ICPHAA

Irish Counselling, Psychotherapy & Allied Healthcare Professionals Association

REGULATION, LAW & DATA PROTECTION

Emerging Regulation (CORU) Policy

ICPHAA's position on the statutory regulation of counselling and psychotherapy by CORU, and the practical steps members should take now to prepare for registration and for emerging areas of practice.

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EFFECTIVE	9 November 2026	NEXT REVIEW	9 November 2027
POLICY OWNER	ICPHAA Board of Directors		

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Emerging Regulation (CORU) Policy

APPLIES TO	Every ICPHAA member, particularly members who practise, or intend to practise, as counsellors or psychotherapists in Ireland.
VERSION	1.0 · effective 9 November 2026 · next review 9 November 2027
POLICY OWNER	ICPHAA Board of Directors
CONTACT	ICPHAA Registry · admin@icphaa.ie

AT A GLANCE

- CORU is introducing statutory registration of counsellors and psychotherapists under the Health and Social Care Professionals Act 2005.
- CORU alone decides who is registered; ICPHAA membership does not confer or guarantee registration.
- Members should keep complete, verifiable records of qualifications, training, practice, supervision and CPD.
- Members must follow CORU's own published guidance and timelines, including on the use of protected titles.
- Digital practice and artificial intelligence must meet the same ethical, clinical and legal standards as in-person work.

CONTENTS

1 Purpose 2
2 Scope 3
3 What statutory regulation means 3
4 ICPHAA's position and commitments 3
5 Preparing for registration: what members should do now 4
6 Use of professional titles during the transition 5
7 Emerging practice: digital practice and artificial intelligence 5
8 Evidence-informed practice and research 6
9 Responsibilities 6
10 Breaches, concerns and review 6

1. Purpose

The statutory regulation of counselling and psychotherapy is one of the most significant developments for the professions in Ireland. This policy sets out the position of the Irish Counselling, Psychotherapy & Allied Healthcare Professionals Association (ICPHAA) on that development, explains what it means for

members, and describes the practical steps members should take to prepare. Because regulation is changing the wider practice environment, the policy also sets out ICPHAA's emerging principles on digital practice, artificial intelligence and evidence-informed practice.

The policy is deliberately cautious. It does not predict dates, requirements or outcomes that only CORU can decide, and it directs members to CORU's own published guidance as the authoritative source.

2. Scope

This policy applies to all ICPHAA members. It is most directly relevant to members who practise, or intend to practise, as counsellors or psychotherapists, but members in the accredited role categories and Allied Healthcare members should also read it, as statutory regulation may affect the titles and services they can offer and the settings in which they work. It also guides the ICPHAA Board of Directors, the Registry and the Accreditation Department in their engagement with statutory regulation.

3. What statutory regulation means

CORU is Ireland's regulator for health and social care professionals under the Health and Social Care Professionals Act 2005. CORU has established a registration board for counsellors and psychotherapists, and statutory registration of counsellors and psychotherapists is being introduced. Once a profession is regulated by CORU, statutory regulation typically involves:

- **A public register.** Practitioners who meet CORU's requirements are entered on a register that the public can check.
- **Protection of title.** Once registration is in force and any transitional arrangements have ended, only registrants may use the titles protected for the profession.
- **Statutory standards.** Registrants are bound by the standards of education, proficiency, conduct and ethics that CORU sets for the profession.
- **Statutory fitness to practise.** CORU can receive complaints about registrants and take action under the Act to protect the public.

The detail of what statutory regulation will require of counsellors and psychotherapists, including any arrangements for practitioners already working in the field, is a matter for CORU. Members should read CORU's published materials directly rather than relying on summaries.

4. ICPHAA's position and commitments

ICPHAA welcomes statutory regulation that is well designed and fairly implemented. It strengthens public protection, gives clients a clear way to check a practitioner's standing, and raises the profile of counselling and psychotherapy as essential contributions to health and wellbeing in Ireland.

The Association commits to:

- engaging constructively with the regulatory process, including responding to public consultations where it is appropriate to do so;
- reviewing its accreditation requirements, membership criteria, CPD expectations and governance against the standards CORU publishes, and making changes where gaps are identified;
- keeping members informed of significant developments through member communications and www.icphaa.ie;
- supporting members to understand and prepare for registration, while making clear that registration decisions are for CORU alone.

> **MEMBERSHIP IS NOT REGISTRATION**
>
> ICPHAA is a voluntary professional association, not a statutory regulator. ICPHAA membership or accreditation is not statutory registration, does not confer CORU registration and cannot guarantee that a member will meet CORU's requirements.

5. Preparing for registration: what members should do now

Members who expect to seek statutory registration are strongly encouraged to take the following steps now, whatever stage of their career they are at.

