

# Regulatory Impact Assessment

Establishment of Pre-Registration Education and Training Requirements for Counsellors and Psychotherapists

This Assessment addresses only <u>one</u> element of the regulations required to facilitate the introduction of statutory regulation.

The <u>establishment</u> of Pre-Registration Education and Training Requirements does not, in and of itself, constitute a regulatory provision. When regulation is being introduced for a profession, all of the legal provisions <u>taken together</u> constitute the regulatory provision.



Registration Board   Establishment of distinct and separate Pre-Registration Education and Training Requirements for Counsellors and Psychotherapists:   Standards of Proficiency for Counsellors (Counsellors)	Organisation	CORU – Health and Social Care Professionals Council			
Establishment of distinct and separate Pre-Registration Education and Training Requirements for Counsellors and Psychotherapists:  • Standards of Proficiency for Counsellors  • Criteria for Education and Training Programmes (Counsellors)  • Standards of Proficiency for Psychotherapists  • Criteria for Education and Training Programmes (Psychotherapists)  This is only one element of the regulations required for the introduction of statutory regulation and does not – in and of itself – constitute a regulatory provision.  Relevant Legislation  Pate of Assessment Report  Stage  Post-Public Stakeholder Consultation  Copies of the following documentation  • Consultation Documentation  • Consultation Documentation  • Consultation on draft Standards and Criteria for Counsellors  • Consultation on draft Standards and Criteria for Psychotherapists  [2] Consultation Reports  • Public Consultation Report: Pre-Registration					
Date of Assessment Report   October 2025		Establishment of distinct and separate Pre-Registration Education and Training Requirements for Counsellors and Psychotherapists:  • Standards of Proficiency for Counsellors • Criteria for Education and Training Programmes (Counsellors) • Standards of Proficiency for Psychotherapists • Criteria for Education and Training Programmes (Psychotherapists)  This is only one element of the regulations required for the introduction of statutory regulation and does not – in and			
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Education and Training Requirements for Psychotherapists  [3] Pre-Registration Education and Training Requirements  • Standards of Proficiency for Counsellors  • Criteria for Education and Training Programmes (Counsellors)  • Standards of Proficiency for Psychotherapists  • Criteria for Education and Training Programmes (Psychotherapists)	Associated Documentation	online:  [1] Consultation Documentation  • Consultation on draft Standards and Criteria for Counsellors  • Consultation on draft Standards and Criteria for Psychotherapists  [2] Consultation Reports  • Public Consultation Report: Pre-Registration Education and Training Requirements for Counsellors  • Public Consultation Report: Pre-Registration Education and Training Requirements for Psychotherapists  [3] Pre-Registration Education and Training Requirements  • Standards of Proficiency for Counsellors  • Criteria for Education and Training Programmes (Counsellors)  • Standards of Proficiency for Psychotherapists  • Criteria for Education and Training Programmes (Psychotherapists)			
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### [1] Regulatory Intervention Context and Objectives

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. Following designation of these professions by <u>Statutory Instrument 170/2018</u>, the then Minister established the Counsellors and Psychotherapists Registration Board, on 27 February 2019, determining there would be one Registration Board with statutory responsibility for two distinct registers: one register for counsellors and a second for psychotherapists.

Under Section 38(2)(a) of the Health and Social Care Professionals Act 2005 (as amended), entry to a professional register (for new or recent graduates at the time the register opens <sup>1</sup>) is subject to the holding of an approved qualification. In defining an approved qualification, the legislation in Section 3(1) states that this qualification attests to the person's having achieved the **standard of proficiency** required for registration in that profession. In discharging its object under the legislation – as defined in Section 27(1) to protect the public by fostering high standards of professional conduct and professional education, training and competence among registrants of that profession – and establishing regulation for a designated profession or professions, the Board must set this standard of proficiency for entry onto its register or registers.

The *standard of proficiency* set by a Registration Board forms part of **the pre-registration education and training requirements** that comprise two documents:

- the *Standards of Proficiency* that articulate the threshold knowledge and skills required at entry to the register; and
- the *Criteria for Education and Training Programmes* that describe the design and management requirements that an education provider must meet in order to demonstrate that an education and training programme can consistently produce graduates that have demonstrated achievement of all the *Standards of Proficiency*.

