



Ag Rialáil Gairmithe Sláinte
agus Cúraim Shóisialaigh

Regulating Health +
Social Care Professionals

Regulated Professions Proportionality Assessment

Report to the European Commission on the Establishment of Pre-Registration Education and Training Requirements for Counsellors and Psychotherapists

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

The establishment 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 taken together constitute the regulatory provision.

Counsellors and Psychotherapists Registration Board

October 2025

[1] Overview Information

Organisation	CORU – Health and Social Care Professionals Council
Registration Board	Counsellors and Psychotherapists Registration Board
Nature of Regulatory Intervention	Establishment of distinct and separate Pre-Registration Education and Training Requirements for Counsellors and Psychotherapists: • <i>Standards of Proficiency for Counsellors</i> • <i>Criteria for Education and Training Programmes (Counsellors)</i> • <i>Standards of Proficiency for Psychotherapists</i> • <i>Criteria for Education and Training Programmes (Psychotherapists)</i> <i>This is only one element of the regulatory intervention (the introduction of statutory regulation) and does not – in and of itself – constitute a regulatory provision.</i>
Date of Assessment Report	October 2025

[2] About the Regulatory Intervention

Is the regulatory intervention a new or amending professional regulation?

If it is an amending professional regulation, please provide details of the current regulation in place.

The professions of counselling and psychotherapy are **not** currently statutorily regulated in Ireland. 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 [Statutory Instrument 170/2018](#), 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.

The Board is currently engaged in the process of putting in place all the necessary regulatory and legal infrastructure to introduce regulation.

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 opens¹) is subject to the holding of an *approved qualification*. In defining an *approved qualification*,

¹ 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 meeting the conditions for registration under Section 91 of the Act. More information on this registration pathway is available on the CORU website here: [Transitional \(Grandparenting\) Route \(S91\) - Coru](#)

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*.

On 11 July 2025, following a detailed drafting process and extensive public stakeholder consultation exercise, the Counsellors and Psychotherapists Registration Board published distinct and separate pre-registration education and training requirements for both professions of counselling and psychotherapy.

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; the establishment of pre-registration education and training requirements is only one of these steps.

Please Note. This assessment of proportionality was **not** conducted on the establishment of a regulatory provision, but rather on one of the elements that together with other regulatory and legislative components are necessary for the introduction of 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 noted that such an assessment and reporting to the EU Commission is typically conducted on a regulatory provision, as opposed to one component of it. However, 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 to publish a Regulatory Impact Assessment on this first element

of its regulatory provision. Connected with this, it took the decision to prepare a corresponding assessment report for the EU Commission to highlight how its activities to date are in line with the principle of proportionality.

What is the purpose of the new or amending professional regulation?

In setting its pre-registration education and training requirements for both professions, the Counsellors and Psychotherapists Registration Board is delivering on its statutory remit to establish the threshold standard for entry onto each of its registers. This requires the settings of two distinct sets of documents – one for counsellors and another for psychotherapists – that articulate:

- the threshold knowledge and skills required at entry to the respective register (the *Standards of Proficiency*); and
- the programme design and quality assurance mechanisms required of an education provider to ensure that its education and training programme can consistently produce graduates that have demonstrated achievement of all the *Standards of Proficiency*.

By setting these pre-registration education and training requirements, the Board not only sets the threshold competencies required for entry to each of its registers, it also provides the regulatory basis upon which it can commence its programme approval process – resulting in the establishment of an Approved Qualifications Bye-Law – and undertake assessments of applicants holding internationally awarded qualifications when the register opens.

The setting of these pre-registration education and training requirements ensures that, when the register opens, entry for new graduates (or recent graduates) who are awarded approved qualifications in the State **and** applicants holding an internationally awarded qualification will be assessed against the same threshold requirements for entry to the professional register.

Who is affected by the new or amending professional regulation?

Pre-registration education and training requirements are used in two regulatory functions:

- approval and monitoring of education and training programmes awarded in the Irish State; and
- the recognition of international applicants who have trained and/or worked outside the State who are seeking to register in the Irish State.

