



**FEDERATION of IRISH  
COMPLEMENTARY THERAPY ASSOCIATIONS**

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Submission to the National Qualifications Authority of Ireland  
on the

**Inclusion of Professional and International Awards.**

**INTRODUCTION:**

The FEDERATION OF IRISH COMPLEMENTARY THERAPY ASSOCIATIONS is composed of professional associations and regulatory bodies representing a number of complementary therapy disciplines.

FICTA supports the Authority in its work towards a National Framework of Qualifications. The Discussion Paper on the Inclusion of Professional and International Awards in the National Framework of Qualifications is an accurate assessment of the present situation. The ideas put forward in the Discussion Paper on how the Authority might perform its function are considered and useful. This function will be enabled further by the determining and declared difference between FETAC and HETAC. The type and level of Award for which they will each be responsible is a prerequisite to the placing of International and Professional Awards within the Framework.

The practitioners represented by the regulatory bodies making this submission aim to provide the highest level of education and training for their students. The Inclusion of Professional and International Awards in the National Framework will facilitate the maintenance of the high standards set by responsible and principled Professional and International Bodies and provide access and transfer to progression routes for complementary therapists.

There are approximately 1,350 teachers of complementary therapy in Ireland providing training and education courses in resource centres, in Private Institutions and in VEC's. That complementary therapy will continue to grow as the career of choice and the treatment of choice of a substantial section of the

population makes the setting and maintaining of standards of skill, knowledge and competence a matter of concern for FICTA, the Department of Health and Children and the public.

Complementary therapy is one of the fastest growing sectors of adult education in Ireland to-day. 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. There are approximately 1,350 teachers of complementary therapy in Ireland providing training and education courses in resource centres, in private institutions and in VEC's.

- This puts complementary therapies in the educational system before the standards required for safe practice have been agreed with and laid down by the professional bodies.

That complementary and alternative therapies will continue to grow as the treatment of choice of a substantial section of the public makes the setting of operational standards a matter of public safety. The regulation/registration and recognition of complementary and alternative therapies is an element of the current Health Strategy. It is vital for public safety and for the industry itself that this process is completed and quality standards of practice are set.

### Question 1

FICTA agrees with the rationale set out in Chapter 1. The inclusion of complementary health training awards in such a framework will support the process of quality assurance, which is a priority for FICTA. The conclusion of the consultation process with the Department of Health and Children on the registration /regulation of complementary therapies should facilitate the development of suitable levels and types of awards for complementary therapies through HETAC and FETAC.

- In addressing the Inclusion of International and Professional Awards in the National Framework that is a 'nationally and internationally accepted entity' the Authority in is accord with the aspirations of the Bologna Agreement and this will enhance the international reputation of the Framework.

- In developing a process for the inclusion of such awards, the Authority has the opportunity to develop a model that could be used internationally.
- In the development of a process for the Inclusion of International and Professional Awards in the Framework, it is imperative to ensure that access, transfer and progression routes are available to those who already have and who will, in the future have, such awards. There are presently few, if any, progression routes for learners with complementary therapy awards as such qualifications, of themselves, are not recognised for the purpose of access or progression, by public education establishments within the state.

The placing of Professional and International Awards in the National Framework is dependent, to a large extent on the Authorities final decision as to the type and level of awards that FETAC and HETAC will be separately responsible for. The vocational methods of training and education employed under the NCVA are best suited to the training and education requirements of complementary and alternative therapy. The ceiling of a level 3 award is however, too low a level of knowledge, skill and competence for some complementary therapies.

## Question 2

The majority of FICTA members fall into the category of professional bodies whose qualifications lead to renewable membership, as outlined in Chapter 2. Membership of such a professional body is in effect a licence to practice and presently the only assurance users can have as to the level of qualification a practitioner of complementary therapy has attained. It is also the only method in the State by which standards of learning and practice can be monitored and maintained.

