Public Consultation
Professional Regulation Unit
Department of Health
Hawkins House
Dublin 2, D02 VW90



30 November 2016

Re: Proposed Regulation of counsellors and psychotherapists under the Health and Social Care Professionals Act 20015

Dear Sir/Madam,

QQI welcomes the opportunity to respond to the public consultation on the regulation of counsellors and psychotherapists. Having regard to the background information provided and the specific issues to be addressed, QQI submits its response with particular reference to two of the issues:

- The appropriate level of qualifications to be set for future applicants for registration having regard to the QQI Award standards
- The appropriate level of "grand parenting" qualifications to be set for existing practitioners having regard to the QQI Award standards.

In 2014 QQI completed and published the Awards Standards for educational and training qualifications in Counselling and Psychotherapy. These are designed to be used by persons developing and reviewing specific programmes of education and training leading to major awards (at NFQ Levels 6 through 9 inclusively) in Counselling and Psychotherapy. These standards are solely for use in education and training and are not standards for professional practice. They are used by providers designing programmes for awards to be made by QQI or by awarding bodies to which it has delegated authority to make awards (currently this applies to the Institutes of Technology for taught programmes up to level 9). The Award Standards provide a reference for benchmarking intended programme learning outcomes when specific programmes are being validated or revalidated by QQI. It should be noted that the universities and Dublin Institute of Technology are awarding bodies in their own right and can validate their own programmes. They are not bound by QQI award standards. However, we hope that they will be useful references for them when validating their programmes.

While QQI's standards identify a common core of learning outcomes for counselling and psychotherapy, this is not intended to preclude distinguishing between the two for purposes of providing or regulating professional services if this is deemed in the public interest.

To help guide programme validation, the standards include an indicative special validation condition. This concerns the 'practice placement' in programmes leading to honours bachelor's degree (level 8) qualifications. The 2014 standards note that this may be superseded or become unnecessary when the professional regulator takes on a role in approving programmes intended to prepare persons for entry to this professional field.



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Dearbhú Cáilíochta agus Cáilíochtaí Éireann Quality and Qualifications Ireland

QQI considers it important that information is clearly set out by the Regulator that addresses concerns by providers, learners, graduates and professional bodies as to what qualifications will be appropriate for registration. Such information should take cognisance of the range of qualifications possible given the range of awarding bodies that are currently represented in the National Framework of Qualifications (NFQ). Professional awarding bodies or international awarding bodies may in time seek recognition with the NFQ. Hence regulation should take cognisance of the need for such flexibility in the future.

Since the publication of the 2014 Counselling and Psychotherapy Award Standards, several providers have validated or revalidated programmes. These include programmes which have identified either counselling or psychotherapy as the intended focus, while others have been designed to cover both. Appendix 1 (available via http://qsearch.qqi.ie/WebPart/Search?searchtype=programmes) provides a list of all programmes validated by QQI with reference to Counselling or Psychotherapy. Some of these precede the publication of the 2014 standards. There is a duplication where the terms 'counselling' and 'psychotherapy' appear in the same programme. title. Each programme listed includes a hyperlink to specific information on the QQI website which helps identify the level and validation date of the programme. This may prove useful when looking at subject content of programmes and the validation period (first entry to last entry onto programme). In gauging the potential scale of grand parenting it may benefit the Department and CORU to refer to the programmes in Appendix 1.

A further source of information is certification figures i.e. the number of learners who have achieved awards. Each of the providers mentioned in Appendix 1 has a page (accessed via http://qsearch.qqi.ie/WebPart/Search?searchtype=providers) and on that page is a link to 'Infographics' which provides a graphical representation of the provider's certification history by gender, age band, award title.

QQI looks forward to working with the Department and CORU as appropriate during the establishment of the regulation process.

Your faithfully,

Roisin Sweeney

Head of Award Standards
Qualifications Directorate

Appendix 1



43 Programmes named Counselling

HIGHER CERTIFICATE IN ARTS in Applied Social Studies in Counselling Studies DUBLIN BUSINESS SCHOOL

BACHELOR OF ARTS (HONOURS) in Counselling and Psychotherapy DUBLIN BUSINESS SCHOOL

HIGHER DIPLOMA IN ARTS in Counselling and Psychotherapy DUBLIN BUSINESS SCHOOL

BACHELOR OF ARTS in Counselling Skills and Psychotherapy Studies IRISH COLLEGE OF HUMANITIES AND APPLIED SCIENCES LIMITED

BACHELOR OF ARTS in Counselling Skills and Addiction Studies
IRISH COLLEGE OF HUMANITIES AND APPLIED SCIENCES LIMITED

BACHELOR OF ARTS in Counselling Skills and Youth Studies IRISH COLLEGE OF HUMANITIES AND APPLIED SCIENCES LIMITED

BACHELOR OF ARTS (HONOURS) in Counselling and Psychotherapy IRISH COLLEGE OF HUMANITIES AND APPLIED SCIENCES LIMITED