Therefore, the stakeholders impacted by the setting of the Board's pre-registration education and training requirements are:

- education providers;
- students (current and future) enrolled in education and training programmes that will seek Board approval for inclusion on its Approved Qualifications Bye-Law; and
- international applicants seeking recognition of internationally awarded qualifications and experience gained outside the State.

On what **date** is the new or amending professional regulation proposed to **be introduced**?

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.

The Board has provided 4 years for education providers in Ireland 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.

[3] Condition One: Non-Discrimination

Does the new or amending professional regulation discriminate – either directly or indirectly – on the basis of nationality or residence?

No.

The Registration Board's development of its pre-registration education and training requirements was undertaken in line with the principles of equality, diversity and inclusion and was informed by CORU's obligations under the Public Sector Duty, as defined in Section 42 of the *Irish Human Rights and Equality Commission Act 2014*.

An extensive public consultation process was undertaken – publicised online, on social media and in print media – offering the opportunity for all stakeholders, including members of the public, to provide a response. In order to ensure as broad engagement as possible with all stakeholders, the following avenues and media were used to publicise the consultation process:

- 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.

Furthermore, it is important to highlight that when registers open, **all** applicants seeking registration, regardless of nationality or residence, will remain subject to the same threshold *standard of proficiency* as required under Section 38(2)(a) of the *Health and Social Care Professionals Act 2005 (as amended)*.

[4] Condition Two: Public Interest Objective

Please identify which public interest objective(s) that justify the new or amending regulatory provision.

Public Policy	☐
Public Security	☐
Public Health	☐
Overriding reasons in the public interest	☒
<i>If Overriding reasons in the public interest, please specify</i> Public Protection	

How does the new or amending regulatory provision meet the public interest objective(s) identified above?

Under the *Health and Social Care Professions Act 2005 (as amended)*, each Registration Board – for the professions designated in the Act – through the enactment of its regulatory functions is statutorily responsible for **promoting high standards of professional conduct, education, training and competence** in order to deliver on its statutory object to ensure public protection.

As noted above, the setting of pre-registration education and training requirements forms the first step in the process of introducing statutory regulation for the professions of counselling and psychotherapy. When the regulatory provision is introduced with the opening of distinct and separate registers for both professions:

- the *Standards of Proficiency* will ensure that **all registrants** (with the exception of existing practitioners who have the opportunity to register through the grandparenting pathway ²) have demonstrated achievement of the same threshold knowledge and skills for safe practice as either a counsellor and psychotherapist; and

² It is important to emphasise that while the *Standards of Proficiency* will not be used to assess the proficiency of existing practitioners as part of their registration process under Section 91 of the *Health and Social Care Professions Act 2005 (as amended)*, **all** registrants – regardless of their registration pathway – will be subject to the same *Code of Professional Conduct and Ethics*. The setting of the *Codes* for counsellors and psychotherapists forms a later stage of the Board's work in establishing the regulatory provision.

- the *Criteria for Education and Training Programmes* will ensure that education providers who seek to be approved by the Board – and have their qualifications listed on its Approved Qualifications Bye-Law – have the systems and mechanisms in place that provide assurance that graduates consistently achieve the threshold standards for entry into practice that, by extension, provides assurance of public protection

The setting of regulatory standards for entry to practice both professions, and subsequent approval of education and training programmes, ensures consistency of standards for entry into practice of both professions for the first time, thereby ensuring public protection.

[5] Condition Three: Principle of Proportionality

Who does the new or amending regulatory provision aim to protect?

The public.

What are the risks the new or amending regulatory provision aims to minimise and how will the provision achieve this?

Currently in Ireland, in the absence of statutory regulation, there are no legal, enforceable mechanisms to underpin the safe practice of counselling or psychotherapy. While there exists a range of professional bodies, these are voluntary in nature and there is no requirement for practitioners to be members of any such body in order to offer therapeutic services to the public.

In short, the current reality for practice of these professions in Ireland is that any individual – with or without training – can present themselves publicly as a counsellor or psychotherapist and offer services to the public, oftentimes the most vulnerable members of society. In tandem, there are no legal parameters around the education and training programmes that are offered to prepare individuals for practice as a counsellor or psychotherapist. While there are accreditation schemes managed through professional bodies, these again are voluntary in nature. This means that there are no quality assurance mechanisms to ensure the consistency of the standard of education and training and, ultimately, no consistency in the knowledge and skills required for entry in to practice as either a counsellor or psychotherapist.