There are, however, multiple awarding bodies within some of the complementary therapy disciplines themselves, who operate without any obligation to submit their curriculum to national or international monitoring. This results in a variety of awards and standards and leads to difficulties for practitioners who apply to their national professional body for membership. This problem would be resolved by the development of

- A process by which the fitness of awarding bodies themselves to make awards, could be assessed.
- A process by which the providers of a course that leads to an award could be assessed

While the Authority has a statutory obligation to consult with International Awarding Bodies, the inclusion of the state based Professional licensing Bodies in the consultation would greatly reduce the work load of the awarding councils in designing awards for complementary and alternative therapy for inclusion in the Framework.

### Question 3

FICTA commends the freedom accorded to publicly funded providers to offer multiple awards. This can only serve to facilitate quality assurance as well as access, transfer and progression for learners. While FICTA agrees in principle with the proposal that private awarding bodies develop practices consistent with the procedures for access, transfer and progression to be put in place by the Authority, we can see potential difficulties for complementary therapy.

The holistic approach to health and well being is what distinguishes complementary therapy from mainstream health care. The imposition of restrictive conditions for access, transfer and progression could compromise that ethos if the criteria for awards is not flexible enough to accommodate non-traditional modes of learning, assessment, practice and delivery.

- A difficulty of the present system as FICTA sees it, is the growing practice of universities, DIT, etc. of offering postgraduate awards in some of the disciplines that fall under the heading of complementary therapy. The essential element of holism and the existence of the disciplines themselves is threatened as long as the Professional Awarding Bodies who have developed the most effective methods of transmitting this distinguishing element, are excluded from both the awards system and the state health service.
- FETAC (NCVA) too is engaged in the practice by validating awards for courses delivered in various colleges within the VEC system, which include complementary therapy as subjects and where the level of knowledge, skill and competence falls short of the standards set by the professional bodies.

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- The Dept. of Health and Children and FICTA are extremely concerned about the public safety issues that are a consequence of this practice by FETAC.
- FICTA is also concerned that this situation will undermine the potential quality and level of awards that can be reached through the study of complementary therapies in their own right.

*This is a prime example of the tensions referred to on p. 18 and extensive dialogue between the professional licensing bodies, the awarding bodies and the Authority will be required to resolve these.*

#### Tax Relief:

FICTA believes that all education that qualifies for an award at any level within the framework should be subject to tax relief.

People who attend private colleges are, for a variety of reasons, excluded from the public system and are already marginalised. There is a proliferation of private education simply because there is a failure of state education providers to cater for the needs of all learners. These learners should not be further penalised by denying them tax relief on fees they must pay because the state funded institutions have failed to provide for their particular learning needs.

#### Question 4

FICTA agrees with the Authority that global bodies should be included in the framework through the first option only, for reasons stated in the document. Unless already linked with a university or institute of technology, global awards are often made on a too narrow a basis to qualify the holder for access, transfer and progression in a national system of qualification. International and Professional Awarding bodies should have the freedom to choose between processes 1 and 2 according to their needs and the needs of their learners.

- In the absence of a European network of quality assurance agencies for international and professional vocational/occupational awards, the policies and criteria for access, transfer and progression within the developing framework would be essential.

In determining the procedures by which applications for inclusion in the framework be considered, the professional awarding and licensing bodies within the State must be involved. In the case of awarding bodies who wish their awards to be included in the framework, in their own right, a process for deciding the type and level of award to be made would be required.

The third option described would appear to be expensive, time consuming and not necessarily consistent.

The associations contributing to this submission are:

Association of Irish Acupuncturists  
Association of Irish Reflexologists  
Bio-Energy Therapists Association  
Institute of Clinical Hypnotherapy & Psychotherapy  
Irish and International Aromatherapy Association  
Irish Reflexology Institute  
Irish Yoga Association  
Kinesiology Association of Ireland  
Rebirthing Psychotherapy Association  
Scenar Practitioners Society of Ireland  
Shiatsu Society of Ireland  
The Reiki Association of Ireland  
Yoga Federation of Ireland  
Yoga Society Ireland  
Yoga Therapy Ireland

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