

BRITISH GESTALT JOURNAL

Edited by
Christine Stevens, PhD

Autumn 2024: 33.2

**Karen Horney: trailblazer
and Gestalt inspiration**

Katy Wakelin

**The enduring
enchantment of
Erving Polster**

Dora Darvasi

**Relating in a refugee
setting**

Adamantia-Georgia Kotsoglanidi

**Becoming a person
through dialogue**

Friedemann Schulz

An Origin Story: Part Two

Eamonn Marshall

Expelling a trainee

Ekkehard Tenschert

ISSN 0961 - 771X

Enquiries

Address for all correspondence:

British Gestalt Journal
Malvern House
41 Mapperley Road
Nottingham
NG3 5AQ
United Kingdom

Editorial:

editor@britishgestaltjournal.com
+44 (0)7826 915161

Subscriptions and Sales:

admin@britishgestaltjournal.com

Website:

britishgestaltjournal.com

Copyright belongs to Gestalt Publishing Ltd. and material may only be reproduced in other publications after obtaining written permission of the Editor. Production of single copies for personal use is permitted.

British Gestalt Journal is published by Gestalt Publishing Limited (Directors: Angela Barrows (Chair), Christine Stevens (Editor), Chris O'Malley (Secretary), Rehana Begum, Michael Ellis, Marie Willaume, Christine Whaite).

Gestalt Publishing Limited, Registered Office:

72 Livingstone Road
Kings Heath
Birmingham
B14 6DN
United Kingdom

Company registered in Cardiff
Registered No. 12182440.

Ethical problems with expelling a trainee from psychotherapy training

Ekkehard Tenschert

Received August 2023; revised October 2024

Abstract

There are times when trainees do not fulfil the criteria for the completion of a psychotherapy training. In the rare cases where it is not possible to achieve consensus, trainers may have to expel trainees against their will. In this paper I focus on ethical problems that arise in such demanding situations. Since trainees are supposed to develop the needed capacities in the course of the training, such decisions come down to the trainers' judgments of the trainees' estimated developmental capacities. This theoretical paper focuses on the problems involved in such situations and scrutinises which procedures and ethical approaches can be helpful for trainers and training institutes. Trainers can never have sufficient knowledge about the rightfulness of their decision, neither at the time of decision-making nor in the future, but such decisions may still be necessary and inevitable. This paper is about how this can be done in an ethically acceptable way and which ethical principles can be useful in the process.

Keywords

Gestalt training, personal development, criteria, exclusion, expulsion, ethical decision-making

Introduction

In this paper, I will share an overview of the importance of personal qualities of psychotherapists, the necessity of selection in psychotherapy training, and ethical problems that arise with this. The aim of psychotherapy training is to help people become well-trained professionals who can fulfil their tasks responsibly according to the current state of the profession. The training is intended to provide a supportive environment for acquiring the knowledge, skills and personal qualities. If trainees do not fulfil personal requirements and are not seen as being able to sufficiently develop, it is necessary that there is a process whereby they can be excluded from completing their training, partly to safeguard future clients. This creates a situation that demands decision-making where someone is bound to execute power over another.

In the training of Gestalt psychotherapy there is a special focus on personal development as it is experienced through the interpersonal contact and relationship with the trainers and judged in a complex, subjective way. Thus, such decisions are based on personal judgments and ethical implications arise

and have to be acknowledged. Since standardisation in such processes is difficult, the influence of individual impressions can only be broadened by involving more trainers.

The importance and role of developing personal qualities in psychotherapy training

Since the influence of C. G. Jung, psychotherapy training includes experiencing the trained modality (psychoanalysis, behaviour therapy, Gestalt therapy and other approaches) through personal therapy as a way to enhance personal development. Freud acknowledged the importance of 'having undergone a psycho-analytic purification' which should provide an increase in self-knowledge and in self-control, and enable the psychoanalyst 'to use his unconscious in this way as an instrument in the analysis' (1912, p. 116). While in his terms, psychoanalysts should 'model themselves... on the surgeon' (Freud, 1912, p. 115) and be 'opaque to his patients... like a mirror' (Freud, 1912, p. 118), today's relational psychoanalysts and humanistic psychotherapists emphasise the role of therapists as partners in an interpersonal

dialogical relationship where qualities of meeting and being-with the clients have to be developed (Orange, 2010, p. 114ff). The aim in this training therapy is for trainees to increasingly know themselves and be able to engage with others, even if others have significantly differing experiences and personality structures. Psychotherapists should be able to be intentional about their contacting and communication so they can be helpful to clients with different difficulties and life-situations.

