



Ag Rialáil Gairmithe Sláinte
agus Cúraim Shóisialaigh

Regulating Health +
Social Care Professionals

Counsellors and Psychotherapists Registration Board

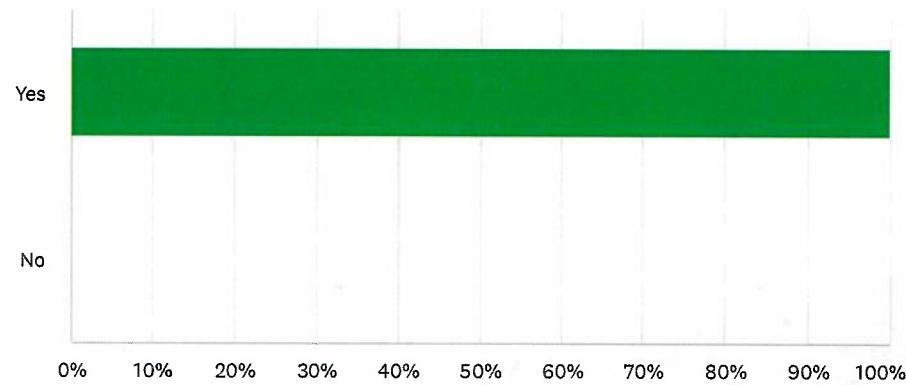
***Consultation on the Standards of Proficiency
for Counsellors and Criteria for Education and
Training Programmes (Counsellors)***

Online Questionnaire Responses

Consultation Period: 4 September 2023 – 1 December 2023

Q1 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 survey.

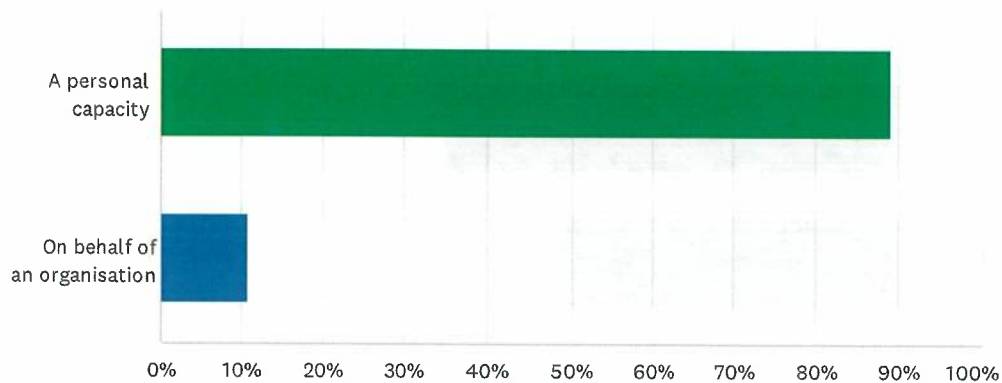
Answered: 149 Skipped: 0



ANSWER CHOICES	RESPONSES	
Yes	100.00%	149
No	0.00%	0
TOTAL		149

Q2 Are you contributing to this survey in:

Answered: 146 Skipped: 3

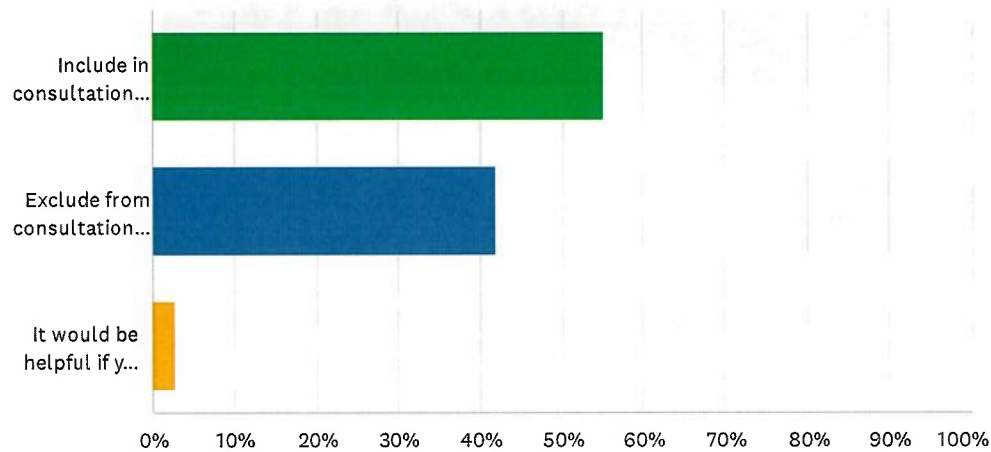


ANSWER CHOICES	RESPONSES	
A personal capacity	89.04%	130
On behalf of an organisation	10.96%	16
TOTAL		146

#	IF ON BEHALF OF AN ORGANISATION, PLEASE SPECIFY:	DATE
1	Northside Counselling Service	12/1/2023 11:06 AM
2	Human Givens Network Ireland	11/30/2023 11:41 AM
3	Addiction Counsellors of Ireland	11/30/2023 9:50 AM
4	Irish Hospice Foundation	11/29/2023 10:20 AM
5	NAPCP	11/26/2023 5:13 PM
6	IICP College, Killinarden Enterprise Park Tallaght, Dublin 24 D24 TKC7, Ireland	11/22/2023 12:57 PM
7	NAPCP	11/18/2023 12:07 PM
8	University College, Cork and Technological University of the Shannon	11/12/2023 11:38 AM
9	NAPCP	11/9/2023 11:09 AM
10	Helplink	11/6/2023 12:03 PM
11	Munster Technological University	10/26/2023 7:15 PM
12	Finglas counselling service	10/25/2023 3:41 PM
13	PCI	10/19/2023 9:52 AM
14	ATCI Addiction Treatment Centres of Ireland	9/25/2023 3:05 PM
15	ICHAS	9/8/2023 2:41 PM

Q3 Please indicate if you would like your name and/or organisation to be kept confidential and excluded from the consultation report.

Answered: 143 Skipped: 6

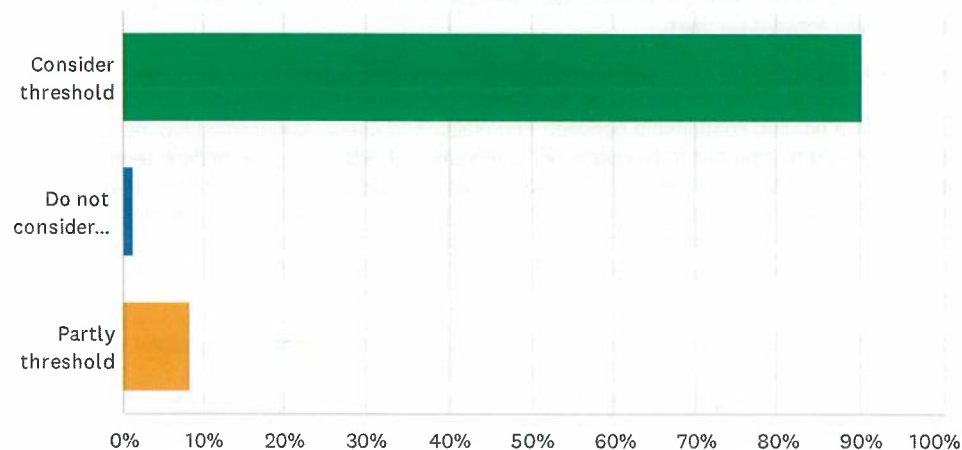


ANSWER CHOICES		RESPONSES	
Include in consultation report		55.24%	79
Exclude from consultation report		41.96%	60
It would be helpful if you could explain if you regard the information you have provided as confidential.		2.80%	4
TOTAL			143

#	IT WOULD BE HELPFUL IF YOU COULD EXPLAIN IF YOU REGARD THE INFORMATION YOU HAVE PROVIDED AS CONFIDENTIAL.	DATE
1	[REDACTED]	11/29/2023 10:12 PM
2	[REDACTED]	11/28/2023 3:10 PM
3	[REDACTED]	11/9/2023 2:12 PM
4	[REDACTED]	9/19/2023 12:25 AM

Q4 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.

Answered: 84 Skipped: 65



ANSWER CHOICES	RESPONSES	
Consider threshold	90.48%	76
Do not consider threshold	1.19%	1
Partly threshold	8.33%	7
TOTAL		84

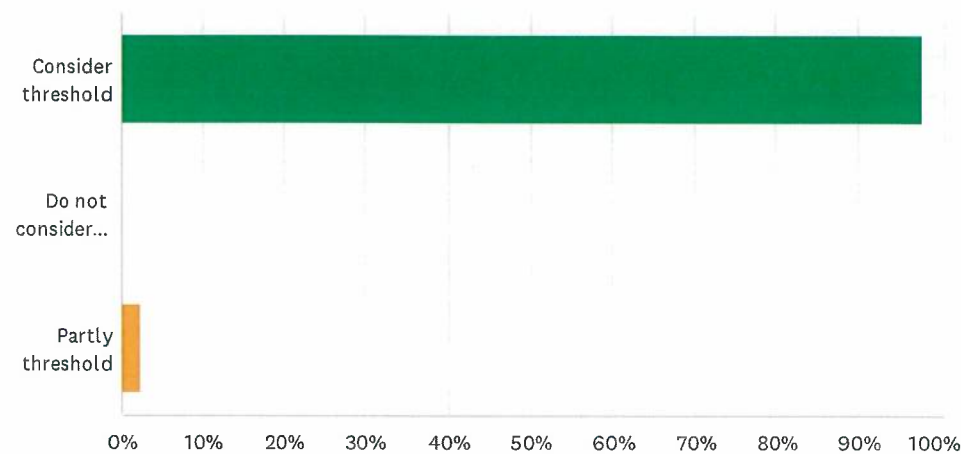
Q5 If you do not consider Standard 5.9 to be threshold or if you consider it to be partly threshold, please explain why

Answered: 5 Skipped: 144

#	RESPONSES	DATE
1	As Counsellors we do not 'treat' our clients. We meet with them and work with them to discover best way forward for them.	11/29/2023 10:39 PM
2	The language is medicalised, and more appropriate to psychiatry. It does not reflect the history, tradition or the current status quo in the humanistic counselling profession, which is at its core about a healing relationship between counsellor and client. Counselling has never unthinkingly adhered to psychiatric language or "diagnosis". "Treatment" is a medical term and alien to the humanistic counselling profession. The language suggests that rather than regulating an existing profession, the intention is to create a new medicalised counselling profession, subordinate to psychiatric orthodoxy and hierarchies. Referral to other professionals, where necessary, is an existing aspect of codes of counselling ethics and is threshold.	11/24/2023 5:15 PM
3	I do not think someone whose only trained only to a degree standard would be equipped with the training, knowledge and skill to manage a spectrum of presentations. Most Psychotherapy programmes require their students to have completed a degree before qualifying for the masters Psychotherapy programmes. My psychology degree introduced me to the workings of the mind and was the beginnings of my journey, but it was the masters programme that connected the dots for me. I think our mental health is very complex and vulnerable and it takes time along with specialised masters training programmes to nurture this.	11/13/2023 11:40 PM
4	Counsellors can form hypotheses that is ever evolving with the information a client is sharing. It may include the counsellor's biases and may exclude information not shared by the client at the time of formulation.	11/8/2023 9:33 AM
5	use of medical language incongruent with majority model in Ireland of person centered or integrative therapy Consider - be able to identify and conceptualise(in collaboration with client) , core concerns and articulate and formulate options for client work	10/20/2023 7:54 PM

Q6 Standard 5.10 Be able to practise counselling that is within counsellor’s level of skill, knowledge and professional judgement.

Answered: 84 Skipped: 65



ANSWER CHOICES	RESPONSES	
Consider threshold	97.62%	82
Do not consider threshold	0.00%	0
Partly threshold	2.38%	2
TOTAL		84

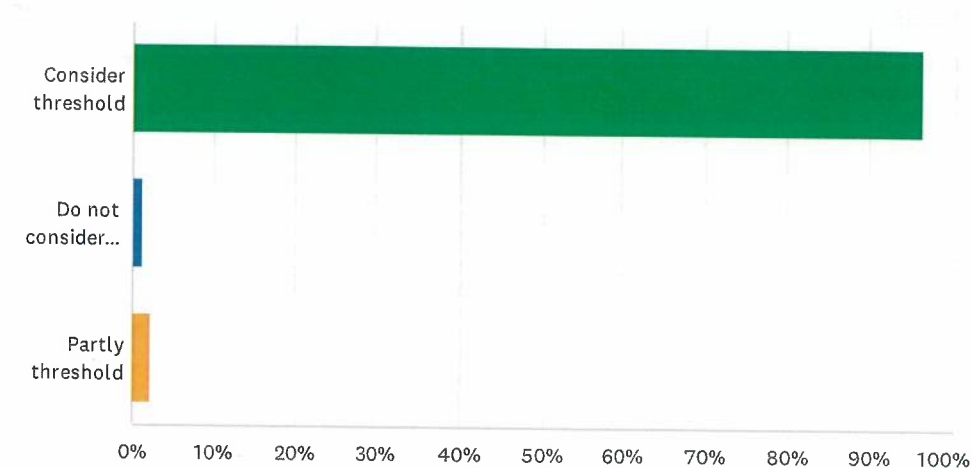
Q7 If you do not consider Standard 5.10 to be threshold or if you consider it to be partly threshold, please explain why

Answered: 0 Skipped: 149

#	RESPONSES	DATE
	There are no responses.	

Q8 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.

Answered: 83 Skipped: 66



ANSWER CHOICES	RESPONSES	
Consider threshold	96.39%	80
Do not consider threshold	1.20%	1
Partly threshold	2.41%	2
TOTAL		83

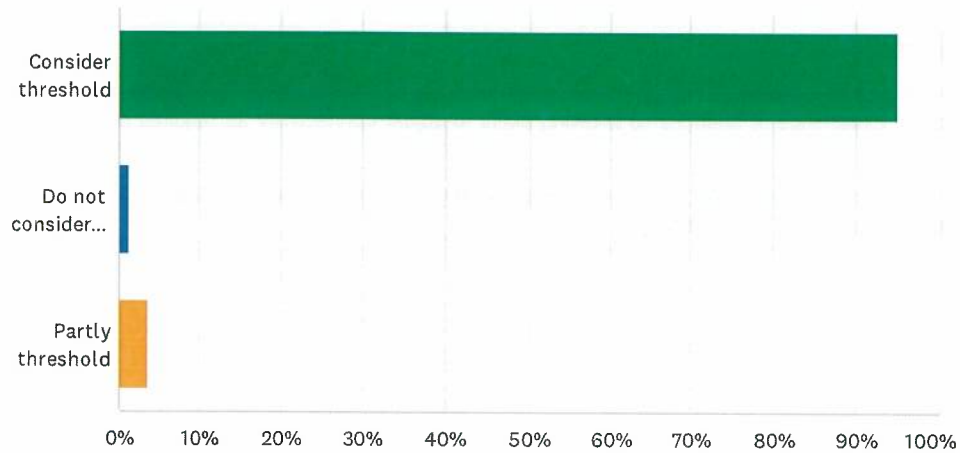
Q9 If you do not consider Standard 5.11 to be threshold or if you consider it to be partly threshold, please explain why

Answered: 1 Skipped: 148

#	RESPONSES	DATE
1	As Counsellors we meet with members of the general public and as such they are identified as clients, not service users.	11/29/2023 10:39 PM

Q10 Standard 5.12 Be able to use counselling skills to build therapeutic relationships including the ability to demonstrate active listening skills.

