



FICTA
Federation of Irish
Complementary Therapy Associations

Submission on Consultative Paper: Draft Policies and Criteria for the Inclusion of Awards in the National Framework of Qualifications

The Federation of Irish Complementary Therapy Associations (FICTA) is pleased that the Authority has proceeded to this section of the Framework so promptly.

The majority of our members hold qualifications and awards made by bodies from other jurisdictions or through regulated professional bodies who do not have status in law or whose authority to make awards is not currently recognised. Because of this, the present discussion paper is most welcome.

Previous discussion documents produced by the Authority asserted the Authority's commitment to the principle of inclusion. The policy rationale for the inclusion of professional awards in the national framework must therefore be such as to insure the inclusion, recognition and award of all learning achievements and qualifications based on standards of the knowledge, skill and competence to be acquired by learners and to facilitate learners progression through access to the framework.

FICTA does not agree with the Authorities suggestion that only those awards made by professional bodies that have a basis in law be considered for inclusion as professional awards in the Framework.

Question A

Do you agree with the suggested arrangements for the professional awarding bodies and national awarding bodies from other jurisdictions which may seek to have their awards included in the National Framework of Qualifications? Would you suggest that these arrangements should be changed or further amended?

Comment: If the Qualifications Framework is to become the single nationally and internationally accepted entity through which all learning achievements may be measured and related to each other in a coherent way, it is important that this opportunity be taken to award as much acquired learning as possible.

A qualification or award, for the purposes of the Framework, is one which recognises learning achievement and/or confirms the learners ability to perform a particular function.

A number of FICTA members are administrative providers of awards or professional qualifications to learners. As such, they are eligible for inclusion in the Framework as awarding bodies. The inclusion of regulated professional bodies which determine standards, provide assessments and accredit learning achievement, will benefit learners and enhance the transferability of their qualifications. Such an initiative will afford the holders of these qualifications the opportunity for access, transfer and progression which is expected to flow from inclusion.

FICTA fully accepts that given the multiplicity of bodies in the complementary therapy field at the moment, that the NQAI, FETAC and HETAC will require assistance in determining the appropriate body for each therapy. The National Working Group on the Regulation of Complementary Therapists is currently dealing with this issue and any recognition and awarding of qualifications in this field would have to be referenced against the report of the working group, which should be available at the end of 2005.

The range and diversity of stake holders in this field are comprehensively represented by FICTA.

FICTA suggests: That regulatory bodies be assured of recognition as awarding bodies including those from outside the state and from professional bodies which may not have a status in law/Æ. To do otherwise is to exclude all of the bodies currently involved in the regulation of complementary therapies in Ireland and the majority of other professions as only 9 are currently regulated by statute.

that the Quality assurance requirements and competence appropriate to specific professions or professional activity be established in consultation with the experts in the field of complementary therapy, i.e. the designated professional bodies in each therapy.

that national regulated professional bodies be included as awarding bodies

that awards and qualifications made by professional bodies in Ireland and from other jurisdictions be included in the framework

that national professional bodies be consulted on the inclusion of awards made by awarding bodies from other jurisdictions who seek to have their awards included in the framework. (It could be seen as nothing more than expediency if the Authority was to accept those qualifications as the industry standard for Ireland.)

that the national professional bodies and Awarding Councils commit to open and transparent consultation on the award-type and the levels at which awards enter the framework,

that this consultation process be undertaken in regard to the inclusion of major awards for complementary therapy and medicine.

Question B

Do you agree with the suggested approach set out above for the awards of professional awarding bodies and national awarding bodies from other jurisdictions which may seek to have their awards included in the National Framework of Qualifications? Would you suggest that these arrangements should be changed or further amended?

Comment: FICTA welcomes the reiteration of the AuthorityÆs commitment to an open approach in keeping with one of the major aims of the Framework, to recognise learning achievements.

The inclusion of the Irish regulated professional bodies representing complementary therapy in all stages of the development, recognition and award of qualifications is crucial to ensuring the quality of the education provided and the status of the awards made. Where more than one body makes awards in a therapy an all-inclusive consultation approach is critical to agreeing the appropriate type of award and level of entry to the framework.

