

Professional legitimacy enhanced by a scope of practice

Abstract

Despite being a profession with a long history counselling in Aotearoa New Zealand continues to struggle for professional legitimacy. In this current economic environment social services are perceived to be at the bottom of the medical hierarchy, and hence subject to radical cuts in funding resulting in understaffing and long waiting lists. In contrast to these economic pressures, the demand for counsellors continues to grow in communities with increasingly complex mental health issues. This article advocates for the New Zealand Association of Counsellors (NZAC) to develop a scope of practice, along similar lines to the British Association of Counselling and Psychotherapy (BACP), that would give counselling in Aotearoa the professional legitimacy it deserves to raise the profile of the profession. A scope of practice would give government organisations and the public confidence that counsellors have the education, skills and professional expertise to sit alongside our psychologist colleagues and other health and helping professionals to provide a specialised and essential service.

Keywords

counselling, professional legitimacy, scope of practice, NZAC

The New Zealand Association of Counsellors (NZAC) has begun to investigate a scope of practice, indicated by the former President of NZAC, but has yet to articulate what this might look like to its members (S. Maindonald, personal communication 5 Sept, 2024).

The Medical Council of New Zealand defines a scope of practice as “the defined boundaries and limitations of what a practitioner can do, and what they are legally and ethically permitted to perform” (MCNZ/ registration, n.d. para. 1). This article advocates that in order to advance our profession, a well-designed scope of practice that seeks collaborative consultation from NZAC members, its stakeholders and other interested parties is needed. Taking the time to develop a clear statement of practice that incorporates diversity, bi-cultural and multicultural practice, as well as the range of knowledge and skills that counsellors are equipped with, similar to the British Association of Counsellors and Psychotherapists (BACP), while maintaining the values articulated in the NZAC Code of Ethics (2020), is essential. Protecting members’ practice interests and development will be crucial to ensure individuals’ integrity and the integrity of the profession.

This article explores and proposes a framework based on the essential elements that make up a scope of practice following the BACP framework and argues that the NZAC already has many of those foundational components. As a recent example of managing this process, Te Poari Kaimatai Hinengaro o Aotearoa New Zealand Psychologists Board (NZPB) attempted to refine their scope of practice in 2024 that potentially places restrictions and limitations on the breadth of individuals’ work. This has created tension and confusion within the membership of their professional body. Looking at the parts of that process that caused dissent could help the NZAC avoid potential pitfalls in defining a scope of practice (NZPB, 2024). Lastly, understanding why professional legitimacy for the counselling profession in this country is important while retaining our self-regulation status is discussed.

An NZAC registered counsellor

Counselling in this country is defined by the values articulated in the New Zealand Association of Counsellors' (NZAC) Code of Ethics (2020) with a commitment to Te Titiri o Waitangi at its centre. The nature of counselling in the NZAC Code of Ethics is described as:

Counselling involves the formation of professional relationships based on ethical values and principles. Counsellors seek to assist clients to increase their understanding of themselves and their relationships with others, to develop more resourceful ways of living, and to bring about change in their lives (NZAC, 2020).

The NZAC is the largest professional body representing counsellors in Aotearoa New Zealand. As a self-regulated body, it requires members to abide by the professional and ethical standards specified in the NZAC Code of Ethics (2020), which includes te Tiriti o Waitangi informed practice as specified in the introduction (para 3).

An important function of a professional body is the oversight of safe practice through an established set of standards, systems and processes that hold people to account. This is an essential component of the NZAC that contributes to the public's trust of counselling as a profession but in my view is under promoted and not well understood. Standards of practice, ethics and education are elements of professionalism that help develop counsellors' sense of professional identity and belonging, as well as holding them to account (Evetts, 2014). The NZAC has the foundations for gaining the public's trust and confidence in its registered counsellors if the components of registration are clearly defined and promoted. The public perception of who counsellors are, and the values they uphold, will contribute to building trust with the government, organisations and individuals who depend on counselling services.

There may still be some suspicion about individual counsellors and their professionalism, but the advantage of being registered with NZAC, for counsellors, the profession, and the general public, is that NZAC provides legitimacy for its members. Being a member of NZAC guarantees a level of competency and increasingly there is response to individuals who fail to adhere to appropriate standards of practice rather than the profession of counselling or the integrity of NZAC. When the values and behaviours associated with NZAC, and more specifically the Code of Ethics, are breached, counsellors can be subject to complaints.