Answered: 82 Skipped: 67



ANSWER CHOICES	RESPONSES	
Consider threshold	95.12%	78
Do not consider threshold	1.22%	1
Partly threshold	3.66%	3
TOTAL		82

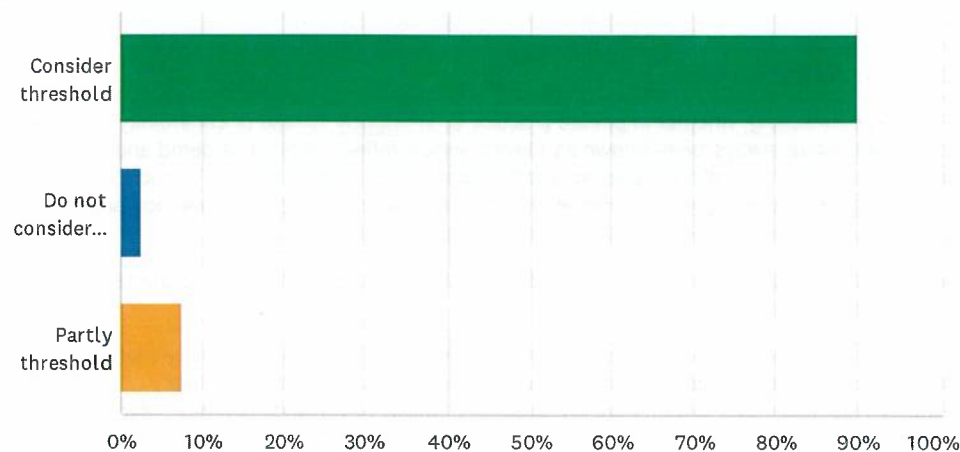
Q11 If you do not consider Standard 5.12 to be threshold or if you consider it to be partly threshold, please explain why

Answered: 2 Skipped: 147

#	RESPONSES	DATE
1	inclusion of 'active listening' diminishes wider understanding of skills- adding 'enable client feedback on experience of relationship showing skills to adjust connectivity as required by client'	10/20/2023 8:06 PM
2	be able to use counselling skills, whilst also consistently being active in developing awareness of self in the relationship.	9/7/2023 9:47 AM

Q12 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.

Answered: 81 Skipped: 68



ANSWER CHOICES	RESPONSES	
Consider threshold	90.12%	73
Do not consider threshold	2.47%	2
Partly threshold	7.41%	6
TOTAL		81

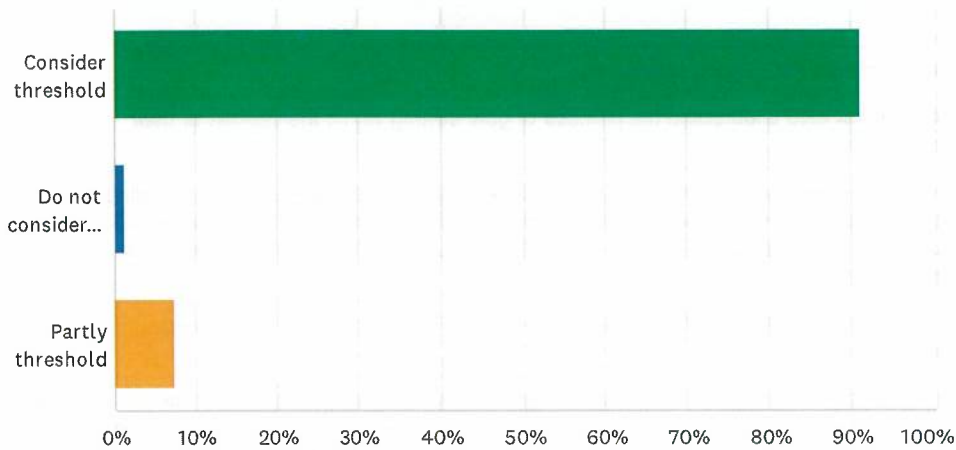
Q13 If you do not consider Standard 5.13 to be threshold or if you consider it to be partly threshold, please explain why

Answered: 6 Skipped: 143

#	RESPONSES	DATE
1	As counsellors we are often working with members of the public and as such we identify them as clients, not 'service users'	11/29/2023 10:42 PM
2	Those seeking counselling, whether in private practice or in publicly funded or community services are, and have always been known as clients, which reflects their considered and voluntary engagement in a healing relationship with a professional. They are not "service users". The language used suggests a concerning lack of awareness of current practice and custom, and a lack of respect for the counsellors and their clients.	11/24/2023 5:23 PM
3	This should read "a range of theories" to clearly indicate that the standard relates to some but not all theories on this topic.	11/22/2023 2:16 PM
4	I do not think only a degree standard of education facilitates the level of competency that is required to critically analyse theories of attachment and relationship dynamics. Most Counselling & Psychotherapy degrees are not academic unlike psychology degrees, which tend to be more academic and require a strong degree of critical analysis. However, psychology degrees could never equip you with the training, skills and knowledge required to achieve standard 5.13.	11/13/2023 11:51 PM
5	The counsellor passes judgement and requires feedback of the client as part of the analysis to satisfy validity.	11/8/2023 9:47 AM
6	be able to collaboratively review relationship	10/20/2023 8:06 PM

Q14 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.

Answered: 80 Skipped: 69



ANSWER CHOICES	RESPONSES	
Consider threshold	91.25%	73
Do not consider threshold	1.25%	1
Partly threshold	7.50%	6
TOTAL		80

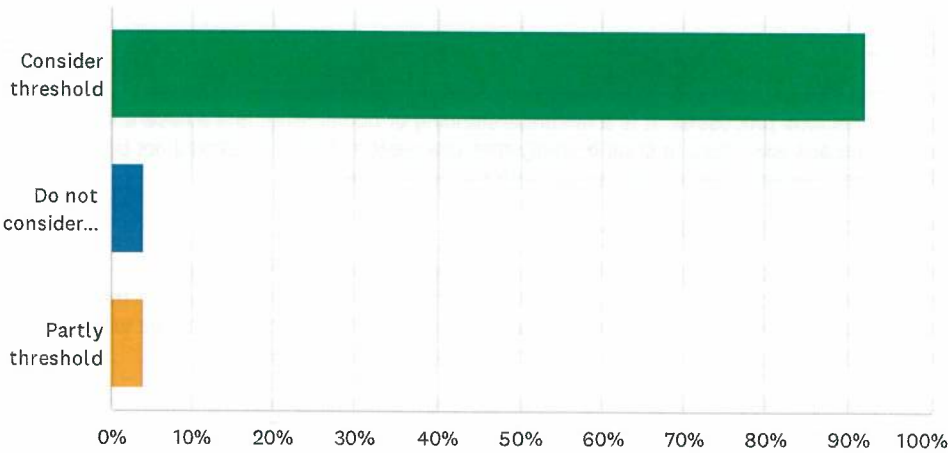
Q15 If you do not consider Standard 5.14 to be threshold or if you consider it to be partly threshold, please explain why

Answered: 5 Skipped: 144

#	RESPONSES	DATE
1	As counsellors we work collaboratively with our clients to set goals. We identify those we work with as clients not service users.	11/29/2023 10:42 PM
2	Counsellors must also understand the process of goal setting within the context of their practice modality	11/29/2023 9:23 PM
3	This question suggests a concerning lack of understanding of the spectrum of counselling approaches, and theories of change, which are respected within the counselling profession. Not all of the established approaches to counselling (e.g. Rogerian) involve the setting of goals for change.	11/24/2023 5:23 PM
4	include - to be able identify progress colleberatively and advise clients on identifying outcomes and change	10/20/2023 8:06 PM
5	I am not sure about the need for the word change, I feel that specific goals would be enough. A clients goal might be to discuss a certain topic in a safe space. I feel by using the word change that the focus is then on some sort of change having to take place and discounts the process of getting there.	9/4/2023 9:40 PM

Q16 Standard 5.15 Be able to recognise and manage the dynamics of power and authority as experienced in the therapeutic relationship.

Answered: 76 Skipped: 73



ANSWER CHOICES	RESPONSES	
Consider threshold	92.11%	70
Do not consider threshold	3.95%	3
Partly threshold	3.95%	3
TOTAL		76

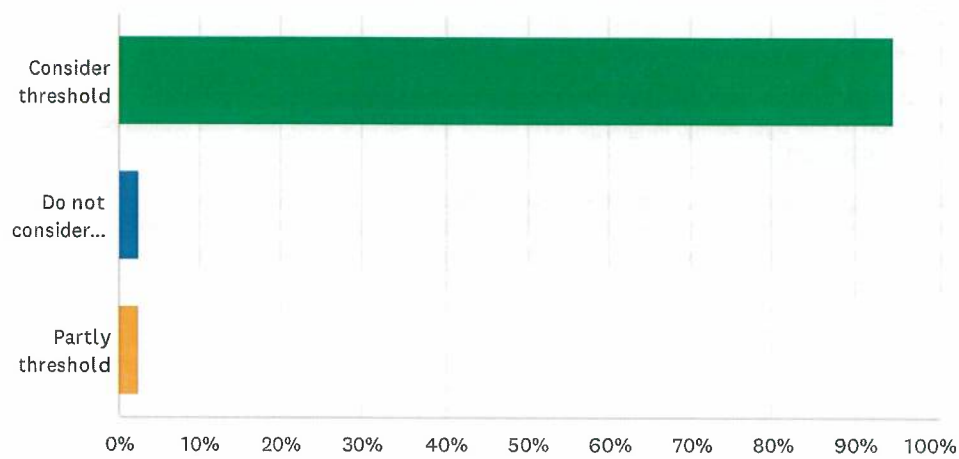
Q17 If you do not consider Standard 5.15 to be threshold or if you consider it to be partly threshold, please explain why

Answered: 5 Skipped: 144

#	RESPONSES	DATE
1	It is also crucial that the draft criteria be changed to include understanding of theories regarding unconscious processes. It is a misunderstanding of counselling, and a false and potentially dangerous assertion, to state or imply that counsellors do not, or should not be required to, have familiarity and understanding with these theories.	11/24/2023 5:26 PM
2	This should read "manage appropriately".	11/22/2023 2:21 PM
3	This is something that is contingent on the therapist/counsellor having an ongoing experience in their own personal therapy. The issue in expecting this from therapists is that education providers currently do not seem to place enough importance on engagement with ongoing personal therapy for the student therapist or new qualified therapist	11/20/2023 8:57 PM
4	I'm not sure a four year Counselling & Psychotherapy degree could ever achieve this, especially if this degree is only the beginning of their personal and professional development. From my experience a lot of people are attracted to this profession because they've had a lot of their own trauma & suffering in their lives, and it takes a lot more than four years for them to see beyond this, and to separate their stories from the clients stories.	11/13/2023 11:59 PM
5	evaluate collaboratively with client	10/20/2023 8:08 PM

Q18 Standard 5.16 Be able to orient service users to the counsellor approach and explain the responsibilities of the counsellor in a therapeutic relationship.

Answered: 76 Skipped: 73



ANSWER CHOICES	RESPONSES	
Consider threshold	94.74%	72
Do not consider threshold	2.63%	2
Partly threshold	2.63%	2
TOTAL		76

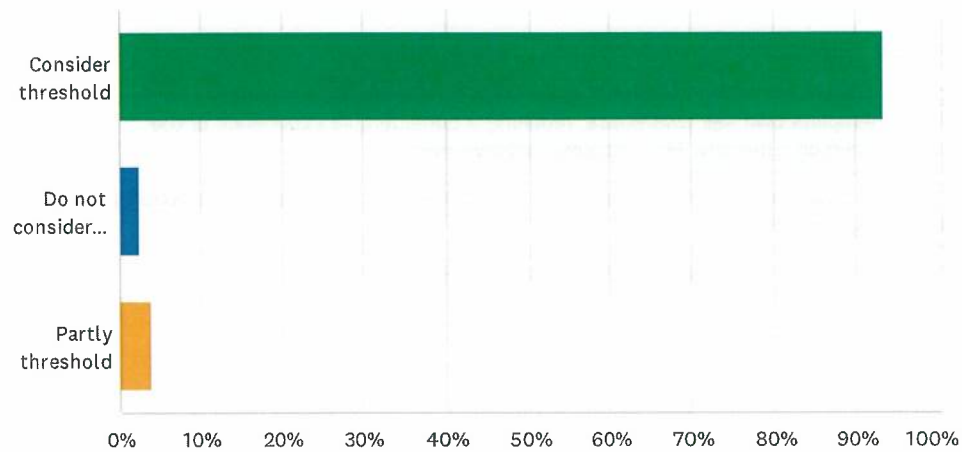
Q19 If you do not consider Standard 5.16 to be threshold or if you consider it to be partly threshold, please explain why

Answered: 3 Skipped: 146

#	RESPONSES	DATE
1	The title client is a more accurate description than service user.	11/29/2023 10:43 PM
2	This should read "explain appropriately". The counsellor should be able to adapt their communication to the age, ability, language level etc of the service user, and this should be explicit in the standard.	11/22/2023 2:21 PM
3	This is an ambiguous statement. Does this mean for the therapist/counsellor to be a directive agent in the therapeutic relationship?? This is surely separate from having the ability and internal robustness to navigate questions the client might have about the therapeutic relationship	11/20/2023 8:57 PM

Q20 Standard 5.17 Be able to initiate and manage engagement by developing rapport and trust.

Answered: 76 Skipped: 73



ANSWER CHOICES	RESPONSES	
Consider threshold	93.42%	71
Do not consider threshold	2.63%	2
Partly threshold	3.95%	3
TOTAL		76

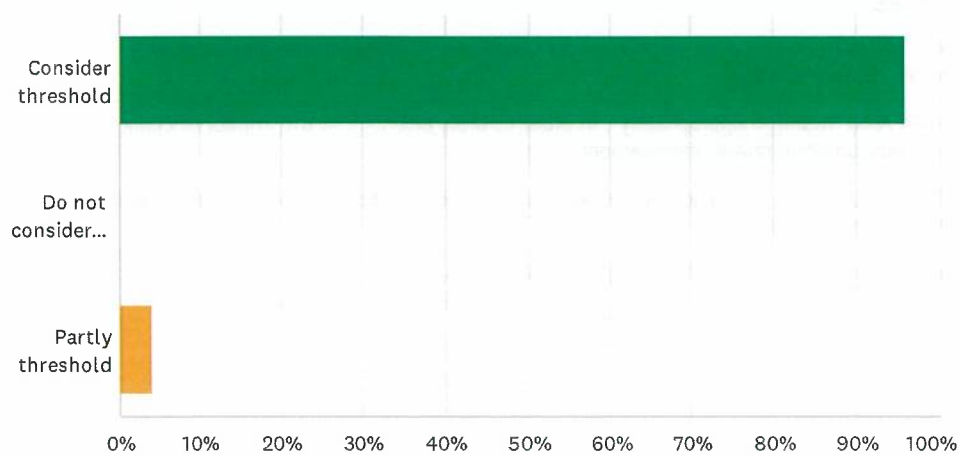
Q21 If you do not consider Standard 5.17 to be threshold or if you consider it to be partly threshold, please explain why

Answered: 3 Skipped: 146

#	RESPONSES	DATE
1	Once again a chance confusing statement, dependant on therapeutic orientation and the depth of the therapists own self awareness, requiring a considerable experience of the therapists own personal therapy. Not academic achievement	11/20/2023 8:57 PM
2	Cultural barriers and other factors may act as an impediments to effective rapport building and manage engagement.	11/8/2023 9:57 AM
3	and identify and support clients with barriers to engagement	10/20/2023 8:08 PM

Q22 Standard 5.18 Be able to identify professional and ethical boundaries with service users and be able to identify and manage any associated challenges.