Therefore, the quality of contact between Gestalt trainers and trainees is important and highly focused. In addition to more measurable knowledge acquired in theoretical, technical, methodical and clinical seminars, this personal development is regarded as fundamental. Overall personal development is judged on a complex set of interacting individual capacities like awareness, self-exploration, self-disclosure, personal interactions, responsiveness, contacting skills, giving and receiving feedback, empathy, ethical responsibility and others (cf. McMahon & Rodillas, 2020, p. 164). These are experienced in a trainee's therapy from a second-person perspective in an interpersonal relationship as something more than the sum of these individual elements (cf. Ehrenfels, 1890, p. 2).

In the course of a Gestalt training, personal difficulties of the trainees have to be addressed reflectively, differentiating influences from one's own 'psychical field' from the other's (cf. Lewin, 1935, p. 46). Inadequacies should be worked on and transformed to capabilities, or at least be made aware and supported by ways to deal with them.

Gestalt trainers are in a dual role of providing a supportive environment for this process and evaluating if the outcome is sufficient. On the trainees' side, there is tension in showing difficulties, which may be judged as a positive quality of self-awareness and a will to work on difficult parts of their personality structure, while at the same time can risk contributing to a possibility of being expelled. This balancing act between psychotherapeutic support for which being judged is counterproductive, and evaluation of the professional development, is unavoidable and has to be acknowledged and addressed.

Necessity of selection and evaluation of trainees

Training institutes have to abide by regulations and guarantee the training standards of their respective countries, some also want and/or need to meet

the standards and ethical values of international psychotherapy regulatory bodies like EAGT, ECP, WCP and others. They have to decide how trainees are assessed, which steps they have to take and how to evaluate their accomplishments. The assessment criteria may be different in countries where psychotherapy training is only accessible to trainees who already work with clients as medical doctors or psychologists as opposed to countries where psychotherapy training in and of itself allows for this. In both cases, situations that make it questionable if someone can complete the training can occur at any time and have to be addressed by the trainers. Training institutes with their trainers and supervisors function as gatekeepers to the profession, protecting future clients from inadequate or even harmful treatment (cf. Larrson Sköld et al., 2018, p. 395). Expelling someone from training is challenging for both trainers and trainees, and there needs to be support for all involved to avoid unnecessary harm.

Assessment and evaluation in our institute (FSIG/ÖAGG): an example for a developed format

I share the procedures we developed in our institute as an orientation for others who meet the same questions and problems. In Austria, psychotherapy is a standalone profession, which opens the possibility of working with clients. The high training standards are defined in the state law of psychotherapy. To be offered a place on a training programme – outside of the requirements of age, education, health and integrity – trainees need to go through two personal interviews and a selection seminar with different trainers. Four different trainers judge on personal qualities, such as motivation, self-awareness, integration of self-image and how one is perceived by others, contacting capabilities, ethical responsibility and others. Training groups are led by two trainers and limited to sixteen trainees to support close personal encounters and relationships. Screening procedures are implemented after the first and third year of the training group (trainees being evaluated as to their capability to work with clients), and at the end of individual and group supervision (recommendation for graduation). The trainees present their personal development and challenges and get feedback from peers and the trainers.

Situations that raise questions as to whether someone fulfils the criteria or not can occur at any time during training and need to be addressed by the trainers.

Who is affected by expulsion?

Trainees who are expelled are forced to quit an educational path that is associated with hopes and expectations of a future professional life. They would have successfully passed the necessary steps up to this point and invested much energy, time and money into their training. Often consensus can't be reached with trainees about stepping back from the programme and still, trainers are having to responsibly decide whether a trainee should continue or not. Being rejected can feel like a narcissistic insult – difficult to understand and accept. Trainers inevitably end up judging a trainee's journey up to this point and they also communicate that, in some way, they have given up and shut the possibility of working on, improving and overcoming difficulties that have arisen. To put it simply, they have judged the trainee's developmental capabilities as insufficient.