NZAC has a robust complaints process, designed to protect both client and counsellor, and a national Ethics Committee to address these (NZAC, n.d.). The consequences of having a complaint upheld by the NZAC has serious implications for any counsellor, as their practising certificate can be withdrawn, and they may be removed from NZAC's list of registered members. In the case of a complaint process with a constructive outcome, the counsellor has an opportunity to learn from the experience and may be required to undertake specific professional development and engage in more supervision.

For some on the journey to provisional or full membership, the accountability requirements may seem unnecessarily restrictive and limiting (Crocket, 2013). Additionally, for those going through an ethics complaint nonadherence to these requirements may seem punitive. Those practitioners who do not belong, are on the verge of belonging, or have been marginalised, may see professional associations as protectionist, exclusive, and acting in ways that are perceived as maintaining power and privilege by adhering to professional standards that preserve their exclusivity (Callaghan, 2014; Came et al., 2018). However, these same standards are also what define us as professional and give us a special and trusted status by those in the community who value our work (Evetts, 2014). The NZAC is there to protect the public, and our clients in particular, from those counsellors who break the rules and act unprofessionally. Practice by people who are not registered with a professional body of counsellors has implications for professionalism and for public safety. A universal registered body for counsellors is unlikely to attract those who currently avoid registration with NZAC, or a similar professional body, and those members who break the rules can be called to account by the association (Crocket, 2013).

Professionalisation in practice

Counselling is continuing the journey towards stronger professionalisation, and counsellors need to recognise that they have an important role to play in maintaining the professional standards set by the Association. Callaghan (2014) warns that belonging to a professional group that requires adherence to standards of practice and professional boundaries, can also confer the status of '*expert*' on individuals, placing them in a privileged position. The notion of counsellors being *the expert* is one that registered counsellors tend to avoid, as academic evidence supports the view that a focus on developing a trusting therapeutic relationship is a

more effective approach than positioning oneself as the expert (Norcross, 2011). The NZAC Code of Ethics (2020) encourage counsellors to work in a holistic way that puts the client at the centre of the counselling process and embraces diversity, social justice, and the wider political and social contexts that shape clients' worldviews, including attending to the principles of Te Tiriti o Waitangi. Working holistically recognises misuse of power, inequality and the continuing colonisation that affects marginalised groups in society (Proctor, 2011). Being client-led acknowledges and respects group and individual differences and recognises the potential for bias and the privilege attached to Western ways of working (Winter et.al, 2016). In this country working with both Māori models of health and wellbeing, as well as Western models offer a more culturally sensitive and accessible approach to the unique perspectives that clients bring (Winter et.al., 2016). Many counsellors in Aotearoa New Zealand are community-based and need to be able to respond to the complex needs of clients in respectful, culturally responsive and professional ways.

Being professional emerges as a way of responding to client needs embodying identified and agreed values and behaviours that underpin practice and contribute to the public's belief that counselling follows safe practice guidelines (Evetts, 2014). The concept of a profession is a contested Western construct (Came, 2018), however Evetts (2014) sees a distinction between professions and other occupations, defining a profession as a role or specialist area of practice, with appropriate educational qualifications and experience. Callaghan (2014) is more specific in proposing that professions are a particular occupational category with specialist education and a focus on providing a service for others, requiring managing uncertainty with those who are therapeutically at risk. This definition requires robust and specialist education to ensure that counsellors are appropriately qualified to work effectively and safely with clients.

Counsellor Education Standards

Over the past 10 years the NZAC has worked hard to influence the standardisation of counsellor education in Aotearoa New Zealand to ensure that the special skills required to be a counsellor are taught consistently to a high level. The NZAC Counsellor Education Committee developed the Counsellor Education Standards framework and accreditation process for counsellor education programmes throughout the country which have been in

place since 2019 (NZAC, n.d.). To be a registered member of the NZAC, counsellors are required to have a minimum of an undergraduate degree or master's qualification from an accredited university, polytechnic or Private Training Establishment (PTE) in Aotearoa New Zealand. These standards discuss obligations to te Tiriti o Waitangi, the counselling profession, requirements for practice, the integration of theory into practice, and include expectations about research and supervision.