Answered: 75 Skipped: 74



ANSWER CHOICES	RESPONSES	
Consider threshold	96.00%	72
Do not consider threshold	0.00%	0
Partly threshold	4.00%	3
TOTAL		75

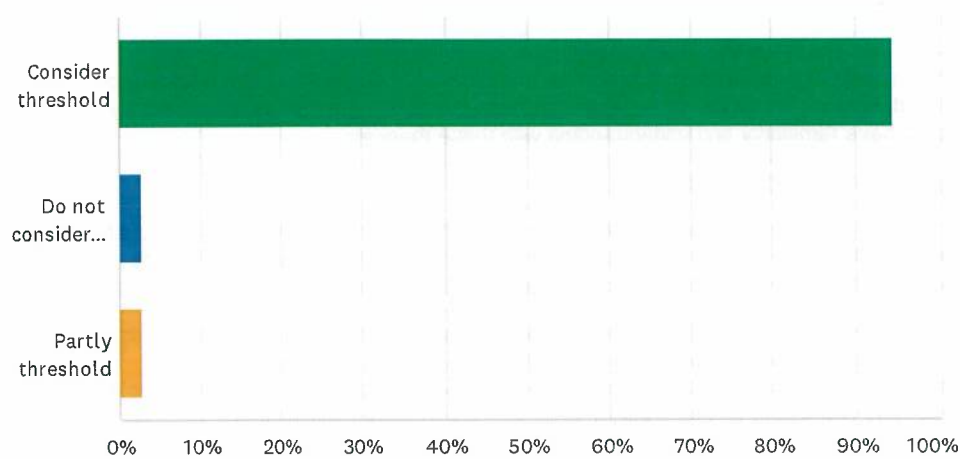
Q23 If you do not consider Standard 5.18 to be threshold or if you consider it to be partly threshold, please explain why

Answered: 4 Skipped: 145

#	RESPONSES	DATE
1	The title client is more accurate as this is how Counsellors identify those they work with. Service user is inaccurate.	11/29/2023 10:46 PM
2	This should read "manage appropriately", in order to draw attention to the impact of client characteristics on appropriate management.	11/22/2023 2:27 PM
3	I think counsellors need on-going supervision and continual professional development and this needs to be regulated.	11/14/2023 12:11 AM
4	in line with professional codes of conduct for therapist model	10/20/2023 8:11 PM

Q24 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.

Answered: 73 Skipped: 76



ANSWER CHOICES	RESPONSES	
Consider threshold	94.52%	69
Do not consider threshold	2.74%	2
Partly threshold	2.74%	2
TOTAL		73

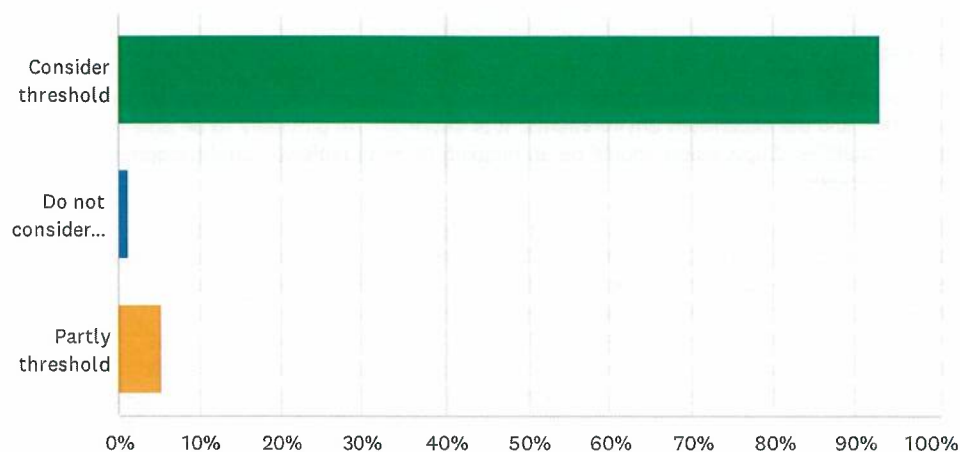
Q25 If you do not consider Standard 5.19 to be threshold or if you consider it to be partly threshold, please explain why

Answered: 6 Skipped: 143

#	RESPONSES	DATE
1	It is also crucial that the draft criteria be changed to include understanding of theories regarding unconscious processes. It is a misunderstanding of counselling, and a false and potentially dangerous assertion, to state or imply that counsellors do not, or should not be required to, have familiarity and understanding with these theories.	11/24/2023 5:37 PM
2	This should read "manage appropriately".	11/22/2023 2:27 PM
3	Yes but can only be developed and achieved by ongoing personal therapy for the therapist - education programs currently do not prepare the therapist/counsellor for this - in fact the more theoretically laden the course the less potential for internal reflection	11/20/2023 9:00 PM
4	I'm not sure a degree in counselling & Psychotherapy nurtures a critically reflective mindset. I really think a masters or a degree in psychology before doing a counselling & Psychotherapy is required for standard 5.19 to be achieved. I don't think the Counselling & Psychotherapy degrees is very academic.	11/14/2023 12:11 AM
5	This should include an explicit requirement for supervision of work at some ratio.	11/11/2023 9:43 AM
6	Is this referring to transference/ counter - transference? very unclear standard	10/20/2023 8:11 PM

Q26 Standard 5.20 Be able to articulate the necessity of engaging in clinical supervision to support, sustain and improve practice.

Answered: 74 Skipped: 75



ANSWER CHOICES	RESPONSES	
Consider threshold	93.24%	69
Do not consider threshold	1.35%	1
Partly threshold	5.41%	4
TOTAL		74

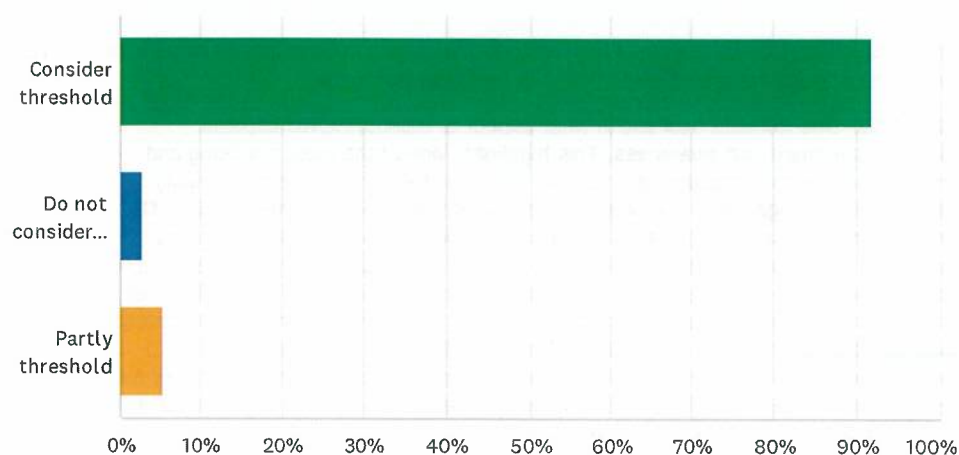
Q27 If you do not consider Standard 5.20 to be threshold or if you consider it to be partly threshold, please explain why

Answered: 6 Skipped: 143

#	RESPONSES	DATE
1	Training supervision is vital in meaningfully scrutinising the trainees work. This may occur in both placement and the classroom environments. It is important for providers to be able to utilise both modalities. Supervision should be an ongoing facet of professional development following qualification.	11/30/2023 9:57 AM
2	Below threshold. It is my strong opinion and that of every one of the many colleagues I have spoken to about this, that the current practice of lifelong engagement in regular clinical supervision - not merely during initial training - should be protected, maintained and incorporated into the remit of the registration boards. Lifelong independent clinical supervision (uncontaminated by the dynamics of line management) is one of the most distinctive and admired aspects of the counselling and psychotherapy profession. The safety of the public would be greatly served if lifelong clinical supervision were introduced into the other HSC professions rather than removing it from our profession in the name of standardisation. Were CORU to continue on this trajectory of removing something that is currently a valuable and distinctive aspect of our profession, this would lead to a reduction in standards of practice - and of client and practitioner safety - rather than an improvement.	11/24/2023 5:37 PM
3	Clinical supervision should read "practice supervision". Clinical Supervision has a particular meaning	11/22/2023 2:27 PM
4	I think supervision and CPD should be mandatory to ensure personal & professional competency. I think this is vital for the Protection of the client and therapist.	11/14/2023 12:11 AM
5	This should include an explicit requirement for supervision of work at some ratio.	11/11/2023 9:43 AM
6	'demonstrate engagement in regular supervision to	10/20/2023 8:11 PM

Q28 Standard 5.21 Be able to recognise personal emotional responses, vicarious trauma and the need to develop effective self-care strategies and burnout prevention.

Answered: 74 Skipped: 75



ANSWER CHOICES	RESPONSES	
Consider threshold	91.89%	68
Do not consider threshold	2.70%	2
Partly threshold	5.41%	4
TOTAL		74

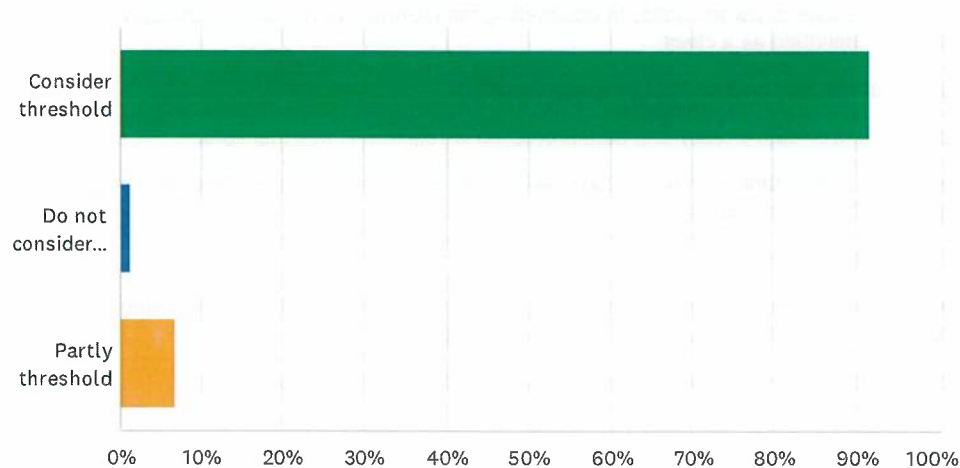
Q29 If you do not consider Standard 5.21 to be threshold or if you consider it to be partly threshold, please explain why

Answered: 5 Skipped: 144

#	RESPONSES	DATE
1	Personal therapy would be considered a requirement to ensure a counsellor can sit with their clients and not get pulled into something that is in fact their own issue.	11/29/2023 10:49 PM
2	Below threshold. One wonders how and in what aspect of training CORU expects counsellors to gain such self-awareness. This highlights one of the most shocking and concerning omissions from the draft standards - which is the deletion of the necessity for practitioners to have engaged in personal counselling or therapy during their training. This has always been an essential part of training in most modalities of counselling and its omission opens an appalling vista where clients would in future potentially be subjected to practitioners who lack self awareness. Again - the counselling profession is appalled that, apparently for the convenience of the regulatory process and in order to harmonise criteria with those for other professions, counselling clients would in the future be subjected to receiving counselling from counsellors who had never sat in the client's chair, and had not gained self-awareness and insight, and the healing of their own traumas. Again this is a downward harmonisation, and potentially the most destructive and most concerning aspect of what is currently proposed. Of course, personal therapy in training is no guarantee of sound practice, but the proposal to remove this suggests a disturbing lack of awareness of the history and tradition and current practice of our profession. The proposal that this would be left to the discretion of training providers - which are currently private entities and "for profit" companies - without intending any disrespect for the bona fides of the many excellent individuals who currently train counsellors - would put those training providers - and their students - in a very difficult position, given that the criteria proposed will most likely increase the cost of training. Personal counselling is essential aspect of the training of a counsellor and should be part of the remit of the regulator.	11/24/2023 5:50 PM
3	I really don't think someone with only a four year degree would achieve standard 5.21 which for me is a huge concern for both the client and the therapist. I think a huge level of damage could potentially happen by insisting on a minimum of only a degree with regards to standard 5.31	11/14/2023 12:16 AM
4	The counsellor must be supported to develop and upkeep self-care strategies as it is part of a wider system and framework.	11/8/2023 10:09 AM
5	I believe secondary stress and burn out should be a separate standard to recognising personal emotional responses- again demonstrate commitment to working on these issues in supervision, personal therapy and personal practice e.g. reflection	10/20/2023 8:15 PM

Q30 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.

Answered: 73 Skipped: 76



ANSWER CHOICES	RESPONSES	
Consider threshold	91.78%	67
Do not consider threshold	1.37%	1
Partly threshold	6.85%	5
TOTAL		73

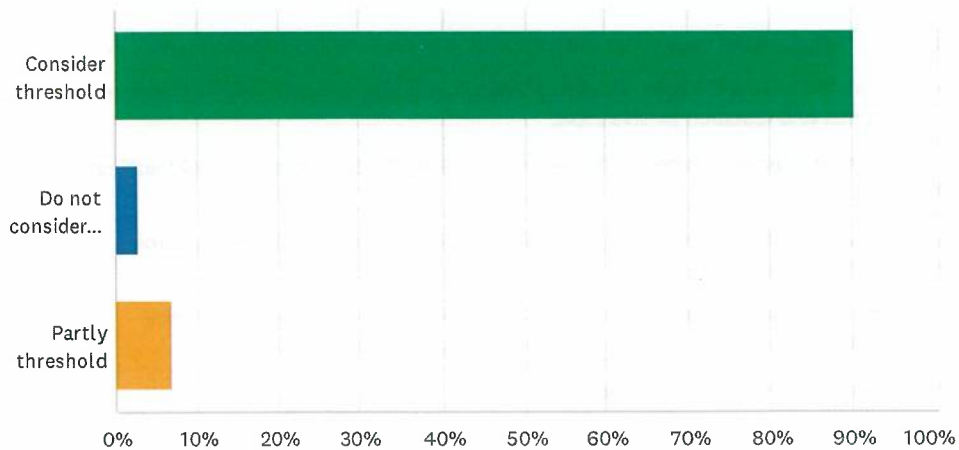
Q31 If you do not consider Standard 5.22 to be threshold or if you consider it to be partly threshold, please explain why

Answered: 7 Skipped: 142

#	RESPONSES	DATE
1	The term service user is not accurate. In counselling the member of the public working with a counsellor is identified as a client.	11/29/2023 10:49 PM
2	Some practitioners may choose not to engage virtually.	11/29/2023 3:22 PM
3	Specific reference to data privacy and data protection is required in this standard.	11/22/2023 2:29 PM
4	Not everyone is comfortable with technology, security of equipment and confidentiality could be compromised in certain situations	11/17/2023 8:37 AM
5	I think this can be CPD training	11/16/2023 9:26 AM
6	I believe there should be a separate standard regarding gaining skills and adapting methods for online work - e.g. adapting body work and creative practice	10/20/2023 8:15 PM
7	Not all counsellors may wish to engage in delivering counselling in a virtual setting	9/5/2023 1:40 PM

Q32 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.

