



**FICTA**  
Federation of Irish  
Complementary Therapy Associations

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## Submission to the National Qualifications Authority of Ireland on the development of a National Framework of Qualifications

### **INTRODUCTION:**

The FEDERATION of IRISH COMPLEMENTARY THERAPY ASSOCIATIONS ( **FICTA** ) is composed of professional associations and regulatory bodies from various fields of complementary therapy. The practitioners represented by the regulatory bodies making this submission take their work seriously and aim to provide the highest level of education and training for their students. This submission is the result of a consultative process among the member associations of the Federation of Irish Complementary Therapy Associations. The member organisations of the Federation of Irish Complementary Therapy Associations represent over 4,600 practitioners and members.

There are approximately 1,350 teachers of complementary therapy in Ireland providing training and education courses privately, in resource centres and in VEC's. Currently there are approximately 1,500 learners studying to be therapy practitioners in privately run courses and PLC courses in the VEC's. These figures represent the numbers of people involved with the member associations of the Federation of Irish Complementary Therapy Associations only and does not include the thousands studying complementary therapy at introductory level or for their own personal use.

Complementary therapy training and education is a large and growing sector of adult education, the economy and Irish life in general. That it will continue to grow as the education choice of a substantial section of the population, must be recognised by statutory authorities. In it's report, the White Paper on Adult Education recognises the wide public interest in complementary and alternative therapies, illustrated by the growth of provision of courses in the area of Adult Education in recent years.

- Complementary therapy is one of the fastest growing sectors of adult education in Ireland to-day.
- On the economic front it accounts for approximately one quarter of all books published and is a growing factor in the music industry.

### **FICTA's relationship with the Government**

FICTA is actively involved in the current consultation process with the Department of Health and Children to establish a system for the registration for Complementary Therapy

Practitioners. Complementary Therapy qualifications are not yet generally recognised by the Dept. of Education and Science, public bodies and universities for the purpose of awards. This lack of recognition contributes to the following problems:

- . Lack of standardisation and quality assurance in training and practice
- . Difficulty in accessing affordable, quality training in the State.
- . Limitations in the range of employment available on graduation - mostly freelance or self-employment.
- . The limitation of the service to those who can afford to pay for it.
- . The limitation of training to those who can afford to pay for it.
- . Hard earned qualifications with no official currency and no transferability in Ireland.
- . Highly skilled therapists with no access to the accreditation which would qualify them to be registered with the health boards or the Dept. of Health and Children.

### **FICTA as a stakeholder in learning generally .**

The Complementary therapy training and education providers meet a number of the objects set out in the Qualifications Act ( Ch .2 of Discussion Document. *Rational* ) such as:

- . to establish and develop standards of knowledge, skills and competence
- . to facilitate lifelong learning
- . to promote and maintain procedures for access, transfer and progression
- . to promote the recognition of knowledge, skills and competence

Complementary Therapy is a relatively new entry to the awards system.

The growing public awareness of complementary therapy as a service to avail of in times of crises and transition, raises the question of the standards of skill, knowledge and competence of practitioners. A particular difficulty to be addressed in the development of an award criteria for complementary therapy is the holistic nature of the ethos that underpinnings it. A prerequisite to the positioning of awards for Complementary Therapies

in the National Framework, is consultation with the Awards Councils and Professional Associations to address the issues of:

- . standards
- . methods of assessment
- . access to common modules
- . transfer and progression
- . levels of awards
- . type of award
- . nature of awards

### **Overview of the Discussion Document**

The aspirations of the Authority as put forward in the discussion document towards a National Framework of Qualifications are admirable. The extensive nature of the issues taken into account and addressed, is impressive. This Discussion Document holds out the promise of a revitalised training and education system and a gratifying rewards system that generates interest and enthusiasm. It is important that in practice, the principles of

Simplicity, Equality Comprehensiveness, Transparency, Flexibility, Quality and Relevance underpinning the establishment of a national framework of qualification will not be limited or compromised in any way for any political, economic or social reasons.

The statutory requirement of providers of education and training to provide information to learners is pointless unless it extends to include the Councils. It is incumbent on the Authority to promote and maintain the easy and effective access of all providers of education and training to the two Awarding Councils. It is regrettable that the Authority did not ensure that the principle of simplicity and transparency were employed in the publication of this document. If this document is an example of the practice - it falls short of the principles of Accessibility, Transparency and Simplicity. The Federation earnestly hopes that the consultation process, development process and the Framework itself will indeed be shaped and informed by these lofty principles.