Counsellor education programmes are required to be accredited by the NZAC every five years and students graduating from an accredited programme attain provisional membership of the professional body. Accredited counsellor education programmes ensure that their graduates have the specialist educational background combined with the practice skills to significantly contribute to individual, whānau and family wellbeing in schools, social service organisations, workplaces and in the broader community. The NZAC Counsellor Education Standards also require either an introduction to research or engagement in counselling research which can only enrich the profession. The specialist education that is required for counsellors in training, from an NZAC accredited programme, ensures that they are equivalent to other health professionals in registered professions such as social workers, psychotherapists and psychologists whom they work alongside in education settings, hospital and health settings, organisations and government services.

Self-regulation versus registration

Misunderstandings have occurred about counsellors' professionalism under self-regulation versus registration under the Health Practitioners' Competence Assurance Act (2015). A major disadvantage of self-regulation that gives rise to criticism from NZAC members is that the term *counsellor* lacks statutory protection and anyone in Aotearoa New Zealand can call themselves a counsellor (Crocket, 2013). The argument is that by protecting the title of counsellor through registration under the HPCA Act (2020) professional legitimacy is ensured and an elevation of status for the profession in the eyes of the public will follow (Crocket, 2013; Tudor, 2013). However, as Crocket (2013) has argued, if the title of counsellor was protected under the HPCA Act (2020), the practice of counselling would not be, as this practice falls under the scope of practice of other similar professions, such as psychology and social work, who are already registered. Therefore, social workers and

psychologists could still practice counselling as long as they don't call themselves counsellors. The same would apply to those partly qualified or unqualified practitioners who could choose a similar title, develop a glossy website and continue to practice without registration (Crocket, 2013; Tudor, 2013; Webb, 2000). Additionally, registration under the HPCA Act (2020) would involve a long bureaucratic process, without any guarantee of success or benefit, and cost members a lot more money. The debate took centre stage in the public press a few years ago with an article from the Mental Health Commissioner in 2019 and the response from the President of the NZAC, about the professional nature of counselling practice (L'Estrange, 2019). The President of the NZAC at the time made it clear that self-regulation did not mean unprofessional or without standards.

Professional supervision, cultural consultation and professional development

Another element of ongoing professional standards is the requirement for all counsellors, however experienced, to engage in regular professional supervision and cultural consultation which are part of the Counsellor Education Standards expectations, as well as being a requirement for NZAC membership and registration (NZAC, n.d.). Career-long supervision and regular professional development, set against specific competencies, is an important risk-management strategy, which supports the safety of both clients and practitioners in the helping professions. Both professional supervision and cultural consultation also play a significant role in practitioner wellbeing and building and maintaining practitioner resilience (Adamson et al., 2014; Beddoe, 2017). Supervision is useful as a sounding board to reflect on practice and to work through challenging situations, as well as being an opportunity for ongoing learning (Davys & Beddoe, 2020). Similarly, regular engagement in cultural consultation is part of NZAC's commitment to te Tiriti o Waitangi, as well as to being effective with clients of other ethnicities, aims to assist counsellors to work in culturally responsive ways (NZAC, n.d.). In training and once registered with NZAC or NZCCA, all members are required to have regular professional supervision, cultural consultation when needed, and engage in regular professional development which is assessed as part of the annual registration requirements (NZAC, n.d.).

To become a Provisional Member of the NZAC can take between two and four years and the journey to full membership another two to five years. It is a long and expensive journey, as it can be for many allied professions. NZAC's Counsellor Education Standards sit alongside standards of practice represented in the Code of Ethics, supervision and professional development as well as NZAC's requirements for full Membership. The process of registration is rigorous, and it is crucial that the public is made aware of the standard to which our counsellors are qualified and the commitment that is involved. NZAC registered counsellors are professional and worthy of recognition. Retaining registration is an annual exercise requiring a fee for membership renewal but also achieving and reflecting on professional development goals which are signed off by the counsellor's supervisor. This process is not just about client safety, although this too is paramount, but ensures counsellors are kept up to date, are continually reflecting on practice and growing and developing as lifelong learners.

Given the criteria above, counsellors who are registered with NZAC can legitimately describe counselling as a profession, develop a sense of professional identity throughout their counsellor education, and on attaining Provisional and then full Membership of NZAC, can see themselves as competent professionals worthy of government service, organisations and the public's trust.