Answered: 73 Skipped: 76



ANSWER CHOICES	RESPONSES	
Consider threshold	90.41%	66
Do not consider threshold	2.74%	2
Partly threshold	6.85%	5
TOTAL		73

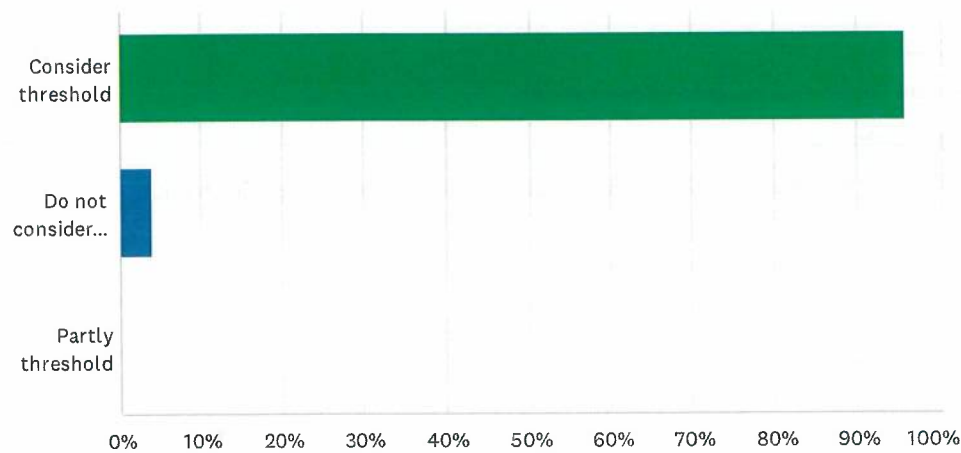
Q33 If you do not consider Standard 5.23 to be threshold or if you consider it to be partly threshold, please explain why

Answered: 7 Skipped: 142

#	RESPONSES	DATE
1	Generalised condition, would need to be more specific and relevant to one's own practice.	11/28/2023 11:54 AM
2	This should read "a range of theories" to clearly indicate that the standard relates to some but not all theories and research on this topic.	11/22/2023 2:29 PM
3	I really don't think someone with only a degree in counselling & Psychotherapy could achieve standard 5.23	11/14/2023 12:16 AM
4	This should be a capability but would be more along the lines of psychotherapy regarding the research part specifically.	11/11/2023 9:44 AM
5	Having ease of access to continuous education and training can develop and enhance training and knowledge and this must be obtained by counsellors and proven.	11/8/2023 12:03 PM
6	In the counsellor's specific field or modality.	11/8/2023 10:09 AM
7	Difficult to assess?	9/5/2023 1:40 PM

Q34 Standard 5.24 Be able to utilise a theoretical framework for practice with psychosocial factors and the impact on well-being.

Answered: 74 Skipped: 75



ANSWER CHOICES	RESPONSES	
Consider threshold	95.95%	71
Do not consider threshold	4.05%	3
Partly threshold	0.00%	0
TOTAL		74

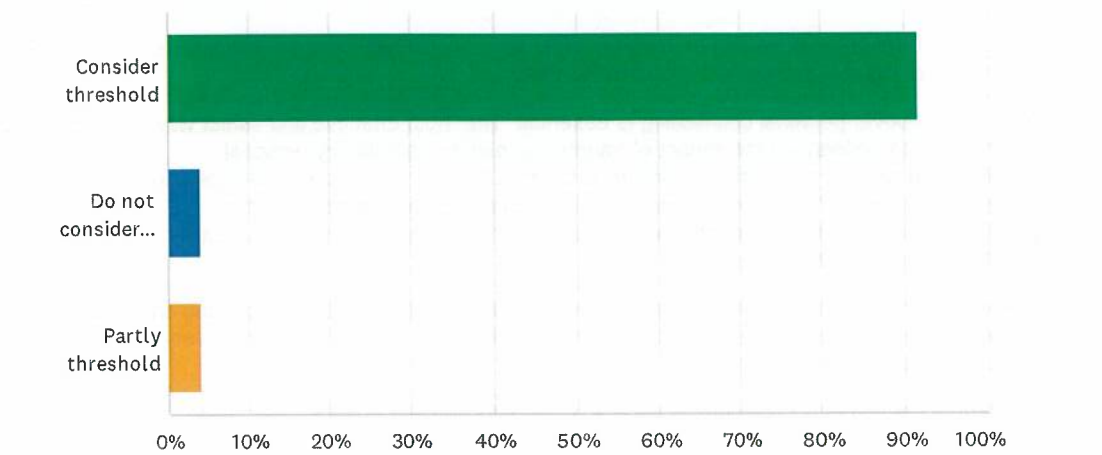
Q35 If you do not consider Standard 5.24 to be threshold or if you consider it to be partly threshold, please explain why

Answered: 3 Skipped: 146

#	RESPONSES	DATE
1	I'm not sure this level of education facilitates this.	11/14/2023 12:21 AM
2	wording unclear.....	10/20/2023 8:21 PM
3	I think it should be necessary to 'be aware of' rather than use a theoretical framework.	9/19/2023 10:01 AM

Q36 Standard 5.25 Be able to analyse the impact of trauma on psychological functioning and be able to integrate this knowledge to inform practice.

Answered: 73 Skipped: 76



ANSWER CHOICES	RESPONSES	
Consider threshold	91.78%	67
Do not consider threshold	4.11%	3
Partly threshold	4.11%	3
TOTAL		73

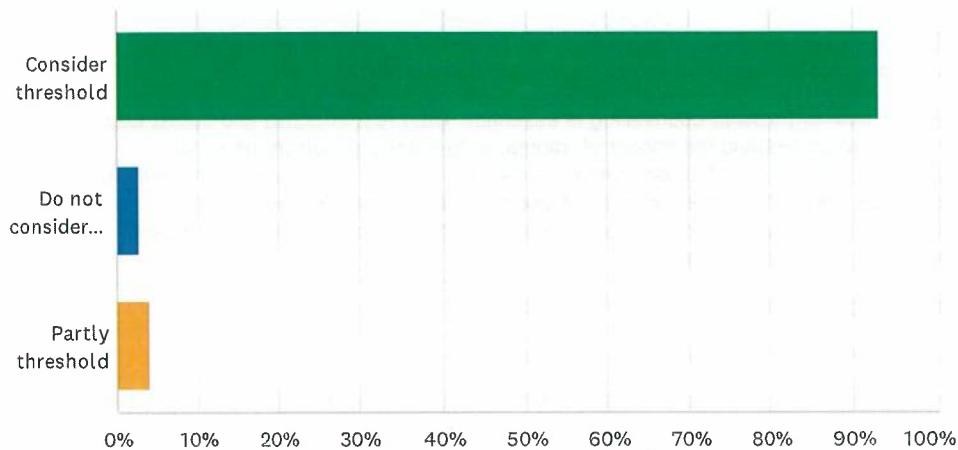
Q37 If you do not consider Standard 5.25 to be threshold or if you consider it to be partly threshold, please explain why

Answered: 6 Skipped: 143

#	RESPONSES	DATE
1	It is not part of the counsellors role to analyse. They are not qualified to do so. Awareness of the impact of trauma is important to inform practice.	11/29/2023 10:51 PM
2	Further to the above, personal counselling is essential. The most effective and safest way for counsellors to understand the impact of trauma, is to enter compulsory personal counselling and work to heal their own universal trauma. Trauma is a universal phenomenon and does reside only in "the sick" or "service users". Every acknowledged expert in psychological trauma understands that a practitioner with unhealed trauma is not a safe person to help a traumatised client.	11/24/2023 5:53 PM
3	I really don't think a degree would allow for this level of understanding. I think expecting only a degree to have an in-depth knowledge of Trauma is frightening. I think this could be very dangerous for both client & counsellor.	11/14/2023 12:21 AM
4	Again trauma training and knowledge is usually a specialty training acquired after basic counselling courses so knowledge on this must be obtained separately or have specific training on same.	11/8/2023 12:05 PM
5	Trauma informed practice is a specialist approach.	11/8/2023 10:16 AM
6	pleased to see specific mention of trauma - investigating collaboratively with client the impact on all domains of functioning and demonstrate ability to incorporate into case conceptualisation and client work	10/20/2023 8:21 PM

Q38 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.

Answered: 73 Skipped: 76



ANSWER CHOICES	RESPONSES	
Consider threshold	93.15%	68
Do not consider threshold	2.74%	2
Partly threshold	4.11%	3
TOTAL		73

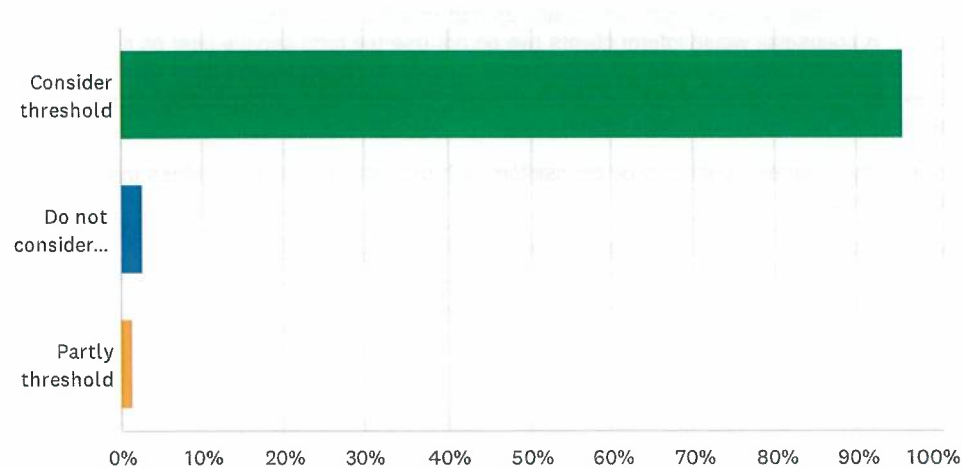
Q39 If you do not consider Standard 5.26 to be threshold or if you consider it to be partly threshold, please explain why

Answered: 7 Skipped: 142

#	RESPONSES	DATE
1	Counsellors work with members of the public, not as part of a service, and as such the people we work with are identified as clients, not service users.	11/29/2023 10:51 PM
2	Further to the above, personal counselling is essential. The most effective and safest way for counsellors to understand the impact of trauma, is to enter compulsory personal counselling and work to heal their own universal trauma. Trauma is a universal phenomenon and does reside only in "the sick" or "service users". Every acknowledged expert in psychological trauma understands that a practitioner with unhealed trauma is not a safe person to help a traumatised client.	11/24/2023 5:53 PM
3	I'm not sure they would which is also very frightening.	11/14/2023 12:21 AM
4	Trauma informed practice is a specialist approach.	11/8/2023 10:16 AM
5	This conveys that counsellors are not competent to work with trauma therapeutically....also misses potential for harm to therapist. Specific standards for working with trauma could be included- This wording is incompatible with a trauma informed approach	10/20/2023 8:21 PM
6	Very important	9/5/2023 1:41 PM
7	I think the word refer needs to be considered. For many, the word refer means a direct refer that is made by one professional to another and involves a direct route from one to the other. In therapy this is rarely the case and involves the client self-referring.	9/4/2023 9:49 PM

Q40 Standard 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.

Answered: 70 Skipped: 79



ANSWER CHOICES	RESPONSES	
Consider threshold	95.71%	67
Do not consider threshold	2.86%	2
Partly threshold	1.43%	1
TOTAL		70

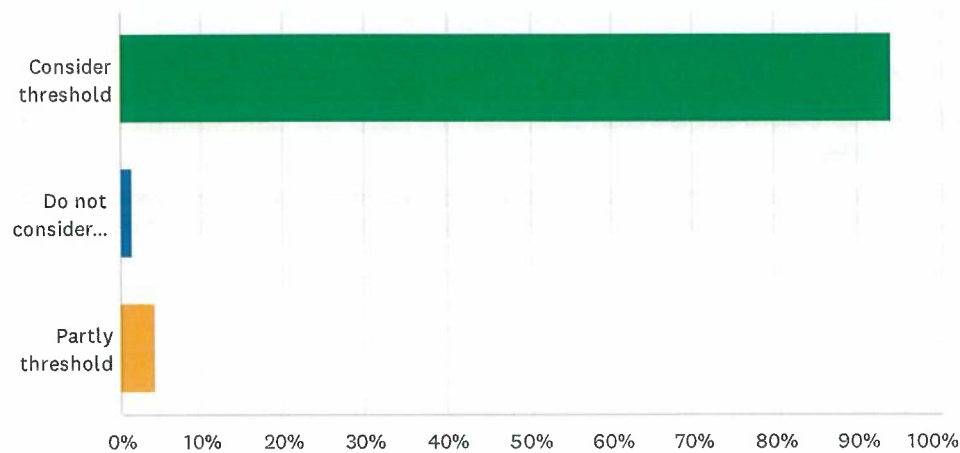
Q41 If you do not consider Standard 5.27 to be threshold or if you consider it to be partly threshold, please explain why

Answered: 3 Skipped: 146

#	RESPONSES	DATE
1	Counselling is an isolated profession, not usually as part of a team, or within an organisation. A counsellor would inform clients (we do not use the term service user as it is inaccurate in the work of a counsellor) of the limits of confidentiality on first meeting them. Within these emergency contacts are identified, including their doctor. The counsellor would act using this information should there be the need.	11/29/2023 11:01 PM
2	I'm not sure only a degree would provide counsellors with this training and skill, unless they were trained in it also.	11/14/2023 12:26 AM
3	demonstrate active use of risk evaluation tools and ability to support client	10/20/2023 8:25 PM

Q42 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.

Answered: 69 Skipped: 80



ANSWER CHOICES	RESPONSES	
Consider threshold	94.20%	65
Do not consider threshold	1.45%	1
Partly threshold	4.35%	3
TOTAL		69

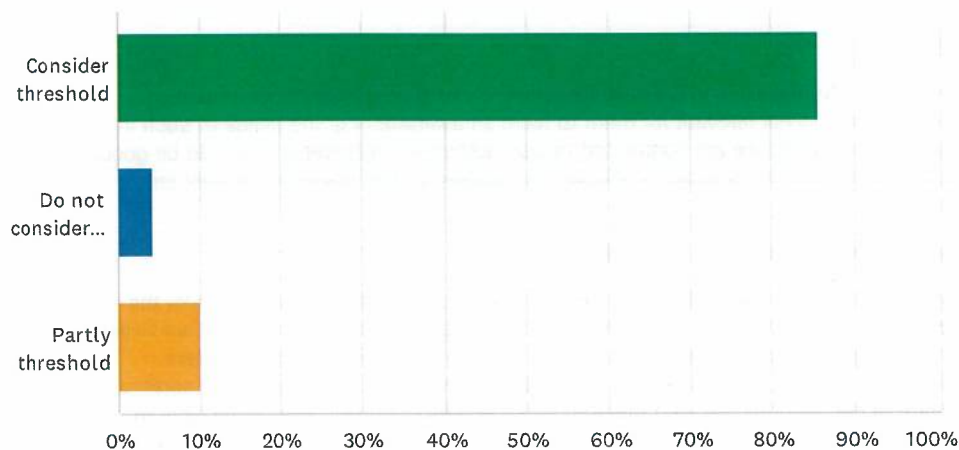
Q43 If you do not consider Standard 5.28 to be threshold or if you consider it to be partly threshold, please explain why

Answered: 3 Skipped: 146

#	RESPONSES	DATE
1	I really don't think this level of training or expertise provided only by a degree would achieve standard 5.28	11/14/2023 12:26 AM
2	I think this is a specialised area and could be referred if the practitioner hasn't sufficient training in this area.	9/19/2023 10:08 AM
3	Providing counsellor has relevant qualifications and experience to work in crisis intervention and trauma. Counsellor must work within their ethics of to know their limitations and to do no harm.	9/18/2023 7:00 PM

Q44 Standard 5.29 Have a critical awareness of the need for organisation and resource management in various practice settings.

