



Dear Mr O'Shea,

Thank you for your correspondence on behalf of the Addiction Counsellors of Ireland. CORU appreciates the opportunity to engage with you and values the continued collaboration with professional bodies in supporting high standards of education, training, and practice. The matters raised in your letter are important, and I welcome the opportunity to provide further clarification on these issues and on CORU's regulatory remit. I will address each of the points in turn below.

Personal Development

Personal Therapy

Pre-registration education and training requirements set by a Statutory Registration Board are defined by two key documents:

- **Standards of Proficiency** – the threshold knowledge, skills, and competencies required for entry to the professional register.
- **Criteria for Education and Training Programmes** – the quality assurance requirements education providers must meet to ensure graduates achieve all Standards of Proficiency.

CORU applies the principles of right-touch regulation through an outcomes-focused approach. While the Criteria do not prescribe how an education provider designs curriculum or selects assessment methods, we require providers to demonstrate that all graduates meet the Standards of Proficiency. Capabilities such as self-awareness, reflection, and personal development are integral to these standards and must be explicitly evidenced within programmes.

Assessment methods may vary, but providers must show that graduates have achieved all standards. Evidence of attainment is required for programme approval. The Standards of Proficiency guide curriculum design and assessment strategies, ensuring graduates can practise safely and autonomously. These standards form a holistic framework for professional competence, encompassing both knowledge and skills, often within a defined context.

Examples:

- *Knowledge competence:* Be aware of current guidelines and legislation relating to candour and disclosure.
Example of assessment: Examination or written assignment.
- *Skills competence:* Be able to recognise and manage the dynamics of power and authority as experienced in the therapeutic relationship.
Example of assessment: Case study, reflective journal, or indirect/direct observed practice.



- *Skill and context in which it is achieved:* Be able to establish and build a therapeutic relationship with a service user, within a chosen theoretical framework, recognising and managing professional and ethical boundaries. *Example of assessment:* Practice placement and direct engagement with service users.

Through these standards, the development of personal and professional growth becomes embedded within the curriculum.

Under Domain 4: Professional Development, the following standards are particularly relevant to the knowledge and skills that all graduates must achieve:

- Be able to evaluate and reflect critically on own professional practice to identify learning and development needs; be able to select appropriate learning activities to achieve professional development goals and be able to integrate new knowledge and skills into professional practice.
- Understand and recognise the impact of personal values and life experience on professional practice and be able to manage this impact appropriately.
- Understand the importance of and be able to seek professional development, supervision, feedback and peer review opportunities in order to continuously improve practice.

Under Domain 5: Professional Knowledge and Skills, the following standards are shared across both the Standards for Counsellors and the Standards for Psychotherapists:

- Be able to recognise and manage the dynamics of power and authority as experienced in the therapeutic process.
- Be able to critically reflect on the necessity of engaging in clinical supervision to support, sustain and improve practice.

Additionally, The Counsellors and Psychotherapists Registration Board has set profession specific standards that reflect the centrality of personal development, self-awareness and reflectivity in counselling and psychotherapy practice.

Standards of Proficiency for Counsellors

- Be able to critically reflect on the role of the counsellor in the therapeutic process and manage personal involvement in, and contribution to, the process of counselling.
- Be able to recognise personal emotional responses, vicarious trauma and the need to develop effective self-care strategies and burnout prevention.
- Be able to know and critically reflect on the presence of the conscious and unconscious dynamics in clinical supervision.



Standards of Proficiency for Psychotherapists

- Be able to recognise and manage personal emotional responses, vicarious trauma and the need to develop effective self-care strategies and burnout prevention.
- Be able to reflect on and critically analyse the factors that influence therapeutic boundaries and dynamics of the therapeutic relationship.
- Be able to critically reflect on the presence of conscious and unconscious dynamics in clinical supervision and manage personal involvement in, and contribution to, the process of clinical supervision.