To increase public awareness and foster trust in counselling services in this country, the NZAC faces the challenge of breaking down the public's perception that a registered profession is more accountable and safer than a self-regulated one. The BACP faced a similar challenge in Britain and successfully developed a scope of practice to assist with raising its profile and building trust with government services and the community. The specifics of the BACP's approach may or may not suit NZAC but it could provide a framework or a starting point to develop professional legitimacy for counselling in Aotearoa New Zealand.

Defining a Scope of Practice

Being able to hold people to account professionally is one of the cornerstones of the British Association of Counsellors and Psychotherapists' (BACP) scope of practice. Government and other organisations are often risk adverse when forming contracts with external parties (Laurensen Elder, 2023). Therefore, a professional body that has a standard of practice and a means of holding counselling professionals to account, while not a guarantee of safe practice, does provide a sense of security that safe practice is the standard and there is right of redress if standards are not adhered to. Consequently, government contracts were able to be forged with the BACP whose scope of practice included transparent ethical standards and guidelines while still retaining its self-regulated status.

A comparison between the New Zealand Psychologists Board (NZPB) and the BACP's approach to defining a scope of practice will endeavour to draw out lessons for NZAC. The BACP retains its self-regulated status which NZAC has modelled in its own regulatory framework. Rather than going down the problematic, and expensive registration pathway travelled by our psychotherapy, psychology (HPCA, 2020) and social work colleagues registered with the Social Work Registration Board (SWRB, 2019), NZAC members voted to embrace the professional independence offered through self-regulation and the opportunity to hold to the values and bi-cultural focus stated in the NZAC Code of Ethics.

The NZAC, like the BACP, currently has the delegated authority and autonomy to create and enforce its own policies, practice standards and ethical codes for self-regulation (Evetts, 2014). The processes and frameworks in place provide oversight of practice in broad terms, through the NZAC's rigorous membership criteria, Counsellor Education Standards, Code of Ethics and complaints processes. This allows the NZAC to retain its independence and autonomy and hold true to its members' values without compromise. However, these efforts alone do not seem to be enough to establish the public profile needed to secure consistent work in government organisations. An example of this was the time taken and lengthy discussions between NZAC and Te Whata Ora to secure work for counsellors in hospitals throughout the country.

Defining a scope of practice has been a significant part of the BACP's efforts to raise its public profile and establish further credibility with government and private organisations in the United Kingdom (UK). In Aotearoa New Zealand other professional bodies, such as psychologists, have also attempted to do this but with limited success. The distinction it seems is that the BACP have established a scope of practice for the professional body rather than confining or defining the roles of its individual members as the NZPB attempted to do with psychologists. The differences between the BACP and the Association of Psychologists approach highlights the need for NZAC to think carefully about their values and what they need to protect or give away in this process of developing a scope of practice.

The Health & Care Professions Council (HCPC) in the UK defines a scope as:

“... the limit of your knowledge, skills and experience and is made up of the activities you carry out within your professional role” (<https://www.hcpc-uk.org>).

The BACP and five other UK based professionally accredited bodies across counselling and psychotherapy, have together developed the SCoPED (Scope of Practice and Education) to describe a shared standards framework. The framework sets out core education, practice and competency requirements for counsellors working with adults (BACP), therefore defining the scope and limits of counselling practice within that framework. In the development of SCoPED the collaboration recognised the need to account for and celebrate the diversity of counsellors working in different ways with diverse clients in communities with complex needs. The focus of the framework was to set relevant standards for the profession that provided transparency and clarity about the skills, education and experience that is required to become a counsellor, rather than limiting individual counsellors to one restricted scope of practice based on their perceived skills set and area of work (SCoPED 2022).

SCoPED enabled members of the public, organisations and services that BACP counsellors are engaged with, to trust that they are competent and safe practitioners. BACP highlighted that they are a professional body with high standards and a complaint process that is designed to protect clients, employers and the community against unsafe or unethical practice. Their scope of practice articulates and maintains the standards for the profession as well as helping build trust in its members, without compromising its values or self-regulation status.

