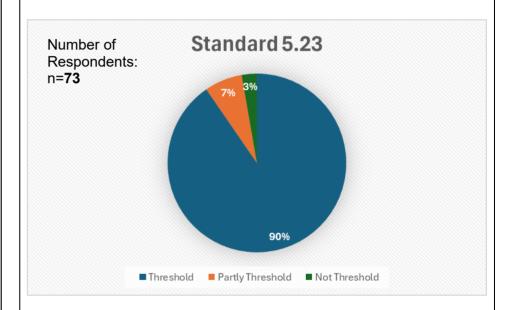
#### **Registration Board Response**

The Board noted that the majority of respondents considered this standard was set at threshold level for entry into practice.

Following a review of the qualitative feedback provided and consideration of the original intent behind the articulation of the standard, the Board agreed that slight amendments to its articulation to aid clarity of understanding:

- Removal of 'Obstacles': the Board agreed that inclusion of 'obstacles' unnecessarily narrowed the application of the standard, implying that research around wellbeing was only required in respect of the obstacles to it. In a revised articulation, the use of 'obstacles' has been removed;
- Replacement of 'Outcomes' with 'Approaches': the Board, viewing the
  original standard through the lens of assessability, recognised the
  challenge of assessing an improved 'outcome' given that it may not always
  be possible to have an improved outcome. Furthermore, the Board noted
  that the appraisal of research does not directly correlate with an improved
  outcome but informs a treatment approach. In a revised articulation,
  'outcomes' has been replaced by 'approaches'; and
- Removal of second 'be able to': in line with decisions taken in other standards to allow for succinctness of articulation the second 'be able to' has been removed.

The revised standard is now articulated as follows:



**Standard 5.14:** Be able to appraise theories and research on mental health and wellbeing and use these to develop and implement improved treatment approaches.



Standard 5.24: Be able to utilise a theoretical framework for practice with psychosocial factors and the impact on well-being

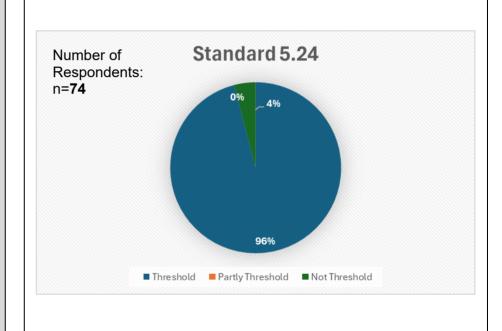
#### **Registration Board Response**

The Board recognised that a significant majority of respondents to the questionnaire considered this standard to be articulated at the threshold level for entry into practice.

The Board also noted that a number of respondents suggested that the clarity of the standard could be improved. In reviewing its articulation, the Board agreed that that the intended outcome of the standard was that entrants into practice must be able to recognise that service users present with a range of – oftentimes intersecting – psychological factors and that, through their practice, they must respect these factors. The Board, in rearticulating the standard and clarifying its intended outcome, was informed by feedback provided as part of the omissions portion of the consultation feedback form around Equality, Diversity and Inclusion.

The Board agreed the following rearticulation:

**Standard 5.26** Be able to identify and apply knowledge of intersecting psychological factors – including diversity – in service user presentations, recognising their impact on well-being, and work in an inclusive, sensitive and non-discriminatory manner.





Standard 5.25: Be able to analyse the impact of trauma on psychological functioning and be able to integrate this knowledge to inform practice

#### **Registration Board Response**

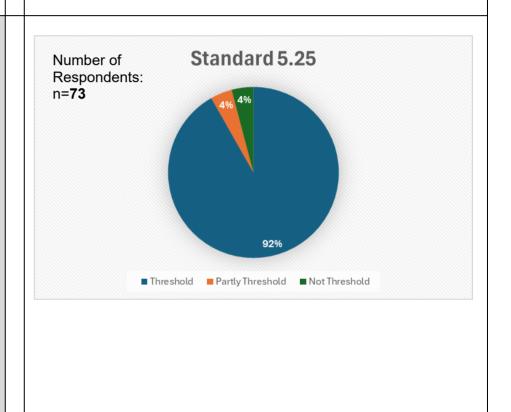
The Board noted that the majority of respondents considered this standard to be set at threshold level for entry into practice.

There were some responses received that discussed the area of trauma within counselling practice. Following detailed consideration by the Board, it agreed that the intention of this standard was to ensure that, at entry into practice, a counsellor would be trauma aware and able to integrate this knowledge into his or her practice in order to inform practice. The Board agreed that this knowledge and its application to counselling practice was a foundational area of practice and essential to ensure safe and effective care.

The Board emphasised that the *Standards* were set at threshold entry into practice. The Board's comments under Issues Two of its High-Level Thematic Analysis Feedback above are relevant to understanding how this standard has been articulated.

The Board agreed the following revised wording:

**Standard 5.28** Be able to demonstrate awareness of the impact of trauma on psychological functioning and integrate this awareness to inform practice.





**Standard 5.26:** Be aware of the potential for harm to the service user in exploring trauma therapeutically, understand the need to refer on and be able to identify suitable referral pathways

#### **Registration Board Response**

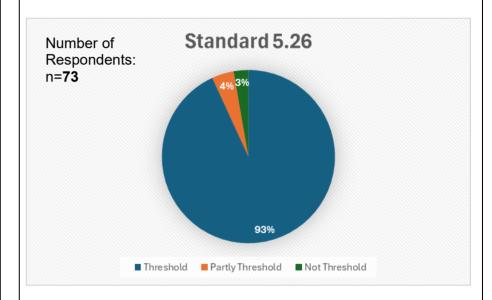
The Board recognised that most survey respondents considered this standard to be set at threshold level for entry into practice.

The Board also reflected on the qualitative feedback provided and its intended outcome when drafting the original standard. It emphasised that this standard should be read in conjunction with the previous standard concerning awareness of the impact of trauma on service user presentations and that this standard builds on that skill. It also noted that the intention of the standard was not to suggest that counselling practice cannot take place with a service user who presents with trauma, but rather that the counsellor – at entry into practice, on day one of their practice – needs to have the ability to recognise the scope of their knowledge and skills and work safely within that.

In light of these considerations, the Board agreed that amendments were required to the articulation of the standard to ensure the clarity of its intended outcome. To this end:

- the Board replaced the phrase 'potential for harm in exploring trauma therapeutically' with 'potential for exploring trauma within the parameters of a counselling relationship' in order to emphasise the application of the standard within a counselling relationship; and
- the removal of 'referral onwards' as this skill is already sufficiently captured in standards 5.21 and 5.23.

The Board agreed to rearticulate this standard to read:



**Standard 5.29** Be able to recognise trauma in service user presentations and know the potential for harm in exploring trauma within the parameters of a counselling relationship.



**Standard 5.27:** Be able to identify potential risk of suicide, self-harm or harm to others and implement early management supporting the immediate safety of the service user, and make referrals for additional treatment

#### **Registration Board Response**

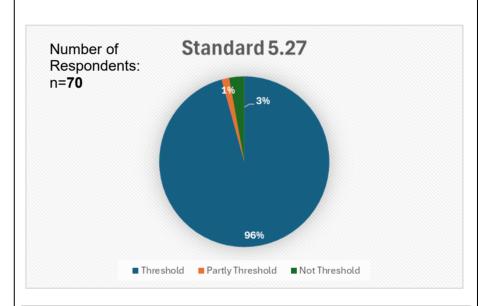
While the majority of respondents to the quantitative portion of the consultation process were in agreement that the proposed standard was set at threshold level for entry into practice, the Board noted and reviewed the qualitative feedback received that suggested there needed to be a greater focus in the standard around the need to support the service user.

In light of this feedback, the Board made a number of minor amendments to the articulation of the standard:

- Addition of 'Evaluate': the Board agreed that a counsellor in order to support the service user needed to not just identify such potential in a presentation, but evaluate it as well to inform the next steps to take;
- Replacement of 'Early Management' with 'Safety Plan': the Board noted that the reference to a 'safety plan' was a clearer, more concrete expression that would aid the assessment of this standard:
- Replacement of 'Referral for Additional Treatment' with 'Escalate as appropriate': the Board agreed that this articulated more clearly the range of next steps that could be required i.e. further treatment may not be the only step; there may be other agencies that need to be part of a safety plan.

In addition, the Board noted that the development of a safety plan reflects the need to protect both the service user and any other individuals, including the practitioner him or herself.

In light of these considerations, the Board agreed the following revised wording:



**Standard 5.31:** Be able to identify and evaluate potential risk of suicide, self-harm or harm to others, implement a safety plan to support the service user and others and escalate as appropriate.



Standard 5.28: Be able to demonstrate knowledge of crisis intervention and prevention and be able to work with people in crisis for improved outcomes

#### **Registration Board Response**

The Board acknowledged the high level of support from respondents that were of the opinion this standard was set at threshold for entry into practice.

Having reviewed the qualitative feedback received and considered this standard holistically in conjunction with all other drafted standards, the Board agreed the following amendments:

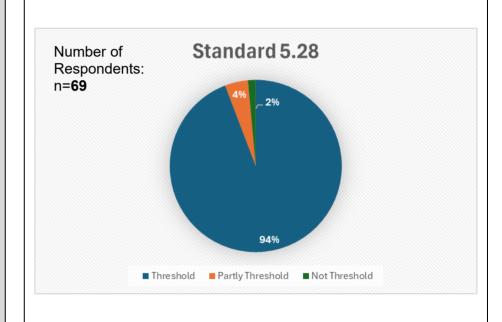
- that reference to 'crisis intervention and prevention' could be viewed as restrictive and is replaced with 'presentations'; and
- the reference to 'improved outcomes' was removed as it was agreed that this would be challenging to assess and measure as part of an education and training programme.

In addition, the Board qualified the working with service users with the adverb 'therapeutically', clarifying the nature of the work expected of a counsellor when engaging with a crisis presentation.

Once again, the Board concluded that this standard should be read in conjunction with all other standards around the presentations that counsellors – at entry into practice – are trained to work with.

The Board approved the following revised wording:

**Standard 5.30** Be able to demonstrate knowledge of crisis presentations and be able to work therapeutically with people experiencing crisis.





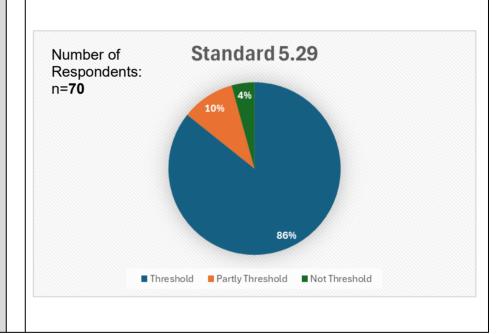
Standard 5.29: Have a critical awareness of the need for organisation and resource management in various practice settings

## **Registration Board Response**

While the Board noted that the majority of respondents were of the opinion that this standard was set at threshold level for entry to practice, the qualitative feedback provided suggested a level of ambiguity around its intended outcome. Indeed, the Board recognised that feedback suggested the standard was referring to clinical practice organisations and management processes in such settings, when in fact, this was not the intention of the originally drafted standard.

In order to clarify the original intention underpinning the standard to apply across a range of practice settings and be concerned with the practical administrative management of practice – such as diary management, phones, scheduling – the Board agreed to make minor amendments to the original articulation:

**Standard 5.37** Have a critical awareness of the need for organisation and resource management in a variety of settings, including private practice.





Standard 5.30: Be able to demonstrate knowledge of the effects of medications, prescribed or otherwise, relevant to service user counselling work

### **Registration Board Response**

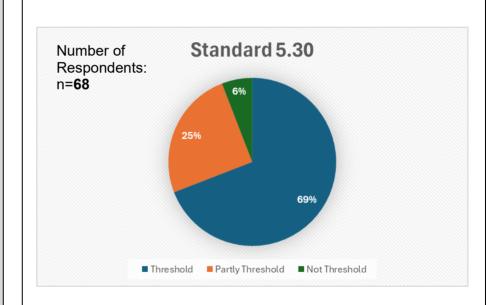
The Board noted the level of quantitative feedback received and, while this reflected a majority of respondents, it also noted the concern identified in qualitative feedback that the standard, as originally written, was outside the scope of counselling practice - i.e. there was a perception by respondents that the requirement was to have a detailed understanding of prescription and non-prescription drugs and that the standard required something akin to prescribing rights that are held by medical professionals.

The Board noted this was not the intention of the standard and agreed to rearticulate the standard to clarify its intention. It is amended to emphasise that it is a knowledge-based standard, removing the 'demonstrate an understanding' which could have given the perception that this was a skills-based standard. The wording now includes 'impact' of pharmacological use to emphasise that there can be a direct, knowable impact from some drug use and 'implications' recognising that drug use can also have different manifestations in different presentations.

Finally, the Board emphasised that education and training programmes must include, as part of its curriculum and assessment, pharmacology as it was essential knowledge – at the threshold level – for entrants into practice to have.

The Board approved the following revised wording:

**Standard 5.15** Be able to understand the impact and implications of pharmacological use on service users.





#### **New Standards drafted Post-Consultation**

Throughout the course of feedback provided by stakeholders against the individual standards noted above, there were comments – not included as part of the omissions section below – suggesting potential gaps in the Board's proposed draft *Standards of Proficiency*. In particular, the Board noted there was a consistent level of feedback, across both consultation processes for both counsellors and psychotherapists, suggesting that there was greater scope, within setting the threshold knowledge and skills for entry into practice, to more clearly articulate the differences – at entry into practice – between both professions.

In addition, in comparing both sets of draft *Standards* documents, a number of respondents raised questions in the 'Additional Comments' portion of the consultation feedback questionnaire querying why some skills were specific to counselling or psychotherapy and introducing the question as to whether a skill included in one set of standards should be considered for inclusion – in a profession-specific articulation – in the other set of standards.

On the basis of these considerations, the Counsellors and Psychotherapists Registration Board introduced a number of additional standards. The standards, along with the Board's rationale for its articulation, are included in the table below.

Post-Consultation New Standard	Registration Board Rationale
	While not an area of omission that was identified in feedback received to the counsellors standards, the Board noted that it was identified as part of responses to the consultation on the psychotherapy standards.
<b>Standard 5.11:</b> Know and be able to apply in practice the different stages of human development and behaviour, recognising its impact on the presenting psychological issue.	When reviewing these standards, it was agreed that this foundational area of knowledge was essential for both professions and, as such, it was agreed to include a specific requirement around the different stages of human development and the impact these have on psychological functioning specific to the practice of counselling at entry into practice.
<b>Standard 5.12:</b> Know and be able to evaluate a range of therapeutic frameworks that underpin and inform counselling practice.	The Board, following detailed discussion, agreed the importance of including a standard that articulated the need for counsellors, upon entry into practice, to have knowledge of a range of therapeutic modalities. It was agreed by the Board that it was not a threshold requirement that counsellors were able to practice using these



Post-Consultation New Standard	Registration Board Rationale
	range of modalities; only that they had knowledge of them. Therefore, a solely knowledge-based standard was articulated.
	This newly articulated standard requires a level of critical engagement with these therapeutic frameworks – indicated through the inclusion of the skill of evaluating. Some narrowing in application of the standard, for the purposes of assessment, has been included to shape the scope of the requirement around its application to counselling practice – i.e. the 'range' is applied to those frameworks that inform counselling practice.
Standard 5.18: Identify and apply an appropriate structured intervention to target and address an identified presenting psychological issue.	In order to appropriately differentiate between the threshold practice of a counsellor and a psychotherapist, the Board agreed that an additional standard should be included, supplementing the already existing standards, that addressed the types of intervention employed by counsellors at the point of entry into practice.
	The standard drafted by the Board articulates the types of presentation and the impact that this has on the methods of intervention used by counsellors. This is reflected in the standard's articulation through referencing 'structured interventions' and again the formulation repeated throughout the Board's standards – used to identify counselling practice – 'identified presenting psychological issue.'
<b>Standard 5.19:</b> Be able to assess service user readiness and suitability for the intervention offered.	A further area raised through the consultation feedback by respondents was a focus on the importance of establishing the therapeutic relationship and determining whether counselling is the appropriate therapeutic environment for the service user and his or her specific presentation. The Board agreed that this was an essential skill required for entry into practice.
	In agreeing the standard, the Board noted that the practitioner should have the skills to assess the presenting issue and determine whether it was appropriate to enter



Post-Consultation New Standard	Registration Board Rationale
	into a therapeutic relationship considering the parameters of counselling practice – at entry into practice. It was also felt important to note the assessment of the service user and his or her readiness to engage with what counselling is – setting of aims and delivery of a structured intervention to target and address the presenting issue.  The Board noted that this newly articulated standard should be read in conjunction with role of the counsellor in communicating the roles and responsibilities of the counsellor (Standard 5.17) and the identification of appropriate structured interventions to address the identified issue (Standard 5.18).
Standard 5.21: Monitor the compatibility of the counselling intervention with the ongoing service user presentation, assess if a referral to another professional or service is appropriate and identify suitable referral pathways.	One of the key areas of discussion of the Board, emerging from the consultation feedback, concerned articulation of the specific parameters of counselling practice, as defined at the threshold level for entry into practice. The Board considered this particularly important recognising the changing dynamics that emerge in service user presentations and the impact this might have on the type of intervention used.  Therefore, the standard articulated requires that a practitioner – at entry to the register – is able to monitor on an on-going basis whether counselling is still appropriate in light of continuing engagement with the service user. As part of this monitoring and on the basis of the on-going outcome of it, the practitioner is required to assess whether referral onwards is necessary.  In addition to the skills of monitoring and assessing, the final element of the standard is a knowledge-based component that requires the practitioner to have knowledge of appropriate referral pathways based on what has been revealed/concluded as part of his or her ongoing monitoring and assessment. The skills required around referral of a service user onwards as already captured under Standard 5.23.



Post-Consultation New Standard	Registration Board Rationale
Standard 5.38: Be able to write concise, accurate and relevant notes and records which articulate and justify professional decisions made.	While not originally included in the proposed draft <i>Standards</i> , the Board noted feedback from stakeholders that suggested the area of note and record keeping was an important area of professional practice that was required at entry into practice.  The Board recognised that the Framework Standards includes the following requirement around documentation:  Standard 2.6: Be able to produce clear, concise, accurate and objective documentation  However, it also agreed that more than just notes and records being made of actions taken, a central component of counselling practice was that such documentation – given the nature of presenting issues and therapeutic engagement and relationships – is used to explain and justify decisions made with regard to engagements with service users.  As such, it was agreed that the Framework Standard did not cover this component of practice specifically and the inclusion of this profession-specific standard was deemed to be required by the Board.



### Possible Omissions from Standards of Proficiency

Respondents to the public consultation were asked to consider if there were any possible omissions in the *Standards of Proficiency for Counsellors* that the Registration Board should consider. 85% (n=51) of respondents commented that there were no omissions, while 15% (n=9) identified some areas of omission for consideration. The following table identifies the areas noted through the consultation process and the Board's response to these.

It is important to note that this list includes both the omissions identified by respondents as part of Question 48 in the online questionnaire, to which the quantitative figures noted above correspond, **and** the gaps or errors identified throughout the qualitative feedback from stakeholders.

