

Working as a psychotherapist in Europe

While challenges remain, Tom Warnecke explains that it is becoming easier for UK psychotherapists to work in Europe

An increasing number of psychotherapists migrate between European countries, but getting to grips with variations in psychotherapy regulation across Europe can be confusing. So far, ten countries out of 27 have established some form of statutory regulation for psychotherapy. Some of them (Germany, Italy, Sweden, Netherlands) have restricted the practice of psychotherapy to psychologists and medical doctors. Others (Austria, Finland, Romania) have established legal frameworks that recognise psychotherapy as an independent profession. And efforts are being made to make it easier for psychotherapists to migrate or work temporarily in other EU countries.

A legal framework for professional migration

Freedom of movement and the right to work anywhere in Europe is a key EU objective. If you move to another EU country or work there temporarily the European Commission's (EC) Professional Qualifications Directive 2005/36 will apply. This directive consolidated and modernised the rules for recognition of professional qualifications in EU countries and introduced rules that

allow you to practise your profession on a temporary basis in another EU country.

The directive created the 'general system', a legal framework that permits unrestricted professional movement for some 800 regulated professions in Europe. It also requires EU countries to provide procedures to facilitate this.

The general system

How does the general system work? Your application for recognition will be examined by the relevant national authority. Usually, if you are qualified to practise a profession in your home country and apply to have your qualifications recognised in order to practise in the host country, your qualifications will be recognised as they stand. Only when there are substantial differences between the training undertaken by the migrant and that required by the host country can the host country demand that the practitioner compensates for these differences by undertaking a test or an adaptation period of supervised practice.

There is one exception. The general system does not apply if the country you wish to work in does not recognise psychotherapy or psychotherapeutic counselling as an independent profession but restricts its clinical practice to another profession, such as psychiatry. In such circumstances, the European Certificate for Psychotherapy (ECP) is your best hope of establishing your right to practise. More on the ECP later. Psychotherapeutic counsellors can utilise the European Certificate in Counselling awarded by the European Association for Counselling (<http://www.eac.eu.com>).

I want to practise in another EU country – what do I do?

Psychotherapy and psychotherapeutic counselling come under the general system. Whether you are considering moving abroad or working there temporarily, your first point

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of call should be the EC contact point in your host country, which gives up-to-date information about a country's procedures. Contact points are listed at http://ec.europa.eu/internal_market/qualifications/contactpoints. The EU's Citizens' Signpost Service (http://ec.europa.eu/citizensrights/front_end/index_en.htm) may also be able to advise.

The general system is applicable to EU countries where psychotherapy is regulated. There is no requirement to apply for recognition of your professional qualifications if psychotherapy is not regulated in the country you wish to work in. You can practise there subject to the same conditions as native practitioners and apply for recognition by the national professional body (such as UKCP).

If your host country has established some form of statutory regulation for psychotherapy or psychotherapeutic counselling, you will need to apply to the relevant authority there to recognise your qualifications. They will compare the professional training you have received with that required by them. If they find that there are significant differences in terms of either length or content they may make recognition conditional on your fulfilment of additional requirements.

Training and experience

When making the comparison, the national authority must also take into account periods of training and/or professional



Tom Warnecke

Vice Chair
(Information and Member Services)

experience completed after you obtained your initial qualification. They may regard that training and/or experience as making up, in full or in part, for what they consider to be deficiencies in your initial training. If they establish that there are major differences between the professional qualifications you have obtained and those they require, you may be asked to provide proof of practising psychotherapy in your home country, to complete an adaptation period (practice under supervision, usually for six months) or to take an aptitude test for the specific issues where a training disparity has been identified.

Only one of these requirements may be imposed. Normally, proof of additional professional experience would be required if your professional training was at least one year shorter than that required by the host country. You may be required to complete an adaptation period or an aptitude test if there are significant differences in the content of your training and that required in the host country or in the range of activities covered by the profession.