BACP's SCoPED (2022) was set up by six similar professional counselling and psychotherapy bodies with a shared vision for working in partnership with government and other organisations providing counselling contracts. This approach may or may not be part of the vision for the NZAC, which is already established as the largest counselling association in a much smaller country than the UK. The foundational elements of the BACP groups' shared professional purpose provided the beginning of a framework of practice which articulated a collaborative vision for working with adults in the community. Collectively all the counselling partners wanted to be "*better understood, valued and trusted*" by government and the public (BACP SCoPED Framework, January 2022). To advance the counselling and psychotherapy profession, the SCoPED Framework included clear information on standards of practice and competence, and information on the training required to collectively meet the increasing demands of mental health needs in the UK. The purpose of SCoPED was to gain work, via large government contracts that BACP members may have previously missed out on due to misunderstandings, mistrust, or lack of information about the counselling profession in the past. The BACP SCoPED framework represents over 75,000 counsellors and has developed some very clear strategic objectives which are transparent and available on their website (SCoPED, 2022.). It is governed by an oversight committee consisting of the Chief Executive Officers of each of the partner organisations represented and headed by an independent chair. The Committee meets regularly to ensure that the work of SCoPED continues to meet the standards that are publicly available on the website.

The SCoPED (2022) document is divided into two parts:

Part 1: Training and practice requirements which include:

- A Code of Ethics
- Education standards
- Professional development guidelines
- Endorsements through additional study and professional development
- Practice hours
- Expectations around supervision

Part 2: Core competencies

- Core competencies for safe practice at different stages of the practice journey, i.e. student, provisional and full members. These are colour coded to reflect the developmental journey.

SCoPEd (2022) is written and framed in a way that stakeholder organisations can understand and refer to when recruiting counsellors. The document ensures that government organisations, service providers and the public are making an informed choice when they choose a counsellor affiliated with any of the SCoPEd partners. BACP have recently made changes to their original document that puts greater emphasis on the importance of the therapeutic alliance, acknowledging diversity and ensuring the language of the document reflects those values (SCoPEd, 2025.). Therefore, SCoPEd is a dynamic, rather than a static document set in stone, and it needs to be revisited regularly to ensure it meets the needs of the community it serves (SCoPEd, 2025).

Recommendations

The purpose of this article is not to suggest that the NZAC go into partnership with other similar registered or unregistered professional bodies. Working with other organisations would have both benefits and disadvantages and would be a time consuming and lengthy process to reach common ground. Rather, this article is suggesting that NZAC could develop and publicise its own SCoPEd framework relatively easily based on what it already has in place. The challenge would be to ensure that the website is easily accessible to outside parties, is up to date, and the material provided, and the language used are consistent and clear without jargon. The website would need to reflect the same level of consistency throughout, and individual registered counsellors would need to be listed on the website and their contact details easily accessible to the public.

A scope of practice developed by the NZAC for registered members would reflect the values of the profession of counselling in Aotearoa New Zealand without compromise. A well-defined and succinctly packaged scope of practice could advance NZAC as a profession and provide further legitimacy to the profession of counselling without being overly prescriptive (Dower, et al., 2013). Being able to promote NZAC registered counsellors with a scope of practice, to various government agencies, service providers and organisations, could help the public understand what counsellors do, appreciate the journey involved in registration, and build confidence that an NZAC registered counsellor is a trusted and experienced practitioner.

However, a note of caution is required following the recent experience of the New Zealand Psychologists Board (NZPB) who are seeking to make changes to their already-established scopes of practice. Registered professions like psychology, and psychotherapy under the HPCA Act (2003), and social workers registered with the SWRB, (2019) are required to develop a scope of practice. The NZPB are now proposing changes to that original framework. A recent analysis of the feedback from NZPB members about the changes could provide a useful guide to NZAC about what not to do in this process (NZPB, 2024).

What can be learned from the NZPB process

In 2023 the NZPB proposed a change to the Scopes of Practice set for psychologists in 2003 (HPCA, 2003). According to the NZPB website psychologists are required, ethically and legally, to be suitably qualified and experienced to practice within a particular Scope. Each Scope has a unique focus and is defined by the title of the role, the qualification and the hours of supervised practice required under the Act (HPCA, 2003). Originally the NZPB had a disclaimer on its website that scopes of practice generally defined the title of the role, for example psychologist or clinical psychologist, but not did not limit tasks under that title provided the psychologist was competent to perform those tasks. This disclaimer was removed in 2018 causing some confusion about boundaries of the roles.