Possible Omission Area	Registration Board Response
Role of Group Counselling (Counselling with more than one person)	The Board agreed with feedback that suggested there needed to be reference in the <i>Standards of Proficiency for Counsellors</i> to the breadth of counselling environments; more specifically that the practice of counselling was not in a singular one-to- one engagement. To this end, the Board agreed the following draft standard:  Standard 5.13 Be able to appraise the benefits of and differences between individual, couple, group and family counselling to identify appropriate intervention pathways.  The Board was keen to stress that this standard should not be interpreted as requiring practitioners – at entry to the register – to be able to demonstrate practice in each of these environments. This newly articulated standard is, therefore, a knowledge- based standard concerned with having the foundational knowledge of
Role of the Unconscious in Clinical Supervision	the different environments of counselling delivery so best pathways can be best identified.  The Board noted feedback from stakeholders that suggested, regardless of consideration of the role of the conscious and unconscious as part of the therapeutic relationship itself, the role of unconscious dynamics were central to clinical



Possible Omission Area	Registration Board Response
	supervision for all practitioners, whether practising as a counsellor or a psychotherapist.
	As such, the Board agreed that this was central to counselling practice that such issues – both conscious and unconscious – should be recognised as part of the process of clinical supervision. To this end, the Board agreed the following standard for inclusion in the <i>Standards of Proficiency for Counsellors:</i>
	<b>Standard 5.35</b> : Be able to know and critically reflect on the conscious and unconscious dynamics in clinical supervision.
	Feedback received suggested that the draft standards did not provide for competency in areas of facilitating service user discovery of the meaning behind their experiences and their search for purpose.
Understanding the Individual	Having reviewed the feedback from stakeholders and the concerns identified, the Board concluded that already drafted standards addressed the areas of competence in terms of the individual service user and his or her experiences and circumstances specific to the parameters of practice for a counsellor:
	Standard 5.11 Know and be able to apply in practice the different stages of human development and behaviour, recognising its impact on the presenting psychological issue
	<b>Standard 5.25:</b> Be able to apply counselling skills to convey empathetic understanding of and compassion for the service user's perspective.
	<b>Standard 5.26:</b> Be able to identify and apply knowledge of intersecting psychological factors – including diversity – in service user presentations,



Possible Omission Area	Registration Board Response
	recognising their impact on well-being, and work in an inclusive, sensitive and non-discriminatory manner.
	In light of this the Board agreed that no additional standard was required.
Psychotherapy Draft Standard 5.13  Be able to reflect on the impact of the service user's experience, be able to demonstrate an understanding of their feelings and emotions and communicate that understanding in a non- judgemental manner.	Feedback suggested that the draft standard 5.13 for psychotherapists should be transposed into the <i>Standards of Proficiency for Counsellors</i> .
	The Board, following detailed consideration, concluded that the requirement – as articulated – extended beyond the scope of counselling practice at entry into practice, as it was beyond the immediate presenting issue and an effort to explore a presentation beyond the knowledge and skills of a counsellor at threshold entry into practice.
	As such, it was agreed that this standard would not be appropriate to include in threshold standards for counsellors.
	The Board, in making this assessment, noted that the current <i>Standards of Proficiency for Counsellors</i> includes the following standards that are concerned with the recognition of a service user's experience:
	<b>Standard 5.25:</b> Be able to apply counselling skills to convey empathetic understanding of and compassion for the service user's perspective.
	<b>Standard 5.26:</b> Be able to identify and apply knowledge of intersecting psychological factors – including diversity – in service user presentations, recognising their impact on well-being, and work in an inclusive, sensitive and non-discriminatory manner.



Possible Omission Area	Registration Board Response
Working within a Framework of Counselling Theory	The Board reviewed the feedback presented and parsed the distinctions in practice between counselling and psychotherapy and the request of the respondent that if psychotherapists work within established psychotherapeutic theory, counsellors should also work within counselling theory.
	It concluded that the range of frameworks for psychotherapy reflected the breadth of modalities of practice <b>and</b> the threshold scope of the practice as dealing with more acute and complex psychological distress. Therefore, counsellors are not expected to work within – or use – these frameworks in their practice.
	It was noted that counsellors are expected to work within an appropriate theories that inform their practice, of which there is already reference to in the draft standards:
	<b>Standard 5.12</b> Know and be able to evaluate a range of therapeutic frameworks that underpin and inform counselling practice
	<b>Standard 5.14</b> Be able to appraise theories and research on mental health and wellbeing and use these to develop and implement improved treatment approaches.
	In light of this the Board agreed that no additional standard was required.
Review and Analysis of Policies related to Counselling Profession	Having reviewed the feedback received from stakeholders, the Board agreed with the suggestion that the standard articulated in the psychotherapists standards concerning the skill of analysing local and national policies should also be reflected in the standards for counsellors.
	In light of this conclusion, the Board agreed to adopt the revised articulation in the psychotherapists standards, based on the feedback received against that standard in the consultation on the <i>Standards for Psychotherapists</i> :



Possible Omission Area	Registration Board Response
	<b>Standard 5.39:</b> Be able to critically appraise local and national guidelines and policies appropriate to the profession.
Reflecting on Service User's Experience in a non-judgemental manner	The Board agreed that at entry into practice a counsellor should be able to both reflect on a service user's experience and be able to engage therapeutically with them in a non-judgemental way.
	Having reviewed its profession-specific <i>Standards</i> , the Board concluded that there were existing standards that addressed these skills:
	<b>Standard 5.25:</b> Be able to apply counselling skills to convey empathetic understanding of and compassion for the service user's perspective.
	<b>Standard 5.26:</b> Be able to identify and apply knowledge of intersecting psychological factors – including diversity – in service user presentations, recognising their impact on well-being, and work in an inclusive, sensitive and non-discriminatory manner.
	It also noted that there were existing Framework standards that concerned this area of practice as well:
	<b>Standard 1.8:</b> Recognise the importance of practising in a non-discriminatory, culturally sensitive way and acknowledge and respect the differences in beliefs and cultural practices of individuals and groups.
	<b>Standard 1.9:</b> Understand the role of policies and systems to protect health, safety, welfare, equality and dignity of service users, staff and volunteers.



Possible Omission Area	Registration Board Response
	In light of this the Board agreed that no additional standard was required.
	The Board noted the feedback received and the intention of the respondent to adopt the wording included in the SCoPEd Framework.
	Having reviewed the content of the suggested inclusions that addressed the areas of self-awareness, professional development and their role in developing professional practice and the understanding of the self in the therapeutic process, the Board concluded that the intended learning outcomes were already captured in its existing standards:
	<b>Standard 5.32:</b> Be able to critically reflect on the role of the counsellor in the therapeutic process and manage personal involvement in, and contribution to, the process of counselling.
Personal and Professional Reflexivity	<b>Standard 5.33:</b> Be able to recognise personal emotional responses, vicarious trauma and the need to develop effective self-care strategies and burnout prevention.
	<b>Standard 5.34:</b> Be able to critically reflect on the necessity of engaging in clinical supervision to support, sustain and improve practice.
	<b>Standard 4.3:</b> Be able to evaluate and reflect critically on own professional practice to identify learning and development needs; be able to select appropriate learning activities to achieve professional development goals and be able to integrate new knowledge and skills into professional practice.
	In light of this the Board agreed that no additional standard was required.



Possible Omission Area	Registration Board Response
Possible Omission Area  Knowledge of Abuse and Abusive Systems	The Board considered the feedback identified around knowledge of abuse and abusive systems and reflecting on experiences of power. It noted that the respondent sought specific inclusion of recognition of the power of abuse and its manifestation 'unconsciously' or 'out of awareness'.  The Board agreed that the area of 'power dynamics' in the therapeutic relationship was addressed through already existing standards and did not require an additional articulation:  Standard 5.27: Be able to recognise and manage the dynamics of power and authority as experienced in the therapeutic relationship.  The Board further noted that, as defined elsewhere in the threshold standards, at entry into practice it is not considered threshold practice that a counsellor has the skills to explore therapeutically underlying trauma.  There are existing standards that require a counsellor, at entry into practice, to be trauma aware. The Board agreed this would include having a knowledge of abuse and abusive systems. However, it noted that its standards in this area were carefully articulated to ensure that the parameters of working with trauma therapeutically – at entry point into practice – are clearly recognised:  Standard 5.28: Be able to demonstrate awareness of the impact of trauma on psychological functioning and integrate this awareness to inform practice.
	<b>Standard 5.29:</b> Be able to recognise trauma in service user presentations and know the potential for harm in exploring trauma within the parameters of a counselling relationship.



Possible Omission Area	Registration Board Response
	In light of this the Board agreed that no additional standard was required.
	The Board, having reviewed this feedback, agreed that the issue of managing
	'challenge' in a therapeutic relationship was included in already articulated standards.
	As identified above in response to Standard 5.18, the outcome of establishing and
	identifying (and re-contracting) counselling aims, maintaining a therapeutic
	relationship and successfully concluding it inherently carries that the challenges that emerge in a relationship have been managed.
	The Board agreed that the following standards – and the knowledge and skills
Managing Challenge in a Therapeutic Relationship	required to successfully demonstrate achievement of them – inherently require the ability to manage challenges that emerge in a therapeutic relationship.
	<b>Standard 5.16</b> Be able to establish, build and maintain a therapeutic relationship with a service user safely and ethically, recognising and managing professional and ethical boundaries.
	<b>Standard 5.19:</b> Be able to assess service user readiness and suitability for the intervention offered.
	<b>Standard 5.20:</b> Be able to collaborate with the service user to set specific aims to target and address the identified presenting psychological issue and recontract aims and timeframes as necessary.
	Standard 5.21: Monitor the compatibility of the counselling intervention with the
	ongoing service user presentation, assess if a referral to another professional or service is appropriate and identify suitable referral pathways.



Possible Omission Area	Registration Board Response
	Standard 5.22: Be able to evaluate service user progress against agreed counselling aims and collaboratively with the service user agree when to conclude the therapeutic relationship, ensuring this is achieved in a safe and ethical manner.  In light of this the Board agreed that no additional standard was required.
Impact of Social, Cultural and Political Factors on Experience	The Board considered the feedback provided that this was an area of omission. It agreed, however, that as a result of other feedback provided against individual standards earlier in the consultation questionnaire, a standard had been rearticulated to address the impact of intersecting psychological factors on service user presentations:  Standard 5.26: Be able to identify and apply knowledge of intersecting psychological factors – including diversity – in service user presentations, recognising their impact on well-being, and work in an inclusive, sensitive and non-discriminatory manner.  Furthermore, the Board also identified that under Domain One of the Standards, at entry to the register a practitioner must be able to:  Standard 1.8: Recognise the importance of practising in a non-discriminatory, culturally sensitive way and acknowledge and respect the differences in beliefs and cultural practices of individuals and groups.  In light of this the Board agreed that no additional standard was required.
Reference to Neurodiversity	The Board recognised the feedback presented the case made for the inclusion of neurodiversity specifically in the standards.



Possible Omission Area	Registration Board Response
	Following considered review and reflection, the Board concluded that it was not possible to only identify one potential presentation characteristic of service users, and it would not be possible to comprehensively articulate all potential presentation characteristics within the <i>Standards</i> .
	The Board agreed that the already existing standards which articulate requirements around identifying and respecting intersecting psychological factors and practising in a non- discriminatory manner sufficiently addressed the concerns raised by the respondent.
	<b>Standard 5.26:</b> Be able to identify and apply knowledge of intersecting psychological factors – including diversity – in service user presentations, recognising their impact on well-being, and work in an inclusive, sensitive and non-discriminatory manner.
	<b>Standard 1.8:</b> Recognise the importance of practising in a non-discriminatory, culturally sensitive way and acknowledge and respect the differences in beliefs and cultural practices of individuals and groups.
	In light of this the Board agreed that no additional standard was required.
Differences in Framework Standards Domain 2	The Board reviewed the additions that had originally been made to Standard 2.12, recognising that no such additions had been made to the corresponding standard in the Standards of Proficiency for Psychotherapists.
	It concluded that issues around consent were sufficiently dealt with in other Framework standards in Domain One, including:



Possible Omission Area	Registration Board Response
	<b>Standard 1.3:</b> Be able to act in the best interest of service users at all times with due regard to their will and preference.
	<b>Standard 1.5:</b> Respect and upload the rights, dignity and autonomy of every service user including their role in the diagnostic, therapeutic and social care process.
	In addition, the issue of power dynamics was addressed in the profession-specific standard:
	<b>Standard 5.27:</b> Be able to recognise and manage the dynamics of power and authority as experienced in the therapeutic relationship.
	In light of this, the Board agreed that the additional elements originally added to Standard 2.12 should be removed. The agreed wording of Standard 2.12 is:
	<b>Standard 2.12:</b> Understand the need to work in partnership with service users, their relatives/carers and other professionals in planning and evaluating goals, treatments and interventions.
Differences in Framework Standards Domain 3	The Board noted feedback from stakeholders that noted an addition to the Framework Standard 3.2 in the <i>Standards of Proficiency for Psychotherapists</i> with the suggestion that a similar addition should be included in the <i>Standards of Proficiency for Counsellors</i> .
	The Board agreed that similar wording should be adopted as a threshold skill for entry into practice was the ability to assess whether counselling is the most appropriate course of action for a presenting service user.
	The Board agreed wording of Standard 3.2 is:



Possible Omission Area	Registration Board Response
	<b>Standard 3.2:</b> Be able to justify the selection of and implement appropriate assessment techniques and be able to undertake and record a thorough, sensitive and detailed assessment, relevant to what is necessary for the safe practice of counselling.

The Board noted that, in addition to the above areas, comments were submitted in relation to the following areas:

- Articulation of Council Framework Standards of Proficiency
- The use of 'service user' rather than 'client'
- Issues in relation to grandparenting and whether these standards will be required of existing practitioners
- The registration process
- The decision of the Department of Health to introduce statutory regulation for two distinct professions counsellor and psychotherapist.

While these issues were identified as omissions, they lie outside the scope of this consultation process and do not relate to the Board's *Standards* of *Proficiency for Counsellors*.



#### Part Two: Feedback on Profession-Specific Criteria for Education and Training Programmes

Criterion 1.1: The minimum level of qualification for entry to the register is Level 8 on the National Framework of Qualifications (NFQ)

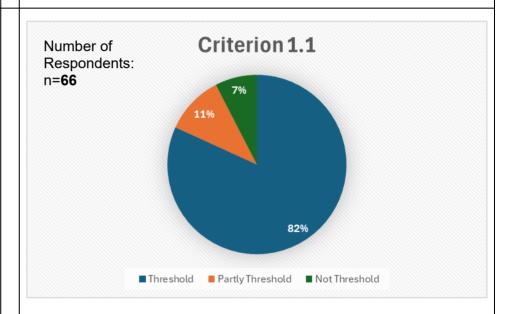
#### **Registration Board Response**

The Board noted the range of feedback provided from stakeholders alongside the majority of respondents to the questionnaire that indicated support that Level 8 was the threshold qualification level for entry to the Counsellors Register.

The Board recognised that the majority of qualitative feedback concerned a perception that this criterion would be applied to existing practitioners. The Board emphasised – as noted under Issue 3 of the High Level Analysis – that the *Criteria for Education and Training Programmes* will apply to new graduates at the time the registers open; it **does not apply** to existing practitioners, for whom there is a different bespoke registration pathway: the grandparenting registration route.

While the significant majority of respondents were agreed that Level 8 was the threshold for entry into practice, given that the Board had made a number of significant changes to its *Standards of Proficiency*, and to ensure consistency of process, it undertook a two stage process to reassess the threshold level of qualification set for entry to the Counsellors Register.

The Board reviewed: (a) the knowledge and skills articulated in the revised Standards of Proficiency for Counsellors considering the content of each requirement in order to determine the level of proficiency and demand of knowledge and/or skill required to deliver on the standard and (b) the determining the holistic level of demand required by the Standards of Proficiency mapping this against the National Framework of Qualifications Level Descriptors that set the broad indicators of knowledge, skill and competence required for attainment of a qualification at each level of the National Framework of Qualifications in Ireland.



The Board concluded that the level of demand identified in the *Standards of Proficiency for Counsellors* aligned with the NFQ Level 8 descriptors as articulated in the Framework.

The Board agreed to set the threshold level of qualification for entry to the Counsellors Register at: NFQ Level 8.



Criterion 2.2: The programme must ensure that each student completes 450 hours of practice placement.

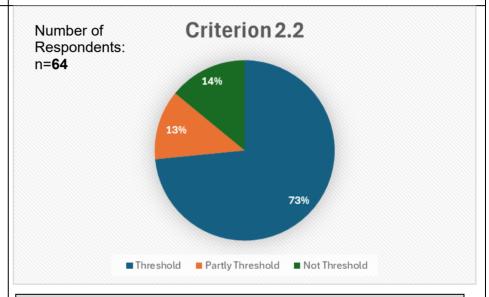
## **Registration Board Response**

The Board noted the quantitative feedback received from stakeholders indicated that there was a majority support for its proposed minimum practice placement hours. However, through the course of qualitative feedback provided, the Board recognised that the majority of feedback raised concerns around the perceived high level of placement hours, their viability given the nature of practice and the challenges presented to service provision.

In light of the breadth of issues raised, the Board in addition to reviewing the feedback received, discussed and explored the current nature and practice of service delivery in Ireland, the current provision of practice education in education and training programmes and, in particular, the current varied arrangements in place around the assessment of student achievement of competency during practice education experiences.

In drafting its proposal, the Board envisaged that the minimum number of placement hours encompassed both direct service user engagement and other elements of practice education (e.g. research, preparation for sessions or assessment portfolios). Feedback, however, suggested there was general confusion around this and took the decision to replace 'hours of practice placement' with 'direct therapeutic engagement with service users' to ensure greater clarity of the requirement.

With regard to the minimum number of hours then in 'therapeutic engagement with service users', the Board reviewed the existing arrangements set by professional bodies, recognising the inclusion of both pre-accreditation and post-accreditation hours. The Board agreed that the depth of professional skills and exposure to the range of presentations required more practice placement hours than currently in place. It also recognised that the *Criteria* must detail the minimum number of hours within which a student could achieve all the *Standards*.



The Board concluded that the current combined training and postqualifying requirements were beyond threshold.

Following a detailed review of its *Standards of Proficiency for Counsellors*, its consideration of the current structure of practice education hours and feedback provided, the Board agreed that the minimum number of hours in therapeutic engagement with service users for delivery of the *Standards* should be set at 200 hours.

This revised element of the criterion was articulated as: *The programme must ensure that each student completes a minimum of 200 hours in direct therapeutic engagement with service users during practice placements.* 



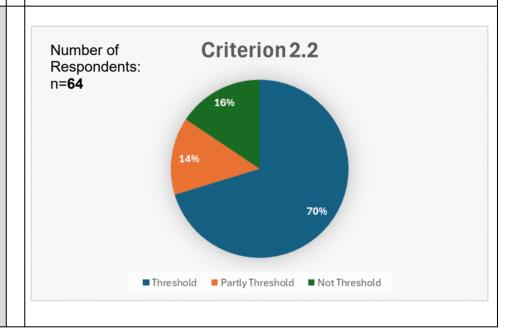
Criterion 2.2: Of the 450 hours of practice placement a student must complete, 300 hours must be supervised service user contact experience.