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, ensuring that all programmes at minimum 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 *Standards of Proficiency* 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.

How will the new or amending regulatory provision be applied consistently and systematically?

The Board's pre-registration education and training requirements can only be applied in the context of the introduction of the regulatory provision; that is, when all other legislative and regulatory elements of the regulation provision have been introduced.

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.

However, when the regulation provision is established and registers are opened, the consistent and systematic application of the Board's pre-registration education and training requirements will be underpinned by Sections 38 and 48 of the *Health and Social Care Professionals Act 2005 (as amended)*. These sections detail the means through which registration is granted to both applicants from the State and internationally (Section 38) and that education and training programmes must be approved, monitored and listed on an Approved Qualifications Bye-Law (Section 38/48).

How will those the new or amending regulatory provision aims to protect be provided with clear and accurate information, including how new technologies can enhance this provision?

The Board's revised pre-registration education and training requirements are available for all members of the public to access through the CORU website:

- *Standards of Proficiency and Criteria for Education and Training Programmes:*
[Standards and Criteria - Coru](#)

All key stakeholders have been directly communicated – via email – with information about the Board's revised requirements. In addition, the following resources are available to support stakeholder understanding of both the Board's pre-registration education and training requirements and the process for education provider alignment to them:

- *Update for Education Providers:* [Update for Education Providers - Coru](#)

- *Frequently Asked Questions: [FAQs - Coru](#)*

The Counsellors and Psychotherapists Registration Board section on the CORU website will be regularly updated to reflect any updates in information around the pre-registration education and training requirements, including additional new FAQs, and, where appropriate, the Board will use its extensive stakeholder database to directly engage with stakeholders.

What is the scope of the activities of the profession (including the autonomy the professionals have) and can these activities be shared with another profession?

It is important to stress that under the provisions of the Health and Social Care Professionals Act 2005 (as amended), the Counsellors and Psychotherapists Registration Board regulates by protection of title; it does not regulate by scope of professional practice.

The *Standards of Proficiency* detail the specific knowledge, skills and professional behaviours that are required counsellors and psychotherapists at entry into practice as autonomous practitioners. This means that they set the knowledge and skill that an individual must have on day one of their practice in order to be able to enter the register and practice safely.

In setting the *threshold* knowledge and skills, each Registration Board recognises 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 evolves over time and will change through their experience, engagement in continuing professional development, additional post-qualifying training.

The pre-registration education and training requirements detail the requirements for **entry** to the register. When the register opens, each registrant will be subject to minimum acceptable levels of performance that he or she must meet in the delivery of services or care. These will be defined in a separate document: *the Code of Professional Conduct and Ethics*, which the Board will set for each of its registers in advance of both opening.

[5] Condition Three: Necessity of Regulatory Provision

Why are the current provisions in place insufficient to meet the public interest objective?

Following a public consultation process in 2016, managed by the Department of Health, the then Minister for Health – having reviewed the feedback from stakeholders to each of the questions asked, including whether statutory regulation should be introduced - made the decision to designate the professions of counselling and psychotherapy for regulation.

The decision to designate a profession for statutory regulation is the responsibility of the Minister for Health. The Counsellors and Psychotherapists Registration Board is responsible for establishing the regulatory and legislative infrastructure to deliver on the

direction of the Minister for Health, in line with its responsibilities under the *Health and Social Care Professionals Act 2005 (as amended)*.

Currently, as there is no statutory regulation of these professions in Ireland, there are no regulatory standards established. The Board's setting of distinct and separate pre-registration and training requirements for both professions is the first time that regulatory standards have been introduced in Ireland for both professions.

Could a less restrictive intervention be used to achieve the public interest objective?

The professions of counsellor and psychotherapist are designated in the *Health and Social Care Professionals Act 2005 (as amended)* as requiring statutory regulation.

As noted above, the decision to designate a profession for statutory regulation is the responsibility of the Minister for Health. The Counsellors and Psychotherapists Registration Board is responsible for establishing the regulatory and legislative infrastructure to deliver on the direction of the Minister for Health, in line with its responsibilities under the *Health and Social Care Professionals Act 2005 (as amended)*.

