



ASSOCIATION FOR
Psychoanalysis & Psychotherapy
IN IRELAND

APPI SUBMISSIONS AND POSITION STATEMENTS

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As Chair of the *Association for Psychoanalysis and Psychotherapy in Ireland* (APPI), I am writing on behalf of the Executive Committee and the membership, to submit some of our thoughts relating to the Draft Statement of Strategy 2021-2025.

Firstly, we would like to commend CORU for the declared shift of emphasis, in the document and their thinking generally, away from the previously stated bald purpose of 'protection of the public', and onto 'the public we protect and the professionals we regulate', so to also include references to the '*value of our regulated professionals and their contribution to safe and effective service delivery*'.

This is an entirely different message and ethos than the one which was delivered during our meeting with CORU (29/07/2019) where the sole purpose of CORU was stated to be 'Protection of the Public' and which had for effect that we were left wondering what place if any was being envisioned for us as professionals in the field of Mental Health in this new schema. This was rather disheartening at the time. There seemed to be little room for acknowledgement of the fact that organisations such as our own, and their members individually, have been historically the guarantors of high standards in the training of psychotherapists and their practice for thirty years. There was little or no evidence of the public having been at any risk from involvement with us over many decades. In fact, most of the psychotherapy that has been available to the public to date is provided by members of organisations such as APPI, - by individual professionals then and not by the State. Because of our longstanding commitment to that work of providing psychotherapy ethically, and our efforts over the course of our development to maintain and ensure standards, our organisation has been 'CORU-ready' for a long time. It is to be commended that CORU's draft document begins to mention in a positive way the ongoing engagement and work of these professionals.

The declared '*shift in focus and resources to supporting all registrants to deliver safe service user outcomes, rather than concentrating on the few who have a complaint made against them*' is obviously the better approach all round if the aim is to ensure safe practice, while avoiding alienating the registrants themselves. So, we once again commend CORU's rethink on this as represented in its draft strategic planning for the future. Our hope is that such positive engagement intensifies, as it must if there is to be an ordered transition to this new reality, which needs to have sustainability built into it.

Consequently, for us the question now turns towards *how CORU will in fact resource and support the professional registrants*. It is our contention, - in fact for us it is just plain common-sense - that this is best achieved by CORU openly supporting the continuing work of properly established professional bodies such as our own, which have a proven track record in assuring standards of training and practice, and which have all the appropriate structures required for good governance already in place. A strong indication of that support from CORU will be vital to in place the stability of the general landscape of psychotherapy in the years immediately following the opening of registration.

APPI, as a stakeholder of longstanding in this profession, its development and its regulation, sees an element of its future as being one of the 'Key Enabler' partners, to ensure that once regulation begins that there is a coherent process thought out to secure the immediate to long-

term future supporting structure which will underpin the ongoing formation of psychotherapy (in our case psychoanalytic) for the following 15 years.

We would like to see Section 5b of the draft document fleshed out somewhat so to give some indication of how CORU intends to actively contribute to and collaborate with relevant bodies. We would like to know who CORU would see as 'relevant'. On foot of our long history of involvement, APPI already considers itself to be a relevant body, alongside others, which CORU will want to actively engage with, as provided for in the draft Statement of Strategy Section 5 (p22).

That CORU in the current strategic document is opening a conceptual space for inclusion of such relevant bodies is heartening. The continuing support that we are already supplying to our members in terms of training and ongoing CPD requirements specific to the psychoanalytic modality of psychotherapy, so that they may be well placed to provide a service to the public in a safe and informed way, can only be countenanced if the required resources are to remain available going forward.