#### **Registration Board Response**

The Board noted that while a majority of respondents had identified in the questionnaire they were satisfied that this element of the criterion was set at threshold for entry into practice, there continued to be extensive qualitative commentary that suggested a level of confusion around what the requirement was seeking.

In light of the decision taken by the Board around the replacement of 'hours of practice placement' with 'direct therapeutic engagement with service users', the Board agreed that the original articulation of this element of the criterion (differentiating between placement hours and supervised service user contact) was no longer required.

The Board agreed to delete this element from the articulation of Criterion 2.2.





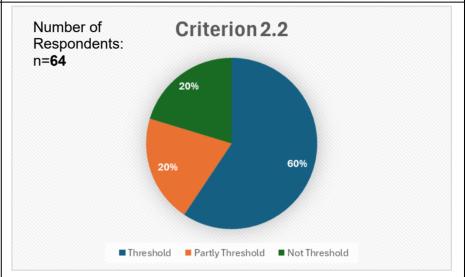
Criterion 2.2: Of the 300 hours of supervised service user contact experience, 75 hours must be directly observed service user contact.

#### **Registration Board Response**

In reviewing the quantitative feedback provided, the Board also considered the detailed qualitative feedback provided by respondents that raised a range of concerns around the meaning of 'direct observation', how this was envisaged to be undertaken and the potential challenges for placement providers and education providers around the volume of 'observed' hours.

In considering this feedback, the Board reaffirmed its fundamental principle that achievement of the practice-based components of the *Standards of Proficiency* required a robust assessment methodology to provide regulatory assurance of competence for entry into practice. In particular, the Board noted, as evidenced through the feedback received, inconsistency in the oversight and quality assurance of placement assessment, with a heavy reliance on the use of self-reporting and recording of hours completed.

Looking at the principal concern around clarity, the Board agreed to replace the phrase 'direct observation' and reorienting this component of the criterion around assessment. The verb 'assessment' is used to explicitly draw the relationship between the task (assessment) and its purpose (achievement of the *Standards*). In addition, the phrase 'using direct and/or indirect observational methodologies' was agreed by the Board, providing education providers with the flexibility to select from possible assessment methodologies (thus removing the perception that the intention was for additional presence in the therapeutic relationship) that involved either synchronous (e.g. two-way windows) or asynchronous assessment (e.g. transcription). The revised articulation also makes explicit reference to the 'practice education team' emphasising that assessment of proficiency is determined by both the placement supervisor and a tutor from the education provider.



Recognising the varied assessment methodologies available take difference forms, noting in particular that indirect methodologies (i.e. transcription) are labour intensive to produce something to be assessed, the Board agreed that the minimum hours for assessment should be set to facilitate all types of assessment methodology.

In balancing these considerations, the Board agreed that this element of the criterion should be rearticulated to read: *A minimum* of 60 hours of the 200 hours must be assessed by members of the practice education team using direct and/or indirect observational methodologies.



#### Possible Omissions from Criteria for Education and Training Programmes

Respondents to the public consultation were asked to consider if there were any possible omissions in the *Criteria for Education and Training Programmes for Counsellors* that the Registration Board should consider.

72.41% (n=42) of respondents commented that there were no omissions, while 27.59% (n=16) identified some areas of omission for consideration. The following table identifies the areas noted through the consultation process and the Board's response to these. The following table identifies the areas noted through the consultation process and the Board's response to these.

It is important to note that this list includes both the omissions identified by respondents as part of Question 60 in the online questionnaire, to which the quantitative figures noted above correspond, **and** the gaps or errors identified throughout the qualitative feedback from stakeholders.

Possible Omission Area	Registration Board Response
Personal Therapy	While an issue that extended beyond the profession-specific criteria that the Board sets in its <i>Criteria</i> , the Board spent considerable time discussing the issue of personal therapy.  The Board noted the extensive feedback provided by respondents to the consultation and recognised that for many practitioners personal therapy is a valuable tool and, for many, an essential part of their practice.  However, following detailed discussions, the Board affirmed that its primary regulatory focus in setting its <i>Criteria for Education and Training Programmes</i> was to ensure that all graduates meet the <i>Standards of Proficiency</i> , which outline the knowledge and skills required to ensure public protection at the point of entry to the register. Therefore, any requirements set in the <i>Criteria</i> must be directly linked to achieving the <i>Standards of Proficiency</i> .
	Underpinning decisions around the setting of the <i>Criteria</i> was the recognition that education providers have the necessary systems and mechanisms in place to demonstrate that students graduating from the programme have met the <i>Standards of Proficiency</i> . Indeed, the Board concluded that it was not the role of the <i>Criteria</i> to specify how particular standards



Possible Omission Area	Registration Board Response
	are to be achieved or assessed. Each education provider must have the flexibility to design
	their curriculum in a way that best suits their approach to teaching, and they are free to
	choose the most appropriate assessment strategy and methods.
	In terms of assessment of the <i>Standards of Proficiency</i> , the Board agreed that personal therapy is one method used, among others, to assess whether a student has developed the threshold skills of self-reflexivity specific to counselling practice. It is not the regulator's role to prescribe the specific method an education provider uses.
	From a regulatory perspective, the Board concluded that personal therapy should not be viewed as an end in itself, but as a means to enhance the practitioner's self-awareness and understanding of their role in the therapeutic process. This deeper understanding ultimately contributes to the safety and well-being of the service user. The proficiencies linked to these outcomes are reflected in the Board's <i>Standards of Proficiency</i> , ensuring that practitioners possess the necessary skills for safe practice.
	<b>Standard 5.32:</b> Be able to critically reflect on the role of the counsellor in the therapeutic process and manage personal involvement in, and contribution to, the process of counselling.
	<b>Standard 5.33:</b> Be able to recognise personal emotional responses, vicarious trauma and the need to develop effective self-care strategies and burnout prevention.
	The Board concluded that while the skills of self-reflexivity and management of the self in a therapeutic relationship are set as threshold standards for entry into practice, the Board cannot determine or set the method used to assess achievement of these skills. As such, the setting of personal therapy hours is beyond the regulatory scope.



Possible Omission Area	Registration Board Response
	In making this decision, the Board emphasised that in the design of education and training programmes, education providers can determine whether or not to use personal therapy as an assessment tool.
Group Observation/Supervision	In reviewing the feedback that suggested that group supervision requirements should be stipulated in the <i>Criteria for Education and Training Programmes</i> , the Board noted that this identified area extended beyond the profession-specific criteria that it has responsibility for setting.
	Throughout the course of its discussions, the Board agreed that the criteria are written – in the main – as outcomes based requirements in that the concern is not to stipulate specific means of <i>how</i> something is to be achieved but the overarching concern of <i>what</i> is to be achieved.
	Under Criterion 2: Practice Placements, the criteria states that there must be appropriate supervision in place in order to ensure assessment of the student's achievement of the Standards of Proficiency:
	<b>2.10:</b> While on placement, appropriate support, guidance and supervision is maintained with the student by the practice education team.
	<b>2.15:</b> Supervision policies include guidelines on how students progressively achieve independence in practice.
	<b>6.2:</b> Assessments must be employed that assess learning outcomes (at module and programme levels) and appropriately and effectively facilitate progression decisions and the achievement of the standards of proficiency.



Possible Omission Area	Registration Board Response
	The Board agreed that there is flexibility within the already existing criteria for an education provider to select group observation/supervision as a form of assessment in the design of its programme curriculum and assessment.
	The Board concluded that regardless of the assessment methodology taken, it must be assured that each student on the programme has been assessed as achieving all the <i>Standards of Proficiency.</i>
	The Board noted that throughout the feedback received there was some confusion around the role of placement supervision on a regulated programme and clinical supervision that currently exists for – and is used by both – students in training and existing practitioners.
Clinical Supervision	The Board affirmed the role of practice education on a regulated programme as an essential aspect of pre-registration education and training, offering students the opportunity to engage in professional practice in a safe and managed environment. Practice education serves two key objectives:
	<ul> <li>Public Protection: by allowing students to practice at a level appropriate to their training, they can bridge the gap between theory and practice. This ensures that the future workforce meets high standards, ultimately enhancing the quality of care provided to service users.</li> </ul>
	<ul> <li>Opportunity to demonstrate achievement of the Standards: practice education provides students with the hands-on experience needed to develop the necessary skills and knowledge to practice effectively and safely.</li> </ul>
	It is for these reasons that placement supervision is an essential component of an education and training programme. It involves a practitioner being responsible for the support, training, learning and development of the student. This ensures that the student progressively develops develops their proficiency, meets the required standards of proficiency and



Possible Omission Area	Registration Board Response
	safeguards the well-being of service users they engage with. This responsibility can only be effectively carried out by a professional who is present in the placement setting.
	However, the Board emphasised in its discussions that placement supervision is not clinical supervision.
	Clinical supervision is understood and practised in the counselling profession as a formal process of professionally facilitated reflection on clinical practice and experience that contributes to individual development. In the context of practice placement arrangements, as they are currently delivered in education and training programmes for the professions of counselling and psychotherapy, clinical supervision is a relationship established by a student with a clinical supervisor outside of the practice environment the student is practising in.
	While the Board's <i>Standards of Proficiency</i> for Counsellors requires that students have the skills to be able to engage in clinical supervision as part of their practice <b>upon entry onto the register</b> , its <i>Criteria</i> <b>does not</b> stipulate any requirements around clinical supervision. Rather, the <i>Criteria</i> requires that students are supervised during the course of their practice placement <i>on-site</i> . Fundamentally, <i>on-site supervision</i> combines the intended purpose of clinical supervision – reflection on and learning from practice experience – with the purpose of practice education – the assessment of a student's proficiency.
	The Board, recognising the regulatory parameters of its <i>Criteria</i> as directly linked with the achievement of the <i>Standards</i> , agreed that it was beyond its remit to stipulate clinical supervision hours. Its remit was in ensuring that there was appropriate placement supervision for students during their practice education.
Post-Qualifying Pre-Accreditation Hours	In reviewing the feedback that suggested that the Board should stipulate post-qualifying hours requirements in its <i>Criteria for Education and Training Programmes</i> , it noted that this



Possible Omission Area	Registration Board Response
	identified area extended beyond the profession-specific criteria that it has responsibility for setting.
	The Board noted that under the provisions of the <i>Health and Social Care Professionals Act 2005 (as amended)</i> , CORU operates a qualifications-based register. As such, entry to the professional register requires that applicants have demonstrated achievement of all the standards of proficiency. Qualifications, approved by the Board, for entry to its Register must then ensure that all graduates have achieved the standards of proficiency.
	The Board, under the provisions of the <i>Health and Social Care Professionals Act 2005 (as amended)</i> does not have the legislative power to set post-registration requirements such as those proposed by the feedback provided.
Pre-Placement Training Stipulations around placement only in Years 3 and 4 of an education and training programme	In reviewing the feedback that suggested that the Board should stipulate when practice placements should commence in its <i>Criteria for Education and Training Programmes</i> , it noted that this identified area extended beyond the profession-specific criteria that it has responsibility for setting.
	However, the Board once again noted that it <i>Criteria</i> articulate outcomes based requirements in that the concern is not to stipulate specific means of <i>how</i> something is to be achieved but the overarching concern of <i>what</i> is to be achieved. To this end, education providers have the flexibility to design their education and training programmes to ensure the delivery of the <i>Standards of Proficiency</i> .
	The Board noted, however, that the <i>Criteria</i> provide a number of safeguards to ensure that students engage in practice placement at the appropriate times in their training, with the aim – ultimately – of ensuring the protection of both the student and the public he or she may come into contact with during training:



Possible Omission Area	Registration Board Response
	<b>2.3:</b> The number, duration and range of practice placements, and their position within the programme must reflect current practice and demands of the profession. They must be appropriate to facilitate translation of theory into practice and the achievement of the standards of proficiency.
	<b>2.7:</b> Student allocation to practice placements is based on the need to integrate theory and practice and to facilitate the student's progressive development of the standards of proficiency.
	<b>2.9:</b> Pre-placement requirements – including academic, legal, occupational health and other requirements – and procedures for non-compliance with these requirements, are clear.
	The Board concluded that education providers are responsible then in the design and delivery of their programmes for ensuring that students enter into supervised practice when they are prepared to do so and have the appropriate supervisory arrangements in place to support them during their practice education and that there were sufficient criteria already included in its <i>Criteria</i> to provide assurance of this.
	While the Board acknowledged, as the respondents suggested, that there was an increased use of online platforms for the delivery of counselling services, there is no specific articulation of placement venues included in its <i>Criteria</i> .
Online Placement Settings	The Board agreed that there is flexibility within the <i>Criteria</i> for education providers to identify appropriate placement sites that will allow for the translation of theory into practice and the student's achievement of the standards:
	<b>2.4:</b> The education provider will have a set of requirements for the selection of practice placements to ensure quality learning experiences for students that reflect the normal context and environment of practice. The education provider will work in partnership with the



Possible Omission Area	Registration Board Response
	practice placement provider and have written agreements in place that clearly set out the responsibilities of all parties in ensuring that the placement supports the achievement of the standards of proficiency.
	The Board agreed that it was not appropriate to specifically single out one potential environment for the delivery of counselling services. In noting this, the Board concluded that its <i>Standards of Proficiency</i> ensure that graduates of education and training programmes have the necessary skills to be able to deliver therapeutic interventions in the digital space:
	<b>Standard 5.36:</b> Be able to demonstrate skill in the technologies and communication methods required for the delivery of counselling in a virtual setting and apply these therapeutically and safely while protecting service user privacy and confidentiality.
Couple Therapy	The Board noted the feedback received suggesting that there either be an additional title of 'couples and relationships therapist or conditions set on future employment within the area of couples and relationships therapy.
	In discussing the first of these issues the Board emphasised that the then Minister for Health, Simon Harris, made the designation – following a public consultation process – that two distinct registers should be established: one for counsellors and one for psychotherapists. In addition, as part of this designation, the professional title 'counsellor' is designated for public protection.
	It is beyond the legal or regulatory scope of the Counsellors and Psychotherapists Registration Board to determine what professional titles are to be protected; this responsibility rests with the Minister for Health.
	Additionally, the Board emphasised that in establishing a register, it is essential – under the provisions set out in the <i>Health and Social Care Professionals Act 2005 (as amended)</i> – that



Possible Omission Area	Registration Board Response
	the threshold knowledge and skills are articulated for entry onto that register. This is the role of the <i>Standards of Proficiency</i> .
	The <i>Standards</i> set outline the threshold level of practice for anyone wishing to work as a counsellor. They do not focus on specific modalities of practice, meaning that educational programmes can specialise in a particular modality of counselling or psychotherapy, as long as they demonstrate how their curriculum meets the required threshold standards.
	In developing the standards for both professions, the Board agreed that it had sought to establish high-level, outcome-focused standards that are concerned with the knowledge or skill a student must demonstrate upon completion of his or her education programme (the 'what' of learning), rather than prescribing the means through which this learning must take place (the 'how' of learning). This approach ensures the standards can be applied across diverse practice settings and demonstrated through various modalities of practice.
	Finally, the Board concluded that employment responsibilities were beyond its regulatory remit. These rested with an employing authority. For those engaging in private practice, the Board noted that when registers open, each individual will be subject to the <i>Code of Professional Conduct and Ethics</i> (this will be set by the Board, following a public consultation). Included within the <i>Code</i> is the legal requirement that at all times registered practitioners must <i>act within the limits of your knowledge, skills, competence and experience.</i> The Board noted that one of the principal benefits of regulation for the counselling profession was that following its introduction, there will be statutory powers to deal with practitioners who present a risk to the public.
Supervisor Training	In reviewing the feedback that suggested that the Board should stipulate training for supervisors in its <i>Criteria for Education and Training Programmes</i> , it noted that this identified area extended beyond the profession-specific criteria that it has responsibility for setting.



Possible Omission Area	Registration Board Response
	Throughout the course of discussion, the Board concluded that the responsibility for ensuring the suitability and training of placement supervisors lay with education providers; it was not
	the responsibility of the regulator. To this end, the <i>Criteria</i> requires:
	<b>2.17:</b> The education provider will make regular support and training available to the practice education team to develop their practice education skills.
	<b>2.18:</b> All stakeholders must be informed about practice education assessments, their link to the standards of proficiency and the marking criteria used. The practice education team must have access to assessment tools and be trained in completing these assessments and providing feedback during the placement.
	In addition, all those involved in assessment must have the requisite knowledge, skills and experience to undertake this role:
	<b>4.4:</b> All staff involved in the programme delivery and assessment of students must possess relevant qualifications, expertise and knowledge for the subject matter they teach.
	<b>4.5</b> : Those responsible for delivery and assessment of the core professional elements of the programme must be registered with the appropriate registration board.
	Upon review of these requirements, the Board was satisfied that there were robust regulatory mechanisms in place to ensure that education providers had appropriate oversight of placement supervisors.
Organisational Governance	In reviewing the feedback that suggested that the Board should stipulate requirements on the financial, legal, governance, external regulation and academic quality assurance structures in its <i>Criteria for Education and Training Programmes</i> , it noted that this identified area extended beyond the profession-specific criteria that it has responsibility for setting.



Possible Omission Area	Registration Board Response
	The Board emphasised, in response to this observation, that the purpose of professional regulation is to ensure public protection. One of the mechanisms to achieve this is through the setting of threshold standards for entry into practice and the approval of education and training programmes that deliver on all these standards.
	It noted that there are a range of different bodies that hold regulatory responsibility for different aspects of higher education. There are a range of governance issues that sit outside the parameters of what a professional regulator is responsible for. Professional regulation is not a catch-all for all aspects of the regulatory environment – there are very clear legal parameters that set out its responsibilities and remit.
	Where the Board is concerned with aspects of programme organisation and management, it is in relation to the assurance that each student that graduates from the programme consistently achieves the <i>Standards of Proficiency</i> . To this end the Board noted the following criteria that are articulated in Criterion 4: Programme Management:
	<b>4.1:</b> The programme must have a secure place in the education provider's plans to ensure that admitted cohorts of students will have the opportunity to complete the programme and be eligible to apply for registration.
	<b>4.3:</b> The programme must have regular monitoring and evaluation systems in place incorporating input from staff, students and all relevant stakeholders.
	<b>4.13:</b> There must be a quality assurance policy and system in place – which includes regular quality assurance audits, reviews and reports – that identifies quality issues and with clear accountability for addressing these issues.



Possible Omission Area	Registration Board Response
	<b>6.7:</b> All assessments must provide a rigorous and effective process by which compliance with external-reference frameworks can be measured.

The Board noted that, in addition to the above areas, comments were submitted in relation to the following areas:

- The composition of a Practice Education Team and the definition of Practice Educator
- How an education provider is expected to demonstrate sufficient resources to support student learning in all settings.
- The requirement to have a profession-specific student Code of Conduct.
- Clarification of what an external reference framework is.
- The requirements around an Assessment of Professional Competence for Section 91 applicants.
- Fitness to Practise Requirements.