Trainees blaming trainers for their part of the relationship, questioning their perception, hermeneutic skills and responsiveness are understandable reactions in such a challenging situation. Trainees can experience harmful events and processes in psychotherapy trainings and suffer from low self-confidence even long after they successfully qualified (cf. Larsson Sköld et al., 2018, p. 408). Being expelled can also become a harmful event, and it is necessary to offer support to trainees who are being asked to discontinue.

Trainees get to know each other very well and build strong, personal relationships. Expelling a trainee leads to much distress in a training group. Naturally, there are different views on what went wrong. Questions of justice arise and a sense of vigilance can develop around the non-benevolent judgement of the trainers. This, of course, makes it all the more difficult to continue to be honest in the group. Remaining members may have to deal with feeling disloyal by accepting the expulsion of a member or come to terms with their own guilt around being relieved if the expelled trainee was also difficult for the group. It is important that trainers take responsibility for their decision and attempt to make their thinking as transparent as possible to the group to retain confidence in their capabilities. It is also important to focus on the remaining group members and their feelings and actions rather than give in to the temptation of theorising about the person's experience who was asked to leave.

Trainers are in a double bind between care for their trainees as well as fulfilling their obligations towards the training group, the quality of the programme and

future clients. They have to balance contradictory demands (cf. Larsson Sköld et al., 2018, p. 402), bear the weight of their responsibility and influence, and face difficult interpersonal conflicts. As it was their task to provide a supportive and challenging environment for personal development, trainers can feel as though they failed to act or act sooner. Trainers need to be supported by clearly designed procedures provided by training institutes. Once the decision is made, their main obligation is to transparently communicate their decision and their assessment criteria with the expelled trainee as well as the training group, and to offer or arrange support.

Decision path in our institute (FSIG/ÖAGG)

Trainees have different trainers in their training group, their personal training therapy, clinical and theoretical seminars, and individual and group supervision, and each training group has an assigned training program coordinator. Only the personal training therapists have full obligation of confidentiality about the content trainees bring. Their only option, when difficulties arise, is to deny the completion of the training through denying the completion of the personal training therapy.

Doubts

If trainers have doubts about the professional aptitude of a trainee, they are obliged to inform other trainers of the training group or a training supervisor as well as inform the training therapist. It is important to have the greatest possible transparency about this communication towards the trainee.

Serious doubts

If trainers of a training group or the training supervisor have serious doubts, they are obliged to discuss this with the training programme coordinator, and the training therapist is to be notified. Serious doubts have to be communicated to the trainee by the trainers of the training group or the training supervisor in a formal conversation. This has to be protocolled and is to be submitted to the candidate and the training programme coordinator for document storage.

Decision about expulsion

Decision about expulsion from the training is only possible after two formal conversations of the above kind, where the possibility of exclusion from the training was brought to the notice of the trainee. The

final decision can only be made by the trainers of the training group or the training supervisors in unity with the training programme coordinator. It is then, again, to be communicated by the trainers or supervisors to the trainee in a formal conversation. This has to be protocolled, submitted to the trainee and stored safely.

Training institutes, outside of their ethical obligations, also have to meet economical expectations. Either they are paid directly by trainees, or they are an institution that has to deliver a certain output of graduates. They are responsible for what happens in their training and have an interest in their reputation as an institution of high-quality training that is appealing to future trainees. Furthermore, they need to attend to legal considerations. They have to adhere to regulations and implement transparent and traceable procedures for such cases, so they are not (or less) vulnerable to failures of trainers.

Areas of ethical considerations

The quality of the profession

The overall obligation of any psychotherapy training is to train responsible and capable psychotherapists. The training institutes and trainers function as ‘gatekeepers’ for the quality of the profession. The gatekeeping function can lead to a potential conflict of competitiveness, since licensed practitioners allow or deny competitors to access the market.

Protecting future clients

The safety and wellbeing of future clients is paramount. We need to be able to evaluate knowledge and clinical skill-sets while remembering that the most confirmed common factor for successful psychotherapy is the therapeutic alliance – the quality of the personal relationship between clients and psychotherapists (cf. Rosian et al., 2017, p. 26). Since clients differ very much in their personal qualities and needs, they may profit from differing therapists and relational styles. Trainers should be open towards the advantages of various styles of contacting and relating that are different from their own ideals.