DIPLOMA IN COUNSELLING AND PSYCHOTHERAPY

IRISH COLLEGE OF HUMANITIES AND APPLIED SCIENCES LIMITED

DIPLOMA IN COUNSELLING SKILLS AND ADDICTION STUDIES

IRISH COLLEGE OF HUMANITIES AND APPLIED SCIENCES LIMITED

DIPLOMA IN YOUTH AND COUNSELLING STUDIES

IRISH COLLEGE OF HUMANITIES AND APPLIED SCIENCES LIMITED

CERTIFICATE IN COUNSELLING STUDIES

IRISH COLLEGE OF HUMANITIES AND APPLIED SCIENCES LIMITED

MASTER OF ARTS in Counselling and Psychotherapy

IRISH COLLEGE OF HUMANITIES AND APPLIED SCIENCES LIMITED

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Dearbhú Cáilíochta agus Cáilíochtaí Éireann

MASTER OF ARTS in Counselling and Pastoral Care Quality and Qualifications Ireland IRISH COLLEGE OF HUMANITIES AND APPLIED SCIENCES LIMITED

BACHELOR OF ARTS in Integrative Counselling and Psychotherapy IICP EDUCATION AND TRAINING LIMITED

HIGHER CERTIFICATE IN ARTS in Integrative Counselling and **Psychotherapy**

IICP EDUCATION AND TRAINING LIMITED

BACHELOR OF ARTS (HONOURS) in Integrative Counselling & Psychotherapy

IICP EDUCATION AND TRAINING LIMITED

CERTIFICATE IN INTEGRATIVE COUNSELLING AND **PSYCHOTHERAPEUTIC STUDIES**

IICP EDUCATION AND TRAINING LIMITED

BACHELOR OF ARTS (HONOURS) in Counselling and Psychotherapy Studies

INDEPENDENT COLLEGES

CERTIFICATE IN COUNSELLING AND PSYCHOTHERAPY STUDIES INDEPENDENT COLLEGES

Master of Arts in Pluralistic Counselling and Psychotherapy **IICP EDUCATION AND TRAINING LIMITED**

Postgraduate Diploma in Arts in Pluralistic Counselling and **Psychotherapy**

IICP EDUCATION AND TRAINING LIMITED

Higher Diploma in Arts in Counselling and Psychotherapy DUBLIN BUSINESS SCHOOL

Bachelor of Arts (Honours) in Counselling and Psychotherapy

DUBLIN BUSINESS SCHOOL



Bachelor of Arts in Holistic Counselling and Psychotherapy

International College for Personal and Professional Development

Certificate in Holistic Counselling and Psychotherapy

International College for Personal and Professional Development

Master of Arts in Counselling and Pastoral Care

IRISH COLLEGE OF HUMANITIES AND APPLIED SCIENCES LIMITED

Postgraduate Diploma in Arts in Counselling and Pastoral Care

IRISH COLLEGE OF HUMANITIES AND APPLIED SCIENCES LIMITED

Master of Arts in Counselling and Psychotherapy

IRISH COLLEGE OF HUMANITIES AND APPLIED SCIENCES LIMITED

Postgraduate Diploma in Arts in Counselling and Psychotherapy

IRISH COLLEGE OF HUMANITIES AND APPLIED SCIENCES LIMITED

Bachelor of Arts (Honours) in Counselling and Addiction Studies

IRISH COLLEGE OF HUMANITIES AND APPLIED SCIENCES LIMITED

Bachelor of Arts (Honours) in Counselling and Psychotherapy

IRISH COLLEGE OF HUMANITIES AND APPLIED SCIENCES LIMITED

Bachelor of Arts (Honours) in Counselling and Youth Studies

IRISH COLLEGE OF HUMANITIES AND APPLIED SCIENCES LIMITED

Bachelor of Arts (Honours) in Counselling Studies

IRISH COLLEGE OF HUMANITIES AND APPLIED SCIENCES LIMITED

Bachelor of Arts in Counselling Studies

IRISH COLLEGE OF HUMANITIES AND APPLIED SCIENCES LIMITED

Higher Certificate in Arts in Counselling Studies

IRISH COLLEGE OF HUMANITIES AND APPLIED SCIENCES LIMITED

Certificate in Counselling Studies

IRISH COLLEGE OF HUMANITIES AND APPLIED SCIENCES LIMITED

QQI

Dearbhú Cáilíochta agus Cáilíochtaí Éireann Quality and Qualifications Ireland

Bachelor of Arts in Counselling Skills and Psychotherapy Studies

IRISH COLLEGE OF HUMANITIES AND APPLIED SCIENCES LIMITED

Bachelor of Arts in Counselling Skills and Addiction Studies

IRISH COLLEGE OF HUMANITIES AND APPLIED SCIENCES LIMITED

Bachelor of Arts in Counselling Skills and Youth Studies

IRISH COLLEGE OF HUMANITIES AND APPLIED SCIENCES LIMITED

Bachelor of Arts in Integrative Counselling and Psychotherapy

IICP EDUCATION AND TRAINING LIMITED

- Higher Certificate in Arts in Counselling and Psychotherapeutic Studies
- IICP EDUCATION AND TRAINING LIMITED
- Certificate in Counselling and Psychotherapeutic Studies
- IICP EDUCATION AND TRAINING LIMITED
- Bachelor of Arts (Honours) in Integrative Counselling and Psychotherapy
- IICP EDUCATION AND TRAINING LIMITED