While these issues were identified as omissions, they lie outside the scope of this consultation process and do not relate to the Board's *Criteria* for Education and Training Programmes for Counsellors.



# **Conclusion**

The Counsellors and Psychotherapists Registration Board approved and adopted its *Standards of Proficiency for Counsellors* at its meeting on 24 February 2025 and its *Criteria for Education and Training Programmes for Counsellors* at its meeting on 12 May 2025.

Following this decision, copies of the *Standards* and *Criteria* were published on the CORU website, alongside an extensive Frequently Asked Questions section, and all stakeholders were communicated with to highlight the availability of the Board's education and training requirements online.

Copies of the documents are available on the CORU website here: <a href="https://www.coru.ie/health-and-social-care-professionals/education/criteria-and-standards-of-proficiency/">https://www.coru.ie/health-and-social-care-professionals/education/criteria-and-standards-of-proficiency/</a>



# **Appendix 1: Copy of Advertisement**

# Irish Times - 18 September 2023



#### Comhairliúchán Poiblí

Tá CORU freagrach as gairmithe sláinte agus cúraim shóisialaigh a rialáil leis an bpobal a chosaint.

Tá tuairimí an phobail, na gairme agus páirtithe leasmhara eile á lorg ag Bord Clárúcháin na gComhairteoirí agus na Síciteiripeoirí maidir leis na comhairliúcháin atá á reáchtáil ar:

- Na Dréachtchaighdeáin Inniúlachta do Chomhairleoirí agus Síciteiripeoirí
- Na Dréachtchritéir le haghaidh Cláir Oideachais agus Oiliúna do Chomhairleoirí agus Síciteiripeoirí

Tá tuilleadh faisnéise faoi na comhairliúcháin sin agus mionsonraí faoin gcaoi ar féidir aighneacht a dhéanamh ar fáil ar www.coru.ie.

5pm, Dé hAoine, an 01 Nollaig 2023 an sprìocdháta chun aiseolas agus aighneachtaí a fháil.

Ní bhreithneofar aighneachtaí a gheofar i ndiaidh an ama agus sprìocdháta sin.

#### Public Consultation

CORU is responsible for protecting the public by regulating health and social care professionals.

The Counsellors and Psychotherapists Registration Board currently seeks the views of the public, the profession, and other interested parties on the latest consultations concerning the:

- Draft Standards of Proficiency for Counsellors and Psychotherapists
- Draft Criteria for Education and Training Programmes for Counsellors and Psychotherapists

Further information on these consultations and details on how to make a submission, are available on www.coru.ie.

The closing date for receipt of feedback and submissions is 5pm on Friday 01 December 2023.

Submissions received after this time and date will not be

CORU, Infinity Building, George's Court, George's Lane, Smithfield, Dublin 7, D07 E98Y. T: 01 2933160 E: info@coru.ie W: www.coru.ie

Irish Times 21x2 83mm GF



#### Seachtain – 20 September 2023



### Comhairliúchán Polblí

Tá CORU freagrach as gairmithe sláinte agus cúraim shóisialaigh a rialáil leis an bpobal a chosaint.

Tá tuairimí an phobail, na gairme agus páirtithe leasmhara eile á lorg ag Bord Clárúcháin na gComhairleoirí agus na Síciteiripeoirí maidir leis na comhairliúcháin atá á reáchtáil ar:

- Na Dréachtchaighdeáin Inniúlachta do Chomhairleoirí agus Síciteiripeoirí
- Na Dréachtchritéir le haghaidh Cláir Oideachais agus Oiliúna do Chomhairleoirí agus Síciteiripeoirí

Tá tuilleadh faisnéise faoi na comhairliúcháin sin agus mionsonraí faoin gcaoi ar féidir aighneacht a dhéanamh ar fáil ar www.coru.ie.

5pm, Dé hAoine, an 01 Nollaig 2023 an spriocdháta chun aiseolas agus aighneachtaí a fháil.

Ní bhreithneofar aighneachtaí a gheofar i ndiaidh an ama agus spriocdháta sin.

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# **Appendix 2: Notice of Public Consultation on CORU's website**

## STANDARDS OF PROFICIENCY AND CRITERIA FOR EDUCATION AND TRAINING PROGRAMMES FOR COUNSELLORS

#### STAKEHOLDER CONSULTATION

The Counsellors and Psychotherapists Registration Board (Board) was formally established by the then Minister for Health, Simon Harris TD, on 27 February 2019.

Following feedback received from a Department of Health public consultation in 2016, the Minister designated that one Registration Board be established with responsibility for two registers: one register for Counsellors and one register for Psychotherapists.

The Counsellors and Psychotherapists Registration Board has statutory responsibility for:

- establishing and maintaining a Register for counsellors and a register for psychotherapists;
- assessing, approving and monitoring training courses for counsellors and psychotherapists; and
- establishing the Code of Professional Conduct and Ethics and standards of performance to which counsellors and psychotherapists must adhere.

Since its establishment, the Board has been working towards implementing the Minister's direction to establish two separate registers.

As part of its preparatory work to establish two registers, the Board has developed, in draft form, a number of key documents.

The first of these documents is the threshold entry level standards that new registrants to each profession must meet – known as the *Standards of Proficiency* – and the second document identifies the requirements that education and training programmes must demonstrate when seeking regulatory approval for their programmes – known as the *Criteria for Education and Training Programmes*.

For Counsellors, the Board has drafted:

- Draft Standards of Proficiency for Counsellors
- Draft Criteria for Education and Training Programmes (Counsellors)

Copies of both documents are available here for you to access.

#### **Public Stakeholder Consultation**

As part of the Board's process in setting its *Standards of Proficiency for Counsellors* and its *Criteria for Education and Training Programmes (Counsellors)*, it is seeking feedback from stakeholders, including members of the professions, education providers, employers, professional bodies, as well as members of the public.

You are invited to submit your feedback – your personal views or on behalf of your organisation – on the draft *Standards of Proficiency* and draft *Criteria for Education and Training Programmes* by either:

• completing the online questionnaire, accessible here; or



• submitting written feedback via email to strategyandpolicy@coru.ie

The consultation will run for 12 weeks, opening for feedback on **Monday**, **4 September 2023** and closing on **Friday**, **1 December 2023**. Any submissions received after this date will not be considered.

Following the close of the stakeholder consultation period, CORU will review all the feedback received as part of this public engagement and prepare a report of findings for the Counsellors and Psychotherapists Registration Board.

The Board will review and evaluate the feedback received, making any changes or amendments to the *Criteria* and *Standards of Proficiency*, before agreeing and issuing final versions of the documents to education providers.

#### **Consultation Resources**

CORU has developed eBook resources that explore a range of key issues associated with the Board's setting of its *Standards* and *Criteria*, explaining the process the Board undertook and its rationale in making its proposals. You are encouraged to read and review these eBook resources as you prepare your feedback.

You can access these resources here.

In addition, a webinar was held on Friday 1 September 2023 with CORU's Interim CEO, Margaret Hynds-O'Flanagan and the Head of the Strategy and Policy Unit, Catherine Byrne. An extensive range of stakeholders were invited to attend this online event. A recording has been uploaded **here** to the CORU website for you to access.

If you have any questions or if you require further information, please contact CORU by email strategyandpolicy@coru.ie.

We thank you in advance for your participation in this consultation.



### **Appendix 3: Copy of Online Feedback Form**

#### **Counsellors and Psychotherapists Registration Board (CPRB)**

Stakeholder Consultation Questionnaire: Criteria for Education and Training Programmes and Standards of Proficiency (Counsellors)

#### **Data Protection and Freedom of Information**

Completion of this questionnaire is voluntary. By completing it, you are allowing your responses to be analysed by CORU for the purpose of seeking feedback on the *Criteria for Education and Training Programmes* and the *Standards of Proficiency* as set by the Counsellors and Psychotherapists Registration Board for counsellors. A report on the survey will be compiled and shared with the Counsellors and Psychotherapists Registration Board.

The information you provide to this survey will be stored in a secure and confidential manner by CORU, it will only be used for the purposes outlined above and it will be maintained as per the CORU's record retention policy. CORU uses SurveyMonkey to gather feedback to our public consultations. Full details of how your information is processed via SurveyMonkey is documented in this privacy policy.

Please be advised that submissions made to CORU are subject to the provisions of the Freedom of Information Act 2014.

Do you agree to the terms above?  By selecting 'Yes' you are confirming that you consent to providing your answers to the questions in this questionnaire.	Yes □ No □
Are you contributing to this survey in:	Personal Capacity □ On behalf of an Organisation □
If on behalf of an organisation, please specify:	
Please indicate if you would like your name and/or organisation to be kept confidential and excluded from the consultation report	Include in Consultation Report □ Exclude from Consultation Report □

#### **About CORU**

CORU is Ireland's first multi-profession health and social care regulator. Our role is to protect the public by promoting high standards of professional conduct, education, training and competence through statutory registration of health and social care professionals.

CORU was set up under the Health and Social Care Professionals Act 2005. We are an umbrella body made up of the Health and Social Care Professionals Council and



Registration Boards, one for each profession named in our Act. The designated professions under the Act are clinical biochemists, counsellors, dietitians, dispensing opticians, medical scientists, occupational therapists, optometrists, orthoptists, physical therapists, physiotherapists, podiatrists, psychologists, psychotherapists, radiation therapists, radiographers, social care workers, social workers and speech and language therapists.

#### **About the Consultation**

This consultation is seeking your feedback on two documents drafted by the Counsellors and Psychotherapists Registration Board:

- The draft Standards of Proficiency for Counsellors
- The draft Counsellors and Psychotherapists Registration Board Criteria for Education and Training Programmes: **Counsellors**

Both documents are accessible on the CORU website here.

Additional guidance e-books are available on the **CORU website** that provide detailed information on the process the Board undertook in drafting its *Standards of Proficiency for Counsellors* and its *Criteria for Education and Training Programmes: Counsellors* and the rationales for the decisions it has taken.

It is important that you read these documents before providing your consultation feedback.

#### **Proportionality of Proposed Regulations**

<u>Directive 2018/958 of the European Parliament and Council</u> – on a *proportionality test* before adoption of new regulation of professions – establishes rules for proportionality assessments to be conducted by EU countries before the adoption of new professional regulations or the amendment of existing regulations. The aim of the Directive is to:

- prevent undue restrictions on access to or the pursuit of professional activities; and
- ensure transparency and the proper functioning of the EU internal market.

The Directive was transposed into Irish law in August 2022 through Statutory Instrument 413/2022.

The setting of *Criteria* and *Standards of Proficiency* for Counsellors, as part of the Board's work towards opening its Counselling Register, requires that an assessment of proportionality be undertaken before the adoption of the *Criteria* and *Standards of Proficiency* by the Board.

This public consultation, and the report that issues from it, will form a key component of the proportionality assessment CORU is undertaking in relation to the setting of *Criteria* and *Standards of Proficiency* for Counsellors.

All proportionality assessments, following completion and submission to the European Commission, are accessible on the *Regulated Professions Database*, available <a href="here">here</a>.



#### **Consultation Section [1]: Standards of Proficiency for Counsellors**

Domain 5 of the Standards of Proficiency detail the professional knowledge and skills required for the safe practice of the profession. These are the **minimum or threshold standards** that graduates are expected to meet in order to safely practice the profession.

Only profession-specific standards are included for survey feedback. These have been identified and specific questions on each of these will be presented in this section.

Please be reminded that in this instance the term threshold refers to the minimum requirements.

- 'Consider threshold' means that the minimum requirement detailed is appropriate.
- 'Partly or not threshold' could refer to either being more or less than the minimum requirement.

Please indicate in the comment box if you consider it more or less than the minimum requirements and provide a brief rationale.

	Standard	Feedback
5.9	Be able to outline typical presentations from mild to severe presenting concerns and be able to treat presenting concerns, within the limits of their knowledge skills and competence or refer to another professional.	Consider Threshold □ Do Not Consider Threshold □ Party Threshold □
If you do not consider the standard to be at threshold level or if you consider it to be partially threshold, please explain why		

Sta	ındard	Feedback
5.10	Be able to practise counselling that is within counsellor's level of skill, knowledge and professional judgement.	Consider Threshold □  Do Not Consider Threshold □  Party Threshold □
If you do not consider threshold, please exp	the standard to be at threshold level of	or if you consider it to be partially



Sta	andard	Feedback
5.11	Be able to demonstrate the ability to use counselling skills to convey empathic understanding and to be informed by and connect compassionately to the perspective of the service user.	Consider Threshold □  Do Not Consider Threshold □  Party Threshold □
If you do not consider	the standard to be at threshold level o	r if you consider it to be partially
threshold, please exp	olain why	

	Standard	Feedback
5.12	Be able to use counselling skills to build therapeutic relationships including the ability to demonstrate active listening skills.	Consider Threshold □  Do Not Consider Threshold □  Party Threshold □
If you do not consider the standard to be at threshold level or if you consider it to be partially threshold, please explain why		

	Standard	Feedback
5.13	Be able to analyse the theories of therapeutic relationship dynamics and be able to establish, build, maintain and conclude a therapeutic relationship with a service user.	Consider Threshold □  Do Not Consider Threshold □  Party Threshold □
If you do not consider the standard to be at threshold level or if you consider it to be partially threshold, please explain why		

	Standard	Feedback
5.14	Be able to collaborate with the service user to set specific goals for change; to re-contract goals and timeframes as necessary.	Consider Threshold □  Do Not Consider Threshold □  Party Threshold □
If you do not consider the standard to be at threshold level or if you consider it to be partially		
threshold, please explain why		



	Standard	Feedback
5.15	Be able to recognise and manage the dynamics of power and authority as experienced in the therapeutic relationship.	Consider Threshold □  Do Not Consider Threshold □  Party Threshold □
If you do not consider the standard to be at threshold level or if you consider it to be partially		
threshold, please	explain why	

	Standard	Feedback
5.16	Be able to orient service users to the counsellor approach and explain the responsibilities of the counsellor in a therapeutic relationship.	Consider Threshold □  Do Not Consider Threshold □  Party Threshold □
If you do not consider the standard to be at threshold level or if you consider it to be partially threshold, please explain why		

	Standard	Feedback
5.17	Be able to initiate and manage engagement by developing rapport and trust.	Consider Threshold □  Do Not Consider Threshold □  Party Threshold □
If you do not consider the standard to be at threshold level or if you consider it to be partially threshold, please explain why		

	Standard	Feedback
5.18	Be able to identify professional and ethical boundaries with service users and be able to identify and manage any associated challenges.	Consider Threshold □  Do Not Consider Threshold □  Party Threshold □



If you do not consider the standard to be at threshold level or if you consider it to be partially threshold, please explain why

	Standard	Feedback
5.19	Be able to critically reflect on the role of the counsellor in the therapeutic process and be able to manage personal involvement in, and contribution to, the process of counselling.	Consider Threshold □  Do Not Consider Threshold □  Party Threshold □
If you do not cons	ider the standard to be at threshold level o	r if you consider it to be partially
threshold, please explain why		

	Standard	Feedback
5.20	Be able to articulate the necessity of engaging in clinical supervision to support sustain and improve practice	Consider Threshold □  Do Not Consider Threshold □
support, sustain and improve practice.  Party T  If you do not consider the standard to be at threshold level or if you of threshold, please explain why		Party Threshold □ r if you consider it to be partially

	Standard	Feedback
5.21	Be able to recognise personal emotional responses, vicarious trauma and the need to develop effective self-care strategies and burnout prevention.	Consider Threshold □  Do Not Consider Threshold □  Party Threshold □
If you do not consider the standard to be at threshold level or if you consider it to be partially threshold, please explain why		

	Standard	Feedback
5.22	Be able to demonstrate skill in the	Consider Threshold □
0.22	technologies and communication	Consider Threshold



	methods required for the delivery of counselling in a virtual setting, and be able to apply these therapeutically and safely while protecting service user privacy and confidentiality.	Do Not Consider Threshold □ Party Threshold □
If you do not consi threshold, please o	ider the standard to be at threshold level or explain why	r if you consider it to be partially

	Standard	Feedback
5.23	Be able to appraise theories and research on mental health and obstacles to wellbeing and be able to use these to facilitate improved treatment outcomes.	Consider Threshold □  Do Not Consider Threshold □  Party Threshold □
If you do not consider the standard to be at threshold level or if you consider it to be partially threshold, please explain why		

	Standard	Feedback
5.24	Be able to utilise a theoretical framework for practice with psychosocial factors and the impact on well-being.	Consider Threshold □  Do Not Consider Threshold □  Party Threshold □
If you do not consider the standard to be at threshold level or if you consider it to be partially threshold, please explain why		

	Standard	Feedback
5.25	Be able to analyse the impact of trauma on psychological functioning and be able to integrate this knowledge to inform practice.	Consider Threshold □  Do Not Consider Threshold □  Party Threshold □



If you do not consider the standard to be at threshold level or if you consider it to be partially threshold, please explain why

	Standard	Feedback
5.26	Be aware of the potential for harm to the service user in exploring trauma therapeutically, understand the need to refer on and be able to identify suitable referral pathways.	Consider Threshold □  Do Not Consider Threshold □  Party Threshold □
If you do not consider the standard to be at threshold level or if you consider it to be partially threshold, please explain why		

	Standard	Feedback
5.27	Be able to identify potential risk for suicide, self-harm or harm to others and implement early management, supporting the immediate safety of the service user, and make referrals for additional treatment.	Consider Threshold □  Do Not Consider Threshold □  Party Threshold □
If you do not cons	ider the standard to be at threshold level of	r if you consider it to be partially
threshold, please	explain why	

	Standard	Feedback
5.28	Be able to demonstrate knowledge of crisis intervention and prevention and be able to work with people in crisis for improved outcomes.	Consider Threshold □  Do Not Consider Threshold □  Party Threshold □
If you do not consider the standard to be at threshold level or if you consider it to be partially threshold, please explain why		



	Standard	Feedback
5.29	Have a critical awareness of the need for organisation and resource management in various practice settings.	Consider Threshold □  Do Not Consider Threshold □  Party Threshold □
If you do not cons threshold, please	ider the standard to be at threshold level of explain why	r if you consider it to be partially

	Standard	Feedback
5.30	Be able to demonstrate knowledge of the effects of medications, prescribed or otherwise, relevant to service user counselling work.	Consider Threshold □  Do Not Consider Threshold □  Party Threshold □
If you do not consider the standard to be at threshold level or if you consider it to be partially threshold, please explain why		

#### Consultation Section [2]: Common Standards of Proficiency

The common standards have been agreed by the Health and Social Care Professionals Council and have been adopted by the Counsellors and Psychotherapists Registration Board. As such, they are not the subject of this consultation.

These common standards are common across all professions CORU regulates and can be found in Domains 1-4 of the *Standards of Proficiency for Counsellors* document.

In relation to the common standards, these have been included for completeness so please keep in mind that we do not plan to make any significant changes to these standards **unless there is a factual error, or a standard has been omitted.** 

In this context, you should read through the whole document to ensure that there are no omissions.