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 opens³) 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.

In setting its pre-registration education and training requirements, the Board has been guided by the principles of proportionality and right-touch regulation, ensuring the appropriate regulatory intervention to address the identified risks.

To this end, in setting its *Standards and Criteria* for both professions it has 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,⁴ as is proposed in Ireland, the Board reviewed entry level

³ 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: [Transitional \(Grandparenting\) Route \(S91\) - Coru](#)

⁴ 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 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
- **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 work, the Board undertook an extensive public stakeholder consultation process to which 689 responses were received. Following the close of the consultation process, the Board reviewed each individual submission received. The consultation process was underpinned by the principle of proportionality, asking the question of each profession-specific standard and criterion whether it was the opinion of the respondent that it was set at threshold level for entry into practice and, if not, the reason for this and alternatives for the Board to consider.

Are there any alternative routes available to applicants to the register to demonstrate threshold level of proficiency for practice?

Entry to the professional register is subject to the routes designated under legislation in the *Health and Social Care Professionals Act 2005 (as amended)*. The Registration Board does not have the authority to register applicants outside of the scope it is provided under the provisions of the Act.

Under the provisions of Section 38 of the *Health and Social Care Professionals Act 2005 (as amended)*, all applicants to the register must be able to demonstrate achievement of the threshold level of proficiency for practice (*Standards of Proficiency*) through:

- Holding an approved qualification awarded in the State that sits on an Approved Qualifications Bye-Law; or
- Holding a qualification that is recognised in the State in accordance with Directive 2005/36/EC; or
- Satisfying the Board that he or she is *fit and proper* to engage in practice of the profession.

Under Section 91 of the Act, there is provision for entry to the register for existing practitioners at the time the register was established. Under this provision of the Act, an applicant must:

- Apply for registration during the transitional period (i.e. the first two years a register is open);
- Hold a qualification listed in Schedule 3 of the *Health and Social Care Professionals Act 2005 (as amended)* **or** a qualification deemed by the Board to be sufficiently relevant that attests to the standard of proficiency of a Schedule 3 qualification **or** completes an Assessment of Professional Competence set by the Board; and
- Satisfy the Board that he or she is *fit and proper* to engage in practice of the profession.

Please Note. The Board's pre-registration education and training requirements will apply only to applicants making a Section 38 application. They will not apply to existing practitioners making an application through the grandparenting pathway.

What impact will the new or amending regulatory provision have on the free movement of persons, consumer choice and quality of service?

There will be no impacts on the free movement of persons, consumer choice or quality of service by setting the pre-registration education and training standards. It is only on the opening of registers for both professions that the Board will become the competent authority for recognition of international qualifications in the State for both professions.

What will the effect of the new or amending regulatory provision have when combined with existing provisions?

Currently there are no statutory provisions in operation for the regulation of counsellors or psychotherapists in Ireland. The requirements set by the Board are the first time that distinct

threshold regulatory standards for entry into practice have been established for counsellors and psychotherapists in Ireland.

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, ensuring 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 *Standards of Proficiency* 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.

[6] Regulatory Impact Assessment

Has a Regulatory Impact Assessment been conducted?

If Yes, what were the outcomes?

If No, why was an assessment not conducted?

The Counsellors and Psychotherapists Registration Board prepared and published a Regulatory Impact Assessment on the establishment of its pre-registration education and training requirements which is available on the CORU website here: [Counsellors & Psychotherapists Registration Board - Coru](#)

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

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 establishing its pre-registration education and training requirements for entry to practice each profession and following a public consultation process to agree the knowledge, skills and competence required at entry to practice each profession, the Board determined that the threshold level of qualification to be – NFQ level 8 for counsellors and NQF level 9 for psychotherapists.

[7] Stakeholder Consultation Process

Did you undertake a stakeholder consultation?

Please provide details of the consultation process and its outcomes.

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.

As identified above, significant efforts were made to publicise the public consultation and invite submissions from stakeholders. Submissions were accepted in multiple forms:

- visiting www.coru.ie 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. ⁵

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

⁵ 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. 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: [Counsellors & Psychotherapists Registration Board - Coru](#)