Answered: 70 Skipped: 79



ANSWER CHOICES	RESPONSES	
Consider threshold	85.71%	60
Do not consider threshold	4.29%	3
Partly threshold	10.00%	7
TOTAL		70

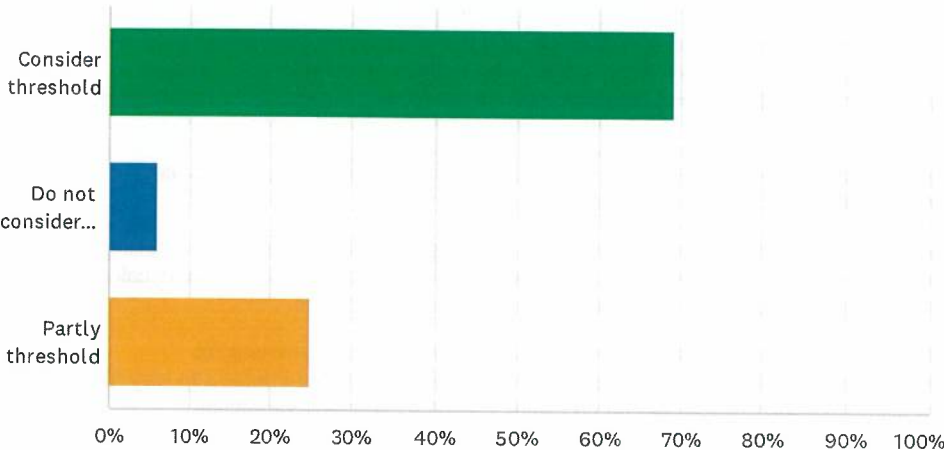
Q45 If you do not consider Standard 5.29 to be threshold or if you consider it to be partly threshold, please explain why

Answered: 8 Skipped: 141

#	RESPONSES	DATE
1	Counsellors are often working in isolation, independent of an organisation or resource management, so it is not relevant for them to have an awareness of the needs of such in practice settings. Where we are contracted to work within an organisation, it would be good to have an awareness of resources available, as opposed to being aware that they are needed.	11/29/2023 11:01 PM
2	Not applicable to self employed counsellors	11/28/2023 11:56 AM
3	The language suggests that CORU envisages universal access to counselling under the auspices of the HSE. This does not currently exist and given the current state of our health services, to suggest that it will ever exist will stretch the imagination of most current counsellors and clients. Mention is here made of "various practice settings". It is notable that in spite of the fact that the vast majority of accredited counsellors currently work in private practice settings, the criteria and the standards appear to envisage a public setting and appear to suggest a lack of awareness of the reality of current situation and the many excellent and ethically sound private practitioners, accredited by the professional bodies, who currently constitute the profession.	11/24/2023 5:58 PM
4	It is very important and relevant, but not necessarily part of training to be a counsellor.	11/16/2023 9:29 AM
5	This seems more along the lines of psychotherapy and a clinical setting	11/11/2023 9:46 AM
6	include governance	10/20/2023 8:25 PM
7	This seems to be outside of a counsellors job description	9/19/2023 10:08 AM
8	Not sure if this is the role of a counsellor or they can necessarily influence it	9/5/2023 1:43 PM

Q46 Standard 5.30 Be able to demonstrate knowledge of the effects of medications, prescribed or otherwise, relevant to service user counselling work.

Answered: 68 Skipped: 81



ANSWER CHOICES	RESPONSES	
Consider threshold	69.12%	47
Do not consider threshold	5.88%	4
Partly threshold	25.00%	17
TOTAL		68

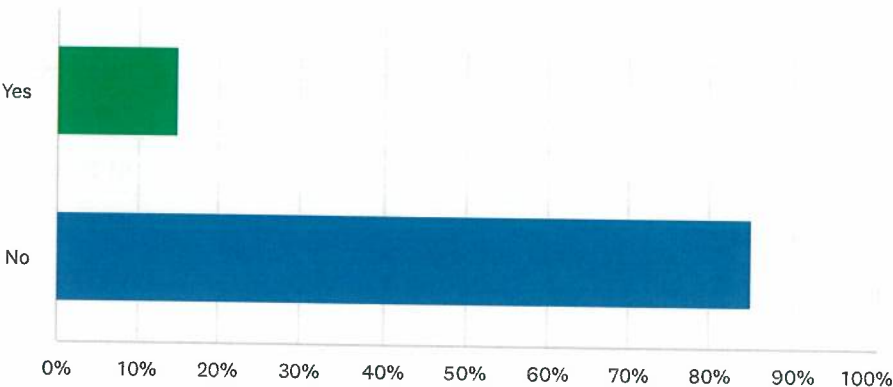
Q47 If you do not consider Standard 5.30 to be threshold or if you consider it to be partly threshold, please explain why

Answered: 18 Skipped: 131

#	RESPONSES	DATE
1	This is a vast area that is continually changing, and is a problem for clinicians in that field i.e. psychiatrists...it would be nigh impossible for counsellors to be able to have anything other than a general understanding, and certainly not something they could be responsible for .	12/1/2023 11:13 AM
2	To have some basic knowledge but it is not our duty to have a thorough understanding of medications, this is not our field of expertise.	11/30/2023 10:44 AM
3	It can be useful knowledge to have, but is not something currently covered in Counselling or Psychotherapy training. We identify the people we work with as clients, as we are usually not working within a service, so the term service users is not accurate.	11/29/2023 11:01 PM
4	As medications are prescribed by doctors, definately some knowledge should be demonstrated however as these medications consistently change and effects can vary for individual clients perhaps this should be an awareness rather than full knowledge	11/29/2023 5:48 PM
5	Counsellors/ psychotherapists do not have medical or pharmaceutical training or knowledge, this is outside of their areas of competence	11/29/2023 4:35 PM
6	Consultation is generally available on such matters.	11/29/2023 3:36 PM
7	Beyond professional scope	11/28/2023 11:56 AM
8	Medication knowledge and management to be left to the remit of trained and qualified medical professionals, and not the responsibility of counsellors	11/16/2023 11:07 AM
9	Medication and its many and varied side effects seem excessive. Counsellors/Psychotherapists are not medically trained and whilst a general understanding would seem appropriate this statement is way too vague. Aspirational rather than realistic	11/16/2023 10:53 AM
10	I personally have a knowledge of this, but it was not in my training and I feel this is more in the realm of medical professional.	11/16/2023 9:29 AM
11	I really don't think this is best practice and could be potentially dangerous.	11/14/2023 12:26 AM
12	Medical models, prescribing, pathologies and diagnosing are not part of counselling. This should be rephrased and reconsidered. No course teaches medical information such as this.	11/11/2023 9:46 AM
13	It can be obtained this knowledge through some personal research but not always widely understood by professionals.	11/8/2023 12:06 PM
14	The same medication have markedly different responses in clients and must be factored into the extend this knowledge is expected to be demonstrated. Basic to expert knowledge.	11/8/2023 10:30 AM
15	Within reasonable limits, some medications are newer than others and may be taken in a combination of other medications that will have an impact. Explaining our limitations in terms of medication knowledge to clients but also always ensuring we research what we're unsure of.	11/8/2023 9:48 AM
16	Some knowledge of medications would be useful, but there are many new meds on the market and having to be up to scratch with all of these could be quite a challenge	9/20/2023 9:07 AM
17	Medication can have very individual effects. Awareness of how it affects each client can come from discussion with client.	9/19/2023 10:08 AM
18	As the effects and side effects of medications are extremely wide-ranging and can vary from individual to individual (also by gender, age, weight and ethnicity), it is outside the scope of a counsellor to have a working knowledge of all possible medications. A little knowledge is a very dangerous thing. Counsellors should defer to people who are qualified to prescribe medications.	9/8/2023 5:01 PM

Q48 Do you consider there to be omissions?

Answered: 60 Skipped: 89



ANSWER CHOICES		RESPONSES	
Yes		15.00%	9
No		85.00%	51
TOTAL			60

Q49 Please fill in the boxes below if you consider there to be omissions from the document

Answered: 6 Skipped: 143

ANSWER CHOICES		RESPONSES	
Domain		100.00%	6
Suggested Omission		83.33%	5
Proposed Wording to rectify omission		66.67%	4
Rationale for Comment		100.00%	6

#	DOMAIN	DATE
1	4. Professional Development	11/30/2023 10:23 AM
2	Practice Placement Hours	11/29/2023 11:26 PM
3	across all domains	11/29/2023 4:37 PM
4	Personal counselling	11/24/2023 6:03 PM
5	Counselling and the Law	10/28/2023 12:22 PM
6	client safety	10/25/2023 3:01 PM

#	SUGGESTED OMISSION	DATE
1	Ongoing CPD should incorporate a minimum of 30 hours annually, with a requirement for reflection on learning	11/30/2023 10:23 AM
2	That supervision is directly observed	11/29/2023 11:26 PM
3	working with more than one person in therapy simultaneously	11/29/2023 4:37 PM
4	There seems to be no focus on the need for counsellors to be familiar with current legal requirements around mandatory reporting, child protection and how to engage with Tusla on this very common issue	10/28/2023 12:22 PM
5	recording and note keeping	10/25/2023 3:01 PM

#	PROPOSED WORDING TO RECTIFY OMISSION	DATE
1	The student needs to attend clinical supervision.	11/29/2023 11:26 PM
2	Counsellors are required to have completed a minimum of 50 hours personal counselling during their first two years of training	11/24/2023 6:03 PM
3	Be knowledgeable on the importance of current legislation regarding Child protection, mandatory report requirements and familiar with the process of engaging with Tusla on these issues	10/28/2023 12:22 PM
4	Safe practice requires counselor to keep contemporaneous notes of all sessions and interactions.	10/25/2023 3:01 PM

#	RATIONALE FOR COMMENT	DATE
1	Criteria for what constitutes CPD requires further clarification	11/30/2023 10:23 AM
2	To have someone in the room while trying to build trust with a client would be damaging to the therapeutic relationship. To inform their practice a counsellor needs to attend clinical supervision and provide a verbal account, or perhaps, with client consent, an audio or video recorded session, for review with the supervisor. Not with the supervisor in the space with the client. To have the clinical supervisor present would not only impact the relationship, it would also be cost prohibitive.	11/29/2023 11:26 PM
3	draft consultation documents do not refer to working with more than 1 individual simultaneously	11/29/2023 4:37 PM

Counsellors and Psychotherapists Registration Board Stakeholder Consultation: Standards of Proficiency for Counsellors and Criteria for Education and Training Programmes (Counsellors)

4	As above, this is essential to fulfil CORU remit of protecting the public. It is not a guarantee of safe practice, but nothing is, which is why fitness to practice process is necessary	11/24/2023 6:03 PM
5	I have not found any mention of Counselling and the Law in the list of Common Standards of Proficiency. The requirements for mandatory reporting are updated on an ongoing basis Graduates need to be very clear as to when they are required to report Child Protection issues or historical abuse, and need to be familiar with the process of such reporting. This issue currently comes up on a daily basis for counsellors and psychotherapists	10/28/2023 12:22 PM
6	needs to be explicit	10/25/2023 3:01 PM

Q50 Please fill in the boxes below if you consider there to be omissions from the document

Answered: 4 Skipped: 145

ANSWER CHOICES		RESPONSES	
Domain		100.00%	4
Suggested Omission		75.00%	3
Proposed Wording to rectify omission		75.00%	3
Rationale for Comment		75.00%	3

#	DOMAIN	DATE
1	4. Professional Development	11/30/2023 10:23 AM
2	Overall	11/29/2023 11:26 PM
3	Career-duration regular clinical supervision, independent of organisational line management	11/24/2023 6:03 PM
4	Clinical supervision	10/28/2023 12:22 PM

#	SUGGESTED OMISSION	DATE
1	█ supports a requirement for personal development during training. In our view this may incorporate a combination of personal therapy, group process work and self-practice/self-reflection activities	11/30/2023 10:23 AM
2	The omission of the description of those attending a counsellor as client.	11/29/2023 11:26 PM
3	No 26 states the applicant needs to be able to articulate the need for engagement with ongoing Clinical Supervision to support, sustain and improve practice, but knowing and being able to articulate the necessity does not guarantee the counsellor will actually engage. We need a requirement on an ongoing basis to engage with clinical supervision on an ongoing basis, perhaps as part of ongoing CPD. Supervision is also relevant to no 28 regarding Self Care. Regular supervision supports the counsellor in recognising the need for self care interventions	10/28/2023 12:22 PM

#	PROPOSED WORDING TO RECTIFY OMISSION	DATE
1	Replace the wording service user through all the documents with the more accurate description client.	11/29/2023 11:26 PM
2	Counsellors are required to engage in regular clinical supervision, independently of organisational line management, at least once per month during which they are actively seeing clients (suggest following the excellent model developed by the IACP	11/24/2023 6:03 PM
3	Recognise and agree with the ongoing need for Continuous Professional Development, including regular engagement with Clinical Supervision (monthly/bi-monthly) during the registration year	10/28/2023 12:22 PM

#	RATIONALE FOR COMMENT	DATE
1	Any of the literature through training, papers, books, when referring to those a counsellor or a psychotherapist works with the people are referred to as clients, unless the person working with them is a dr. and in these cases they are referred to as patients. Counsellors refer to those they work with as clients. The term service user is inaccurate. Overall there seems to be a copy and paste from some other profession which demonstrates a lack of understanding of the role and practice of counsellors and psychotherapists.	11/29/2023 11:26 PM
2	As above, this is essential to fulfil CORU remit of protecting the public. It is not a guarantee of safe practice, but nothing is, which is why fitness to practice process is necessary	11/24/2023 6:03 PM
3	Most Counsellors will set up in private practice when they register as there are few employment opportunities for counsellors. In private practice, working alone, there is no-one to support or advise and without a requirement for Clinical supervision it can easily happen	10/28/2023 12:22 PM

that the counsellor becomes overburdened or burnt out. Unsupervised work is actually a danger to the public.