If you feel there are omissions, you should note these in the table below along with your proposed wording to rectify an omission. It is important that if you feel that a standard has been omitted, that you explain your rationale so we can better understand your comment and consider whether it is something that should be included in the final document.

Do you consider there to be any omissions from	Yes □
or factual errors in Domains 1-4?	165 🗆



		No □
If yes, please complete the f	ollowing as appropriate	y:
Domain		
Suggested		
Omission/Error		
Proposed		
Wording to		
rectify omission		
Rationale for		
Comment		
Domain		
Suggested		
Omission/Error		
Proposed		
Wording to		
rectify omission		
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rectify omission		
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Wording to	
rectify omission	
Rationale for	
Comment	
Comment	
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Suggested	
Suggested Omission/Error	
Suggested Omission/Error Proposed	
Suggested Omission/Error Proposed Wording to rectify omission	
Suggested Omission/Error Proposed Wording to	

## Consultation Section [3]: Criteria for Education and Training Programmes (Counsellors)

The Criteria for Education and Training programmes identify the requirements an education provider must meet around how a programme is designed and managed to ensure that all graduates meet the Standards of Proficiency.

The following criteria are specifically related to counsellors and have been included in addition to the common criteria that all CORU registered professionals are expected to meet. When looking at each criterion, you should consider whether they result in a graduate being a safe practitioner for the purpose of public protection when entering the register.

Please be reminded that in this instance the term threshold refers to the minimum requirements.

- 'Consider threshold' means that the minimum requirement detailed is appropriate.
- 'Partly or not threshold' could refer to either being more or less than the minimum requirement. Please indicate in the comment box if you consider it more or less than the minimum requirements and provide a brief rationale.

	Criterion	Feedback
	The Counsellors and Psychotherapists	Consider Threshold □
1.1	Registration Board requires that the	Do Not Consider Threshold □
	minimum qualification level for entry to	Party Threshold □



	the register is: Level 8 on the National Framework of Qualifications (NFQ)	
If you do not con threshold, please	sider the criterion to be at threshold level or e explain why	r if you consider it to be partially

The second profession-specific criterion relates to the total number of practice placement hours each student must complete as part of an education and training programme:

2.2 The programme must ensure that each student completes 450 hours.
A minimum of 300 of the 450 hours must be supervised service user contact experience, of which 75 hours is directly observed service user contact.

There are three elements to this criterion. There is one question per element below.

	Criterion	Feedback
2.2	The programme must ensure that each student completes 450 hours of practice placement.	Consider Threshold □  Do Not Consider Threshold □  Party Threshold □
If you do not con threshold, please	sider the criterion to be at threshold level o	r if you consider it to be partially

	Criterion	Feedback
2.2	Of the 450 hours of practice placement a student must complete, <b>300 hours</b> must be supervised service user contact experience.	Consider Threshold □  Do Not Consider Threshold □  Party Threshold ⊠
If you do not con threshold, please	sider the criterion to be at threshold level o explain why	r if you consider it to be partially

	Criterion	Feedback
2.2	Of the 300 hours of supervised service user contact experience, <b>75 hours</b> must be directly observed service user contact.	Consider Threshold □  Do Not Consider Threshold □  Party Threshold □



Suggested Omission

If you do not consider the criterion to be at threshold level or if you consider it to be partially threshold, please explain why		
Consultation Section [4]: Criteria for Education and Training Programmes Having read through the draft profession-specific Criteria for Education and Training Programmes (Counselling), you are now invited to consider if there are any omissions.  If you feel there are omissions, you should note these below along with your proposed wording to rectify an omission. It is important that if you feel that a criterion has been omitted that you explain your rationale so we can better understand your comment and consider whether it is something we should include it in the final document.  Please answer the following questions in relation to the Profession Specific Criteria for Education and Training Programmes.		
Do you consider there to be any omissions from the profession-specific criteria?  Yes □ No □		
If yes, please complete the fo	ollowing as appropriate	<b>:</b> :
Suggested Omission		
Proposed Wording to rectify omission		
Rationale for Comment		
Suggested Omission		
Proposed Wording to rectify omission		
Rationale for Comment		



Proposed Wording to	
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Wording to	
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Rationale for	
Comment	
not in a position to remove all changing any of the languag the professions that we curre	bution to this consultation process. As already stated, we are ny of the common standards or criteria. We are also limited in e as it has been developed to ensure consistency across all ntly regulate or will regulate in the future.
	further general comments related to these documents, please the relevant issue for our consideration.
	·
include it below and describe	·
Issue General	·
Issue General Comment	·
Issue General Comment Rationale for	·
Issue General Comment	·
Issue General Comment Rationale for	·
Issue General Comment Rationale for	·
Issue General Comment Rationale for Comment	·
Issue General Comment Rationale for Comment Issue	·
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Issue	
General Comment	
Comment	
Rationale for Comment	

#### **Consultation Section [6]: Submission**

Thank you for completing this survey. If you have any questions about this consultation, please email <a href="mailto:strategyandpolicy@coru.ie">strategyandpolicy@coru.ie</a>



### **Appendix 4: Copy of Social Media Posts**

#### LinkedIn:



CORU - Regulating Health + Social Care Professionals + Following \*\*\*
Public Safety

The Counsellors and Psychotherapists Registration Board was established in 2019, with responsibility for two registers – one for counsellors and one for psychotherapists.

The Board is now seeking feedback from stakeholders, including members of the professions, education providers, employers, professional bodies, as well as members of the public on:

- . Draft Criteria for Education and Training Programmes for both professions
- . Draft Standards of Proficiency for both professions

These consultation documents can be viewed on the CORU website https://lnkd.in/eHTgY7E6.

CORU has developed two eBook resources that explore a range of key issues associated with the Board's setting of its Standards and Criteria, explaining the process the Board undertook and its rationale in making its proposals. You are encouraged to review these eBook resources as you prepare your feedback.

- Read the Criteria for Education and Training Programmes eBook here https://lnkd.in/e\_fGetCH
- Read the Standards of Proficiency eBook here https://lnkd.in/eTgu8UwC

The consultation process will close at 5pm on Friday, 01 December 2023.

#counsellors #psychotherapists #CORU







CORU - Regulating Health + Social Care Professionals · Following \*\*\* Public Safety

The Counsellors and Psychotherapists Registration Board is working towards introducing statutory regulation for the professions of:

- Counsellor
- · Psychotherapist

Each profession is recognised as having a distinct professional identity. There will be two separate registers established, - one for counsellors and one for psychotherapists.

For each profession, the Board has drafted:

- The threshold professional standards that will be used for entry to each of these registers
- The education criteria that will be used to approve education and training programmes

The Board is now seeking feedback from stakeholders, including members of the professions, education providers, employers, professional bodies, as well as members of the public on the draft Standards and draft Criteria. These consultation documents can be viewed on the CORU website https://lnkd.in/eHTgY7E6

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Swipe through to read both eBooks



Counsellors and Psychotherapists Registration Board (CPRB)

Public Consultation 2023 Criteria for Education and Training Programmes





## CORU - Regulating Health + Social Care Professionals · Following · · · Public Safety

CORU recently hosted a webinar to share information on the Counsellors and Psychotherapists Registration Board's public consultation on the Standards of Proficiency and Criteria for Education and Training Programmes for the designated professions of Counsellor and Psychotherapist.

You can watch the webinar here https://lnkd.in/etxSz9BM

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Consultation documents including FAQs can be viewed on the CORU website https://lnkd.in/eHTgY7E6



Counsellors and Psychotherapists Information Session -September 2023

coru.ie • 1 min read



#### Twitter (X):



The Counsellors and Psychotherapists Registration Board was established in 2019, with responsibility for two registers – one for counsellors and one for psychotherapists.

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- Draft Standards of Proficiency for both professions

Consultation documents including FAQs can be viewed on the CORU website coru.ie/public-protect...



Last edited 11:35 AM · Sep 15, 2023 · 1,086 Views



**Appendix 5: Copy of Webinar PowerPoint Presentation** 

**Appendix 6: Copy of eBook Resources** 

**Appendix 7: Copy of Frequently Asked Questions** 

Section on the CORU Website



# **Briefing on the Regulation of Counsellors** and Psychotherapists in Ireland

CORU Information Webinar, 01 September 2023

## **CORU's Mission**



To protect the public by promoting high standards of professional conduct and professional education, training and competence among registrants of the designated professions

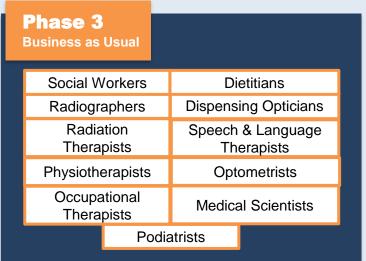
(Health and Social Care Professionals Act 2005)

# **CORU's Regulated Health and Social Care Professions**



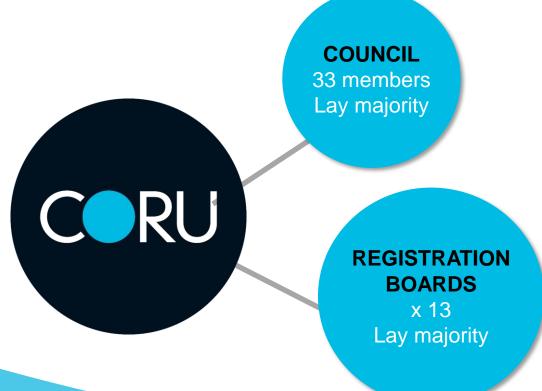






## **Structure of CORU**





## **Role of Registration Boards**





Setting professional standards



Establishing and maintaining a register of members for the profession



Approval and Monitoring of Education and Training Programmes



Recognition of professional qualifications awarded outside Ireland



Setting code of professional conduct and ethics

## **Public Protection**



Counsellors and Psychotherapists Registration Board (CPRB)



# **Counsellors & Psychotherapists Registration Board**



In 2016, the Minister for Health designated the regulation of **counsellors** and **psychotherapists** 

Following a 2016 DoH Public Consultation, the Minister determined there would be **one Registration Board** established with statutory responsibility for **two registers** 



## **Key Steps towards Opening a Register**



Set its Standards of Proficiency and Criteria for Education and Training Programmes

 Threshold level of knowledge, skills and professional attributes for entry to the register

 Requirements that education programmes must meet in order to deliver on the standards of proficiency

Set its Code of Conduct

Approving programmes to be used for entry to the register (under Section 38) to ensure each meets all the Board's Criteria and delivers the Board's Standards of Proficiency

Process of Approving Education and Training Programmes

 The standards of conduct, performance and ethics that a registered member of the profession must adhere to during their course of their work

Make its Bye-Laws

Establish the legal architecture for the opening of the register

## Process for setting Criteria and Standards



Board drafts Criteria and Standards of Proficiency for each profession

Board considers and adopts Criteria and Standards for consultation

#### Stakeholder consultation

Board reviews consultation feedback and revises Criteria and Standards accordingly

Board adopts Criteria and Standards for professions

Dissemination to Education Providers

## What this means for the CPRB?



Counsellors and Psychotherapists Registration Board

Register of Psychotherapists

Register of Counsellors

#### Criteria

for Education and Training Programmes for **Psychotherapists** 

#### **Standards**

of Proficiency for **Psychotherapists** 

#### Criteria

for Education and Training Programmes for **Counsellors** 

#### **Standards**

of Proficiency for Counsellors

## What are the Standards of Proficiency?



# Standards of Proficiency

Describe the threshold

– minimum – level of
knowledge, skills and
professional attributes
needed to enable a
person, upon entry onto
a register, to practice
safely and, in so doing,
keep the public safe

Standards of Proficiency for Counsellors

Standards of Proficiency for Psychotherapists



Standards of Proficiency are set as Threshold Standards

The Board must set **high standards** at the **threshold** level required to protect the public

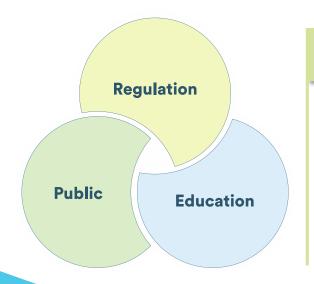
**Threshold** = the minimum knowledge, understanding and skills to practice safely

Not optional, desirable or aspirational standards

Start with a focus on public protection and set the threshold standards from that perspective

### What are the Standards used for?





#### Regulation

All applicants

– from Ireland and internationally – must demonstrate achievement of all the standards as part of the registration process

#### **Education**

Education providers
that prepare students
to practice a
profession upon
graduation – and
which seek approval
from the Board – use
the standards to
design their
education and
training programmes

#### Public

Articulate the practice of a profession at entry level and help the public understand what kind of service they can expect.

## How are the *Standards* developed?





Review of contemporary evidence-informed academic literature



Review of comparator international professional standards



Understanding and experience of contemporary practice of the profession in Ireland



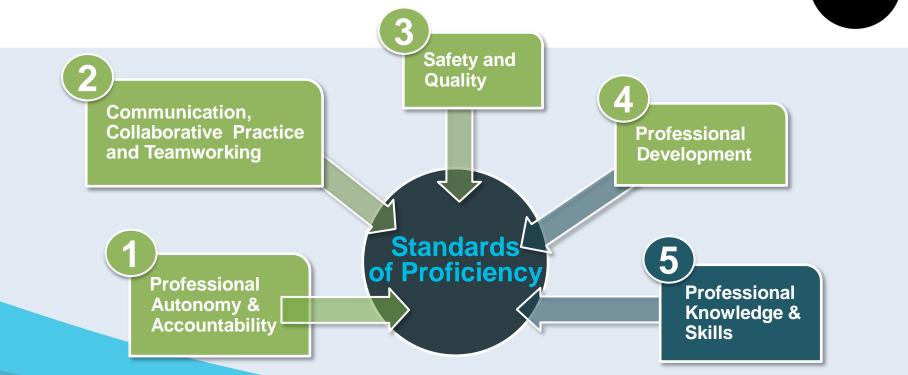
## How are the Standards written?



Outcomes:	they provide clarity and direction on the knowledge or skill a graduate must be able to demonstrate
Succinct:	they avoid extensive lists that detail the means around how the knowledge or skill is to be demonstrated
Flexible:	they allow for application across a diverse range of therapeutic environments
Holistic:	they are not standalone or there is no hierarchy; each standard is as important as another. They are interconnected

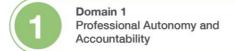
## **5 Domains of the Standards of Proficiency**





## **5 Domains of the Standards of Proficiency**





- Domain 2
  Communication, Collaborative Practice and Teamworking
- Domain 3
  Safety and Quality
- Domain 4
  Professional Development

Common Standards of Proficiency for both professions

- Domain 5
  Professional Knowledge and Skills specific to Counsellors
- Domain 5
  Professional Knowledge and Skills
  specific to Psychotherapists

Standards for individual professions

## **Domain 5:** Professional Knowledge and Skills



5



Both professions share similar professional characteristics



**Similarities** in the practice of the two professions is reflected in common standards for both.

Be able to maintain professional and ethical boundaries with service users and be able to identify and manage any associated challenges



Board has articulated the differences between the two professions that reflect the specific knowledge and skills required to practice each profession

### What are the Criteria?



Criteria for Education and Training Programmes

Detail how a professional education and training programme should be designed and managed in order to consistently produce graduates who have achieved the Standards of Proficiency

Criteria for Education and Training
Programmes for
Counsellors

Criteria for Education and Training
Programmes for
Psychotherapists

## What is the Criteria used for?





1

## Approve and Monitor

Education and Training programmes by the Board

2

## **Qualifications Based Register**

Applies to new and future graduates of approved programmes to join the register once the register is open

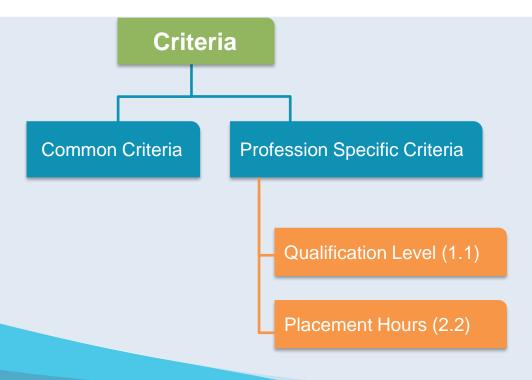
3

## Not for Existing Practitioners

There is a different route for existing practitioners to join the register during the first two years the register is open

## How is the Criteria made up?





# How is the Criteria made up?

All 5 areas work together to ensure a programme can continually produce graduates who have met the standards of proficiency and, in so doing, ensure protection of the public



## **Profession Specific Criteria [1]:**

#### Threshold Level of Qualification for Entry to the Register



#### What does Threshold Level mean?

- Refers to the minimum level on the National Framework of Qualifications a programme must be designed to in order to deliver on the standards of proficiency.
- Programmes can be designed to a qualifications level above this threshold and be considered for programme approval by the Board.
- But, if the programme is designed at a level below the threshold, it could not deliver on the standards of proficiency and therefore would not be considered for programme approval.



## The Board's Approach



Reviewed the NFQ Level Descriptors Reviewed the Standards of Proficiency for both counsellors and psychotherapists

Considered the opportunity for all members of society to access higher education and enter both professions

### The Board's Draft Criteria



Counsellors
Level 8

Psychotherapists
Level 8

## **Profession Specific Criteria [2]:**

#### **Total Number of Practice Place Hours**



Practice Education is an integral part of the training for a future counsellor or psychotherapist

Provides the opportunity to translate learning into practice in a supervised practice setting

 Essential component of student assessment and their demonstrated achievement of the standards of proficiency

## How does the Board establish the total number of placement hours?



The nature of the profession and types of service user engagement

Current professional body requirements

Threshold level of knowledge and skills as articulated in the Standards of Proficiency

Requirement for students to demonstrate achievement of all standards of proficiency

### The Board's Decision



#### Counsellors

- 450 hours of practice placement education
- Minimum 300 hours in supervised service user contact
- 75 hours must be directly observed service user contact

#### **Psychotherapists**

- 500 hours of practice placement education
- Minimum 350 hours in supervised service user contact
- 100 hours must be directly observed service user contact

### **Public Consultation**





Two public consultations on the *Criteria* and *Standards of Proficiency*:

Separate consultation for counsellors and for psychotherapists



Consultation
Questionnaire
accessible online at:

www.coru.ie or email feedback to:

strategyandpolicy@coru.ie



Consultation opens on:

4 September 2023

and closes on:

1 December 2023

Have your say!

### Communication





www.coru.ie



@CORUIreland



communications@coru.ie





## **Thank You**



**Counsellors and Psychotherapists Registration Board (CPRB)** 

## Public Consultation 2023 Standards of Proficiency



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### Introduction

CORU is Ireland's multi-profession health regulator. Our role is to protect the public by promoting high standards of professional conduct, education, training and competence through statutory registration of health and social care professionals. CORU was set up under the Health and Social Care Professionals Act 2005 (as amended). It is made up of the Health and Social Care Professionals Council and the Registration Boards, one for each profession named in our Act.