In short, the *Criteria* works to ensure that all graduates have achieved the *Standards*. When making an application to the Registration Board to have its qualification listed on the Approved Qualifications Bye-Law, it is the responsibility of the education provider to demonstrate how its programme design, curriculum and assessment meet all the Board's *Standards* and how its quality assurance and programme management processes deliver on all the Board's *Criteria*.

While the *Criteria* are only used in the assessment of qualifications awarded in the State, the *Standards*, in defining the threshold level of knowledge and skill required for safe practice, are used in the assessment of internationally awarded qualifications. This means that applicants who have completed an education and training programme that is awarded in Ireland **and** 

<sup>&</sup>lt;sup>1</sup> Please note that the existing practitioners at the time a register is opened, there is distinct registration pathway provided under Section 91 of the *Health and Social Care Professionals Act 2005 (as amended)* meaning that the setting of pre-registration education and training requirements does not impact on those who meet the conditions for registration under Section 91 of the Act. More information on this registration pathway is available on the CORU website here: <a href="Transitional (Grandparenting) Route (S91)">Transitional (Grandparenting) Route (S91)</a> - Coru



applicants who have achieved a qualification outside of Ireland must demonstrate achievement of all the standards as part of the registration process.

The establishment of the Board's pre-registration education and training requirements is the *first step* in the establishment and introduction of statutory regulation for a profession. It is important to highlight that the *introduction of statutory regulation is the regulatory provision in and of itself.* There are a number of steps that a Registration Board must work through before it has all the regulatory and legal infrastructure in place in order to open a register. Following the setting of its *Standards* and *Criteria*, the Counsellors and Psychotherapists Registration Board must:

- commence an education and training programme approval process; the output of which will be the establishment of an Approved Qualifications Bye-Law;
- establishing Codes of Professional Conduct and Ethics, and establishing this by Bye-Law:
- development of guidance and support around Continuing Professional Development;
   and
- set its multiple Registration Bye-Laws.

In the context of establishing statutory regulation, none of these elements or steps of the process can be considered a regulatory provision in and of itself; all of these must be in place and together they form the regulatory provision. In the absence of statutory regulation being established, it is not possible to designate any of the steps towards introducing regulation as a discrete regulatory provision – separate from the others – as in and of themselves before regulation is introduced, they are not enforceable or usable in the context of regulating a profession, as regulation has not yet commenced. It is for this reason that when regulation is being introduced for a profession that a Regulatory Impact Assessment is typically published when all the elements of the regulatory provision are in place. <sup>2</sup>

When publishing its finalised pre-registration education and training requirements in July 2025, the Board provided a period of 4 years for education providers to align their programmes to its *Standards* and *Criteria* before the commencement of the programme approval process. Considering this extended period of time, the Counsellors and Psychotherapists Registration Board agreed a publish a Regulatory Impact Assessment on this first element of its regulatory provision. It is important to stress that the following assessment is **not** a Regulatory Impact Assessment on the regulatory provision itself – as, in the absence of all the other constituent

<sup>&</sup>lt;sup>2</sup> When regulation is established, each of the discrete elements of the regulatory infrastructure is considered to have an impact on the regulatory provision as a change to any of these elements has an impact on the already established regulatory infrastructure – i.e. the nature of the overall regulatory provision (set when regulation was established) is being changed and as such, a change in one element has an impact on the whole established system. It is for this reason, once regulation is established and a change to one of the elements of the infrastructure is made, that a Regulatory Impact Assessment is undertaken on the nature of that change on the overall regulatory provision. A previous example of such an instance is the Regulatory Impact Assessment conduced by the Radiographers Registration Board as part of its review of its *Standards* and *Criteria* – available <a href="here">here</a> – as the changes proposed were assessed in the context of their impact on the provision of regulation for the professions of radiographer and radiation therapist.



elements, this would not be possible. Rather, this is an assessment solely of one element of the regulatory infrastructure.

To this end, the Board's objective in publishing this Regulatory Impact Assessment is to identify the range of options available to the Board in relation to this first step of introducing regulation, how these were assessed and how, having taken a decision to progress with one option, the Board's work was underpinned by the principles of right-touch regulation, and in particular, the principle of proportionality – that is, ensuring the appropriate regulatory intervention to address the identified risks – always underpinned by the Board's legislative object: public protection.

