



Member of the World Council for Psychotherapy (WCP)
NGO with consultative status to the Council of Europe

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To: Republic of Serbia Parliament

This letter is sent to you by the **European Association for Psychotherapy (EAP)**, a leading European organization for psychotherapy and a Non-Governmental Organisation with consultative status at the Council of Europe. The EAP brings together member organizations from 43 European countries, both EU and non-EU, and works to ensure that high-quality, accredited psychotherapy is available to those who need it across these countries (www.europsyche.org).

We draw your attention to a significant risk in the current legislative approach related to the regulation of psychotherapy in the Republic of Serbia. In particular, the current approach risk that psychotherapy may be treated primarily as a specialization of other professions rather than recognized as a distinct professional field with its own competencies, responsibilities, and training requirements. Without distinct recognition, Serbia risks creating a regulatory framework that is incompatible with European standards and harmful to its own citizens.

For these reasons, the EAP recommends that the **Savez društava psihoterapeuta Srbije**, as the EAP National Umbrella Organization in Serbia, be formally involved as an expert partner in the drafting, consultation, and amendment of legislation relating to psychotherapy and mental and emotional healthcare in the Republic of Serbia.

Key Points:

- **Professional Identity:** Psychotherapy requires specific, complex competencies (relational and process-based) that differ from medical or psychological training.
- **Training Standards:** EAP standards require a Master's level equivalent (EQF Level 7) with a minimum of **3,200 hours** of training over seven years. This is not a specialization of other professions.
- **Patient Safety:** Independent regulation is essential to prevent classification errors in legislation that lead to inadequate training and potential patient harm.
- **European Alignment:** Distinct recognition aligns with the ESCO and ISCO-08 frameworks and facilitates the freedom of movement for practitioners under Directive 2005/36/EC.
- **Recommendation:** The EAP urges the formal involvement of the **the Savez društava psihoterapeuta Srbije** as an expert partner in drafting this legislation to ensure it meets international quality and safety benchmarks.



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Psychotherapy is an independent profession with specific and complex clinical competencies. Psychotherapists cannot be defined by prior qualifications in psychology or medicine alone — a psychology or medical degree, even combined with limited technique-specific training, does not produce the competencies necessary for ethical and safe practice. Psychotherapy education must be specifically designed for psychotherapeutic work.

Inadequate training in psychotherapy leads to concrete risks: misapplied interventions, ineffective treatment, dependency, boundary violations, and emotional destabilization. Independent professional regulation is therefore essential to ensure patient safety and quality of care — psychotherapy conducted by improperly trained practitioners causes measurable harm.

EAP training standards require a **minimum of 3,200 hours** over seven years, situated at **EQF Level 7**. The first three years comprise a relevant university degree — recognizing that social sciences, not only psychology, constitute appropriate entry routes. This is followed by **at least four years** of specialized psychotherapy training, including personal therapeutic experience, theoretical study, supervised clinical practice, and professional placement. Successful completion leads to the **European Certificate of Psychotherapy (ECP)**.

Evidence from regulatory policy across EU Member States demonstrates a consistent pattern: when a profession is subsumed under another, regulatory frameworks default to the parent profession's competency model, systematically neglecting the actual core functions performed in practice. This constitutes a classification error in regulatory design — comparable to regulating nurses as a subspecialisation of physicians. Both work in healthcare, but their competencies and responsibilities are fundamentally different. When psychotherapy is classified as a branch of psychology or medicine, essential competencies in relational safety, boundary management, and therapeutic process integrity are systematically overlooked.

The European Skills, Competences, Qualifications and Occupations framework (**ESCO**) recognizes **Psychotherapist** as a distinct occupation with its own competence profile. This recognition is consistent with the International Standard Classification of Occupations (**ISCO-08, Unit Group 2634**), which identifies psychotherapists separately from psychologists and medical doctors.

Regulatory frameworks that assimilate psychotherapy into other professions create inconsistency with **Directive 2005/36/EC** on Recognition of Professional Qualifications, which facilitates mobility based on comparable training standards. Such confusion hinders freedom of movement for an estimated 120,000 practitioners across Europe. The EAP's 2021 submission of a **Common Training Framework (CTF)** proposal to the European Commission under this Directive demonstrates that the profession already possesses the coherence required for European-wide recognition.

As Serbia advances in its EU accession process, alignment of professional regulatory frameworks with EU standards is both a practical necessity and a demonstration of legislative maturity. Recognising psychotherapy as a distinct profession in line with ESCO, ISCO-08, and Directive 2005/36/EC would position Serbia's mental health legislation among the most advanced in Europe.



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Countries including Austria, Germany, Malta, Croatia, Finland, Italy, Luxembourg, the Netherlands, Poland, and Sweden have established legal frameworks recognizing psychotherapy as a profession with defined standards. These frameworks have contributed to improved clarity of practice and quality assurance, responding to growing public demand for accessible, regulated psychotherapy.

Psychotherapy is a cross-sectoral profession and should not be confined exclusively to healthcare legislation. Psychotherapists working within social services, education, justice, or other sectors should also be included within any legislative framework. The EAP recommends that legislation explicitly defines the educational requirements for psychotherapy as well as the conditions for practicing psychotherapeutic activities.

International evidence consistently demonstrates that investment in psychotherapy generates measurable economic returns. A WHO-led analysis published in *The Lancet Psychiatry* (Chisholm et al., 2016) found that every US\$1 invested in treating depression and anxiety yields US\$4 in improved health and workforce productivity. The OECD and European Commission estimate that mental ill-health costs EU Member States over €600 billion annually — more than 4% of GDP — through healthcare expenditure, disability benefits, and lost productivity (*Health at a Glance: Europe, 2018*). The United Kingdom's Improving Access to Psychological Therapies (IAPT) program, developed on the basis of economic modelling by the London School of Economics (Layard & Clark, 2015), has demonstrated that psychotherapy effectively pays for itself: savings in reduced disability claims and increased tax revenue offset treatment costs, while patients with chronic physical conditions who receive psychotherapy show a 20% reduction in hospital admissions. The OECD's most recent analysis (*Mental Health Promotion and Prevention, 2025*) confirmed that scaling up access to structured psychological therapy is cost-effective or cost-saving in every country modelled.

The vision of the European Association for Psychotherapy is of a Europe in which emotional and mental wellbeing are recognized as fundamental human concerns. The EAP offers its expertise, experience, and knowledge to support Serbia in developing an effective psychotherapy law that contributes to an integrated, multidisciplinary approach to mental health, in which each profession contributes its specific expertise to the wellbeing of citizens.

With cordial greetings,

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