Once statutory regulation is introduced to the counselling and psychotherapy professions, practitioners wishing to work using these titles in the Republic of Ireland must be registered with CORU on the appropriate register.

On 27 February 2019, the then Minister for Health, Simon Harris, confirmed the establishment of and appointment of members to the Counsellors and Psychotherapists Registration Board, under the Health and Social Care Professionals Act 2005 (as amended) to regulate the professions of counsellors and psychotherapists.

At the time of designation by the Minister, following public consultation, **one Registration Board** was established which would be responsible for two registers – one for counsellors and one for psychotherapists.

It is CORU's role to implement this direction, as set out by the Minister. Therefore there is one registration board and we are working towards the opening of two separate registers.

There is a standardised process of work to be completed by each Registration Board before the opening of a register. This includes:

- setting the pre-registration education and training standards;
- approving education and training programmes for new graduate entry to registers; and
- making statutory bye-laws and setting the Code of Professional Conduct and Ethics for the professions.

The Counsellors and Psychotherapists Registration Board is at the first stage of this process and has launched a public consultation on its **draft**Standards of Proficiency and Criteria for

Education and Training Programmes. This public consultation will provide you with the opportunity to provide feedback on this key step towards opening registers for counsellors and psychotherapists.





## **Chapter 1**

## **Introduction to the Standards of Proficiency**

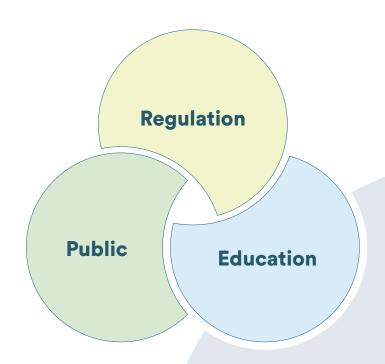
#### What are the Standards?

The standards of proficiency describe the threshold level of knowledge, skills and professional attributes needed to enable a person to practise safely and, in so doing, keep the public safe.

#### What are the Standards Used For?

The standards are used in a number of settings:

- Regulation: they set the minimum level of knowledge and skills required to enter the professional register. All applicants – from Ireland and internationally – must demonstrate achievement of all the standards as part of the registration process.
- Education: education providers that prepare students to practise a profession upon graduation – and who seek approval from the Board – use the standards to design their education and training programmes.
- Public: the standards help the public understand the threshold level of service they can expect from a registered health and social care professional.



#### Where do the Standards Come From?

The Board is responsible for drafting the standards of proficiency. It is made up of practitioners, representatives from education and training and lay members, which ensures there is a broad range of voices and perspectives shaping their design.



## The Board undertakes an extensive research process which informs the drafting of standards. This involves:

- review contemporary evidence-informed academic literature;
- review of comparator international professional standards; and
- understanding of the contemporary practice of the profession in Ireland

#### Who else is involved in this?

Key stakeholders, including the public (through the public consultation), are part of the drafting process.

#### What is next?

Once the Board has prepared a draft set of standards, they are presented for public consultation and feedback.

This is the stage the Counsellors and Psychotherapists Registration Board is at.

## **Chapter 2**

## Articulating the Distinctions between Counsellors and Psychotherapists

The Board has developed two sets of standards: one for counsellors and one for psychotherapists

- There are two sets of standards because they articulate the distinctiveness between the practise of counselling and psychotherapy.
- Each set of standards reflects the distinct proficiencies of each profession.
- There are a range of standards which are common to both professions and are articulated in the same way for both professions. These are known as **Framework Standards** and are found in Domains 1, 2, 3 and 4 of the Standards.

- The profession specific standards are found in Domain 5.
- There is no hierarchy across the standards; each area is an important as another. It is the achievement of all the standards that demonstrates that a person is ready to join the register and ensures public protection.



## **Chapter 3**

## **Common Standards of Proficiency**

- Domain 1
  Professional Autonomy and Accountability
- Domain 2
  Communication, Collaborative Practice and Teamworking
- Domain 3
  Safety and Quality
- Domain 4
  Professional Development

Common Standards of Proficiency for both professions

- Domain 5
  Professional Knowledge and Skills specific to Counsellors
- Domain 5
  Professional Knowledge and Skills
  specific to Psychotherapists

Profession Specific Standards



#### Domain 1:

## Professional Autonomy and Accountability

(Applies to both professions)

This domain is concerned with the professional and ethical behaviours of practitioners in the delivery of counselling and psychotherapy treatment. Key areas of this proficiency include:

- working in the best interests of service users that reflects their will and preference;
- ensuring informed consent is received from the service user; and
- maintaining professional boundaries in the delivery of care; and practices around confidentiality.

2

#### Domain 2:

## Communication, Collaborative Practice and Teamworking

(Applies to both professions)

This domain focuses on the key skills required to use open, responsive and appropriate communication approaches and tools effectively when engaging with service users and colleagues.

This includes counsellors and psychotherapists being able to:

- adapt and modify a communications approach, written and verbal, to ensure service user understanding; and
- recognise the dynamics of working as part of a team, including working alongside colleagues from other professions.

Common Standards of Proficiency for both professions



#### Domain 3:

#### **Safety and Quality**

(Applies to both professions)

This domain recognises the relationship that exists between a service user, their health and wellbeing, the practitioner and the environment in which a counselling or psychotherapy treatment is delivered.

Key to this area of proficiency is the ability of practitioners to:

- gather, analyse and evaluate all necessary information when assessing an appropriate treatment course;
- evaluate, review and modify an approach to treatment, together with a service user; and
- establish and maintain safe environments for the delivery of service user care.



#### Domain 4:

#### **Professional Development**

(Applies to both professions)

This domain articulates standards around engagement in Continuing Professional Development, including:

- the importance of participating in professional development and education opportunities; and
- the development of self-reflection and evaluation skills as part of professional continual improvement.

Common Standards of Proficiency for both professions

## **Chapter 4**

## **Profession Specific Standards**



#### Domain 5:

## Professional Knowledge and Skills

(Specific to each profession)

Domian 5 articulates the profession specific knowledge, skills and behaviours needed for the effective delivery of counselling or psychotherapy practice.

These standards are informed by relevant and contemporary theory, practice knowledge and evidence.

It is in these standards that you will see the distinctiveness of each of the professions emerge.

## Feedback Wanted on Domain 5: Professional Knowledge and Skills!!



#### **Professional Knowledge and Skills**

While expressed differently to reflect the different scope of practice of both professions, these standards address areas including:

- knowledge and application of appropriate therapeutic approaches to meet service user needs;
- the appropriate skills required to establish, build, maintain and safely conclude a therapeutic relationship;
- the need for reflexivity in practice and understand the self, as a practitioner, in the therapeutic relationship; and
- the changing environments of practice and the skills needed to work and manage across these, including in the digital space.



## Stakeholder Consultation

The Board's draft Standards for Counsellors and draft Standards for Psychotherapists are available to access on www.coru.ie

We are looking for your feedback and perspective. We would like your views on:

- whether the standards are set at the threshold level for entry to practice; and
- > are there any gaps or anything missing?

You can access the consultation questionnaires and all relevant information on the CORU website:

#### www.coru.ie

The consultations are open for feedback from 4 September 2023 until 1 December 2023



Counsellors and Psychotherapists Registration Board (CPRB)

# Public Consultation 2023 Criteria for Education and Training Programmes



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### Introduction

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At the time of designation by the Minister, following public consultation, one Registration Board was established which would be responsible for two registers – one for counsellors and one for psychotherapists.

It is CORU's role to implement this direction, as set out by the Minister. We therefore have one registration board and we are working towards the opening of two separate registers.

There is a standardised process of work to be completed by each Registration Board before the opening of a register including:

- setting the pre-registration education and training standards;
- approving education and training programmes for new graduate entry; and
- making statutory bye-laws and setting the Code of Professional Conduct and Ethics for the professions.

The Counsellors and Psychotherapists Registration Board is at the first stage of this process and has launched a public consultation on its **draft Criteria for Education and Training Programmes and Standards of Proficiency**. This public consultation gives you the opportunity to provide feedback on this key step towards opening registers for counsellors and psychotherapists.





## **Chapter 1**

## Introduction to the Criteria for Education and Training Programmes



#### What is the Criteria?

The Criteria identify the requirements the Counsellors and Psychotherapists Registration Board has set around how a professional education and training programme is designed and managed.

The Criteria is used to ensure that a programme has the systems and mechanisms in place to demonstrate that students graduating from the programme have achieved all the standards of proficiency for the profession and are proficient in the practice of the profession to enter onto the register and practise safely and autonomously.

The Criteria, by ensuring that graduates are suitably trained and qualified to practise as counsellors and psychotherapists, is pivotal to ensuring public safety.

#### What is the Criteria Used For?

The Counsellors and Psychotherapists Registration Board operates a qualifications-based register. This means that successful completion of a programme, approved by the Board, is required for new and future graduates to join the register, once the register is open.

Please Note: existing practitioners, at the time the register opens, will have a different route to registration.

The Criteria is used to approve and monitor education and training programmes. Each programme, and the education provider that offers it, is assessed against each of the criteria and only programmes that meet all criteria required by the Board are approved.

In approving a programme, the Board has assessed that successful completion of the course of study and awarding of the qualification provides students with the knowledge, skills and professional attributes required to practise safely and proficiently.

#### Where do the Criteria Come From?

The Board is responsible for drafting the criteria for Education and Training Providers. It is made up of practitioners, representatives from education and training and lay members, which ensures there is a broad range of voices and perspectives shaping their design.



## The Board undertakes an extensive research process which informs the drafting of Criteria. This involves:

- review and evaluation of the standards of proficiency in the context of the National Framework of Qualifications (NFQ) Level Descriptors;
- review of any education and training requirements set by relevant professional bodies in Ireland: and
- consideration of the contemporary practice and structure of the profession in Ireland.

#### Who else is involved in this?

Key stakeholders, including the public (through the public consultation), are part of the drafting process.

#### What is next?

Once the Board has prepared a draft set of standards, they are presented for public consultation and feedback.

This is the stage the Counsellors and Psychotherapists Registration Board is at. The Board has drafted two sets of criteria: one for counselling programmes and one for psychotherapy programmes.

### **Chapter 2**

# Criteria and Quality Assurance

The Criteria is structured around six key areas:

All these areas work together to ensure that a programme can continually produce graduates who have met all the standards of proficiency and so can practise safely in delivering high quality therapeutic care when they join the register, thereby ensuring public protection.

### **Criterion 6**

The assessment strategy which details how the standards of proficiency are assessed and how an education programme ensures that a student who completes a programme has demonstrated achievement of all the standards

### **Criterion 1**

Minimum level of Qualification for entry to register

**Criterion 2** 

Processes around how practice placements are

integrated into the

programme and how the

education provider

continually ensures high

quality placement experiences for students

#### **Criterion 5**

The design of the curriculum and how it is mapped to the delivery of the standards of proficiency

5

2

4 3

### **Criterion 4**

The management and governance arrangements the education provider has at an institutional and programme level

### Criterion 3

The mechanisms through which students are admitted onto a programme

### **Make-Up of Criteria**

It is important to note that the Criteria is comprised of two elements:

- Framework Criteria which is common across all regulated professions; and
- Profession specific criteria which the Board is responsible for drafting.



### What is the Board Looking for Feedback On?

For its draft Criteria for Counsellors and its draft Criteria for Psychotherapists, the Board has identified the professionspecific requirements that it is looking for your feedback on:

- The threshold or minimum level of qualification for entry to the register; and
- The total number of practice placement hours a student must complete as part of an education and training programme.

### **Chapter 3**

### **Level of Qualification**

### Threshold Level of Qualification

The threshold level of qualification refers to the minimum level on the National Framework of Qualifications a programme – and its qualification – must be designed to in order to deliver on the standards of proficiency.

Programmes can be designed to a qualifications level above this threshold and be considered for programme approval by the Board.

However, if the programme is designed at a level below the threshold, it could not deliver on the standards of proficiency and therefore would not be considered for programme approval.



### The Board's Decision

The Board has set the minimum level of qualification for entry to the register at Level 8 for both counsellors and psychotherapists.

#### The Board's Process

In setting the threshold at Level 8, the Board examined:

- the NFQ Level Descriptors which describe the threshold knowledge, skills and competence required at each level;
- the threshold level of practice of the professions as articulated in each of the standards of proficiency for counsellors and psychotherapists;
- the nature of the practice of the professions as providing advanced and specialised therapeutic support on a one-to-one basis with individuals; and
- the opportunity for all members in our society to access higher level education and enter into the counselling and psychotherapy professions, recognising that the professions reflect the people they serve.



### The Board's Rationale

The Board concluded that NFQ Level 7 does not reflect the demands of practice or depth of engagement with service users required at threshold level.

The threshold requirements at NFQ Level 9 go beyond the threshold level of proficiency identified in the Board's standards of proficiency for both counsellors and psychotherapists.

NFQ Level 8 reflects the demands of both professions at threshold level and the articulation of the range and application of knowledge and skills required in the Board's standards of proficiency

### **Chapter 4**

### **Practice Placement Hours**

### **About Practice Education**

Practice Education is an integral part of the training of a future counsellor or psychotherapist.

It is necessary to provide students with the opportunity to engage directly in the practice of the profession - with the appropriate supervision and support structures in place - to allow a student to translate what is learned in the classroom into practice. This ensures the quality and safety of future practitioners.

Practice education, too, plays a vital role in the assessment of students and whether they have demonstrated achievement of the standards of proficiency.

This is why an education provider must have for example:

- a process in place for approving suitable placement sites that have appropriate onsite supervisory arrangements for students;
- a process for how they allocate students to placement sites;
- monitoring and quality assurance processes to ensure the ongoing quality of placement education;
- mechanisms for training supervisors in placement sites;
- process around how assessments of students on placements are undertaken.



These are the requirements for practice education across all regulated programmes.

### **Practice Placement Hours**

The Board has set profession specific requirements around the total number of practice education hours that a student must complete as part of an education and training programme.

The Board has identified three parts to its requirements around placement hours:

- the total number of practice education hours a student must complete;
- the minimum number of hours a student must complete in supervised service user contact; and
- the number of hours a student is directly observed in service user contact.

#### What Does this Mean?

#### **Total Number of Placement Hours**

The total hours that a student is engaged in practice education is madeup of two elements:

- the time on-site in a placement setting in the practice of the profession. This can include direct engagement with a service user, planning for a session with a service user, completion of reports and other administrative duties – all the things that go into practising the profession; and
- the time allocated to academic activities associated with practice education. This can include, for example, completion of a placement portfolio, attendance at supervision meetings with a supervisor.

### Hours in Supervised Service User Contact

These are the hours that a student is on-site in a placement setting engaging in the practice of the profession, reflective of that student's experience and proficiency. At each placement site, a student must be assigned a suitably qualified and experienced on-site supervisor who is available to the student throughout the course of the practice placement.

This is to ensure the protection of the student and the safety of any service users a student engages with during a placement experience.

Supervision is about providing a student with appropriate levels of support and guidance during a placement.

It is important to make a distinction between supervision and observation. Supervision may include observation, but observation is not supervision.

#### **Direct Observation**

Observation is directly linked with the assessment of a student and requires that the student is directly observed in practice by their supervisor to determine achievement of the standards of proficiency.

#### The Board's Decision

The Board has set different practice placement hours requirements for counsellors and psychotherapists.

### For Counsellors, a student must complete:

- 450 hours of practice placement education during the course of a programme; of which
- a minimum of 300 hours must be completed in supervised service user contact; and
- of these 300 hours, 75 hours must be direct observed service user contact.

### For Psychotherapists, a student must complete:

- 500 hours of practice placement education during the course of a programme; of which
- a minimum of 350 hours must be completed in supervised service user contact; and
- of these 350 hours, 100 hours must be direct observed service user contact.

### The Board's Rationale

In setting the practice education hours for both professions, the Board has factored in:

- the practice of the profession and the types of engagement a practitioner has with a service user;
- the practice placement hours currently required by a range of professional bodies in Ireland;
- the threshold level of knowledge and skill as articulated in the standards of proficiency for both professions; and
- the requirement that students must demonstrate achievement of all standards of proficiency during their education and training.

Education providers have flexibility around how to design and structure their programmes to meet these placement requirements; there's no one way to do this.





## **Stakeholder Consultation**

The Board's draft Criteria for Education and Training Programmes for Counsellors and Psychotherapists is available to access on www.coru.ie

We are looking for your feedback and perspective. We would like your views on:

- the level of qualification for entry to the register for both professions; and
- the requirements set by the Board for practice placement hours.

You can access the consultation questionnaires and all relevant information on the CORU website:

#### www.coru.ie

The consultations are open for feedback from 4 September 2023 until 1 December 2023



### Counsellors and Psychotherapists Registration Board (CPRB) Consultation Website Frequently Asked Questions, September 2023

### [1] General FAQs

Question	Answer
[1] What is the role of CORU and how does it differ from a professional association/ accrediting body currently in place in the Counselling and psychotherapy professions?	CORU is Ireland's multi-profession health regulator. Our role is to protect the public by promoting high standards of professional conduct, education, training and competence through statutory registration of health and social care professionals. CORU was set up under the Health and Social Care Professionals Act 2005 (as amended). It is made up of the Health and Social Care Professionals Council and the Registration Boards, one for each profession named in our Act.  CORU's focus is on the protection of the public. Professional associations/ accrediting bodies act as advocates for the profession. In the case of multiple professional bodies in the field of counselling and psychotherapy, professional bodies also often advocate for specific modalities/approaches used by practitioners. Once statutory regulation is introduced to the counselling and psychotherapy professions, practitioners wishing to work using these titles in the Republic of Ireland will have to be registered with CORU on the appropriate register.
[2] Why are there two separate registers – one for counsellors and one for psychotherapists?	The Minister for Health, Simon Harris, confirmed on 27 February 2019 the establishment of and appointment of members to the Counsellors and Psychotherapists Registration Board, under the Health and Social Care Professionals Act 2005 (as amended) to regulate the professions of Counsellors and Psychotherapists.  These were the first professions to be designated under the 2005 Health and Social Care Professionals Act by regulation, having not been listed in the original 2005 Act. At the time of designation by the Minister, following public consultation, regulations proscribe that there was to be one Registration Board which would be responsible for two registers – one for counsellors and one for psychotherapists. It is CORU's role to implement this direction, as set out by the Minister, and we therefore have one registration board and we are working towards the opening of two separate registers.