Q51 Please fill in the boxes below if you consider there to be omissions from the document

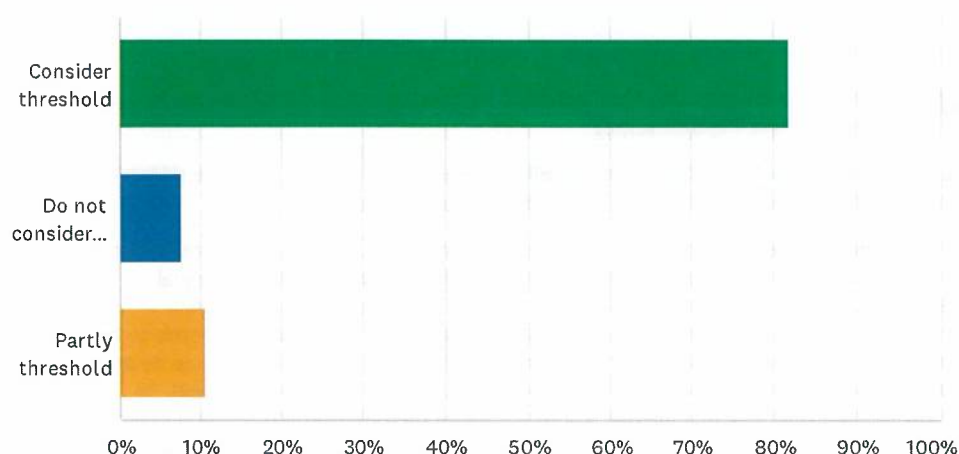
Answered: 2 Skipped: 147

ANSWER CHOICES	RESPONSES	
Domain	100.00%	2
Suggested Omission	100.00%	2
Proposed Wording to rectify omission	50.00%	1
Rationale for Comment	50.00%	1

#	DOMAIN	DATE
1	4. Professional Development	11/30/2023 10:23 AM
2	Criteria for counsellors	11/29/2023 11:26 PM
#	SUGGESTED OMISSION	DATE
1	Supervision should be an ongoing facet of professional development following qualification	11/30/2023 10:23 AM
2	Personal Therapy requirement	11/29/2023 11:26 PM
#	PROPOSED WORDING TO RECTIFY OMISSION	DATE
1	A minimum number of hours of personal therapy needs to be set - 25 hours per year of training	11/29/2023 11:26 PM
#	RATIONALE FOR COMMENT	DATE
1	For a person to sit with another and be able to hold the space in a safe manner it is important that they attend counselling to first work through their own issues. Without personal therapy there is a real risk of missing the client and seeing through eyes of their own experience and missing that of the client.	11/29/2023 11:26 PM

Q52 Criterion 1.1 The Counsellors and Psychotherapists Registration Board requires that the minimum qualification level for entry to the register is: Level 8 on the National Framework of Qualifications (NFQ)

Answered: 66 Skipped: 83



ANSWER CHOICES	RESPONSES	
Consider threshold	81.82%	54
Do not consider threshold	7.58%	5
Partly threshold	10.61%	7
TOTAL		66

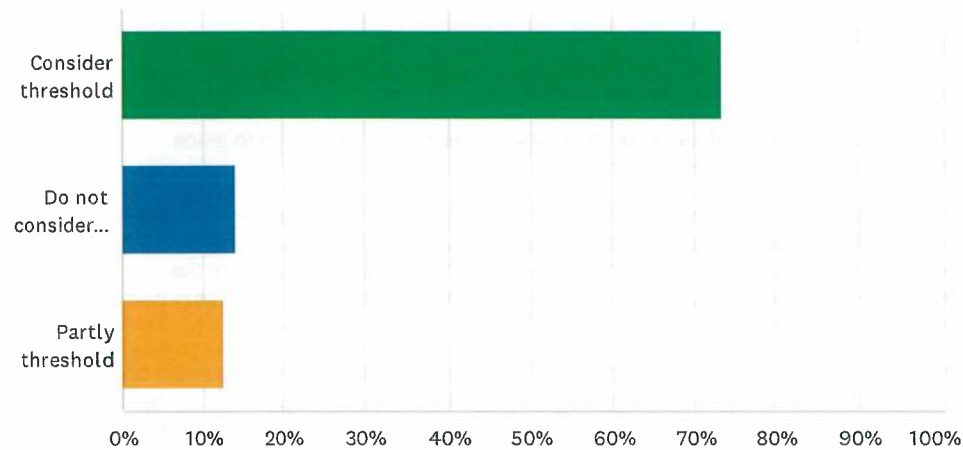
Q53 If you do not consider this criterion to be threshold or you consider it only partly threshold then please explain why

Answered: 13 Skipped: 136

#	RESPONSES	DATE
1	Some professionals with a level 7 with years of practice need to be able to register .	11/28/2023 11:58 AM
2	██████ currently has members who have extensive experience over a long number of years practicing with level 6 and 7 qualifications.	11/26/2023 5:56 PM
3	Fully agree - Level 9 would exclude many excellent, compassionate and safe practitioners from the profession in contravention of EU directive on proportionality	11/24/2023 6:04 PM
4	Once the register has been established, from that year yes level 8 to be the minimum but an overhaul of the current academic programs is needed to ensure that there is equal emphasis on academic -theoretical teaching & the students own personal therapy experience - not as is now where personal therapy is treated like a module that needs to be got through and ticked off the list. For any current practicing therapists there should be an individual look at their practice history, commitment to CPD and clinical supervision, no matter how labourous of a task it maybe. There are some therapists practicing who seem to fly under the radar of what is integral because their training course happens to be approved by one of the larger accreditation bodies.	11/20/2023 9:13 PM
5	Due to some thearpist gave level 7 then specialising in cert area by doing further diploma on top adolescent play thearpy sandtray. Must be able to covert based on experience and cpd	11/16/2023 11:29 PM
6	This needs clarification. Does Level 8 have to be entirely achieved in Counselling Training, or can add-on training achieve it? It is vital that any new criteria be explained and understood fully by current practitioners and that a clear framework/pathway re retrospective training be made clear to those already in practice. In other words, will these criteria be applied retrospectively to Counsellors and Pyschotherapists who are already accredited.	11/16/2023 11:01 AM
7	I strongly believe that to ensure best practice and to provide standards that prioritise a high level of professional competency, which have the publics best interest at heart that we should be increasing the threshold to a masters for Psychotherapy.	11/14/2023 12:33 AM
8	you are working with people that are fragile masters training is imperative	11/11/2023 11:41 AM
9	Relevant experience and continuous education can add to someone's basic training and knowledge skills and experience can be proven this way	11/8/2023 12:13 PM
10	For those who have qualified and worked in the area for 10 years or more at Level 7 should be considered eligible for entry to the register.	11/6/2023 11:56 AM
11	I entered the profession with a level 7 qualification in counselling and felt it was adequate	9/20/2023 9:26 AM
12	What about those who trained at a time when there were no such level 8 training programmed?	9/19/2023 12:36 AM
13	We must consider those already qualified with experience. They may be under Level 8. This criterion should not be retrospectively applied as doing so will exclude many practitioners.	9/7/2023 2:14 PM

Q54 Criterion 2.2 The programme must ensure that each student completes 450 hours of practice placement.

Answered: 64 Skipped: 85



ANSWER CHOICES	RESPONSES	
Consider threshold	73.44%	47
Do not consider threshold	14.06%	9
Partly threshold	12.50%	8
TOTAL		64

Q55 If you do not consider this criterion to be threshold or if you consider it only partly threshold, please explain why

Answered: 15 Skipped: 134

#	RESPONSES	DATE
1	Hours of practice are vital to the students learning.	11/30/2023 2:31 PM
2	Would this be to achieve qualification or to achieve accreditation? It is high to reach qualification, and preaccreditation status.	11/29/2023 11:39 PM
3	If these hours are to be completed within the timeframe of a course of study - it will prove very difficult. If they include pre-accreditation hours - they are achievable. I would envisage a difficulty with getting organisation personnel to commit to the time necessary for the suggested supervision and I would query whether the directly observed service user contact might raise ethical issues.	11/29/2023 3:51 PM
4	Arguably above threshold and not proportional (EU directive). While an increase in the hours is desirable, it is hard to imagine how, with such a large increase, courses would not be forced to become full-time and this would increase the cost of training - which is currently almost exclusively part-time - to such an extent that it would become accessible or economically elitist. This suggests a concerning lack of awareness of, or disregard for what is excellent about current practice	11/24/2023 6:17 PM
5	Sounds good on paper but not sure it's realistic in current placement environment and once again practice placement is only valuable if it is bolstered by the therapist being in their own personal therapy simultaneously. They can only work to an emotional capacity that they have reached in themselves, and that cuts across all theoretical orientations in my opinion	11/20/2023 9:17 PM
6	This number is too high. It causes undue stress and ignores the difficulties in attaining access to clinics that will take on students without prior experience, have enough spaces to take on students and in my personal experience proper care being taken of students once they begin placement. It is a major expense in terms of travel/parking and as you can only begin placement once certain modules are completed, this does not take into account the time it takes up or the time it takes to research clinics, apply and eventually get a place. It also does not take into account that although a student may show up for placement their clients may cancel, no show, be ill or go on holiday which impacts hours and causes undue stress and is not reflective at all of real life circumstances.	11/20/2023 8:53 AM
7	This number is difficult to achieve especially when the majority of individuals qualifying are completing the course part time and working full time.	11/16/2023 5:07 PM
8	My concern is that the training of Counsellors and Psychotherapists is prohibitively expensive and that most training does not exist within the University /Higher Education system where access to grants/student loans are available. We already have a crisis in terms of training of therapists who can provide longterm support (in particular. I welcome high standards and regulation my question is will this mean the decimation of the sector? And the answer to that will be yes unless adequate pathways for upskilling and proper funding to do so are made available	11/16/2023 11:13 AM
9	I consider this amount of hours excessive, specially taking into consideration the majority of Counselling programmes with accreditation bodies is between 100 and 120. It would be very difficult for the majority of people to be able to complete that number, making this degree elitist and privileged. Moreover, it would create a difficult dynamic were Psychotherapists that had graduated before CORU would be practicing having completed 120hours or so, while after CORU Psychotherapist would have to complete 450.	11/13/2023 8:43 AM
10	I think it is important the circumstances of the student at the time are taken into account. If they trained during the pandemic restrictions (2020) and they were not able to get all these hours, I feel there has to be a flexibility from Coru if those hours were not reached.	11/8/2023 2:05 PM
11	This number is possibly too high to achieve in relation to actual time available while studying as courses are full on and a lot of time is needed to commit. People also may need to earn and this may overwhelm students. 200-300 hrs possibly	11/8/2023 12:14 PM
12	In recent years it has been increasingly difficult for students to secure consistent placements that allow them to get their hours. Some placements can only offer very limited	11/8/2023 10:52 AM

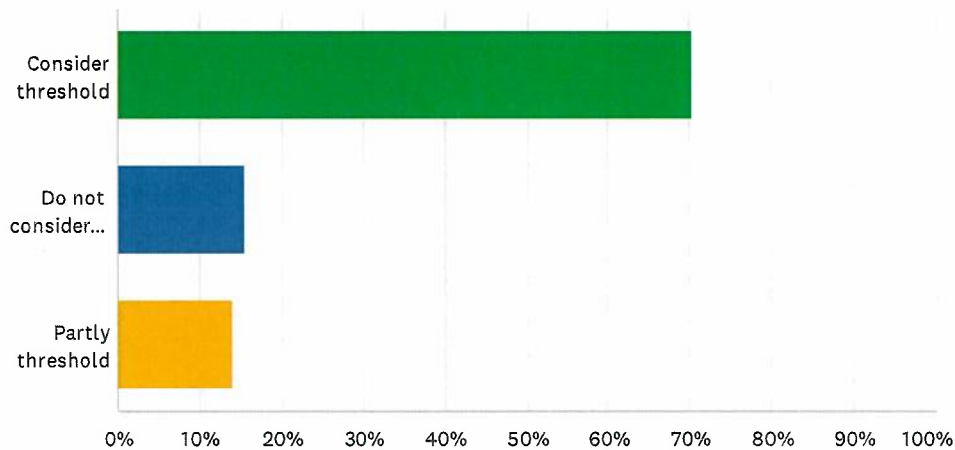
Counsellors and Psychotherapists Registration Board Stakeholder Consultation: Standards of Proficiency for Counsellors and Criteria for Education and Training Programmes (Counsellors)

hours per week, some people are studying part time while working (due to the cost of courses/supervision) which limits their options for placement greatly. If this would eliminate 'pre-accreditation' hours and would be reviewed as to how colleges can secure or offer consistent placement opportunities then it's more reasonable but if it does not address these then it is not threshold.

13	Allowance for current college programmes to combine theory and practice hours.	11/8/2023 10:47 AM
14	This is what I did and it was pretty long - difficult especially if not paid for this work.	9/20/2023 9:26 AM
15	This criterion must not be retrospectively applied to existing practitioners.	9/7/2023 2:18 PM

Q56 Criterion 2.2 Of the 450 hours of practice placement a student must complete, 300 hours must be supervised service user contact experience.

Answered: 64 Skipped: 85



ANSWER CHOICES	RESPONSES	
Consider threshold	70.31%	45
Do not consider threshold	15.63%	10
Partly threshold	14.06%	9
TOTAL		64

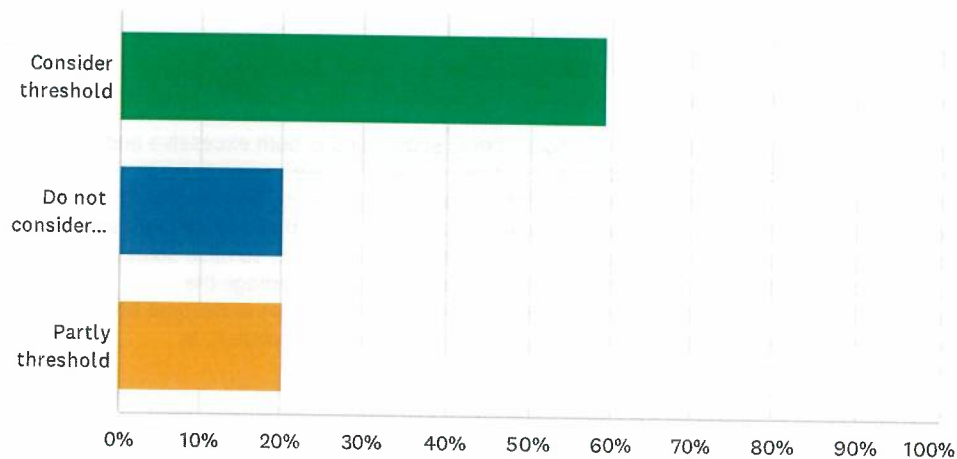
Q57 If you do not consider this criterion to be threshold or if you consider it only partly threshold, please explain why

Answered: 16 Skipped: 133

#	RESPONSES	DATE
1	Supervision & the hours required are paramount for a student.	11/30/2023 2:31 PM
2	The suggestion of a minimum of 300 of 450 hours being supervised is both excessive and prohibitive. It is an unrealistic and unnecessary number of hours. There seems to be a misunderstanding of what the client counsellor therapeutic relationship is here. Research over the years repeatedly shows that the counselling process is seen to be successful as a result of the relationship developed between the client and the counsellor. To have someone directly observe the session would create an unsafe space and would damage the therapeutic relationship. A reasonable ratio of clinical supervision - outside of the time with the client, utilising verbal accounts, or reviewing recordings, with client consent, is sufficient.	11/29/2023 11:39 PM
3	As above	11/29/2023 3:51 PM
4	Arguably above threshold. Whilst an increase in supervised practice is desirable, the model of supervision proposed does not currently exist and is going to be very expensive to operate. It will also exclude many excellent current practitioners from the practice of clinical supervision. As outlined above, it is my strong opinion that current career-duration, independent clinical supervision, is essential for public safety and practitioner safety, indeed if harmonisation is necessary, it should be introduced into the other HSC professions, not removed from the counselling profession. The development of sound clinical practice is and always has been, a process which takes many years of supervised practice, not just a set number of hours which can all be crammed into a few years of initial training. This proposal suggests a concerning lack of awareness of what is currently good about our profession, indeed arguably the envy of practitioners in other HSC professions.	11/24/2023 6:17 PM
5	This is also not reflective of life after Covid. Most clinics offer online therapy which is convenient and widely accessible for clients. I think it is an equally important skill to have in addition to face to face and as such should be at least evenly split.	11/20/2023 8:53 AM
6	Not sure about 300 hrs supervised contact with service user.	11/16/2023 11:26 PM
7	Again having to do the increased hours means increased supervision requirement which is costly on top of providing counselling sessions for free.	11/16/2023 5:07 PM
8	As above. Who will bear the cost?	11/16/2023 11:13 AM
9	I remark the point before this one, excessive amount of hours. It could be 120 with all of then supervised.	11/13/2023 8:43 AM
10	Going forward, I think this is a good require. However, I think understanding should be shown to current practitioners who have not been able to get these hours during training because of course providers' unawareness of minimum necessary hours.	11/8/2023 2:05 PM
11	Supervision most valuable to students please allow group or peer supervision with in educational structure to support individual supervision.	11/8/2023 12:14 PM
12	Supervision is normally an external expense to students (very few organisations are able to offer internal supervision to that ratio). There has been no indication from these guidelines how the industry can remain accessible to students paying for a course, paying for personal therapy (most courses require such now), and supervision to that extent listed above. Supervision to this extent should therefore include group supervision within your college on a bi-weekly basis or something equivalent that reduces the burden of expense and demand on students.	11/8/2023 10:52 AM
13	Allowance for adjustment of this figure in relation to current college programmes e.g., 65.5% supervised	11/8/2023 10:47 AM
14	Not sure why all the hours cannot be supervised	9/20/2023 9:26 AM
15	All 450 hours should be supervised service user contact	9/8/2023 5:14 PM

Q58 Criterion 2.2 Of the 300 hours of supervised service user contact experience, 75 hours must be directly observed service user contact.