1. **Gather your qualifications.** Keep certified copies of awards, transcripts and module descriptors for every qualification, with details of the awarding body and the level of each award.
2. **Record your practice.** Keep an accurate, contemporaneous log of client practice, distinguishing supervised training placements from post-qualification practice, and keep any placement confirmations.
3. **Record your supervision.** Keep a log of clinical supervision, including dates, the supervisor's name and qualifications, and confirmation that the supervisor meets ICPHAA's supervisor criteria.
4. **Record your CPD.** Keep evidence of CPD activities, with reflective notes on what you learned and how it changed your practice.
5. **Keep evidence of good standing.** Keep copies of professional indemnity insurance certificates, Garda vetting where it applies, and references.
6. **Follow CORU directly.** Read CORU's published guidance and sign up for its updates, so you see requirements and timelines as soon as they are published.
7. **Talk to your supervisor.** Use supervision to reflect on any gaps between your training or practice and the standards CORU publishes, and plan how to address them.

The requirements for each ICPHAA membership category remain those set out in the ICPHAA accreditation requirements published by the Accreditation Department. Meeting them is a separate matter from meeting CORU's requirements.

If you are unsure whether you will meet CORU's requirements

Some members may find, once CORU's requirements are published, that their training or experience does not match them in every respect. Members in that position are encouraged to plan early: to compare their records carefully with what CORU asks for, to discuss the position with their supervisor, and to consider whether further training or supervised practice would help. ICPHAA will share general information about developments and signpost members to CORU's guidance, but it cannot assess an individual's eligibility for registration or advise on the outcome of an application. Only CORU can do that.

6. Use of professional titles during the transition

Title protection is a central feature of statutory regulation. Members must:

- use only the titles they are entitled to use, and follow CORU's guidance on which titles are protected and from when;
- describe their ICPHAA membership category accurately, using the exact category name awarded (for example, Accredited Member or Accredited Addiction Counsellor);
- never state or imply that ICPHAA membership is statutory registration or that they are registered with CORU unless they actually are;
- update websites, directory listings, social media profiles and marketing materials promptly when their status or the legal position changes.

Misrepresentation of status or titles is a serious matter and may be investigated under the ICPHAA Complaints Procedures and Disciplinary Procedures.

7. Emerging practice: digital practice and artificial intelligence

Online and remote therapy is now a mainstream way of delivering services. It must meet the same ethical, clinical and legal standards as in-person work. Members who work online or by telephone must:

- use secure, encrypted platforms that allow them to meet their data protection obligations;
- assess whether online work is suitable for each client and agree in advance which platform will be used, with its limitations and risks explained;
- agree emergency arrangements at the outset, including the client's location and local sources of urgent help;
- maintain professional boundaries in digital environments, including social media;
- confirm that their professional indemnity insurance covers online and cross-border work.

The use of artificial intelligence (AI) in therapeutic contexts raises significant ethical, clinical and legal questions. Pending fuller guidance, ICPHAA's preliminary principles are that AI must not replace the therapeutic relationship; any use of AI that affects a client must be transparent to that client; client information must not be entered into AI tools unless doing so is lawful, secure and explained to the client; and members remain fully responsible and accountable for every aspect of the care they provide, whatever technology they use. The Digital & Practice Environment Policy sets out detailed expectations.

8. Evidence-informed practice and research

Statutory regulation places weight on practice that is informed by evidence. ICPHAA encourages members to engage with research relevant to their field and to integrate the best available evidence with clinical expertise and the client's own preferences and values. Research involving human participants carried out by members must follow recognised ethical standards, including informed consent, confidentiality, minimisation of harm and review by an appropriate research ethics committee where required. The Research Evidence & Academic Governance Policy gives further guidance.

9. Responsibilities

Members

- Follow CORU's published guidance and timelines, and decide for themselves, with independent advice where needed, whether and when to apply for registration.
- Keep complete and verifiable records of qualifications, practice, supervision and CPD.
- Use titles and describe their status accurately at all times.
- Apply this policy's principles to digital practice and any use of AI.

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- Monitor developments in statutory regulation and inform members of significant changes.
- Review its standards and policies against those CORU publishes.
- Communicate accurately about the relationship between ICPHAA membership and statutory registration.

10. Breaches, concerns and review

Concerns about a member's representation of their status, use of titles or digital practice can be raised with the ICPHAA Registry at admin@icphaa.ie and are handled under the Complaints Procedures and, where relevant, the Fitness to Practise Policy and Disciplinary Procedures.

The ICPHAA Board of Directors owns this policy. Because statutory regulation is developing, the policy is reviewed by the date shown on the cover and promptly whenever CORU publishes requirements or guidance that affect it.

READ ALONGSIDE

- Irish Regulatory Policy
- Regulatory Compliance Policy
- Professional Standards & Accreditation Policy
- Continuing Professional Development (CPD) Policy
- Digital & Practice Environment Policy
- Research Evidence & Academic Governance Policy

DOCUMENT CONTROL

VERSION	DATE	CHANGE	APPROVED BY
1.0	9 November 2026	Reissued in the ICPHAA policy framework (replaces the former ICPA version).	ICPHAA Board of Directors

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