Our association, like many other outstanding not-for-profit organisations, has relied on professional fees to fund and structure our activities on behalf of the professional membership. Being accredited by APPI is a sought-after status because the bar for entry remains high. Our membership is highly educated and motivated. It is without hesitation that we can say that APPI comprises an exceptionally talented and committed group of people. There is a vocational ethos towards our chosen work in life and this has been fostered by APPI from the outset. All of our efforts on behalf of the organisation are voluntary and non-remunerated and are made because these will have impact on the clinical work we undertake and our developing understanding of human subjectivity and suffering, which in turn feeds into the wider culture. Attachment to professional bodies such as ours is the generator of this work. This attachment is partly due to the indication of professionalism and accreditation that membership of APPI registers within the public perception. Registration with the State board will doubtless see that public identification weakened. The State recognition will conceivably trump that given by the professional bodies and diminish our relevance in the public mind and in the minds of new entrants to the profession. This may well lead to the dissipation of the learning and development culture which has been established by us and similar organisations. It will doubtless impact on our funding which derives from membership fees entirely. This in turn will see our ability to provide the infrastructure of the profession itself diminished. So, who is going to step in to provide what we have provided cost-effectively (actually at zero-cost to the State) and expertly to date? Will CORU arrange to provide those supports and resources?

What will happen when CORU itself becomes the place of attachment? This will inevitably weaken the status of the professional bodies and will demoralise them. In our meeting with CORU we asked what role the professional bodies would have with CORU. We were told that there would not be one, and that no recommendation would be made to registrants in respect of them. That would send out a strong signal of their irrelevance.

If it is imagined that activities, which now and over the past decades have been driving professional development, will be able to continue without proper resourcing going forward, a serious error of judgement is committed. What will replace that existing resource of organisational expertise and commitment if it is not minded? If it can wither away?

CORU has been actively determining the contours of the psychotherapy landscape and will not need reminding that most psychotherapists work as self-employed, so do not have the training

supports of organisations like the HSE to organise training and CPD. CORU or private providers will have to step in to provide this, and will struggle to do so if organisations such as APPI cease to exist. At our meeting with CORU it was suggested that this very fact would assure the continued relevance of such. We beg to differ.

Rather, starved of resources and/or subject to a changed perception of relevance, the reserve of knowledge and, importantly, Modality Specific expertise - in our case psychoanalytic 'know how' - generated, nurtured and matured over the decades past by the extant professional bodies such as ours steeped in a history which extends back over 150 years, will be seriously eroded. That will leave nothing to prevent a dramatic shift towards a watered down, entry level 'vanilla flavoured' psychotherapy. The diversity of approach currently on offer to the public will see its underpinnings, collapse. While it is inevitable that the profession will be regulated in the near future, is it ever advisable to build a new house without any thought as to the foundations and the ground beneath? How will this new house serve 'the public we protect and the professionals we regulate'?

CORU's draft document begins to open the way towards a working-through of some of these perhaps unforeseen problems which statutory regulation will bring about. Seeking out partnerships and collaborations with relevant bodies such as our own will be key to averting the erosion of the field. What is and has been relevant for the profession cannot be allowed slip into irrelevance through lack of forethought. APPI is more than willing to be an active contributor to minding the future of what has been our collective project since its inception.

We are sure you will agree with us when we say that there is little use in the ball being thrown into play if the pitch imperceptibly begins to break up and disappear beneath the players' feet.

Kind regards,

Helena Texier

Chair APPI

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APPI's understanding is that the role of CORU is about 'fitness to practice criteria' based on minimum standards and the handling of complaints, that statutory regulation by CORU doesn't replace the professional bodies. According to this view, activities normally undertaken by the professional bodies would continue unaffected.

APPI's current thinking in relation to this point is that unless a status is explicitly accorded to the professional bodies by CORU, ability to maintain the excellent culture and tradition of hard work, and to sustain the organisational practices which nurture and protect the distinct modalities, might well be undermined and might well lead to their eventual demise over time. If the professional bodies are weakened - albeit inadvertently - consequent to the introduction of State regulation, CORU in the future may well end up having to itself provide the resources for all of the support structures currently and historically provided by the professional bodies, with very serious implications in terms of cost and expertise.

APPI suggests, at a time when the aim of all stakeholders is to ensure regulation takes off on not only a steady but a *sustainable* footing, that a way to avert such a future disastrous depletion in the psychotherapy landscape would be to officially name approved professional bodies as domains of expertise and CPD providers for a specific modality and/or to require membership of a recognised professional body relevant to the specific modality of the applicant.