Answered: 64 Skipped: 85



ANSWER CHOICES	RESPONSES	
Consider threshold	59.38%	38
Do not consider threshold	20.31%	13
Partly threshold	20.31%	13
TOTAL		64

Q59 If you do not consider this criterion to be threshold or if you consider it only partly threshold, please explain why

Answered: 23 Skipped: 126

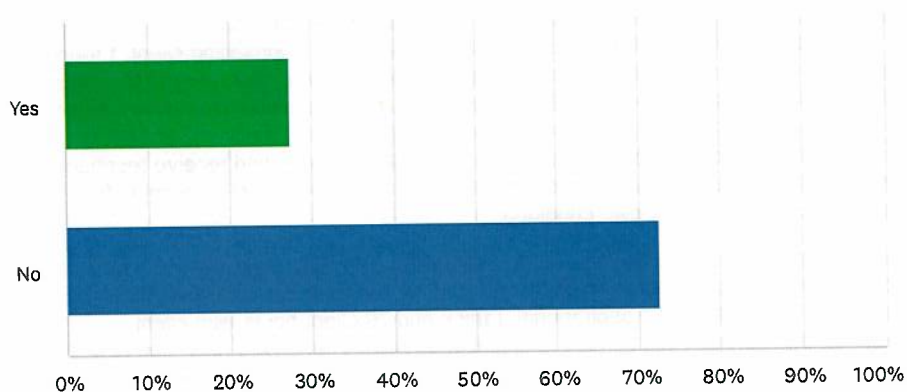
#	RESPONSES	DATE
1	This needs to be explained better.	12/1/2023 11:17 AM
2	The suggestion of a minimum of 300 of 450 hours being supervised is both excessive and prohibitive. It is an unrealistic and unnecessary number of hours. There seems to be a misunderstanding of what the client counsellor therapeutic relationship is here. Research over the years repeatedly shows that the counselling process is seen to be successful as a result of the relationship developed between the client and the counsellor. To have someone directly observe the session would create an unsafe space and would damage the therapeutic relationship. A reasonable ratio of clinical supervision - outside of the time with the client, utilising verbal accounts, or reviewing recordings, with client consent, is sufficient.	11/29/2023 11:39 PM
3	I feel there should be an option for the use of transcripts and film and not solely direct observation	11/29/2023 4:40 PM
4	As above	11/29/2023 3:51 PM
5	Clarification of meaning needed	11/26/2023 6:25 PM
6	This is very complex, due to reasons of client privacy and does not reflect the history and current practice of most modalities. Research also strongly suggests that clients and counsellors behave differently when observed by others. If, as currently, this requirement can be fulfilled by means of verbatim reports, then it is acceptable. However, it envisages a much more intensive engagement with supervision than is currently practiced. It is how to imagine how the necessary infrastructure will be created and funded, as nothing similar currently exists. Again this suggests that CORU sees its remit as to invent two new professions rather than regulate the professions that already exist. I would argue that counselling and psychotherapy are one profession, but I acknowledge that the professions have only ourselves to blame for the division, in spite of the lack of any evidence base to support it.	11/24/2023 6:17 PM
7	Methods of direct observation in Counselling tend to focus on in-depth analysis of individual cases. One hour of counselling can result in multiple hours of analysis and critique. This model has proved useful in this particular profession, and would need to change radically if 70 hours of direct observation is required. We suggest a requirement of in the region of 40-50 hours.	11/22/2023 2:49 PM
8	Does this mean an additional supervisor is in the room too? If so I disagree with this completely. It is a breach of confidentiality and also negates the value and point of supervision which is already an additional time constraint and expense to students/counsellors but has a valuable purpose to supervise students in their work already.	11/20/2023 8:53 AM
9	Not sure about it	11/16/2023 11:26 PM
10	This seems over zealous and may affect the therapeutic relationship if there is another person present. It may also affect the ability to get hours as it may be difficult to get someone to sit in on the sessions.	11/16/2023 5:07 PM
11	As I have stated earlier the provision of professional education for counsellors and psychotherapists is of course vital, however in the setting of thresholds and registrations it must be borne in mind who will be excluded by these criteria and in tandem to these thresholds must run pathways for upskilling that is not financially prohibitive.	11/16/2023 11:13 AM
12	To protect the privacy of clients	11/16/2023 10:10 AM
13	I consider this to be very difficult in practice, very vulnerable position for the service user and can definitely impact the work and dynamic.	11/13/2023 8:43 AM
14	The pandemic didn't always allow for direct supervision. I think Coru has to take the difficulty of students into account for any practitioner qualifying at that time.	11/8/2023 2:05 PM
15	May be an unobtainable goal in relation to availability of service providers who take on	11/8/2023 12:14 PM

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students in training		
16	I think this creates an issue on many fronts. For clients who are normally using students/pre-accredited therapists in a low cost capacity, it puts them in a position where they have a much higher chance that their sessions and experiences of counselling will be directly observed by a third party. Ethically I believe this is unfair on clients who in that population group are already vulnerable and less likely to feel comfortable saying no. For counsellors I believe it places an additional burden and unnecessary stress that such a high number of their sessions are observed. It would completely remove me from feeling present with the client and instead hyper aware of either the recording or 3rd party. Finally it places a huge pressure on supervisors who have to observe 75 hours per counselling client. I found it challenging enough to book my supervisors according to the correct ratio, due to their busy schedule and limited availability- now add the additional task of observing sessions. I don't believe this is a necessary requirement as this was done regularly in a practical setting within college environment where students would role play sessions and receive feedback regularly. This is a far more fair and ethical approach as everybody there is learning from the experience and is there of their own choosing.	11/8/2023 10:52 AM
17	Observed contact requires the service users permission. Currently students find it difficult to find clients who are willing for even one session to be recorded and transcribed for their college requirements. While it is aspirational, I think find 75 client hours with client permission for each student will be nigh impossible. In ireland we do not have practical set up for mirror glass rooms for observation, and even so would need permission. I suggest rethink the numbers with the colleges and placements and find practical solutions for the need for this criteria	10/28/2023 12:29 PM
18	do al courses do so many hours of direct observation	10/25/2023 3:04 PM
19	This is one area that I sense may cause some confusion and uncertainty. I understand and agree there needs to be greater 'observation' within placement however I am concerned about the time, space, client consent and manpower some or the majority of providers have to do this. One suggestion I thought may work was that if the 'Student' received consent for them (the student) to be recorded ie The counselling session is recorded but only the student is visible. The placement supervisor could then view it at some point from an asynchronous perspective, in their own time as opposed to been observed 'live so to speak'. In fact this process used to be very popular within Clinical supervision some time ago, know as the Interpersonal Process Recall (IPR) method (Kagan and Kagan, 1990) . Audio recording alone may be sufficient for proposed on-site supeprvision.	10/9/2023 9:42 AM
20	Don't fully understand what this means	9/20/2023 9:26 AM
21	Not appropriate for direct observation during clinical placement. This will most likely breakdown the therapeutic relationship with client and counsellor. There are opportunities within classroom time for supervision observation. This might be more appropriate way for direct observation supervision	9/18/2023 7:06 PM
22	This will be extremely difficult to implement. Most students have difficulty fining a placement. The vast majority of counselling services in Ireland never directly observe service user contact with student counsellors. This will add workload to services who are already reluctant to take student counsellors on placement.	9/8/2023 5:14 PM
23	This criterion must not be retrospectively applied to existing practitioners.	9/7/2023 2:18 PM

Q60 Do you consider there to be omissions from the profession-specific criteria?

Answered: 58 Skipped: 91



ANSWER CHOICES	RESPONSES	
Yes	27.59%	16
No	72.41%	42
TOTAL		58

Q61 Please fill in the boxes below if you consider there to be an omission

Answered: 14 Skipped: 135

ANSWER CHOICES		RESPONSES	
Suggested Omission		100.00%	14
Proposed wording to rectify omission		71.43%	10
Rationale for Comment		64.29%	9

#	SUGGESTED OMISSION	DATE
1	It would be helpful to clarify whether the practice placement can be undertaken on both full time and part time basis.	11/30/2023 10:24 AM
2	There does not seem to be a stated requirement for personal therapy while training.	11/29/2023 11:50 PM
3	working with more than one person at a time as a counsellor	11/29/2023 4:42 PM
4	Provision for distinction between level 4 year level 8 programmes and 1/2 year level 9 programmes with regard to the amount of time available for doing practice hours.	11/29/2023 3:54 PM
5	Required personal therapy	11/24/2023 6:18 PM
6	No consideration given to the continued and additional cost in time or finance to become an accredited counsellor after years of education has been completed	11/20/2023 9:01 AM
7	Whether students can work online for their proposed hours	11/16/2023 5:08 PM
8	Retrospective Concerns for previously trained Counsellors	11/16/2023 11:14 AM
9	Personal therapy	11/16/2023 9:32 AM
10	Personal development	11/8/2023 12:16 PM
11	It is not explicitly stated what is to happen with pre-accreditation requirements	11/8/2023 10:58 AM
12	Ongoing Clinical Supervision	10/28/2023 12:36 PM
13	Need for personal therapy in training courses	9/20/2023 9:28 AM
14	There is no reference to any requirement for personal development to include personal therapy, though perhaps this is addressed elsewhere py	9/5/2023 1:53 PM

#	PROPOSED WORDING TO RECTIFY OMISSION	DATE
1	A student needs to attend a minimum of 25 hours personal therapy per academic year.	11/29/2023 11:50 PM
2	additional professional protected title or additional training requirement	11/29/2023 4:42 PM
3	An allowance of hours for prior learning for those engaging in level 9 studies.	11/29/2023 3:54 PM
4	as above	11/24/2023 6:18 PM
5	Students can complete their training hours online	11/16/2023 5:08 PM
6	Personal development, student's ability to show personal development through personal therapy	11/8/2023 12:16 PM
7	The proposed 450 hours includes practical hours completed in the course / the 450 hours represents 300 within the course and 150 post graduate	11/8/2023 10:58 AM
8	already provided	10/28/2023 12:36 PM
9	Graduates will be able to show evidence of personal development	9/20/2023 9:28 AM
10	Nothing specific, I would just like to see it included as it relates to a number of the competencies required for a counsellor and I feel needs to be a part of the education and training programmes	9/5/2023 1:53 PM

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#	RATIONALE FOR COMMENT	DATE
1	For a person to sit with a client and be there with them through whatever they bring, it is necessary to have worked through ones own issues. If a person cannot sit and look at themselves with the counselling space with their own therapist they are not ready to sit with another.	11/29/2023 11:50 PM
2	couple and family therapy are specialisms that those training for individual work do not receive	11/29/2023 4:42 PM
3	As above	11/29/2023 3:54 PM
4	It takes years to complete undergraduate degrees and masters to become a counsellor and it's extremely expensive as it is and then to become accredited the expense continues and ignores that this may be possible to be someone's main income to survive. The majority of jobs offer hourly rates which is extremely disheartening after the amount to money, time, care and education that has gone into becoming a counsellor.	11/20/2023 9:01 AM
5	More and more people are seeking online sessions and it is often more convenient for both parties	11/16/2023 5:08 PM
6	I think it's important that training offers personal therapy.	11/16/2023 9:32 AM
7	Students should demonstrate personal psychotherapeutic development through approved therapists prove number of hours and also demonstrate learnings from same.	11/8/2023 12:16 PM
8	It creates uncertainty as to what people are agreeing to or commenting on and how these hours are being divided up.	11/8/2023 10:58 AM
9	If a student doesn't engage in personal therapy during the course, they will not have shown any evidence of having dealt with personal issues which could adversely affect their counselling.	9/20/2023 9:28 AM

Q62 Please fill in the boxes below if you consider there to be an omission

Answered: 5 Skipped: 144

ANSWER CHOICES		RESPONSES	
Suggested Omission		80.00%	4
Proposed wording to rectify omission		60.00%	3
Rationale for Comment		80.00%	4

#	SUGGESTED OMISSION	DATE
1	It can be difficult for trainee counsellors to access clinical hours. The importance of the number of hours is surpassed by the quality of the counsellor professional formation.	11/30/2023 10:24 AM
2	Description of the person meeting with the counsellor as client.	11/29/2023 11:50 PM
3	There is no practical exploration of how additional supervision requirements are to be applied and to be made equitable	11/8/2023 10:58 AM
4	Personal therapy	10/28/2023 12:36 PM

#	PROPOSED WORDING TO RECTIFY OMISSION	DATE
1	The working 'service user' needs to be replaced with the term client.	11/29/2023 11:50 PM
2	Colleges will be required to provide group supervision which accounts for X% of the required supervision	11/8/2023 10:58 AM
3	Trainees need to engage with personal therapy as required by the college	10/28/2023 12:36 PM

#	RATIONALE FOR COMMENT	DATE
1	As counsellors we are not working within a service with people using services, we are working with people from the general public who are comin to work through particular issues.	11/29/2023 11:50 PM
2	My suggestion is for CORU to regulate the current model of clinical supervision in the counselling profession rather than attempt to create a new profession which does not currently exist	11/24/2023 6:18 PM
3	The practical aspects of how this is going to impact students (financially and logistically) is extremely important. Voting on what sounds reasonable when there isn't clear answers for the impact will lead to people voting based on their own assumptions and experiences	11/8/2023 10:58 AM
4	A therapist who has no self awareness is a danger to society. Counselling by definition engages client and counsellor in a very close and trusting relationship. A counsellor who is not aware of his/her human weakness and has no connection to their own feelings and experiences can be triggered by the clients story, find it difficult to recognise boundaries and develop empathy	10/28/2023 12:36 PM

Q63 Please fill in the boxes below if you consider there to be an omission

Answered: 1 Skipped: 148

ANSWER CHOICES	RESPONSES
Suggested Omission	100.00% 1
Proposed wording to rectify omission	100.00% 1
Rationale for Comment	100.00% 1

#	SUGGESTED OMISSION	DATE
1	Standards of Proficiency	11/29/2023 11:50 PM
#	PROPOSED WORDING TO RECTIFY OMISSION	DATE
1	Section 2.1, 3.2, 3.3, 3.4, 3.5 Mention of assessment, diagnosis...	11/29/2023 11:50 PM
#	RATIONALE FOR COMMENT	DATE
1	Counsellors are not qualified to diagnose. Counsellors do not carry out assessments.	11/29/2023 11:50 PM

Q64 Please feel free to provide additional comments below

Answered: 15 Skipped: 134

ANSWER CHOICES	RESPONSES	
Issue	100.00%	15
General Comment	93.33%	14
Rationale for Comment	86.67%	13