Rather than adopting an input-based approach that could limit the autonomy and development of education and training programmes, CORU's outcomes-based approach ensures that required standards are met while allowing flexibility in how programmes are designed and delivered.

It is the responsibility of the education provider, with the knowledge and expertise in curriculum design and assessment to identify and select how all the standards will be progressively achieved by all students. How the standards are taught and assessed is evaluated during a programme approval or monitoring process. The education provider must demonstrate how it assures all students achieve all standards of proficiency.

CORU currently has approved and monitors over 80 education and training programmes and implements a robust programme approval process that assures all graduates have achieved all the standards of proficiency to practice safely on entry to a professional register.

Clinical Supervision

The Criteria require that students receive appropriate on-site supervision during their practice placements. In practice, practice education supervision inherently incorporates clinical supervision - facilitating reflection on, and learning from, real-world practice experiences - while also fulfilling the core function of practice education, which is to assess a student's achievement of the Standards of Proficiency. Therefore, although not explicitly referenced within the Criteria, clinical supervision forms an integral part of a student's progressive achievement of the standards of proficiency during practice placement.

In addition, criteria establish quality assurance of practice placement which is the responsibility of the education provider. This includes

- Supervision policies include guidelines on how students progressively achieve independence in practice.



In regard to the supervisor's experience and training, there are explicit requirements for education providers that must be demonstrated and provide assurances to the Board that they are appropriate to ensure all students achieve all the standards of proficiency.

- The education provider will have a set of requirements for the selection of practice placements to ensure quality learning experience for students that reflect the normal context and environment of practice. The education provider will work in partnership with the practice placement provider and have written agreements in place that clearly set out the responsibilities of all parties in ensuring that the placement supports the achievement of the standards of proficiency.
- Whilst on placement, appropriate support, guidance and supervision is maintained with the student by the practice education team.
- The profile and roles of the practice education team must be described. Practice educators must also be registered with the appropriate registration board.
- Supervision policies include guidelines on how students progressively achieve independence in practice.

It is the responsibility of an education provider to make regular support and training available to the practice education team to develop their practice education skills and to evidence to CORU that all supervisors have the appropriate training.

It is important to understand that we reference the practice education team, this includes the practitioner responsible for clinical supervision of the student whilst on placement.

As highlighted, CORU's approach is outcomes-focused rather than prescriptive, as a prescriptive model can restrict the autonomy of education and training providers.

During the programme approval process, it is the responsibility of the education provider to demonstrate how its quality assurance systems ensure that students can achieve the Standards of Proficiency. This includes outlining the criteria for selecting practice placements and evidencing the knowledge and skills of practice educators who provide clinical supervision, support and assess students' progressive attainment of the standards. Accordingly, it is not necessary for CORU to specify such requirements directly; rather, it is the responsibility of each education provider to demonstrate that its processes are robust and appropriate to ensure all graduates achieve the standards necessary for safe and effective practice.

Scope of practice

It is important to clarify that CORU's regulatory model is designed to protect professional titles. This means that only individuals who are registered with the appropriate Registration Board are legally entitled to use a designated title. CORU



does not regulate by scope of practice, reflecting the broader professional regulatory context in Ireland.

Instead, CORU's Code of Professional Conduct and Ethics requires registrants to practise within the limits of their knowledge, skills, competence, and experience, and only in areas where they possess the necessary expertise or are appropriately supervised. This approach recognises that a professional's knowledge and skills naturally develop over the course of their career through practical experience and ongoing continuing professional development (CPD).

CORU does not define the scope of practice for any profession. Defining scope too narrowly can restrict both the evolution of a profession and the growth of individual practitioners. The Code allows for this flexibility by acknowledging that a practitioner's scope of practice may evolve over time, while also placing a clear responsibility on registrants to ensure they practise safely within their professional competence. Failure to do so may give rise to fitness to practise concerns and potential sanctions where a registrant is found to be practising beyond their knowledge or skills.