Question	Answer
[3] What work needs to be completed before the registers open?	There is a standardised process of work to be completed by each Registration Board before the opening of a register. This includes setting the pre-registration education and training standards, approving education and training programmes for new graduate's entry to registers, making statutory Bye-Laws and setting the Code of Professional Conduct and Ethics for the professions.
[4] What bye-laws are in place when a register opens?	There are a number of Bye-Laws that will be in place when a register opens. These relate to the Code of Professional Conduct and Ethics, Approved Qualifications, Application for Registration, Return to Practice, Restoration to the Register following Removal on Request, and Restoration to the Register following Cancellation of Registration.
[5] What is the timeline for the opening of the registers for Counsellors and Psychotherapists?	Currently there is no date set for the opening of the registers. The Registration Board is currently undertaking the necessary work required for public protection before the opening of the registers. The Board will consult on draft Standards of Proficiency and the draft Criteria for Education and Training Programmes for both professions in 2023. Following consultation, the Board will set its pre-registration education and training requirements which will be issued to the professions. The Board will notify education providers of the timeline for alignment to its requirements before it will commence its programme approval process.
[6] Will there be a grandparenting provision for those already practising in the professions?	Yes, Section 91 of the Health and Social Care Professionals Act 2005 (as amended) provides a path to registration for existing practitioners. This is a standard grandparenting route available to all CORU regulated professions when a register first opens. During the first two years that a register is open - a period known as the Transitional Period - existing practitioners can apply for registration and satisfy the registration board that they meet the requirements for registration.  It is recognised that those applying under this route may have legacy or historical qualifications that were deemed appropriate for entry to practise of the profession at the time of qualification award. As these are historical qualifications, CORU recognises these may not have been delivered at the same level of qualification that is currently the standard for entry to the professions. The Registration Board will set its standards and the level of qualification required for public protection, for new



Question	Answer
	entrants to its registers, which will be the standard required of future graduates entering the professions.
[7] What are the requirements to be eligible to apply to a register under Section 91 (grandparenting)?	<ul> <li>In order to qualify to be eligible to apply for entry to a register under Section 91, a person must:</li> <li>have been practising in the profession for a minimum of two years out of the previous five years on the date that the register opens;</li> <li>hold the relevant qualifications (as proscribed by regulation by the Minster for Health) or have successfully completed a competency test;</li> <li>be deemed fit and proper to practise the profession.</li> <li>Further information can be found on the CORU website in relation to the registration process and requirements including fit and proper requirements, language requirements, guidance for existing practitioners applying under Section 91, and information on supporting documentation required for registration including employment forms and documentation required by private practitioners.</li> </ul>
[8] What is the fee for registration and renewal?	The current registration fee is set at €100. The annual renewal fee is also set at €100 per annum. This has been set under the National pay agreement until 2023.
[9] How often is renewal of registration required?	Registration is renewed annually for all CORU regulated professions.
[10] What are grandparenting assessments? What will be involved in these assessments?	This is called an Assessment of Professional Competence (AoPC) and it may be required to be completed by an existing practitioner who does not hold a relevant qualification (as proscribed by regulation under the Act) or a qualification that is deemed by the Board to be sufficiently relevant to that profession. The Registration Board has not set its requirements for an AoPC. Further information on this will be issued in advance of the registers opening.
[11] For grandparenting requirements, does practice for 2 out of the 5 years before a register opens include work as a pre-accredited counsellor or psychotherapist?	Yes, any person currently practising in the profession, as an autonomous practitioner, will be eligible to apply to the register.



Question	Answer
[12] What kind of work is counted towards practice for 2 out of the 5 years before a register opens?  Does this include client work/ teaching/ supervising/ management? Does it matter if this work is full time or part time?	The Counsellors and Psychotherapists Registration Board has not yet set its requirements for registration. This will be done in advance of its registers opening following public consultation on its Bye-Laws. In general, Registration Boards recognise that those involved in management, education and research directly related to the profession are engaged in practice of the profession.  Full- and part-time employment by a practitioner is accepted.
[13] Will all courses applying for Programme approval with CORU have to be assessed before the registers open and grandparenting opens for existing practitioners?	A vital part of assuring public protection is establishing the correct standards for education and training of the professions. This work is necessary as currently the Board cannot open its registers until such time as an Approved Qualifications Byelaw has been set. The reason for this being that there would be no route for new entrants into the profession (Section 38 applicants) to register as they would not meet the grandparenting requirement of having practice experience (2 years in previous 5 years), as set out in legislation.  It is the decision of the education provider to apply for programme approval to the Board. Institutions should consider an application for programme approval carefully and enter the regulatory approval process when they believe that there is sufficient evidence to demonstrate that the programme meets the Registration Board's requirements.
[14] Can you qualify and register for both the counsellors and the psychotherapists registers?	Yes, it may be possible for practitioners to come forward for registration on both registers, if they can demonstrate they meet the criteria for eligibility to apply to both. A person will need to be registered on the relevant register in order to use the protected title of that profession once the grandparenting period ends.
[15] If I am registered on both registers will I have to pay double the fees and what are the implications for CPD requirements?	Yes, the fee is €100 per annum per register to maintain your registration on each register and to use both titles.  Registrants across all CORU regulated professions are required to accrue 30 CPD credits in every 12-month period. If a person is registered on both registers, they will be required to demonstrate learning achieved relevant to the practice of both professions.



Question	Answer
	Further information on CPD can be found <u>here</u> on the CORU website.
[16] When will the first cycle of CPD auditing begin?	The CPD Auditing period usually commences following the close of the grandparenting or transitional period (2 years after the date a register opens). Registration Boards may set a 12 or 24-month audit period.  Further information on CPD audit can be found <a href="here">here</a> on the CORU website.
[17] Who will be responsible for CPD - will it be the individual, professional body or CORU?	Individual registrants are responsible for maintaining their CPD in line with their Code of Professional Conduct and Ethics. CORU is responsible for auditing registrants to ensure registrants have a system or process to maintain their skills and knowledge. Registration Boards also provide their registrants with CPD support and guidance documents.  A professional body may set its requirements for CPD for its members and/or offer supports to its members to engage in CPD.
[18] How do I prepare to apply for registration with CORU? What paperwork do I need to produce?	Once a register is open, an Individual can apply for registration under either Section 91 (for existing practitioners), this entry route is only available for the first two years following the opening of a register; or under Section 38 for those who hold a relevant qualification (graduates that hold a qualification listed on the Approved Qualifications Bye-Law for the relevant register or applicants whose international qualification has been recognised by the Board).  Further information about the registration process can be found on the CORU website.
[19] Will registrants have to hold ongoing membership in a professional body?	It is not a requirement to hold membership of a professional body to be registered with CORU and use the protected title. A registrant may be a member of a professional body but this is not connected to statutory registration with CORU.



Question	Answer
[20] Will the CORU Code of Professional Conduct and Ethics replace the existing codes of practice of the professional bodies?	Professional bodies may continue to have their own Code of Conduct for their members but all registered professionals will be required to follow the Code of Professional Conduct and Ethics of their profession. The Code sets out the standards of conduct, performance and ethics which a member of that profession must adhere to throughout the course of their work.  All registrants must abide by a statutory Code of Professional Conduct and Ethics. This Code is the basis for which a Fitness to Practise complaint may be brought against a registrant.
[21] Will membership of a particular professional body affect the success or otherwise of a registration application?	No, it is not a requirement to hold membership of a professional body to be eligible to register with CORU and use the protected title. Membership of any professional body will have no impact on the outcome of an application to register with CORU.
[22] Can education and training courses that are run on a part-time basis come forward for CORU programme approval?	Full-time and part-time programmes can apply for programme approval with CORU. CORU set the minimum programme delivery level for a profession in line with the National Framework of Qualifications (NFQ) and do not specify programme duration. Once a programme can meet all of a Registration Board's pre-registration education and training standards they may apply for CORU programme approval.
[23] Will there be any requirements for scope of practice?	CORU regulates by protection of title, in line with other Irish regulatory bodies, not by scope of practice. In line with the Code of Professional Conduct and Ethics, registrants must 'Act within the limits of your knowledge, skills, competence and experience'.
[24] Will the registers take into account specialisms or modalities of working?	The Health and Social Care Professionals Act (2005) does not have provision for regulation of specialisms, nor for annotation of modalities of practice.
[25] Do you anticipate that there will be a decrease in the level of specialisms of courses offered once regulation comes into place? Currently there is for example psychoanalysis, CBT, DBT, family therapy etc.	Education providers may continue to run programmes with an emphasis on particular modalities. The Standards of Proficiency are the threshold standards set by a Registration Board required for safe and effective practice for all those entering the register. Once these standards are being met, a programme may provide training with a focus on any particular approach or modality.



Question	Answer
[26] Will there be a difference between those practicing with adults and those who work with children or adolescents?	In line with the Code of Professional Conduct and Ethics, registrants must 'Act within the limits of your knowledge, skills, competence and experience'. The Health and Social Care Professionals Act (2005) does not have provision for specialisms or annotation and therefore there would be no differentiation within the registers.
[27] When will Fitness to Practise come into place?	All registrants are required to adhere to their Code of Professional Conduct and Ethics. Once registered, a complaint may be received against any professional who may be deemed to be in breach of their Code.
[28] Will therapy services operating online from outside Ireland be able to offer services here once the regulation comes into place?	The area of online provision of services is a growing field and has come into focus since the move to widespread remote working due to COVID-19. All regulators are keeping up to date with developments in this field, as this will be informed by EU Directive and National policy/legislation with regard to regulation of provision of online or AI services.  Any practitioner using a protected title and offering services in the Republic of Ireland must be registered on the appropriate register to allow for use of a protected title. Practitioners using a protected title that are not registered will be subject to enforcement under Fitness to Practise.
[29] Can a psychologist who uses the title counsellor or psychotherapist, register under S91 so they can continue to use the title?	If a practitioner has been engaged in the practice of the profession for 2 out of the previous 5 years before the opening of a register they may come forward for registration under Section 91 in order to continue to use the title. Practitioners must be registered on the appropriate register to continue to use a protected title in the course of their work.
[30] What kind of standards will CORU set for education providers?	<ul> <li>The education and training standards set by CORU are made up of</li> <li>The Criteria for Education and Training Programmes which describe how the education provider facilitates and evaluates the achievement of the standards of proficiency.</li> <li>The Standards of Proficiency which are the threshold standards of practice set by a Registration Board for safe and effective practice.</li> </ul>



Question	Answer
5,3,0,0,0,0	The standards of proficiency detail the knowledge and skills that all registrants must have.
[31] Who will decide the education and training standards required?	The Counsellors and Psychotherapists Registration Board will set the Standards of Proficiency for entry to its registers, following a public consultation process. The Board has developed draft <i>Standards of Proficiency;</i> one set for counsellors and one set for psychotherapists. The public consultation around these documents opened on 04 September 2023 and will close on 01 December 2023. More information on the consultation, including how to provide feedback, is available



Question	Answer
[35] What will supervision requirements be under CORU's education and training standards?	The Counsellors and Psychotherapists Registration Board has developed <b>draft</b> <i>Criteria for Education and Training Programmes;</i> one set for counsellors and one set for psychotherapists. The Board is currently seeking feedback on these draft documents. The <i>Criteria</i> detail the Board's requirements around the threshold level of qualification for entry to the register, practice placements, admissions, programme management, curriculum and assessment. The public consultation opened on 04 September 2023 and will close on 01 December 2023.  More information on the consultation, including how to provide feedback, is available <a "="" browner="" example.com="" here-en="" href="https://example.com/here-en-mailto:here-en-ma&lt;/th&gt;&lt;/tr&gt;&lt;tr&gt;&lt;th&gt;[36] What will the hours requirement for practice placement be for education and training programmes?&lt;/th&gt;&lt;th&gt;The Counsellors and Psychotherapists Registration Board has developed &lt;b&gt;draft&lt;/b&gt; &lt;i&gt;Criteria for Education and Training Programmes;&lt;/i&gt; one set for counsellors and one set for psychotherapists. The Board is currently seeking feedback on these draft documents. The &lt;i&gt;Criteria&lt;/i&gt; detail the Board's requirements around the threshold level of qualification for entry to the register, practice placements, admissions, programme management, curriculum and assessment. The public consultation opened on 04 September 2023 and will close on 01 December 2023.  More information on the consultation, including how to provide feedback, is available &lt;a href=" https:="">here-en/browner/</a>
[37] Will there be personal therapy requirements for education and training programmes?	The Counsellors and Psychotherapists Registration Board has developed <b>draft</b> <i>Criteria for Education and Training Programmes;</i> one set for counsellors and one set for psychotherapists. The Board is currently seeking feedback on these draft documents. The <i>Criteria</i> detail the Board's requirements around the threshold level of qualification for entry to the register, practice placements, admissions, programme management, curriculum and assessment. The public consultation opened on 04 September 2023 and will close on 01 December 2023.  More information on the consultation, including how to provide feedback, is available <a href="here">here</a> .



Question	Answer
[38] Will the pre-accreditation phase still be required or exist once statutory regulation is introduced?	The education and training standards set by a Registration Board require that all practice placement takes place within a training programme. Once a student graduates and gains an approved qualification they will be eligible to apply for registration and practice using the protected title as autonomous practitioners.  Professional bodies can continue to set out their own membership requirements but this will not be linked with eligibility to apply to join a register and work using a protected title.
[39] Will CORU publish and hold a list of approved education and training programmes for Counselling and for Psychotherapy?	Yes, each register will have an associated Approved Qualifications Bye-Law which will list the qualifications that have been approved by CORU.
[40] Are there any education programmes of study currently eligible for CORU approval?	As the Counsellors and Psychotherapists Registration Board has not yet set their Criteria for Education and Training Programmes or the Standards of Proficiency for each profession, no programme is currently able to demonstrate that they meet these standards. Once the Criteria and Standards have been set they will be issued to education providers and all providers will be allowed a period of time to implement these standards before CORU programme approval processes commence for education providers who wish to come forward for approval.
[41] Once registered, will there be a requirement for monthly supervision?	The Registration Board will set its Code of Professional Conduct and Ethics in advance of the opening of its registers. All registrants will be required to adhere to the Code of Professional Conduct and Ethics once registered. The Code of Professional Conduct and Ethics is principles based and is not prescriptive with regard to hours. Professional bodies/associations may continue to establish its standards for its members.
[42] How will CORU deal with qualifications gained outside of the Republic of Ireland?	Only professional qualifications awarded within the State can apply for programme approval with CORU. International qualifications are assessed by CORU through the Recognition of International Qualifications process. More information on the Recognition process can be found <a href="https://example.com/here">here</a> on the CORU website. If a qualification gained outside of the Republic of Ireland is recognised, an applicant can then progress to the registration process.



Question	Answer
[43] Will CORU registration be sufficient for registered psychotherapists to seek employment?	Employers should be aware that those using a protected title must be registered on the appropriate register. Any individual using a protected title that is not registered will be subject to enforcement proceedings following the end of the grandparenting period. CORU registration may not be sufficient to gain employment in all settings. Employers may continue to set employment criteria as they see fit for the services they provide. It is not under CORU's remit to set out employment criteria for individual employers.
[44] What if practitioners working in the profession of counselling or psychotherapy do not register with CORU but continue to work using titles such as 'trauma specialist' or 'healer' or similar?	Statutory regulation with CORU promotes high standards of professional conduct, education, training and competence. Regulation sends a message about a professions' commitment to consistently deliver to the highest standards. It ensures quality of care and most importantly it protects the public.  It will be important as these two professions become statutory regulated professions that CORU as a regulator and those working within the professions work to educate the general public about what it means to be a regulated professional and how to check if a counsellor or psychotherapist is registered. An individual may be subject to enforcement proceedings if they use a protected title and are not registered on the appropriate register.
[45] Will there be a separate register for supervisors in counselling and supervisors in psychotherapy?	No, there will be two registers – one for counsellors and one for psychotherapists. Supervisors working in these professions should choose the appropriate register to apply to in order to allow them to continue to use the protected title of that register. In line with the Code of Professional Conduct and Ethics, registrants must 'Act within the limits of your knowledge, skills, competence and experience'.
[46] Does CORU play a role in employee tax relief/ VAT exemption for Counsellors or Psychotherapists?	Tax relief or VAT issues are outside of CORU's remit as a regulator. These areas come under the remit of the Revenue Commissioners.



### [2] Standards of Proficiency and Criteria for Education and Training Programmes FAQs

Question	Answer
[1] Do the Standards of Proficiency apply to all modalities through which counselling/psychotherapy is practised?	The Standards of Proficiency for both professions detail the threshold level of practice for anyone who wishes to practise as a <b>counsellor or psychotherapist</b> . There are no specific or particular standards that reflect the different modalities through which either profession can be practised. Education programmes can continue to have a particular focus on a modality of counselling or psychotherapy, as long as they can demonstrate how the programme delivers on the threshold standards of proficiency.  In drafting the standards for both professions, the Board has attempted to articulate standards that are high level and outcomes focused. This means that they can be applied across a range of different practice environments and demonstrated through differing practice modalities.
[2] What is the relationship between the Standards of Proficiency and academic standards developed for counselling and psychotherapy programmes?	There is no relationship between the <i>Standards of Proficiency</i> , as set by the Registration Board, and academic standards developed for counselling and psychotherapy programmes. This reflects the distinct purpose of the Board as the profession regulator and its overriding concern for ensuring the protection of the public. The Registration Board's statutory remit and function in setting its <i>Standards of Proficiency</i> is to ensure that all registrants meet a threshold level of professional knowledge and skill in order to practise safely.  The Registration Board does not have a role in the academic accreditation of education and training programmes. Profession regulation is distinct and different from academic accreditation and, as such, there are different requirements for both.
[3] How did the Board determine the threshold qualification level for entry to the register for both professions?	The threshold level of qualification for entry to the register refers to the minimum level on the National Framework of Qualifications (NFQ) a programme must be designed in order to deliver on the <i>Standards of Proficiency</i> .  The standards provide the benchmark by which the Board determines the threshold qualification level. In setting the threshold qualification level, the Board initially reviewed the <i>Standards of Proficiency</i> it had drafted for each profession in the



Question	Answer
	context of the NFQ Level Descriptors. The Level Descriptors identify the knowledge, skill and competence a graduate from a programme must be able to demonstrate at each level on the NFQ.
	In assessing the standards against the NFQ Level Descriptors, the Board considered the language through which the standards were articulated and the requirements around the practice of the profession. The Board reviewed its standards against the requirements of Level 7 and concluded that NFQ Level 7 did not reflect the demands of practice or depth of engagement with service users required at threshold level for both professions. It also concluded that the requirements articulated at Level 9 went beyond the threshold level standards defined by the Board.
	The descriptors at Level 8 reflected the demands of each profession and articulated the range and application of knowledge and skills required to practice at threshold level. Education providers can continue to deliver qualifications above the threshold level 8, that deliver on the threshold standards required. The Board also recognised that the counselling and psychotherapy professions should reflect Irish society and the people they serve. Therefore, the Board factored into its decision that there should be an opportunity for all members in society to access higher education and enter these professions.
[4] Is there a requirement for personal therapy included in the Board's draft Criteria for either profession?	Personal Therapy is <b>not</b> included as part of the requirements set by the Registration Board. In setting its <i>Criteria for Education and Training Programmes</i> , the Registration Board must ensure that the requirements it sets are directly linked to the achievement of the <i>Standards of Proficiency</i> . The function of the <i>Criteria</i> is to ensure that an education provider has the appropriate systems and mechanisms in place to demonstrate that students graduating from the programme have achieved the standards of proficiency and have been assessed and are proficient in the practice of the profession to enter onto the register and practise safely and autonomously.
	Personal Therapy is not connected with the assessment of the student and does not contribute to an assessment of whether a student has achieved the standards of