Vulnerability of the expelled trainee

Trainees of therapy training are in a highly vulnerable situation. They are invited to grapple with their personal development and increase their awareness. They are required to address difficulties in their lives, to openly come to terms with their past, engage with their

present and bear future uncertainties. To be expelled is a potentially traumatising or re-traumatising process.

Consumer rights of trainees

Psychotherapy training in most countries is not provided by the public sector and trainees have to invest a considerable amount of money on top of their personal effort and time. This puts additional pressure on having to judge trainees’ capabilities so that they only spend as much as necessary and as little as possible.

The difficulty of measuring and defining criteria and thresholds

A common way of trying to avoid personal biases in the complex situation of expulsion, and provide transparent, traceable evidence to such procedures, is defining criteria and providing tests that deliver measurable and comparable results. In such procedures, the judgement is moved from engaging and judging the interpersonal experience with a trainee to a meeting of experts consenting to a set of qualities in advance in order to obtain a qualification. These experts have to design procedures to test these qualifications and define thresholds for passing or failing such tests. Such procedures put all trainees under the same challenge, comparing them on a rough pattern of measurable items in a standardised situation. They cannot judge the complex individuality of trainees over and above those measurable items. It is important to notice that criteria and thresholds are extracts and ideas abstracted from complex, concrete past experiences of the experts. They rule out other qualities as irrelevant or unimportant. It is important to point out that it is inevitable that any criteria and thresholds would contain biases and unaware motives, although controlled to some degree by the group discourse. In other words, objectified procedures point to subjective estimation and judgement.

As in the realm of creating ‘moral machines’ difficulties of turning abstract ethical theories into decision procedures and algorithms are faced: ‘...the prospect of reducing ethics to a logically consistent principle or set of laws is suspect, given the complex intuitions people have about right and wrong’ (Wallach & Allen, 2009, p. 215). Wallach and Allen state that ethical theories are not so much direct guidelines for actions, but more so frameworks for negotiation of social norms about trust and cooperation. When programmers design closed systems, they have to anticipate all possible courses of action and provide rules that lead to the desired

outcome. With open-ended systems which are designed to further develop by themselves, they have to consider possible consequences of the system's parameter sets for this development.

Of course, pre-defined hard criteria support and take some weight from individual decision-makers. If these cannot be met, the decision for exclusion is relatively easy. But many of the criteria in Gestalt training are soft – they depend on what one grasps from the other, how one experiences the other, what develops in the in-between. This is not easily measurable. Trainees are judged on the impression trainers have of them, something that can never be fully explained, and which they cannot definitely falsify. The evaluation is individual and may vary much from trainer to trainer about the same trainee, the same situation. And no matter how much effort we put into defining criteria, there will always need to be space left for individual judgement.

A decisive advantage of objectified test procedures is their transparency, which can allow for needed criticism. Their disadvantage is that they build on abstracted features that necessarily capture less of the complexity of an interpersonal encounter. Trainers can use pre-defined criteria and processes to base their judgments on. If they completely rely on provided procedures, they can bypass their ethical responsibility to the designers of these procedures, who are not agents in the concrete situation and therefore lack the complex information trainers as participants of the actual encounter have.

The problem of trainers' involvement and limited perspective

The decision of expelling someone is executing power over another. The action of the deciding trainers has a tremendous impact for the expelled trainee. The trainers have differing obligations: personal support and care can conflict with the overall obligation of training and licensing someone to practise (Audi, 2006, pp. 191-199). Trainers have personal challenges, fears and blind spots, yet they are the best trained and suited persons to make such decisions. If personal responsibility is taken, the problem of the limited perspective of individual experience of another and the active involvement of the deciding trainers in the encounter have to be addressed. Gestalt training is built on interpersonal processes between trainers and trainees based on contact and relationship. The developmental outcome is not only dependent on the trainees, but on both parties and their interaction.

On both sides, there are persons with complex and highly individual sets of capabilities and deficiencies. It is thus a great advantage if trainees have a variety of trainers (e.g. experience with more than one individual therapist, group trainers of differing backgrounds, different supervisors of their psychotherapeutic work with clients) who work with them on their personal development and judge their capabilities.