In 2023, to provide further clarity and ensure practitioner competency, the NZPB proposed adding specific endorsements to each Scope, which meant there was no longer overlap between Scopes and each Scope was more clearly defined. Unfortunately, many psychologists' practices, like that of counsellors, covers a broad range of duties in multidisciplinary teams where flexibility is required to work alongside and support colleagues with different expertise. Additionally, clients present with complex issues requiring a flexible response that may involve other professionals, as well as different members of the family or community. The new endorsements potentially limited specific activities and job-related tasks to only one scope, such as undertaking a psychological or behavioural assessment, or working with kaupapa Māori approaches. Psychologists can legally only practice within the limits of the scope and associated endorsements that define their roles and therefore would be unable to undertake work associated within a broader organisational context if it required engaging in tasks outside the definition of that Scope. The limits and restrictions potentially meant that some psychologists could miss out on employment opportunities or couldn't complete their work due to the limitations enforced by the new endorsements and guidelines. The ethical and legal implications for working out of scope created by the HPCA (2003) was very anxiety-provoking for NZPB members. The new scopes were seen as overwhelmingly restrictive (NZPB, 2024).

Following a limited period of consultation over the Christmas and New Year period in 2024, feedback about the proposed changes was overwhelmingly negative (NZPB, 2024). Although

the period for consultation was extended following feedback, because the NZPB had provided little justification for the restrictive changes, psychologists continued to feel uncertain and negative. Amongst the lengthy feedback from registered psychologists two other themes stood out: assumptions were made that to do work that required a specific focus, such as undertaking and writing up assessments, you needed a specialist scope of practice, in addition to the more general scope gained through current practice requirements. Not only would this be limiting but it was unclear who would provide the additional university training for specific specialist scopes. Additionally, the lack of cultural responsiveness across scopes was also noted (NZPB, 2024).

An important lesson learned from the NZPB experience is that, if they were to decide to do so, it would be difficult for NZAC to frame specific Scopes of practice that would consider the range (breadth and depth) of all the areas that counsellors work in. Specific endorsements that encourage counsellors or psychologists to develop competency are valuable and important to ensure practitioners remain up-to-date and meet the requirements of a particular workplace and client group (NZPB, 6th December, 2023). However, these endorsements can be connected to annual competency and professional development or work-based training rather than confining them to a specific Scope that potentially limits and restricts holistic, culturally responsive practice. Additionally, creating Scopes of this nature could potentially privilege some counsellors over others, causing confusion and creating the type of protectionist and exclusive profession that Callaghan (2014) referred to above. This approach could inadvertently exclude NZAC's own members who are unable or unwilling to meet the extra endorsement criteria or engage in further education. On the other hand, professional endorsements of practice, such as mental health assessments, providing supervision, or working with addictions or trauma, could provide additional useful criteria for entry into a field of work. This approach could support employment opportunities for counsellors that could give employers and the public confidence in their practice. However, such endorsements and educational opportunities should be open to all interested counsellors rather than only those within a defined Scope, as considered by the NZPB.

Counsellors typically grow in practice and experience and may change their field of interest following graduation and Provisional Membership. Being confined to a specific way of

working within a particular field of practice could be limiting, denying opportunities for further growth and development out of scope. This confined approach may also create the feeling of being an ‘expert’ within a limited area of practice and encourage people to work above their level of competency, which in turn could generate complaints to the Ethics committee. Metcalf (2011) defines competence as a combination of knowledge, skill and diligence. The NZAC Code of Ethics (2020) specifically says that counsellors need to work within the limits of their training, knowledge and experience. Ultimately, this is about personal judgement combined with good supervision. It is the counsellor’s responsibility to be honest about the limits of their training, experience and knowledge (Metcalf, 2011). There is a danger to the public of counsellors promoting themselves as an expert because they have an additional certificate or have undergone specialist training that endorses one way of working at the expense of effective counselling practice which is a combination of having the knowledge, skills and experience to meet the needs of the client, build effective, trusting relationships and be a culturally responsive practitioner.

An alternative New Zealand Government regulatory framework

The New Zealand Government is proposing an alternative regulatory system which would put regulated and self-regulated health care professionals into three clearer categories that would make it easier for the public to navigate. This would also provide an opportunity for counselling to be accredited alongside their regulated colleagues. Whether this is an example of the emperor’s new clothes or a genuine opportunity, this new system would presumably ensure that counselling would have equal status with other like professions rather than being perceived to be at the bottom of the medical hierarchy because they are unregistered.