#	ISSUE	DATE
1	The Four Domains	11/30/2023 10:24 AM
2	Standards of proficiency	11/29/2023 11:59 PM
3	working with couples	11/29/2023 4:43 PM
4	The process of establishing the professions under statutory regulation	11/24/2023 6:35 PM
5	Cost of becoming an accredited counsellor	11/20/2023 9:05 AM
6	The lack of clarity around online sessions.	11/16/2023 5:10 PM
7	Practitioners qualifying during pandemic	11/8/2023 2:13 PM
8	Continuing education	11/8/2023 12:19 PM
9	Undue stress of modern day students	11/8/2023 11:17 AM
10	Level 7 requirement	11/6/2023 11:59 AM
11	Clinical Supervision	10/28/2023 12:47 PM
12	Membership of a professional body	9/20/2023 9:33 AM
13	Whistle blower policy or mechanisms,	9/19/2023 12:41 AM
14	Proposed basis for title allocation of "Counsellor" & "Psychotherapist"	9/7/2023 2:43 PM
15	As raised, I feel that personal therapy should be a requirement for any counsellor and I would like to see strict standards around this and also it's inclusion in training programs	9/5/2023 1:55 PM

#	GENERAL COMMENT	DATE
1	The four domains of proficient practice across both counselling and psychotherapy (common standards) are similar to other regulated professions. Therefore we believe that they can be achieved through education, training and clinical placements in a manner that is sufficient to protect the public. While the profession specific standards may adequately represent requirements of proficiency for entry into the registers, we suggest that there should be rigorous and specific standards for maintenance of ongoing competence. • The profession specific standards will potentially determine the scope of practice for addiction counsellors which we look favourably upon. Whereas psychotherapists will be expected to be proficient in practice across a wide range of diagnoses with varying degrees of complexity and severity. This may be somewhat more difficult to achieve. • The overall standards of proficiency for counsellors and psychotherapists overlap, although they are articulated distinctly. We have some questions about the standards of professional knowledge and skills for psychotherapists. This level of professional competence represents a significant undertaking with a level 8 qualification.	11/30/2023 10:24 AM
2	Section 3.5 it is suggested that the counsellor "determine appropriate problem lists, action plans and goals" Counselling is person centered and action plans, goals etc are arrived at collaboratively. The agenda is not set by the counsellor, as the counselling is not about the counsellor but the client.	11/29/2023 11:59 PM
3	Coru has made no provision for the safety of couples seeking therapy in its draft documents	11/29/2023 4:43 PM
4	Like many of my colleagues of long and good standing in the profession, I feel great concern and disappointment in relation to the draft documents and what they suggest about the intentions behind them.	11/24/2023 6:35 PM

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5	The cost to become an accredited counsellor is extremely high in terms of time and salaries/work available afterwards.	11/20/2023 9:05 AM
6	The idea that online sessions are not as effective as in person feels outdated.	11/16/2023 5:10 PM
7	Understanding should be shown	11/8/2023 2:13 PM
8	A need for more accessibility to training my and education from reputable education institutions with qualifications that are actually usable in a professional sense	11/8/2023 12:19 PM
9	The expenses that are not explicitly explained to students (such as years of personal therapy, years of paying for supervision, years of providing a free service with no compensation) is problematic. Before someone starts their course, a full estimate of costs should be provided. The hours and amount of supervision you have laid out here without any mention of how this burden will be evenly shared among shareholders (not just students) shows that there is a lack of consideration for students well being.	11/8/2023 11:17 AM
10	Not fair on those who have qualified for 10 or more years.	11/6/2023 11:59 AM
11	If we had to choose between including mandatory personal therapy and mandatory clinical supervision, supervision is by far the more important as it can at least help the therapist recognise when they are acting out of their own issues rather than taking care of the clients issues.	10/28/2023 12:47 PM
12	Graduates will be able to practice if registered but may not be part of a professional body?	9/20/2023 9:33 AM
13	There's no means of reporting a fello practitioner	9/19/2023 12:41 AM
14	[REDACTED] I can honestly say from experience that there is very little difference in education and training level between a Level 7 and a Level 8. This is because there is no specialisation in training provided in either a Level 7 or a Level 8 as they are both just general degrees. It is therefore misleading to the client to give a Level 8 the legal right of the title "Psychotherapist" while denying this to Level 7 and under. What extra do Level 8 have to offer to warrant this title. The content of their degree in comparison to a Level 7 says very little in my experience. I propose that the best form of regulation is to just have one designation in the profession, that of "Psychotherapist" but have two distinct categories. Category 1 for "General Training" and Category 2 for "Specialised Training" Category 2 would be for those who hold a Level 9 Masters training and upward. All psychotherapists could then be presented on the IACP website using either of these criteria. The General and the Specialised based on their individual educational specialisation rather than their Degree Level Number. The title "Counsellor" would be abolished and have no legal standing. This would provide clarity for the client, It would not be divisive among IACP members as it is a fair way to categorise based on education. It would raise the profile of the profession. It would bring more accountability in employment regarding appropriate personnel hiring and appropriate remuneration. The moment the legislation becomes law, Level 8 would become the minimum standard from then on. In practice, there are really only two standards of education and training that matter, General & Specialised. This is my view based on reflection on it up to now. I think it's fair and equitable and particularly, much more transparent for clients. We pride ourselves on being client focused so that should be how we think regarding this whole area of regulation.	9/7/2023 2:43 PM

#	RATIONALE FOR COMMENT	DATE
1	There seems to be a lack of understanding of the role and practice of counsellors.	11/29/2023 11:59 PM
2	safety of couples and children in their care is paramount	11/29/2023 4:43 PM
3	I have always wholeheartedly supported the principle of statutory regulation, as client and practitioner safety are of paramount importance to me, in common with the many other thousands of accredited and ethical practitioners. However, I now feel extremely disappointed, it is not an exaggeration to say betrayed by the process. My support was for the establishment of a registration board to regulate the existing profession of counselling - to celebrate and enhance the excellent level of client safety provided by the vast majority of practitioners, and to deal with rogue practitioners through enshrining current best practice in law, as well as offering recourse to fitness to practice processes for clients who have been harmed by rogue practitioners. What is proposed is effectively to create two new professions which do not currently exist - with lower standards of personal and professional development and an unrecognisable system of training -, based on a medicalised model whereby "service users" are subjected to "treatment", and is suggestive of an agenda to subordinate counsellors and psychotherapists to other separate and distinct professions such as psychiatry - which many see as itself being a profession in crisis, with no disrespect to the many excellent psychiatrists. This is not something that I would have	11/24/2023 6:35 PM

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supported and I feel let down. Perhaps I was naive but I feel that we were deceived. I am very worried about the future of the profession that I love. I realise that these words are full of emotion, but for the information of those who are not aware, that is what counselling and psychotherapy are all about, and one of our greatest and most distinctive strengths. And notably and disturbingly absent from the draft documents.

4	Does not reflect the level of education, expense or requirements placed on counsellors.	11/20/2023 9:05 AM
5	I feel that COVID-19 has proven that online sessions can be done and should be recognised as valid and valuable	11/16/2023 5:10 PM
6	It was a hard time where minimum placement hours could often not be met. Weight should be given to the difficulty of providing online therapy in hard circumstances, even if less total hours were reached.	11/8/2023 2:13 PM
7	There are a lot of CPD trainings that tick a box and a lot of training education institutions that charge a lot of money for "certification" however there is a need for reputable education institutions providing training and further education that offer more QQI or relevant worthy qualifications.	11/8/2023 12:19 PM
8	We cannot be in the industry of mental health and wellbeing and simultaneously place every additional burden on the student. When are NGO's, colleges and government going to offer some form of assistance to students to indicate that the work we do is valuable and necessary. Assistance can be in the form of reforming practical supports (such as internal college supervision, greater acceptance of group supervision, NGO's having to provide at least some compensation and/or internal supervision).	11/8/2023 11:17 AM
9	They have demonstrated competency in work and CPD and supervision.	11/6/2023 11:59 AM
10	Clinical supervision is the one element which differentiates counselling and psychotherapy from the other medical models regulated by Coru. In counselling the healthy therapeutic relationship is one of the most important healing instruments we have, we bring our whole person into that relationship. Without the ongoing support on supervision even many years after graduation counsellors can become either overburdened with the work, or lax and unboundaried, and both are signs of burnout. Supervision supports, encourages while adding accountability to the ongoing practice of counselling. I believe removing the requirement for clinical supervision on a regular basis will diminish the profession rather than protect the public. Of course supervision as an optional extra will always be there, but human nature being what it is the pressures of time and finance can cause even the best to overlook self care.prevent	10/28/2023 12:47 PM
11	If counsellors can practise on registration with Coru, and there is no requirement to join a professional body, I would be concerned that there may be no monitoring of counsellor practice	9/20/2023 9:33 AM
12	I have read through the proposals and personally, I think they will result in a lot of stormy waters among members. I personally am totally opposed to the current proposals as they stand. If passed, they will create a divisive and entirely unfair two tier system based solely on educational standards achieved. The title of my degree was [REDACTED] and was a Level 7. If these proposals are passed in their current form, I will suddenly become demoted and legally will no longer be able to call myself what my degree title originally gave me!!! This will happen to a huge number of great people who have years of experience in the field, everyone from Level 7 down. [REDACTED] [REDACTED] I can honestly say from experience that there is very little difference in education and training level between a Level 7 and a Level 8. This is because there is no specialisation in training provided in either a Level 7 or a Level 8 as they are both just general degrees. It is therefore misleading to the client to give a Level 8 the legal right of the title "Psychotherapist" while denying this to Level 7 and under. What extra do Level 8 have to offer to warrant this title, The content of their degree in comparison to a Level 7 says very little in my experience.	9/7/2023 2:43 PM
13	Self awareness is a vital part of becoming a skilled and effective counsellor	9/5/2023 1:55 PM

Q65 Please feel free to provide additional comments below

Answered: 5 Skipped: 144

ANSWER CHOICES	RESPONSES	
Issue	100.00%	5
General Comment	100.00%	5
Rationale for Comment	80.00%	4

#	ISSUE	DATE
1	Clinical Placement	11/30/2023 10:24 AM
2	Overall there seems to be a lack of understanding of the role of counsellors and psychotherapists.	11/29/2023 11:59 PM
3	1 year Masters programmes	11/8/2023 2:13 PM
4	NGO's and low cost counselling services profiting off of students	11/8/2023 11:17 AM
5	Employment	9/7/2023 2:43 PM
#	GENERAL COMMENT	DATE
1	• It can be difficult for trainees counsellors to access clinical hours. The importance of the number of hours is surpassed by the quality of the counsellor professional formation. • It would be helpful to clarify whether the practice placement can be undertaken on both full time and part time basis.	11/30/2023 10:24 AM
2	A large amount of the wording seems to have been copied and pasted from another profession.	11/29/2023 11:59 PM
3	Ichas college allowed 1 year Masters programmes	11/8/2023 2:13 PM
4	The scales to now have been completely unbalanced in regards to students providing a necessary service (many NGO's/low cost counselling services would not survive without the free services provided by students). And yet there is no discussion in your proposal as to how these scales will be more balanced in future. I'm not saying that students have to paid necessarily but there ought to be some compensation. Students are expected to study an intensive academic course while travelling to these services to provide their skills with often little to no support.	11/8/2023 11:17 AM
5	Avoid creating a two tier system in the profession.	9/7/2023 2:43 PM
#	RATIONALE FOR COMMENT	DATE
1	The repeated use of the term service user and the lack of understanding of how invasive it would be to have someone else directly observing a session demonstrates a complete lack of understanding of what it is that we do. Any form of direct observation is unacceptable - whether in the room, in the corner, behind a screen sound horrific, or via a two way mirror - unrealistic and horrific.	11/29/2023 11:59 PM
2	Since Coru regulations have become more clear, Ichas now only offers 2 year Masters programmes . Understanding should be given to students who participated in the 1 year full time option with 90 study points instead of 60.	11/8/2023 2:13 PM
3	If a client outlined these types of expectations from their own work life we would be concerned for them, why is it acceptable to spread students so thin?	11/8/2023 11:17 AM
4	As regards employment, these current proposals will basically undermine the employment opportunities of everyone from Level 7 down even though they may have years of experience. I feel there is a vey "bargain basement" attitude towards mental health in this country. If we can do it on the cheap, we will, and that comes from the top down, meaning the government. Tusla is in crisis, CAHMS is in crisis, HSE mental health services are in crisis, Student mental health services are in crisis and I say this from experience. A huge part of the reasons why are staffing and under funding. These current proposals will result in perpetuating this situation as they will result in employers being able to undervalue and exclude everyone from Level 7 down. Having one title in the profession, that of	9/7/2023 2:43 PM

Counsellors and Psychotherapists Registration Board Stakeholder Consultation: Standards of Proficiency for Counsellors and Criteria for Education and Training Programmes (Counsellors)

"Psychotherapist" but with two recognised categories, "General and "Specialised" applied to it will avoid a two tier system being created in the profession and will provide much greater transparency for clients.

Q66 Please feel free to provide additional comments below

Answered: 3 Skipped: 146

ANSWER CHOICES	RESPONSES	
Issue	100.00%	3
General Comment	100.00%	3
Rationale for Comment	66.67%	2

#	ISSUE	DATE
1	CPD & Personal Development	11/30/2023 10:24 AM
2	Accrediting bodies	11/8/2023 11:17 AM
3	Basis for Regulation Divisive and Unfair	9/7/2023 2:43 PM

#	GENERAL COMMENT	DATE
1	- Supervision should be an ongoing facet of professional development following qualification. - Criteria for what constitutes CPD requires further clarification. - Ongoing CPD should incorporate a minimum of 30 hours annually, with a requirement for reflection on learning. - ACI supports a requirement for personal development during training. In our view this may incorporate a combination of personal therapy, group process work and self-practise/self-reflection reflection activities.	11/30/2023 10:24 AM
2	'Accrediting bodies' operate without any oversight and make great money doing so. While I understand Coru will take time to finalise their decision (which may be years), I believe that accrediting should already be presenting a more honest picture of their power in this field. For some accrediting bodies (such as IACP) to present itself as the main or most prestigious body (this is evident in job postings I, HSE hiring and insurance coverage) is not only false but misleading to clients. I hope Coru can find a way to ensure these bodies are not allowed to misrepresent the industry.	11/8/2023 11:17 AM
3	I propose that the best form of regulation is to just have one designation in the profession, that of "Psychotherapist" but have two distinct categories. Category 1 for "General Training" and Category 2 for "Specialised Training" Category 2 would be for those who hold a Level 9 Masters training and upward. All psychotherapists could then be presented on the IACP website using either of these criteria. The General and the Specialised based on their individual educational specialisation rather than their Degree Level Number. The title "Counsellor" would be abolished and have no legal standing. This would provide clarity for the client, It would not be divisive among IACP members as it is a fair way to categorise based on education. It would raise the profile of the profession. It would bring more accountability in employment regarding appropriate personnel hiring and appropriate remuneration. The moment the legislation becomes law, Level 8 would become the minimum standard from then on. In practice, there are really only two standards of education and training that matter, General & Specialised. This is my view based on reflection on it up to now. I think it's fair and equitable and particularly, much more transparent for clients. We pride ourselves on being client focused so that should be how we think regarding this whole area of regulation. These proposals seem to me to have only one primary criteria used in their creation, educational standard achieved. Everyone working in this area of mental health knows that, while education is important and necessary, it is no substitute for experience. The greatest education I personally have had on grief and loss for example came not from my degree, it came from playing my part in lowering the coffins of my parents into the ground. It was only on that day I truly understood grief and loss and became truly qualified to sit with someone experiencing it. Until then, I can honestly say that everything I thought I knew counted for nothing in comparison. The people who selected the criteria for these proposals and created them seem to have ignored this reality not because it was the right thing to do but rather, the easy thing to do.	9/7/2023 2:43 PM

#	RATIONALE FOR COMMENT	DATE
1	They influence courses, insurance, hiring etc and it is misleading to the general public	11/8/2023 11:17 AM
2	We must regulate in a manner that is client centred and honours the previous experience of practitioners irrespective of education level achieved.	9/7/2023 2:43 PM