The national authority must reach a decision within four months of receiving your application. They must state reasons for their decision and you have right of appeal. The EC provides detailed guidance at http://ec.europa.eu/internal_market/qualifications/general-system_guides_en.htm, also available from the UKCP office.

Once your application is approved, you will have the same rights, opportunities and obligations as psychotherapists or psychotherapeutic counsellors in your host country.

Temporary and occasional work

The directive also introduced rules that permit members of regulated professions in one EU country to provide services in another without being subject to a procedure for recognising their qualifications. However, the host country may impose certain formalities, such as annual renewal with a national authority, provision of documents supporting the initial declaration or automatic temporary registration to a professional body.

For professions with public health or safety implications, host countries may retain the right to request verification of qualifications before the initial provision of services. They may also require practitioners to be

The Strasbourg Declaration

1. Psychotherapy is an independent scientific discipline, the practice of which represents an independent and free profession.
2. Training in psychotherapy takes place at an advanced, qualified and scientific level.
3. The multiplicity of psychotherapeutic methods is assured and guaranteed.
4. A full psychotherapeutic training covers theory, self-experience, and practice under supervision. Adequate knowledge of various psychotherapeutic processes is acquired.

subject to a national code of conduct. This covers matters such as the definition of the profession, use of titles and disciplinary provisions. They may also check with the native country that the practitioner has not been subject to disciplinary or penal sanctions. The EC's contact points can provide you with up-to-date information.

European Certificate of Psychotherapy (ECP)

The Strasbourg Declaration, signed initially by representatives from 14 countries in 1990, gave birth to the European Association for Psychotherapy (EAP) and led to the creation of the ECP and a European register for certified practitioners (www.europsyche.org).

EAP, founded in 1991 by several national European psychotherapy organisations, brings together nearly 200 organisations from 40 European countries and represents over 120,000 psychotherapists. The ECP was created as a pan-European qualification for psychotherapy that would enable mobility across Europe for psychotherapists.

The ECP is awarded to practitioners who complete accredited training and who are committed to professional and ethical standards consistent with those of EAP. UKCP is the national awarding organisation in the UK and facilitates the ECP application process for UK residents (application forms are available from our website or from the office).

Professional mobility and the ECP

The ECP supports psychotherapists in countries where psychotherapy is not recognised as an independent profession and where the practice of psychotherapy is restricted. It is recognised by all national professional bodies in EAP. While still quite a 'young' qualification, the ECP continues to develop its influence.

The ECP won its first landmark legal battle with the Lanthaler case in Italy.

Heinrich Lanthaler trained and registered as a psychotherapist in Austria and was awarded the ECP there. In 2002, he moved to Italy and applied for registration as a psychotherapist. Psychotherapy in Italy is provided by psychiatrists and psychologists. Psychotherapy is regulated by the Ministry of Justice and registers are maintained by national and regional chambers of Italian psychologists. Lanthaler's application was refused and he decided to take his case to the courts. In 2008, after six years and numerous court verdicts in his favour, Lanthaler made legal history. The Italian government was forced to scrap a national law that contravened European legislation and the chambers of Italian psychologists were told to register Lanthaler as a psychotherapist in Italy. Two more psychotherapists have since followed Lanthaler's lead and achieved registration in Italy. The success in Italy has been replicated in Germany. In September 2010, another registered psychotherapist and holder of the ECP from Austria was accepted onto the notoriously restrictive German psychotherapy register to practise in Berlin.

It is hoped that the common standard created by the ECP will influence future psychotherapy legislation. This is already the case in Romania, which created psychotherapy legislation based on the Strasbourg Declaration and the ECP standard.

UKCP organisational members also have the option to apply to EAP to join the growing list of European Accredited Psychotherapy Training Institutes (EAPTI). All students of the institute who complete the accredited training course automatically become eligible for the ECP when they graduate.

Professional migration poses many challenges for practitioners but in most cases the EC directive and the ECP will continue to make this easier. **P**