BACHELOR OF ARTS (HONOURS) in Counselling and Psychotherapy DUBLIN BUSINESS SCHOOL

HIGHER DIPLOMA IN ARTS in Counselling and Psychotherapy DUBLIN BUSINESS SCHOOL

MASTER OF ARTS in Psychotherapy

DUBLIN BUSINESS SCHOOL

MASTER OF ARTS in Psychoanalytic Psychotherapy DUBLIN BUSINESS SCHOOL

MASTER OF ARTS in Humanistic and Integrative Psychotherapy and Play Therapy

CHILDREN'S THERAPY CENTRE LIMITED

BACHELOR OF ARTS in Counselling Skills and Psychotherapy Studies IRISH COLLEGE OF HUMANITIES AND APPLIED SCIENCES LIMITED

BACHELOR OF ARTS (HONOURS) in Counselling and Psychotherapy IRISH COLLEGE OF HUMANITIES AND APPLIED SCIENCES LIMITED

DIPLOMA IN COUNSELLING AND PSYCHOTHERAPY

IRISH COLLEGE OF HUMANITIES AND APPLIED SCIENCES LIMITED

MASTER OF ARTS in Counselling and Psychotherapy IRISH COLLEGE OF HUMANITIES AND APPLIED SCIENCES LIMITED

MASTER OF SCIENCE in Systemic Psychotherapy CLANWILLIAM INSTITUTE

POSTGRADUATE DIPLOMA IN SCIENCE in Systemic Psychotherapy CLANWILLIAM INSTITUTE

BACHELOR OF ARTS in Integrative Counselling and Psychotherapy IICP EDUCATION AND TRAINING LIMITED



HIGHER CERTIFICATE IN ARTS in Integrative ounselling and us Califochtaf Éireann Ouality and Qualifications Ireland Psychotherapy

IICP EDUCATION AND TRAINING LIMITED

BACHELOR OF ARTS (HONOURS) in Integrative Counselling & Psychotherapy

IICP EDUCATION AND TRAINING LIMITED

BACHELOR OF ARTS (HONOURS) in Counselling and Psychotherapy Studies

INDEPENDENT COLLEGES

HIGHER DIPLOMA IN ARTS in Psychotherapy Studies INDEPENDENT COLLEGES

CERTIFICATE IN COUNSELLING AND PSYCHOTHERAPY STUDIES INDEPENDENT COLLEGES

MASTER OF ARTS in Psychoanalytic Psychotherapy INDEPENDENT COLLEGES

Master of Arts in Pluralistic Counselling and Psychotherapy IICP EDUCATION AND TRAINING LIMITED

Postgraduate Diploma in Arts in Pluralistic Counselling and Psychotherapy

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QQI

Dearbhú Cáilíochta agus Cáilíochtaí Éireann Quality and Qualifications Ireland

Master of Arts in Psychoanalytic Psychotherapy DUBLIN BUSINESS SCHOOL

Master of Arts in Psychotherapy DUBLIN BUSINESS SCHOOL

Higher Diploma in Arts in Counselling and Psychotherapy DUBLIN BUSINESS SCHOOL

Bachelor of Arts (Honours) in Counselling and Psychotherapy
DUBLIN BUSINESS SCHOOL

Master of Arts in Psychoanalytic Psychotherapy INDEPENDENT COLLEGES

Bachelor of Arts in Holistic Counselling and Psychotherapy International College for Personal and Professional Development

Certificate in Holistic Counselling and Psychotherapy
International College for Personal and Professional Development

Master of Arts in Creative Psychotherapy (Humanistic and Integrative Modality)

CHILDREN'S THERAPY CENTRE LIMITED

Master of Arts in Counselling and Psychotherapy IRISH COLLEGE OF HUMANITIES AND APPLIED SCIENCES LIMITED

Postgraduate Diploma in Arts in Counselling and Psychotherapy IRISH COLLEGE OF HUMANITIES AND APPLIED SCIENCES LIMITED

Bachelor of Arts (Honours) in Counselling and Psychotherapy IRISH COLLEGE OF HUMANITIES AND APPLIED SCIENCES LIMITED

Bachelor of Arts in Counselling Skills and Psychotherapy Studies IRISH COLLEGE OF HUMANITIES AND APPLIED SCIENCES LIMITED

Bachelor of Arts in Integrative Counselling and Psychotherapy

IICP EDUCATION AND TRAINING LIMITED



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