The central problem of decision-making situations

There will always be a lack of information. Deciders can not know if their decision is right, neither at the moment of decision, nor later. They have to rely on their judgments from their personal experience with the trainee. They have to acknowledge the limited soundness of their judgement and do not know which decision produces the least harm and leads to the best outcome. Both possibilities can be good or bad. They have to rely on and use their validated intuition and find ways to pragmatically deal with the uncertain grounds of their judgement.

Ethical approaches in expulsion

I want to outline ethical approaches to support therapists in decision-making situations with ethical implications. Ethical approaches either produce principles that have to be followed under all circumstances or provide procedures on how to address challenging situations. Modern ethical thinkers emphasise the commonalities of different approaches and take them as perspectives that can mutually inform one another, since no single approach can give a complete account of ethical behaviour on their own (cf. Pauer-Studer, 2006, p. 107f; cf. Hosmer cited in Crossan et al., 2013, p. 569). Peter Singer states:

‘One could argue endlessly about the merits of each of these characterizations of the ethical, but what they all have in common is more important than their differences. They agree that the justification of an ethical principle cannot be in terms of any partial or sectional group. Ethics takes a universal point of view.’
(Singer, 2011)

Limited usefulness of deontology, utilitarianism and applied ethics

Ethical approaches relying on principles such as deontology and utilitarianism have been criticised for not being able to support understanding of the fine-grained structure of moral phenomena, as well as the different layers of moral perception and judgmental capabilities (cf. Pauer-Studer, 2006, p. 83). Deontology relies on reason, as an over-individual ideal form for finding out what is to be done. Such an approach will hardly be accessible to involved participants of a decision-making situation. Consequentialism, in contrast, asks a person to prioritise usefulness and presupposes that harm and benefit are known. Using the veil of ignorance, where decision-makers disregard their position to universalise their decision is not useful for our situation. If a trainer imagines themselves to be in the expelled trainee's situation, they would most probably always defend possibilities for their positive development.

Alas, also the usefulness of applied ethics, as Beauchamps and Childress' four principles for biomedical ethics, is limited. It is naive to suppose that in ethically challenging situations it is indisputable what the problem is that is to be decided upon (cf. Flynn, 2022), and even more so what is overall considered as respectful, benevolent, malevolent or just.

More useful ethical approaches for our purpose

Virtue ethics

In a renaissance of Aristotelian virtue ethics, virtues have been described as being the missing motivational link between moral principles and moral actions (cf. *ibid.*, p. 87). Virtue ethics asks a person to act according to certain attitudes and stances. The central question is not a universal principle, but asks what humans regard as good and how they teach and educate future generations to follow their footsteps (cf. *ibid.*, p. 89). Different from deontology and utilitarianism, virtue ethics regard sensations, affects and emotions as well as cognitive qualities as part of the moral attitude (cf. *ibid.*, p. 104). Which telos (end/purpose/goal) is worthwhile and which actions have to be taken is developed in individual and socially embedded reflection.

Discourse ethics

Jürgen Habermas scrutinised the rational grounding of decisions and emphasised the role of discursive exchange and deliberation, which helps keep up the connection of theoretical and practical reason. Rational discourse can ensure that this belief has been examined critically (cf. Habermas, 2009, pp. 10-12). In Habermas' ideal domination-free discourse all consequences and side effects have to be accepted by all persons involved, which makes its full use difficult for decisions in which a group has to decide and impose judgement on others, at times, without their consent. This could provide a useful way to avoid biases and blind spots of an individual in a hierarchical, powerful position, but alas not biases and blind spots of the deciding group.

Ethics of care

Ethics of care is not based on ethical principles, but on the question of what the situation affords from an involved individual. Care for others includes care for oneself, but this is no small task, and demands openness about oneself and the other, and responsibility for the situation (cf. *ibid.*, p. 94). Critics of Gilligan's approach take issue with the lack of impartiality and universal principles. But, while ethics of care is criticised for its focus on direct surroundings and immediate action, these are exactly the features that make it useful for our context. Involved trainers have to decide, from their perspective and point of influence, how to act; taking into account their responsibility for the situation and for all involved, including themselves.

Carol Gilligan developed a feminist approach to the ethics of care. She emphasised that psychological research done by Piaget, Freud, Erikson and Kohlberg were based on men only. Classical ethics that builds on ratio, logic, mathematics is a detached view (and a 'male perspective', Gilligan thought), and ethics of involved care ('the female perspective') have been neglected (cf. Gilligan, 1998, p. 18ff).