The Standards of Proficiency must be understood to be the threshold knowledge and skills required on day 1 of entry to a register. They are used in the design of curriculum and inform the types of practice placements and presentations that students must have exposure to. They should not be read as standards of practice, and once registered, it is expected that practitioners will continue to develop throughout the course of their working career and will work with clients with complex needs.

Grandparenting for existing practitioners

It is important to clarify that the Standards of Proficiency apply only to future entrants to a register and do not extend to existing practitioners. Legislative provisions are in place to support the grandparenting of existing practitioners onto a register when it is first opened. CORU has extensive experience in managing this process, having successfully established twelve registers for health and social care professions.

Clinical Placement

The Board has stipulated direct or indirect assessment methodologies of student progressive achievement of the standards or proficiency. While in certain modalities, the use of recording, live supervision or two-way mirrors is well embedded, not all modalities employ or can employ these assessment models.

Indirect observation methodologies are widely recognised as valid and effective assessment approaches within education and training programmes. These methods - including transcriptions, reflective journals, case studies, and supervised discussions - allow students to demonstrate their knowledge, skills, and professional judgment in a manner that is consistent with the Standards of Proficiency.



It is the responsibility of the education provider to ensure that the assessment methods selected are robust, quality-assured, and capable of accurately measuring student achievement of the standards in practice. Providers must demonstrate how their chosen methodologies reliably assess the proficiencies required for safe and effective professional practice.

While direct observation methods - such as live supervision, one-way mirrors, or video recordings - can provide additional assurance and should be carefully specified where included, they are not the only valid means of assessment. When implemented appropriately, indirect observation methods can maintain the integrity of the therapeutic relationship and safeguard client confidentiality, while still providing rigorous evaluation of students' proficiency in line with the expected standards.

Practice placement hours

The specification of a minimum number of direct client engagements does not diminish the importance of on-site clinical supervision, structured reflective practice, accurate record-keeping, data collection and management, or participation in team and multidisciplinary meetings. When designing a curriculum, the education provider must clearly identify the learning outcomes to be achieved through student engagement in practice placements. The Standards of Proficiency that students are required to demonstrate during placement extend beyond those developed solely through direct client contact.

It is the responsibility of the education and training provider to define these learning outcomes and, through written agreements with placement providers, demonstrate how students will be supported to develop the required proficiencies.

Each criterion set by the Board will be examined and evaluated during a programme approval process, and the suitability of placements considered. For example,

Criterion 2.3 specifies that the number, duration, and range of practice placements, as well as their position within the programme, must reflect the current practice and demands of the profession. Placements must be structured to facilitate the translation of theory into practice and to ensure that students achieve all relevant Standards of Proficiency.

As with the Standards of Proficiency, the Criteria for Education and Training Programmes should be considered holistically to understand how they are applied in the programme approval process by CORU. CORU brings extensive experience in the approval and ongoing monitoring of education and training programmes, having approved 80 programmes across a range of health and social care professions. This experience has allowed CORU to develop robust, consistent, and proportionate quality assurance processes, ensuring that programmes effectively prepare graduates to practise safely and competently.



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This experience will be applied to the approval of education and training programmes for counsellors and psychotherapists, supporting a regulatory approach that is outcomes-focused, flexible, and ensures that all graduates achieve the standards required for public protection. Through the next phase towards introducing regulation, CORU will work with education providers to ensure that programme design, delivery, and assessment strategies clearly demonstrate how students achieve the required Standards of Proficiency and quality assuring practice placement experiences for students on programmes.

Thank you for sharing your considered views. I hope that the information provided above offers additional clarity on CORU's role and remit as a regulator, as well as the purpose and application of the Standards of Proficiency set by the Board.

Kind Regards,

Claire O'Cleary
Chief Executive Officer and Registrar, Health and Social Care Professionals Council
at CORU