The Bologna Declaration points to the need “to build upon intellectual, cultural and social... dimensions” and to the “importance of education and educational co-operation as an irreplaceable factor for social and human growth...”. A qualification system that favours the needs of industry, economic concerns or ‘market leaders’ over personal growth, threatens that “irreplaceable factor”. The value of education and learning for its own sake and for the sake of the effect that education and learning of many kinds can have on the self esteem, performance and the quality of life has, of itself, a stake in the development of a meaningful system of awards.

- Without exception, all learners and providers of a diverse range of education and training systems are stakeholders in the development of a Framework for National awards.

## **Questions arising in the Discussion Document**

### **CHAP. 5      *Principles underpinning the establishment of a National Framework of Qualifications***

The Principles underpinning the establishment of a National Framework of Awards are lofty and admirable. It is, however only in their practice and application that they have any value. The failure to employ the principles of simplicity, accessibility and transparency in this discussion document threatens those principles at the outset.

FICTA favours the approach of the Authority in building a National Framework of Awards on an initial set of principles and that builds on the existing framework. The collaboration with and co-operation between the awarding bodies and professional providers must be consistent, and be seen to be consistent with the governing principles of Equality, Accessibility and Transparency. As this will ultimately replace the current awards system, the implementation of a National Framework will be greatly facilitated by the key-stone of information, information, and again, information.

- In support of a smooth transition and implementation of a National Framework, a program of seminars for the purpose of informing all stakeholders will enhance the reputation and the integrity of the Authority.
- Such a program would need to be ongoing for the duration of the transition and include the provision of development and information officers, and the publication of leaflets that explain the framework in simple, clear and accessible terms.

- The Federation hopes that the Authority has the will and motivation to drive forward the development and implementation of a cohesive and inclusive National Framework for awards within a reasonable timeframe.

CHAP. 6                    ***Process guidelines for the Authority in establishing the framework***

As a working process, the current and growing practice by Government Departments, of publishing discussion documents such as this, inviting written submission of arguments and concerns followed by a Forum where the points raised can be discussed, is already establishing guidelines for a consultation process that is democratic and efficient. The Authority needs to ensure that such consultations are publicised through all the available media and are open to all interested parties. Sufficient time must be allowed for people to submit a considered response to discussions documents.

- An INCLUSIVE framework must be flexible enough to accommodate the different kinds and non-traditional ways of learning as they apply to complementary therapies.
- Complementary therapy training and education incorporates a wide spectrum of learning systems e.g. kinetic, esoteric, energetic, etc not previously recognised by awarding bodies in Ireland.

CHAP. 7                    ***Relevance of award standards to policies and criteria for the development of the framework***

The Grouping of awards is crucial to the development of a National Framework of Awards that serves the underpinning principles of Equality and Flexibility. The example given in the document (p 36) lacks imagination and initiative. A system that groups awards at all, will continue to be inaccessible to the majority of learners and providers presently outside the awards system. A more accessible and flexible grouping would be according to the level of achievement an award signifies. The value, in terms of standard of learning attained would be decided by the

- the entry requirements
- the time required to earn the award
- the body of work done by the learner
- the content of the work
- extent of work required for an award
- combination of subjects
- the learning outcomes.

Provision for the entry of new fields of learning and accreditation needs to be made at the outset and include the validation of

- all methods of training and education
- all methods of access
- all modes of learning - including non-cognitive
- all learning skills - multiple-intelligence

Such a system could be applied across the board - economic, occupation, subject and fields of learning. It would also facilitate the giving of awards for fields of learning and methods of learning not presently included in the awards system. The level (standard) of achievement that the title of an award signifies must also be clear to all stakeholders, in particular learners, providers and employers.

CHAP. 8      ***Relevance of access, transfer and progression to policies and criteria for the development of the framework***

Education and training through the use of learning units is in common and successful usage in the provision of training and education in other states. It is the system best suited to the delivery of the education and training of complementary therapies .

- A number of units on related topics are delivered concurrently forming a module. This facilitates a balanced progression from topic to topic and the inclusion of units of varying duration and credit.
- Each unit successfully studied earns the learner a credit or credits.
- The accumulation of credits over a given period of time leads to an award.