# [2] Identification of Options: Analysis of Risks, Benefits and Impacts

The Counsellors and Psychotherapists Registration Board identified and examined two options:

- 1. Do not set pre-registration education and training requirements
- 2. Set pre-registration education and training requirements

# Option One: Do not set pre-registration education and training requirements

This option would result in the Board not setting Standards of Proficiency or Criteria for Education and Training Programmes for either profession of counselling or psychotherapy and, as a result, not being able to progress the introduction of regulation.

Risks	The designation of counsellors and psychotherapists for statutory regulation was made by the then Minister for Health on the grounds of public protection following a consultation process with both professions in 2016.  Given that the setting of pre-registration education and training requirements is the first step on the process of introducing regulation, the failure to so not only means that regulation would not be introduced, it more fundamentally means that public protection rationale for its introduction would not be addressed, thereby presenting further risk to the public.  In addition, the failure to introduce statutory regulation for these professions would mean that the Counsellors and Psychotherapists Registration Board was not delivering on its statutory object to ensure public protection.
Benefits	The Counsellors and Psychotherapists Registration Board did not identify any benefits to not setting pre-registration education and training requirements for counsellors and psychotherapists.
Impacts	Ultimately, the failure to establish threshold standards for entry into practice and the quality assurance requirements



for education and training programmes would mean that the Board was not in a position to move past the first step of the process for introducing statutory regulation. This result of this would be a failure to introduce statutory regulation.

By extension, and linked inextricably with the risks identified above, beyond the purely regulatory impact, the failure to introduce statutory regulation for counsellors and psychotherapists would present a continuing public protection concern whereby neither title would be protected, where there are inconsistent training for practitioners and no oversight of the conduct of practitioners. All of this combined continues to present a risk to the public – oftentimes vulnerable members of society – who seek out therapeutic support from counsellors and psychotherapists.

## Option Two: Set pre-registration education and training requirements

This option would result in the Board setting distinct and separate Standards of Proficiency and Criteria for Education and Training Programmes for entry into practice as a counsellor and a psychotherapist, thereby facilitating the Board to progress to the next stage of introducing regulation for both professions.

While the majority of respondents to the 2016 Department of Health consultation process welcomed the introduction of statutory regulation, a significant level of fragmentation emerged between and within the professions of counselling and psychotherapy around the nature of practice for both professions, the differences between both professions and the different or interchangeable use of the professional titles. In short, while the opportunity for regulation was welcomed, there was limited agreement between and within the professions around how this would be established.

**Risks** 

The designation by the then Minister for Health of two distinct professions for regulation under two separate registers means that distinct sets of *Standards* and *Criteria* must be established. The *Standards* – which detail the knowledge and skills for entry into practice – must articulate substantial differences in practice – i.e. the same set of standards cannot be used for entry to both registers.

Given the challenges presented by the feedback received to the 2016 consultation – in particular, noting the fragmentation and lack of consensus between the professions – a significant risk to setting distinct sets of preregistration education and training regulatory standards is



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	the lack of agreement between and within the professions.  This lack of agreement could mean that it is not possible for the Board to set threshold standards for entry into practice.
Benefits	The establishment of distinct and separate pre-registration education and training requirements for counsellors and psychotherapists will set a consistent threshold standard for entry into practice for both professions meaning that there will be assurance all future graduates who use the title 'counsellor' or 'psychotherapist' when the registers open will have demonstrated achievement of the same threshold knowledge and skill for safe practice.
	The setting of pre-registration education and training requirements will ensure the standardisation – in terms of the graduate knowledge and skill outcome – of education and training programmes and, for education providers themselves, offers a clear, robust and consistent regulatory approval process, ensuing that all programmes meet the same threshold standards and requirements.
	Additionally, the setting of pre-registration education and training requirements will establish the substantive basis upon which the process for recognition applicants (when the registers open) with internationally awarded qualifications. By extension, the setting of the <i>Standards of Proficiency</i> provides the foundation upon which the competent authority function can be established for the professions of counselling and psychotherapy providing the pathway for ease of workforce mobility both into and out of the State.
	Finally, from a purely process perspective, the establishment of <i>Standards of Proficiency</i> and <i>Criteria for Education and Training Programmes</i> facilitates the continued progress of the introduction of statutory regulation for both professions, without which – as noted above – the introduction of regulation cannot progress.
Impacts	Recognising that the setting of pre-registration education and training requirements will introduce regulatory standards for the professions for the first time in Ireland, there are a range of implications this will have, particularly for education and training providers.
	Most significantly, it will require a review of the curriculum and assessment for each programme, potentially involving redesigning of programmes and undertaking revalidation



with QQI, all in advance of making an application to the Board for programme approval. As education providers work through this, it is noted the challenge presented with managing a legacy programme (with a particular cohort of students) and the design and introduction of a new programme (with a different cohort of students).