Trainers have to evaluate their encounter with a trainee, of which they are a part of and in which they are involved. In situations of uncertainty of a good outcome, more than one decision seems possible. What turns the scale to one side may be very little and it lies in the experience of the trainer, but they need to be thoroughly scrutinised. What are the motives of the trainers? What is the trainer's idea of working well with clients that the trainee seems unable to fulfil? Are there other influences on the decision than the estimation of

the trainee's capability? Are there any resentments from past encounters?

Ethics of care builds on an ethical predisposition that people bring with themselves (see Dan Bloom's Situated Ethics, developed from the Levinasian approach). Such virtues, which are developed on conflicting responsibilities in relationships, have been neglected in male-oriented epistemology of moral development built on competing rights, autonomy and rationality (cf. Gilligan, 1998, pp. 19-22).

While in Aristotelian ethics, virtues were only acquired from others through teachings and lived examples in an imagined, one-directional contact, here virtues can be developed in multidirectional patterns of involvement within a lived relationship with others. Moral feelings influence decisions, while rationality and logical laws can only give coarse-grained orientation and no decisive answers. Yet moral feelings alone do not support trainers to become ethically responsible. Individuals experience the world from a single perspective, but they can develop procedures to take into account different perspectives and rationally evaluate their intuitions. This way they can come to more justified decisions. This, of course, cannot prevent them from having blind-spots and missing important issues beyond their emotional and rational horizons.

Conclusion

Deliberation with more than one person enhances the chance for a good decision by including more perspectives and developing decisions in group discourse. This can never be a democratic procedure since not all involved are decision makers, but we can at least bring a possibility of deliberation and dialogue to a situation. As we know from historical and contemporary examples, a group of powerful decision-making, moral agents made slavery possible, and allowed and continue to allow oppression based on ethnicity and gender. What is viewed as good or bad, accepted as ethical or not changes within the development of individuals and societies and has to be constantly critically attended to, challenged and negotiated.

Trainers having to decide on the expulsion of a trainee have to rely on their moral evaluation of the situation including their intuition and rational argument. To act responsibly, they have to acknowledge and critically evaluate their part of the interaction, their feelings and motives for not believing in the sufficient developmental capacities of the trainee. All involved

trainers who have personal experience with the trainee should be included in the decision so that they can deliberate on their authentic experiences and impressions in a non-hierarchical discourse and search for a common, responsible conclusion. Once the decision is made, supportive measures have to be found to create the least possible harm. One important concern has to be the especially vulnerable psychic situation of the expelled trainee. A sensitive way of coming to a definite decision has to be found and possibilities of help should be offered or at least brought to attention. Trainers can use different ethical approaches and procedures as help and orientation in their deliberation, but are required to take a personal, ethical responsibility for their decision and bear the weight of their powerful action. It is pertinent that they, too, seek help and support for dealing with their emotional burden.

References

- Audi, R. (2006). *Practical Reasoning and Ethical Decision*. New York: Routledge 2006.
- Bloom, D. (2013). Situated Ethics and the Ethical World of Gestalt Therapy. In: *From Psychopathology to the Aesthetics of Contact*. Francesetti Gianni, Gecele M, Roubal Jan, (eds). Franco Angeli, Milano.
- Crossan, M., Mazutis, D. & Seijts, G. (2013). In Search of Virtue: The Role of Virtues, Values and Character - Strengths in Ethical Decision Making. *J Bus Ethics* 113, pp. 567-581. DOI 10.1007/s10551-013-1680-8
- Ehrenfels, C. v. (1890). Über Gestaltqualitäten. In: *Vierteljahresschrift für wissenschaftliche Philosophie*, Jahrgang 13. Leipzig, 249-292. https://phaenomenologica.de/wp-content/uploads/2019/02/CvEhrenfels_Gestaltqualitaeten.pdf (2023-04-23, 16:57)
- Flynn, J. (2022). *Theory and Bioethics*, *The Stanford Encyclopedia of Philosophy (Winter Edition)*, Edward N. Zalta & Uri Nodelman (eds.). <https://plato.stanford.edu/archives/win2022/entries/theory-bioethics> (2023-04-25, 14:22)
- Freud, S. (1912). *Recommendations to Physicians Practising Psycho-Analysis. The Standard Edition of the Complete Psychological Works of Sigmund Freud* 12:109-120
- Gilligan, C. (1998). *In A Different Voice – Psychological Theory and Women's Development* (35th printing). Harvard University Press.
- Habermas, J. (2009). *Philosophische Texte - Studienausgabe in fünf Bänden - Band 3*. Suhrkamp Verlag, Frankfurt am Main.
- Harsanyi, J. C. (1977). Rule Utilitarianism and Decision Theory, *Erkenntnis*, 11(1), pp. 25-53.
- Kant, I. (2013). *Metaphysik der Sitten*. Tugendlehre, Vorrede. In: *Kant im Kontext (Komplettausgabe 2013)*. ViewLit V6.6 – Karsten Worm – InfoSoftware 2013 - Kap.-Nr. 1208/5878, pp. 143 -146.