Government accreditation would enable the counselling profession to carry out regulatory functions with government oversight. This new form of accreditation could provide a compromise between the current registration under the HPC Act (2020) and self-regulation.

The government’s purpose is to streamline access to health services, including counsellors, without compromising patient/client safety (Putting Patients First, 2025). Public consultation about the government’s document suggests that people find it confusing when trying to access individually registered professionals. There are currently 18 regulated professional

bodies in this country which is more than Australia or the UK. The government's aim appears to be to achieve patient-centred regulation rather than regulation that serves the profession. Their view is that regulated professions create unnecessary costs and inefficiencies due to fees funded by the profession it regulates and requires an overly bureaucratic process to meet the regulations (Putting Patients First, 2025). Because the NZAC is self-regulated it sets its own membership fees based on the costs required to run the association. Were it to be regulated, additional fees would be required to pay the costs needed to set up a regulatory board.

However, accreditation with government oversight could mean that it is an independent person or board who agrees to and endorses competency assessments, standards of practice and qualifications required for being a counsellor. The challenge for the counselling profession, if agreeing to this form of regulation, would be to ensure that our standards are maintained and not dumbed down by those who think of counselling as a lesser profession than psychotherapy or psychology. This raises two important questions (or two pathways?): Should the government have the right to establish or streamline professional competencies as they see fit, or should this be the professions' responsibility?

Another aspect of the government's proposal worth considering is that mandating cultural requirements are seen as an optional extra, an either/or, or a barrier to providing the best healthcare to all groups in society rather than acknowledging equity and diversity in a bicultural and multicultural environment. The NZAC would need to stand firm to ensure that counsellors retain a holistic and culturally responsive approach, aligned with Te Tiriti led practice, that reflects the needs of the community rather than responding to a government directive with a different agenda.

Conclusion

Professional bodies offer practitioners a place to belong, to connect and to be part of something meaningful and bigger than themselves. More importantly professional bodies have a responsibility to hold their members to account, facilitate safe practice guidelines and protect the public. This article proposes that ... Developing a well-considered scope of practice for the organisation would clearly define what a counsellor registered with NZAC is and include the requirements needed for membership and registration, that would engender public confidence.

In addition, a well-thought-out scope of practice could assist with the promotion of counselling in the community and facilitate public understanding about the profession. A scope of practice based on the BACP framework could include already established standards of practice represented in the NZAC Code of Ethics, NZAC's requirements for provisional and full membership of the association, comprehensive education standards, regular professional supervision and cultural consultation. Annual registration renewal and professional development that sit alongside robust competency requirements would also be an essential part of the scope of practice. Developed by the NZAC this scope of practice would ensure an intentional approach to partnership with Māori with a focus on strengthening cultural responsiveness in practice. Additions to this scope may also include a registered list of practitioners available to the public on an accessible website and possible endorsements to current practice that may involve postgraduate training or a specific specialisation available to all members.

A well thought out and published scope of practice will help the public distinguish between those counsellors who are registered, and those who have no or incomplete qualifications who are promoting themselves as fully qualified counsellors. Practitioners who are not registered with the NZAC or a similar professional body working within scope cannot claim to be trustworthy counsellors working to the same professional standards. A scope of practice is a way of promoting and enhancing the value of registered counsellors. It ensures that the public understands the education and practice requirements involved in becoming a counsellor, the training and developmental pathways that lead to counselling competence,

and recognises the importance of standards of practice and ethics, and the right of redress through a formal complaints process. These elements ensure that counselling is seen as a trusted and valued profession.

Standards of practice are no guarantee that all counsellors will act professionally and there will inevitably be some suspicion about individual counsellors and their professionalism, but increasingly this is about the individuals rather than the profession of counselling or the NZAC. Counselling is continuing the journey towards stronger professionalisation, but counsellors need to recognise that they all have an important role in maintaining professional standards. It seems unlikely that registration would make any difference to the perception of counsellor's professionalism. What will make a difference is how counsellors are perceived by the public, and that can be enhanced by presenting what they do in a professional way with a clearly defined scope of practice.

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