In turn, the regulatory focus on practice education and the specific requirements around quality assurance or placement sites, the direct linkages between placement sites, the students and the programme team around assessment during placement and the specific model of placement supervision, a requirement of education programmes for regulated professions, will have an impact of education and training providers.

## **Preferred Option**: Set pre-registration education and training requirements

The Counsellors and Psychotherapists Registration Board concluded that in order to meet its primary statutory object of ensuring public protection and to progress the introduction of statutory regulation, it would set distinct threshold pre-registration education and training requirements for both professions.

To this end, balancing the risks and impacts against the benefits, the Board agreed that the setting of pre-registration education and training requirements was the only approach it could take. Indeed, it recognised that both legislatively and practically, no other option was available to it.

In reaching this conclusion, however, it did note the introduction of pre-registration education and training requirements would likely be a lengthy process with an extended period (relative to other regulated professions) needed for adaption and alignment to regulatory requirements.

#### [3] Pre-consultation Activities

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 neither professional title is either regulated or regulated as a discreet profession in and of itself, <sup>3</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

<sup>&</sup>lt;sup>3</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.



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
- 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;
- the articulation of standards to ensure understandability and clarity of the intended outcome; and
- underpinning its analysis by examining these questions through the prism of professional regulation, thereby recognising the differences between professional body non-statutory requirements and regulatory standards.

To 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.

#### [4] Consultation Process

The Board prepared draft *Standards of Proficiency* and *Criteria for Education and Training Programmes* for both professions and issued these for 12-week public stakeholder consultation process.

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.

Significant efforts were made to publicise the public consultation and invite submissions from stakeholders:

- An advertisement was placed in The Irish Times and Seachtain newspapers on 18 September and 20 October 2023;
- Information on the consultation was hosted on the CORU website;
- An online feedback form was developed and a link to this form was included in the public consultation notice on the CORU website;
- CORU social media platforms were utilised throughout the consultation period, including X (formerly Twitter) and LinkedIn;
- An email highlighting the consultation process was issued to an extensive range of stakeholders including education providers of approved programmes and professional bodies;
- 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;
- CORU produced two dedicated eBook resources to support respondents in understanding the Board's draft requirements and assist in how to provide feedback to the consultation process; and
- CORU developed an extensive Frequently Asked Questions section on its website.

Submissions were accepted in multiple forms:

- 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 strategyandpolicy@coru.ie.
- posting written submissions to: Public Consultation, Strategy and Policy Unit, CORU,
   Infinity Building, George's Court, George's Lane, Smithfield, Dublin 7, D07 E98Y

Across the consultation processes, a total of 689 responses were received. 4

Counsellors		Psychotherapists	
Online Questionnaire	149	Online Questionnaire	428
Email Submissions	36	Email Submissions	107
Total	185	Total	535

<sup>&</sup>lt;sup>4</sup> Please note that there is a slight variation in numbers between the total submissions received overall to both consultations (n=689) and the number of responses to each of the individual consultations. This is because the totals for the individual consultations includes responses that provided feedback for both counsellors and psychotherapists.



Copies of all consultation submissions received by the Board are available to access on the CORU website here: Counsellors & Psychotherapists Registration Board - Coru

Following the close of the consultation process, the Board reviewed each individual submission received. On the basis of the feedback received, and further discussion and examination by Board members, a number of changes to the articulation of a number of its draft standards of proficiency across both professions were made – along with introducing additional standards to address areas of omission or ambiguity identified. The Board, on the basis of the changes made to its *Standards of Proficiency* for both professions, revised the minimum number of practice placement hours for both professions and reviewed the proposed threshold level of qualification for entry to the register for psychotherapists. No changes were made to the supervisory requirements around practice education that are detailed in Criterion 2: Practice Placements of the *Criteria* documents.