- Larsson Sköld, M., Aluan, M., Norberg, J. & Carlsson, J. (2018). "To fail psychotherapy training: Students' and supervisors' perspectives on the supervisory relationship", *European Journal of Psychotherapy & Counselling*, 20(4), pp. 391-410, <https://doi.org/10.1080/13642537.2018.1529688> (2023-04-23, 16:58).
- Lewin, K. (1935). *A Dynamic Theory of Personality*. McGraw-Hill Book Company. <https://ia601508.us.archive.org/29/items/in.ernet.dli.2015.18586/2015.18586.A-Dynamic-Theory-Of-Personality.pdf> (2023-04-23, 16:59).
- Löffler-Stastka, H., Gelo, O., Pleschberger, I., Schröder, T., Orlinsky, D., Rønnestad M. H. & Willutzki, U. (2018). "Psychotherapieausbildung in Österreich". In: *psychopraxis. Neuopraxis* 2018. 21, pp. 227-231. doi.org/10.1007/s00739-018-0508-9 (2023-04-23, 17:00).
- McMahon, A. & Rodillas, R. R. (2020). "Personal development groups during psychotherapy training: Irish students' expectations and experiences of vulnerability, safety and growth". In: *Counselling Psychology Quarterly*, 33(2), pp. 163-186. DOI: 10.1080/09515070.2018.1502159
- ÖBVP. <https://www.psychotherapie.at/oebvp/berufspolitik> (2023-02-26 14:37).
- Orange, D. (2010). *Thinking for clinicians - philosophical resources for contemporary psychoanalysis and the humanistic psychotherapies*. Routledge.
- Pauer-Studer, H. (2006). *Einführung in die Ethik*. Wien: UTB, 2. überarb. Aufl., 83-110.
- Psychotherapiegesetz. <https://www.ris.bka.gv.at/GeltendeFassung>.
- Rosian, K., Winkler, R. (2017). "Psychotherapie – Begriffe, Wirkfaktoren und ein deutschsprachiger Ländervergleich zu gesetzlichen Regelungen". LBI-HTA Projektbericht Nr.: 93; 2017. Wien: Ludwig Boltzmann Institut für Health Technology Assessment.
- Singer, P. (2011). *Practical Ethics* (3rd ed.). Cambridge: Cambridge University Press. doi:10.1017/CBO9780511975950
- Wallach, W. & Allen, C. (2009). *Moral Machines: Teaching Robots Right from Wrong*. Oxford University Press. <https://doi.org/10.1093/acprof:oso/9780195374049.001.0001>
- WCP. <https://www.worldpsyche.org/cms-tag/121/world-certificate-for-psychotherapy-wcpc-> (23-02-19, 8:42)

Ekkehard Tenschert, BA Msc works in private practice in Vienna, Austria and is a trainer and supervisor for FSIG/ ÖAGG. He is coordinator of the advanced training programme – Gestalt therapy with infants, children, adolescents and their surroundings, as well as trainer for Institutul de Gestalt terapie din Bucuresti. He is member and accredited supervisor of the EAGT.

He has completed Advanced training in Gestalt therapy with children and adolescents (DUK), Gestalt supervision (Istituto di Gestalt, Margherita Spagnuolo Lobb), and phenomenology and Gestalt (Dan Bloom and Thomas Fuchs).

Address for correspondence:
tenschert@praxis3.at

Website: praxis3.at