The duration of a learning course is relevant to complementary therapy as learners need time in which to grow and develop their skills through participation and contact. The time frame during which credits are earned needs to be taken into account in areas of rapid change and development. A refresher course may be necessary where providers and the Awards Councils feel that the time lapse between the accumulation of credits warrants it.

CHAP.9      ***Differentiating Further and Higher education and training***

The Qualifications Act has set the highest level of award to be made by the Further Education and Training Awards Council to be level 3 - unless otherwise determined by the Authority. In the service of EQUALITY and QUALITY it is imperative that the ceiling on levels of achievement awards that presently applies to awarding bodies be removed, once and for all. Provision must be made to raise the ceiling of the awards the Further Education and Training Awards Councils can confer. The Council must be mandated to make awards of the highest level for subjects and in areas of learning not provided for by other awarding bodies or learning institutions. The present impression that the awards of the NCVA are for learners of limited ability must not carry over to the FETAC. Rather, the Council should boldly further the development and provision of education and training awards, in areas and for methods of learning not yet included in the awards system. By this, the inclusion of meaningful awards for prior and experiential learning, e-learning, work based learning and updating could be easily contained in the National Framework of Awards.

CHAP. 10      ***Process guidelines for the Authority in establishing the Framework***

FICTA is aware that the education and training requirements for complementary therapies varies widely in continental and European Union states. In developing international linkages it is advisable to have regard for the authority of the Professional Bodies in Ireland to set the required standards of training and education for Practitioners of Complementary Therapy working in Ireland - in line with the requirements of the Department of Health and Children. A National Awards system needs to be accessible at all levels to the Professional Bodies and providers of complementary therapy education and training. To date this is provided privately and without state aid or access to awarding bodies.

The Qualifications Act and the White Paper on Adult Education recommends that the national awarding bodies confer with the sector with a view to developing awards for complementary therapy. FICTA strongly recommends that the National Qualification

Authority of Ireland , the Further Education and Training Awards Council, the Higher Education and Training Awards Council, and the Professional Therapy Associations enter into dialogue now to explore the feasibility of :

- . Developing adequate structures of training and providing space in existing colleges, suitable to the requirements of complementary and alternative students.
- . Developing suitable processes of accreditation and certification
- . Developing systems of evaluating prior-learning and experience.
- . Giving students access to state education funds.

**CHAP. 11**                    ***Standards of awards -  
of the awards Councils and the DIT***

A national Standard that applies to all levels of award regardless of the institution providing the required learning and education, would help learners in making choices. The level of achievement indicated by the title of an award needs to be standardised. The present profusion of titles and the standard of education they represent is confusing to learners and employers alike.

**CHAP. 12**                    ***Facilitating and promoting access transfer and  
progression***

Where as the employment of units of learning may not be applicable to all fields of learning, the development of units of learning as a system of education leading to awards needs to be fully explored and developed. The deployment of resources is essential to the development of awards for prior and experiential learning to a high level and to insure that all learners are aware of them. The “low take-up” of awards for prior learning needs investigation.

Why has the take-up being low?

Could it be that prior learners know nothing about them ?

Experiential and non-ordinary learning is difficult to assess by conventional means and the councils need to be committed to including such learning in their remit. The accreditation and integration of all forms of learning into a National Framework should not be confined to either further or higher education exclusively and accreditation should be available through both.

**CHAP. 13**                    ***Overarching Questions***

While the discussion document is admirable and the principles, guidelines and suggestions outlined in it are insightful and far reaching, it does not fully address the diversity of learning, providers and learners in Ireland at the present time. There is a fast growing body of people training in a wide range of complementaries therapies, utilising modes of intelligence and aspects of learning not currently accredited by either HETAC or FETAC.

- . Ways of assessing these forms of learning need to be developed in consultation with the providers of such learning and the Professional registration bodies in the field.

Social skills and emotional maturity are paramount to the development of a stable and progressive society. The psychologic health, strength and well-being of the human spirit is valued in the work place. Complementary Therapy concerns itself with the personal issues that impede human and social growth. On the socio-economic front, the part played by continuous learning in maintaining mental health and our faculties is now recognised. The

highly skilled and experienced providers of part-time education are insufficiently recognised. The provision of awards for providers of training and education who have undertaken their own teacher training through systems that are not awarded by the State must also be part of a framework of awards that is truly inclusive.

Federation of Irish Complementary Therapy Associations

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