Decision of Board regarding the Threshold Level of Qualification for Psychotherapists

The Board noted the range of feedback provided from stakeholders alongside the quantitative feedback from the questionnaire that indicated a small majority of respondents were of the opinion that Level 8 was the threshold qualification level for entry to the Psychotherapists Register.

Reviewing the qualitative feedback, the Board noted that – in the main – respondents identified that the level of qualification was historically, and should be retained, as the key differentiation between counselling and psychotherapy practice in Ireland. The Board emphasised that under the provisions of the *Health and Social Care Professionals Act 2005 (as amended)*, it is responsible for setting the threshold knowledge and skills required for entry into practice and this threshold becomes that metric against which new graduates in Ireland and internationally qualified practitioners are able to enter onto the register. Therefore, within a regulatory context, the *Standards* are the principal differentiating tool, not the level of qualification. The threshold level of qualification as set in the *Criteria* is determined on the basis of the content of the *Standards*.

To this end, the Board noted it had made a number of significant changes to its *Standards* and as such, it undertook a two stage process to reassess the threshold level of qualification. The Board reviewed: (a) the knowledge and skills articulated in the revised *Standards* 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* by 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.

Having completed this work, the Board concluded that application of knowledge, skills and competency descriptors for NFQ Level 9 aligned with and directly reflected the level of demand identified in the *Standards*. Specifically, the Board highlighted the descriptors identified at Level 9 around the range and selectivity of skills required for practice, along with the context of practice and the depth of insight required of working with complex and severe psychological distress as capturing and reflecting the threshold requirements set at the entry point into practice.



Decision of Board regarding the Minimum Number of Hours in Practice Placement
The Board's review of the minimum number of practice placement hours for both professions
considered both the requirements of the criterion, as well as its articulation. The rationale for
the Board's decision in respect of this criterion is divided into two parts below.

# [a] Board Decision around Minimum Number of Placement Hours

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 responses 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*.

[b] Board Decision around Minimum Number of Placement Hours for purposes of Assessment 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.

#### **Please Note**

Detailed reports outlining all the changes made to the Board's *Standards* and *Criteria*, including the rationales for each decision, are available on the CORU website: <u>Counsellors</u> & <u>Psychotherapists Registration Board - Coru</u>

#### [5] Enforcement and Compliance of Regulatory Intervention

The setting of pre-registration education and training is not in and of itself a regulatory intervention (as detailed above). The *Standards* and *Criteria* form one element of the regulatory infrastructure required to establish statutory regulation for both professions. While the *Standards* and *Criteria* will be used as part of the programme approval process undertaken in advance of the opening of the registers for counsellors and psychotherapists, they are not *enforced* until regulation is established through the opening of registers for both professions – i.e. it is at the moment the register opens – and the regulatory provision is established – that the standards become the threshold entry requirements onto each of the registers.

In the period preceding the opening of the registers, the Board's approved pre-registration education and training requirements will be used to assess applications by education providers for programme approval under Section 48 of the *Health and Social Care Professionals Act 2005 (as amended)*. The qualifications associated with the programmes approved by the Board will be listed on the Approved Qualifications Bye-Law. At the time the registers for both professions open, it will be the qualifications listed on this Bye-Law will be the only mechanism through which new or recent graduates of qualifications awarded in the State will be eligible to make an application for registration.

On the day of opening of the registers, the Board becomes the Competent Authority for both professions in the State. This will be the first time there is a designated competent authority in



Ireland for either profession to recognise the qualifications of international applicants seeking to practice in the State.

The Board has provided 4 years for education providers to align their programmes with its regulatory standards before the commencement of programme approval activity. At this stage, the Board has not set – and it is not yet possible for it to set – the date for registers opening.

# [6] Review Mechanisms

The Registration Board cyclically reviews its pre-registration education and training requirements, typically between every 5 and 7 years.

Having provided education providers with a period of 4 years to align programmes to its regulatory standards, the Board will calibrate its review of the pre-registration education and training requirements accordingly.

# [7] Publication

This Regulatory Impact Assessment will be published on the CORU website: <u>Counsellors & Psychotherapists Registration Board - Coru</u>