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E: PROREGADMIN@gov.bc.ca

Dear Minister of Health,

RE: Feedback on a proposal to designate “psychotherapy” as a health profession under the Health Professions Act (HPA)

Thank you for this opportunity to consult on the proposed regulation of psychotherapy. As a regulated profession under the Social Workers Act, registered social workers (RSWs) and registered clinical social workers (RCSWs) already may practice psychotherapy. In addition, those with RCSW designation may provide mental health diagnoses.

Briefly, our position is that psychotherapy should be regulated and that as a regulated profession, social workers would be exempted from the requirements of this Act and would not require further regulation.

The BC Association of Social Workers is a voluntary, not-for-profit membership association that supports and promotes the profession of social work and advocates for social justice. BCASW has members throughout the province. The greatest number of members work in medical settings, mental health, and substance use services, and in private counselling and psychotherapy practices. Members serve on committees and communities of practice including Health Advocacy, Anti-Racism and Cultural Advocacy, Indigenous Social Work Practice, Child and Youth, Seniors Issues, Mental Health and Substance Use, and Sexual and Gender Diversity.

We are in favour of the BC government regulating psychotherapy (protection of the public interest) and generally in support of BC developing regulation following Ontario’s lead in enacting the *Psychotherapy Act, 2007* with corresponding amendments to the *Ontario Regulated Health Professions Act*. “(Registered) Psychotherapist” became a protected title, and, “psychotherapy” became a controlled activity that only registrants of six specified colleges may legally perform, including the Ontario College of Social Workers and Social Services Workers. In Ontario, RSWs are authorized to use the title and perform the controlled activity provided they use the title “Psychotherapist” as an extension of their existing title.

We support the government recognizing that registered social workers (RSWs) and registered clinical social workers (RCSWs) conduct psychotherapy. In the [BCCSW Standards of Practice \(Revision Nov 2009; First Ed Sep 2002\)](#), psychotherapy is included as a form of social work intervention. The Standards (pp. 32-33) define counselling services, social work diagnosis, DSM diagnosis and intervention, and psychotherapy service.

We support the government exempting RSWs and RCSWs from registering with any new profession under any college or requiring RSWs and RCSWs to undertake additional training or be subject to further standards other than those of the BC College of Social Workers. The BCCSW has developed a code of ethics, standards of practice, committee structure, investigations, and discipline. RSWs and RCSWs meet educational requirements, pass an entrance exam and RCSW exam, and the BCCSW sets standards for continuing professional development and practice. Social work practitioners of psychotherapy are already regulated.

We support the government consulting further with professions regarding specific regulations and look forward to discussing initiatives geared to protecting the public by the regulation of professional practice.

Thank you again for the opportunity to participate in this process.

Sincerely,



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We acknowledge that our office is in the unceded territory of the Coast Salish Peoples, including the territories of the x̣ẉməθḳẉəỵəm (Musqueam), Sḳwx̣ẉú7mesh (Squamish), and səliwətəʔ (Tsleil-Waututh) Nations and that our members live and work in unceded territories across British Columbia. We acknowledge territory and Indigenous Peoples and commit to genuine and ongoing work to forge real understanding, and to challenge the legacies of colonialism. We respect the histories, languages, and cultures of First Nations, Métis, Inuit, and all First Peoples, whose presence continues to enrich our vibrant communities.