



# Submission to the Department of Health consultation on the proposed regulation of Counsellors and Psychotherapists

Pharmaceutical Society of Ireland (PSI), the pharmacy regulator

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## Introduction

As a statutory regulatory body, we welcome the opportunity to contribute to the Department of Health's consultation on the proposed regulation of counsellors and psychotherapists. We provide the comments below in reflection of our regulatory remit and experience to protect and promote the health, safety and wellbeing of patients and the public.

The Pharmaceutical Society of Ireland (PSI) is an independent statutory body, established by the Pharmacy Act 2007. The PSI acts to protect and promote the health, safety and wellbeing of patients and the public by regulating pharmacists and pharmacies in Ireland. Functions of the PSI include registration of pharmacists, pharmaceutical assistants and pharmacies, inspection and enforcement, and the handling of complaints and disciplinary matters. The PSI also sets standards for education and training, accredits educational programmes, and works towards the development of pharmacy practice in the public interest.

## Statutory regulation

The PSI is supportive of the proposals to regulate the professions of psychotherapists and counsellors in the interest of protecting those availing of their services and guidance. In addition, it will ultimately elevate professional standards and ensure that only those with the appropriate body of knowledge may hold themselves out as a particular regulated professional, whom any member of the public may rely on as having attained a minimum level of education and training, and who continue to accumulate professional knowledge and experience through a form of continued learning and professional development.

Like pharmacists and other health and social care professionals, those providing counselling and psychotherapy services are involved in the care and treatment of people during vulnerable and challenging life stages. The inclusion of these professions within the professional regulatory framework provides an appropriate means of ensuring their capacity and competency to provide those particular and vital services, and may serve to elevate the position of their care in a regard that will be valuable for both professions. With the proposed designation of these professions under the appropriate legislation, ultimately the intent must be to assure and encourage service users of the protection that regulation affords by establishing an appropriate standard of professional conduct, competence, education and training.

## Proposal to regulate under the Health and Social Care Professionals Act 2005

As outlined in the report prepared by CORU, the PSI agrees that moving a profession to a system of regulation will require time, resources and consultation. In particular, time must be afforded to both those who will be regulated and to the body/board designated with their regulation, so that an appropriate, effective and fully-informed system of registration and regulation can be planned and implemented. CORU has provided a good roadmap already as to how this work might be commenced. The extent of this work cannot be underestimated.

The Health and Social Care Professionals Act 2005 provides a framework which promotes high standards of professional conduct and professional education, training and competence amongst the professions it so far regulates. It appears a viable proposal that both of these professions might fall

appropriately under the legislation overseen by CORU, subject to the requisite resources being made available to the regulatory body so as to deal with the additional workload that a transition to regulation and regulatory on-boarding will require.

## Conclusion

Our regulatory roles recognise that only those sufficiently educated and trained, and working in compliance with the regulatory structure, legislation and national guidelines, may enjoy the privilege of practicing a profession which has the potential for resulting consequences on others. The regulator's role is one that should both facilitate and support best practice, but it must rely too on the willing engagement of the professions at all stages of education, training and practice, and their recognition of the position they hold in Irish society. This can be supported by demonstrated leadership and governance, and clarity of expectations, from the regulator, an intrinsic part of raising the profile, reputation and proving, by example, the benefits of compliance in the interests of all.

The PSI particularly acknowledges the importance of continued engagement between the health and social care regulators, so as to share knowledge, information and learning where it is useful, and to ensure that we can achieve efficiency of services and resources in our public interest roles. We are available to provide further information and welcomes any further engagement with the Department of Health and CORU in the future in relation to all aspects of our work.