FICTA suggests that the professional bodies representing complementary therapy practitioners in Ireland be adequately and meaningfully included in all the discussions concerning the inclusion in the Framework of awards made by the National Awarding Councils and Awarding bodies from other jurisdictions.

That learners residing in Ireland with awards from awarding bodies, either national or international, who do not apply for inclusion in the Framework, have the option of having their awards referenced in the framework and that they be given adequate assistance in doing so regardless of the level of co-operation of the awarding body in question.

Question C

Do you agree with the type of inclusion set out above for the awards of professional bodies? Do you agree with the processes set out? Would you suggest the processes should be changed or further amended?

Comment: FICTA broadly agrees with this two stage process.

However, FICTA members have expressed their concerns that the the Holistic Ethos that sets Complementary Therapy apart from main stream health carers and professionals could be diluted in the rush to meet market demands for certification to secure employment.

Our concerns are in relation to the involvement of national awarding bodies in the consideration of applications for inclusion. It is the experience of FICTA that HETAC, FETAC or the ITÆs do not have either the experience or the expertise to evaluate awards in the complementary health sector and that awards in the field presently made by them, do not always meet industry standards or the function ability required of a professional complementary therapist.

FICTA suggests that HETAC, FETAC and the NQAI be obliged to consult meaningfully with the relevant professional bodies when permitting colleges to use FETAC and HETAC awards as the basis for awards in any form of complementary therapyÆ. This has not been the case to date and it is of serious concern to FICTA in terms of public safety and the dilution of the holistic ethos that identifies the sector.

Question D

Do you agree with the types of inclusion set out above for the awards of national awarding bodies from other jurisdictions? Do you agree with the processes set out? Would you suggest the processes should be changed or further amended?

Comment: FICTA agrees with the two stage process as being thorough and fair.

However, we would again be concerned about the possible exclusion of certain learners, i.e. those who acquired their qualifications in another jurisdiction and/or whose awarding body does not apply for inclusion in the Framework.

FICTA suggests that the Authority and the National Awarding bodies be required in practice and not just in theory to consult in an open and transparent manner with all the professional bodies representing any given discipline when deciding on inclusion, level and types of awards to be made and in the appeals and review process.

Irish residents who hold foreign awards and qualifications on completion of education and training that is not provided by or in the State, be facilitated in having their awards referenced to the Framework for the purpose of progression.

Other Comments: The Consultation Paper is a broad ranging and comprehensive document which clearly outlines the issues to be considered by the Authority in admitting Awarding bodies to the Framework and meeting professional and occupational needs.

The Authority has already noted different types of standards in it's document on the **Establishment of Policy and Criteria** - published in April 2002.

The standard of the holistic competence of a complementary therapists is not assessed by any existing awarding body. The professional and personal development of all learners is actively fostered and evaluated by the providers of complementary therapy training and education programmes . Practitioners are mentored and supported in this by the provision of continuous professional development programmes. The understanding and adherence to a code of ethics is central to safe and effective practice of therapy.

Omitting the holistic aspect of complementary would alter the standard of complementary/holistic therapists being trained and the service they provide.

This raises the question of how linkages between the Authority, the Recognition Implementation Group and sectoral stakeholders are to be established.

FICTA members are particularly concerned that the appointment of advisors to the NQAI and the RIG be open and transparent and a system be in place by which the governing bodies of a complementary therapy can ratify or challenge appointments.

FICTA Members

Amatsu Association Ireland
Association of Naturopathic Practitioners.
Bio-Energy Therapists Association
Bio-Testing and Therapy International.
Irish Association of Cranio Sacral Therapy.
Irish and International Aromatherapy Association
Irish Institute of Counselling and Hypnotherapy (new)
Irish Massage Therapists Association,
Irish Reflexology Institute
Irish Seichem Association
Irish Yoga Association
Kinesiology Association of Ireland
Natural Healing Institute of Ireland.
Rebirthing Psychotherapy Association
Reiki Association of Ireland
Reiki Federation Ireland
Scenar Practitioners Society of Ireland
Shiatsu Society of Ireland
The Association of Irish Reflexologists
Yoga Federation of Ireland
Yoga Society Ireland
Yoga Therapy Ireland

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