Question	Answer
	proficiency. Therefore, the Registration Board is not in a position to set any requirements around Personal Therapy. However, it is important to note that education providers, as part of their programme requirements, are able to stipulate whether a student on their programme is required to undertake a set number of Personal Therapy hours.
	Practice Education is an essential component of pre-registration education and training, through which a student has the opportunity to experience and engage in the practice of the profession in a safe and managed environment.  The purpose of practice education is two-fold:
	Firstly, it is a matter of <b>public protection</b> . In providing the opportunity for a student to experience and practice the profession – at the appropriate level of skill dependent on his or her experience on the programme – it facilitates the translation of theory into practice which thereby ensures the quality of the future workforce, positively impacting the standard of care provided to service users.
[5] What is meant by 'on-site' placement supervision?	Secondly, engagement in practice education allows a student to <b>demonstrate</b> achievement of the standards of proficiency and, in so doing, gain proficiency in the practice of the profession he or she is training in. It is for both these reasons that it is essential that a student on placement has appropriate supervision when he or she is on-site in the placement setting.
	A supervisory presence at each placement site does <b>not</b> mean that a student is observed for the entirety of the placement experience. Rather, it means that when on-site, the student has access to a practitioner of the profession the student is training in and has been trained by the education provider as a supervisor – to provide appropriate guidance, support and training to the student or a small number of students.
	In short, on-site supervision, as defined and practised in regulated professions, is the process through which a practitioner is given responsibility for the support, training, learning and development of the student to ensure that the student



Question	Answer
	progressively develops his or her proficiency, achieves the standards of proficiency and ensures the protection of service users a student comes into contact with. This is a responsibility that can only be undertaken by a professional situated on-site in the placement setting.
	Clinical supervision is understood and practised in the counselling and psychotherapy professions as a formal process of professional facilitated reflection on clinical practice and experience that contributes to individual development. In the context of practice placement arrangements as they are currently delivered in education and training programmes for the professions of counselling and psychotherapy, clinical supervision is a relationship established by a student with a clinical supervisor outside of the practice environment the student is working in. On-site placement supervision differs from clinical supervision in both its purpose and structure.
[6] How does on-site placement supervision of a student differ from clinical supervision?	Purpose of On-Site Supervision The purpose of on-site placement supervision is to ensure that the student has access to a practitioner of the profession the student is training in to provide appropriate guidance, support and training. This guidance, support and training is directly related to the student's professional development of the threshold skills and knowledge required to practice the profession safely and the associated assessment of the student's progressive achievement of the standards of proficiency.
	Structure of On-Site Supervision Each student at a placement site must be assigned an on-site supervisor. It is the responsibility of the placement site to identify supervisors on their site. The education provider is responsible for ensuring that the supervisors identified are trained and suitably proficient in the practice of the profession to undertake supervisory responsibilities.
	An on-site supervisor must be:     of the profession the student is training in;     situated in the placement setting the student is undertaking his or her placement in; and



Question	Answer
	<ul> <li>trained by the education provider in how to assess students' achievement of the standards of proficiency.</li> </ul>
	<ul> <li>The responsibilities of an on-site supervisor will include, for example:</li> <li>working with the student in the development and implementation of a Placement Learning Plan</li> <li>observing the student in practice (where appropriate)</li> <li>providing feedback and guidance to the student in relation to his or her achievement of the <i>Standards of Proficiency</i></li> <li>leading regular supervisory meetings with the student</li> <li>completion of administrative duties – e.g. signing off timesheets</li> <li>engaging with a member of the programme team (from the education provider) throughout the course of the placement to assist with the assessment of the student's achievement of the standards.</li> <li>On-site supervision is therefore a formal process between the student, the practice placement supervisor and the education provider. The Board's <i>Criteria</i> details its requirements around on-site supervision. The Board does <b>not</b> stipulate any</li> </ul>
	requirements around student engagement in clinical supervision.
	The education provider is responsible for identifying suitable practice placement sites where each of its students will undertake practice education in.
[7] What is the relationship between an education provider and a placement site?	As articulated in the Board's <i>Criteria</i> , the education provider must have clear requirements in place for the suitability of placement sites and a clearly articulated process around how these requirements are applied in the selection of each placement site. In evaluating the appropriateness of the site, the education provider is ensuring that the environment is appropriate to provide a student to exposure and practice of the profession and the opportunity to develop and demonstrate achievement of the standards of proficiency.
	For all placement sites where a student is undertaking a placement, the education provider should have a written agreement in place with the site that identifies the



Question	Answer
	responsibilities of all parties involved in the practice placement (i.e. the placement site, the education provider and the student).
	At each placement site, the placement provider is required to identify suitable on- site supervisors. The education provider is responsible for ensuring that the identified supervisors are appropriate and that each is trained in understanding the purpose of practice education, their role on-site, how to assess student achievement of the standards and how to provide feedback to students.
	Throughout the course of the practice placement, there is on-going engagement and communication between the education provider and the placement site. Typically, the education provider assigns a designated person from the institution (sometimes referred to as an academic mentor or practice tutor) to engage with the student and the on-site supervisor in one-to-one meetings with each and, as well, in a group meeting with all three.
	It is important to note that the education provider does <b>not</b> determine the service users a student will engage with during the placement experience. This is left to the professional assessment and judgement of the supervisors on-site. The education provider approves the placement site (on the basis of the selection criteria it has identified); it does <b>not</b> approve individual service user allocation to students.
	Yes. Given the role and responsibilities placement supervisors have in respect of providing support and guidance to students, as well as assessing their achievement of the standards of proficiency, they are required to be on-site and accessible during the course of the student placement experience.
[8] Do Placement Supervisors need to be on-site?	It is important to highlight that practice education is a developmental process whereby a student progresses towards independent practice. Different levels of onsite supervision will be required at different stages. A student, for example, on his or her first placement would require specific direction, support and guidance around all aspects of practice. Conversely, a student in his or her final placement, practising at a higher level of proficiency, would not require the same level of support and guidance.



Question	Answer
[9] Does the on-site supervisor need to be of the profession?	Yes. The responsibilities an on-site supervisor has in relation to practice education, which includes providing professional support and guidance to help a student develop proficiency in the practice of the profession and the assessment of whether a student has demonstrated achievement of the standards of proficiency, can only be appropriately undertaken by a member of the profession the student is training in.
	It is the responsibility of the education provider to ensure that all supervisors are of the profession the student they are support is training in.
[10] What qualifications or training does an on-site supervisor need to undertake the role?	The Board does not stipulate any specific qualifications that an on-site supervisor is required to hold to undertake on-site supervision of a student.
	The Board's <i>Criteria</i> requires that any individual involved in the teaching, supervising and/or assessing of students – which includes on-site supervisors – have the appropriate qualifications, expertise and knowledge to undertake this role.
	In time, following the ending of the transition period (2 years following the opening of the register), the Board's requirement under criterion 2.13 that all supervisors must be registered with the appropriate registration board, comes into effect.
	In terms of training, it is the responsibility of the education provider to provide regular support and training for supervisors. This training must include guidance around the assessment tools and methodology the education provider uses on placement, how the supervisor is to complete the training, along with training on providing feedback to students during placement.
	All supervisors must have completed the training provided by the education provider before they can undertake responsibility for a student on-site.
[11] What type of student assessment is the on-site supervisor responsible for?	The on-site supervisor is responsible for the assessment of the student's achievement of the standards of proficiency. This determination is made on the basis of whether, in the supervisor's professional opinion, having observed the student in



Question	Answer
	practice and through supervisory engagements during the course of the placement, the student has demonstrated that he or she has met the identified proficiencies for that placement. (Each placement experience will likely have a different combination of proficiencies a student is to achieve.) Given the supervisor is based on-site with the student and has observed the student in practice, he or she is best placed to determine whether the student has achieved the required level of proficiency.
	A supervisor does not undertake this task in isolation. The supervisor is assisted in the assessment of the proficiencies by a member of the programme placement education team from the education provider. It is important to highlight that the supervisor is <b>not</b> involved in the academic assessment of a student and does not make the judgement as to whether the student has passed the practice placement module. These decisions are made by the education provider.
	The sole assessment responsibility of the supervisor is to professionally evaluate — on the basis of the observed evidence on-site — whether a student has achieved the standards of proficiency.
	Reflective of its role in pre-registration education and training programmes and that practice placement is an academic module integrated into the programme, practice placement education is constituted of two parts:  • Experience in the practice of the profession on-site in a placement setting; and  • Academic elements associated with the delivery of an academic module.
[12] Do all hours stipulated in Criterion 2.2 have to be undertaken on site in a placement setting?	This division is reflected in the hours requirement articulated in the Board's draft <i>Criteria</i> for both professions.  The <b>total number of practice placement hours</b> includes the hours that a student must be on-site and engaged in all elements of the practice of the profession – what is referred to as service user contact hours – <b>and</b> the hours that a student is engaged in other elements of practice education, such as:  • Research and reading time for academic work associated with practice education;  • Completion of academic placement task(s) – e.g. a placement portfolio;



Question	Answer
	<ul> <li>Periodic days attending placement workshop sessions provided by education provider;</li> <li>Attendance at supervision meetings with a supervisor.</li> </ul>
	Taking for example, the Board's proposed hours for counsellors.
	The Board has stipulated that students must complete <b>450 hours</b> . A minimum of 300 hours out of this 450 hours are required to be on-site in the practice of the profession (i.e. engaging with service users, planning for therapeutic sessions, completion of reports and other administrative duties).
	The other 150 hours may be related to student time engaged in the academic elements of practice education. The entirety of this time does not have to be spent on-site at the placement site – e.g. a student would not be expected to attend a placement site to complete an academic assignment associated with his or her placement experience.
[13] Can time spent in clinical supervision contribute to total placement hours?	No. Supervision, as part of practice education, is concerned with ensuring that the student has access to an on-site practitioner of the profession the student is training in to provide appropriate guidance, support and training. This guidance, support and training is directly related to the student's professional development of the threshold skills and knowledge required to practice the profession safely and the associated assessment of the student's progressive achievement of the standards of proficiency.
	This is distinct from clinical supervision. The Board does not stipulate in its <i>Criteria</i> any requirements around clinical supervision. More detail on the distinction between clinical supervision and on-site supervision can be found above.
[14] Why was there a difference made between the total number of hours for counsellors and psychotherapists?	In setting its proposed placement hours, the Registration Board considered the distinct practice between the professions of counselling and psychotherapy. In particular, the Board reflected on the differences in the length and type of engagement with services, concluding that psychotherapy relationships with a



Question	Answer
	service user tend to take place over a longer period of time than counselling engagements.
	Additionally, and connected with the length of service user engagement, the Board also reflected on the differing types of presenting issues that counsellors and psychotherapists encounter, noting that psychotherapists can work with a wide range of complex presenting issues that vary in severity and present a wide range of diagnoses.
	The Board also considered the differences between the professions as articulated in its draft <i>Standards of Proficiency</i> and the necessity for sufficient practice placement hours in order for students to demonstrate achievement of the standards of proficiency. For example, the draft <i>Standards of Proficiency for Psychotherapists</i> requires:
	<b>5.11</b> – Be able to work therapeutically with a wide range of presenting issues of varying degrees of complexity and severity, and across a wide range of diagnoses in order to facilitate service user insight and long term change.
	The comparative standard for counsellors requires:
	<b>5.9</b> – Be able to outline typical presentations from mild to severe presenting concerns and be able to treat presenting concerns, within the limits of their knowledge, skills and competence or refer to another professional.
	It is for these reasons that the Board proposed a difference in the practice placement hours requirement between counsellors and psychotherapists.
[15] What is meant by 'supervised service user contact'?	Supervised service user contact refers to the period of time that a student is based on-site engaged in the practice of the profession, where there is appropriate supervision available on-site to provide guidance and support to the student.



Question	Answer
	This period of time of service user contact is intended to reflect the holistic experience of practice and, as such, includes all the elements that does into the delivery of either counselling or psychotherapy, including:  • Direct engagement with service users and the delivery of therapeutic care  • Planning time in advance of therapeutic sessions, including research  • Completion of reports and other administrative duties
	Supervised service user contact does <b>not</b> mean that the student has to be observed for the entirety of this time. It means that the student spends the time in a placement setting, where there are appropriate on-site supervisory arrangements in place, engaging in all elements of the delivery of counselling or psychotherapy.
	Direct observation refers to the amount of time the assigned on-site supervisor directly observes a student in the practice of the profession. Practice Education is an integral and central means through which a student is able to develop his or her professional proficiency towards being able to practice as an independent, autonomous practitioner. This determination of proficiency is made on the basis of the student's achievement of the standards of proficiency which are assessed during the course of a student's practice education.
[16] What is meant by 'direct observation'?	Observation of a student in practice is essential for the assessment of whether a student is proficient in the practice of the profession. It would not be possible to determine whether a student has achieved a significant number of standards without direct observation. Taking the draft <i>Standards of Proficiency for Counsellors</i> as an example:
	<b>5.22</b> – Be able to orient service users to the counsellor approach and explain the responsibilities of the counsellor in a therapeutic relationship.
	It is important to note, however, that other standards may not require direct observation with a service user to assess whether the student has achieved and met the required standard. Taking the draft Standards of Proficiency for Counsellors as an example:



Question	Answer
	<ul><li>5.19 – Be able to articulate the necessity of engaging in clinical supervision to support, sustain and improve practice.</li><li>Finally, it is important to highlight that multiple standards of proficiency can be assessed during a single observed session between a student and a service user.</li></ul>
[17] How can direct observation of a student be undertaken?	There are a range of potential methodologies which could be utilised by a supervisor undertaking direct observation of a student during a practice placement. These methodologies may include:  • Observation: this would involve a supervisor sitting in on a therapy session between a service user and a student in an observational capacity, but not interacting and engaging in the session itself  • Co-Therapy: this wouldinvolve a supervisor actively partaking in a session jointly with the student and a service user  • Two-Way Mirrors: this would allow for a supervisor to directly observe a student engaging with a service user without being a physical presence in the room  • Transcription: this would involve formal written record of a session being provided to the supervisor by the student which would include the verbatim discussion between the student and service user and any emotional or physical observations that would impact the understanding of verbatim account.  • Video/Audio Taping: this would involve the session between a student and a service user being recorded and available to the supervisor to review following the session.  It is recognised that there is particular sensitivity in undertaking this practice by the very nature of the therapeutic relationship dynamic developed between a counsellor or psychotherapist and a service user and that any method of direct observation will require the explicit informed consent of the service user.
[18] Are there any requirements around how a programme should be structured?	No. The Registration Board does not stipulate how an education provider should design and structure an education and training programme. Taking the example of other professions CORU regulates, there are a range of programme designs which



Answer
have been approved, including part-time and full-time programmes, programmes that are partly delivered online and programmes that run over 2 years (Level 9 Masters programmes), 3 or 4 years (Level 8 Bachelors programmes).
The education provider has flexibility around how it designs and delivers its programme. The Board's requirements, as detailed in its <i>Criteria</i> , is that the programme has the systems and mechanisms in place to continually ensure that graduating students have met and achieved <b>all</b> the standards of proficiency and are able to practice safely as autonomous practitioners upon entry to the register.
The Board does not set academic requirements for programmes. This does not fall under the Board's regulatory remit or responsibility.
No. The Board does not stipulate admissions requirements for entry onto an education and training programme. All minimum entry level admission requirements are determined, set and applied by the education provider.
Under Criterion 3: <b>Programme Admission</b> of the Board's <i>Criteria</i> , it requires that the education provider clearly articulates its admission requirements and that there are procedures in place for ensuring the stated entry criteria – that the education provider has determined – are consistently applied to all applicants.
Yes. Criterion 3.3 of the Board's <i>Criteria</i> articulates that education providers, if they wish, can allow for applications for Advanced Entry and the Recognition of Prior Learning and Experience (RPL).
If an education provider's policy is to offer Recognition of Prior Learning and Experience to applicants, there must be a clear process in place that includes details of:  • The mechanism the education provider has for evaluating the impact of applying RPL on the applicant's achievement of the standards of proficiency; and



Question	Answer
	How the education provider ensures that an applicant will meet all the standards of proficiency by the completion of the programme (i.e. how any deficits in achievement of the standards of proficiency will be addressed).
[21] Will there be a period of pre-accreditation following successful completion of an approved programme before registration can be granted?	No. The Counsellors and Psychotherapists Registration Board operates, as required under the <i>Health and Social Care Professionals Act 2005 (as amended)</i> , a qualifications-based register. This means that for new graduates within Ireland, the only means for entry onto the register, once it is opened, is through holding a qualification that has been approved by the Registration Board as meeting all its requirements under its <i>Criteria</i> and <i>Standards of Proficiency</i> .
	The Registration Board has no legislative remit to require any post-qualifying training for registrants. In order then to ensure the protection of the public and the integrity of the professional register by guaranteeing that all registrants have met the threshold level of safe practice, it is essential that all approve programmes graduates have demonstrated achievement of all the Board's <i>Standards of Proficiency</i> .
[22] Is there a list of qualifications that can be used during the grandparenting/transition period?	During the grandparenting/transition period, there are a number of routes through which an existing practitioner can apply to join the register.
	One of these routes, in addition to currently practising the profession and having been in the practice of the profession for 2 of last 5 years from the date the register opens, refers to an applicant holding one of what are called 'Schedule 3 qualifications'. These are qualifications which have been recognised by the Minister for Health as appropriate to use for the assessment of applications by existing practitioners.
	The Minister for Health is currently confirming the list of Schedule 3 qualifications to be used for opening the registers for Counsellors and Psychotherapists. When the Minister has listed the qualifications for grandparenting to the registers by regulation, it will be available on the CORU website. <i>All other questions in this theme are addressed in the current FAQs</i> .



Question	Answer
[23] Can one programme be aligned to both sets of standards of proficiency?	Any programme seeking approval by a Registration Board must demonstrate that it meets all the Board's requirements as detailed in the Board's <i>Criteria</i> and <i>Standards</i> for that profession.
	The Board assesses each programme in terms of whether it has the appropriate mechanisms in place to ensure graduates have met the standards of proficiency and can enter the professional register. An education provider has flexibility around how it designs and delivers an education and training programme. Therefore, an education provider could decide to design a programme to meet both the <i>Standards of Proficiency for Counsellors</i> and the <i>Standards of Proficiency for Psychotherapists</i> . It would have to demonstrate how both the taught and practice placement curriculum provides opportunities to meet all the standards for both professions.
	However, it is important to stress that the Registration Board approves an education programme as a pathway for entry onto a single register. If a programme was seeking approval for entry onto two separate registers, this would require two distinct approval processes (both of which could potentially run in tandem).
[24] How long do education providers have to align programmes to the Board's requirements before programme approval starts?	Following the public consultation, the Board will consider and review all the consultation responses and decide on any amendments it needs to make, on the basis of the feedback received, to its draft <i>Criteria</i> and <i>Standards</i> documents for both professions. Once agreed, the Board will publish its <i>Criteria</i> and <i>Standards</i> for both professions and issue these to education providers. At this point of the process, the Board will also make a determination as to how long education providers have to align their programmes to its requirements before the window for programme approval opens. When this decision is taken by the Board it will be communicated to all education providers.

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