These - like APPI - would be those having a long track record and history as domains of particular expertise, developing their profession, understanding and safe-guarding the standards and proficiencies of their modality-specific trainings, creating and nurturing the community of practice of their members by all of their efforts. Such professional bodies would also represent a crucial consultative resource for CORU in the assessment of academic programs within the field of their modality-specific expertise.

APPI considers the richness of diversity of the different modalities of psychotherapy to be the consequence of the work of the individual professional bodies. That diversity ultimately affords the public a choice of treatment options which must be preserved. APPI is keen to draw the attention of CORU and the State registration Board for Counselling and Psychotherapy to the need to be attentive to carefully protecting this diversity in its deliberations, decisions and actions. Whilst prescribing requirements in relation to who might be granted access to the title 'psychotherapist' may inevitably necessitate thinking in terms of a *generic* use of the term, APPI's position is that it is vital for the protection of the integrity of the title, going forward *post*-regulation, that some essential provision be made in respect of modality-specific Continuous Professional Development. It is APPI's considered opinion that this can only be achieved by CORU affording some status officially to the professional bodies, who are *de facto* guarantors of the very existence of that diversity.

Historically, it has been the professional bodies – APPI is one such – which have laboured to provide and regulate the training and standards of psychotherapists within specific and very distinct modalities, to great success. As such, a wealth of knowledge, expertise and network has been built up over many, many years. This now resides in the separate professional bodies. To date, this has supported and sustained the very existence of psychotherapy for those who could access it. All of this has come at no cost to the State. That the work of sustaining modalities has been undertaken freely and on a wholly voluntary basis, in no way impacted on the high quality of the service delivered in terms of training and ensuring high standards of practitioners.

The professional bodies developed the distinct structures necessary to maintain the highest standards of training and of ethical practice, as well as maintaining a register of suitably qualified practitioners within a specific modality. The professional bodies bore the responsibility of establishing a *Code of Ethics and Practice* specific to the modality concerned. Those professional bodies know the core, distinct, and modality-specific elements which would adequately and appropriately constitute the ongoing development for a practitioner in a specific, distinct modality.

APPI is confident that CORU will see the opportunity that exists in terms of the assurance of a vibrant continuance of the modality-specific professional bodies such as our own, so

that they will be able to continue to develop those CPD programs, clinical seminars, conferences, congresses, publications and research going forward.

APPI fully supports the ICP position, declared in its 2015 Position Paper, with respect to the delineation of the two distinct professions of Counselling and Psychotherapy for the purposes of statutory regulation, and the protection and retention of the title of 'Psychotherapist'. That there is emphasis on the fact that a psychotherapy training is, firstly, distinguished by the long duration and profundity of studies, and secondly distinguished by the length and intensity of the training hours in respect of 'Personal Therapeutic Experience' and 'Supervision' accords with APPI's own standards and its expectations of its members.

APPI in its very constitution lays still weightier emphasises on the personal psychoanalysis as fundamental to the work of the future practitioner, according it a special value beyond being one element in a list of requirements:

"The Primary Object of the Association is to advance Freudian and Lacanian Psychoanalysis and Psychoanalytic Psychotherapy. In particular, in keeping with the Freudian principle, this advancement is centred on Personal Psychoanalysis as the indispensable means by which the practice of psychoanalysis and psychoanalytic psychotherapy can be transmitted, studied and understood".

In conclusion:

- State Regulation will be about fitness to practice criteria based on minimum standards.
- ICP has carefully delineated those minimum standards separately for both counselling and psychotherapy in its position paper of 2015.
- Recognising officially the invaluable resource that the individual professional bodies such as APPI constitute, in terms of cost and expertise and protecting and providing for **a diversity of treatment options**, will underpin the survival of the professional bodies going forward and contribute to the overall success of regulation by CORU in the long term.

Helena Texier
Chair APPI

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Honorary Secretary APPI