

Submission to Oireachtas Joint Committee Education, Further and Higher Education, Research, Innovation, & Science

Professional Accreditation of Higher Education (HE) courses
with specific reference to Health and Social Care Professions

THE HIGHER EDUCATION COLLEGES ASSOCIATION (HECA)

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1. Introduction

On behalf of the Higher Education Colleges' Association (HECA), I would like to thank the Chair and the Joint Committee Members for the opportunity to speak with you today.

The attainment of high-quality graduate outcomes stands as the central purpose of professional accreditation and approval, a goal towards which HECA member higher education providers are absolutely committed, supported by the robust regulation of both Quality and Qualifications Ireland (QQI) and, the Health and Social Care Professionals Council (CORU). All strive for high quality education provision and professional training that needs to be responsive to changing societal needs and shifts in professional practice¹. We are very supportive of the valuable work that CORU undertakes in terms of public protection, and that QQI undertakes to underpin the quality of educational awards offered.

In 2022, one private higher education institution (HEI), a member of HECA, and one public HEI² withdrew their applications from the CORU approval process for their social care programmes. In the case of the private provider the withdrawal prompted diverse stakeholder responses, student disruption and HEI uncertainty and risk. It also highlighted the need for significant improvement in the current system overseen by both Professional, Statutory, and Regulatory Bodies (PSRBs) and educational awarding bodies. Given the shared responsibilities of all parties to produce graduates who are qualified to work in health and social care settings and given the high demand in Ireland for such workers, it is crucial to anticipate and avert future failures in the implementation of regulations. This foresight involves adopting proactive measures to avert severe outcomes such as withholding recognition, strengthening the existing regulatory mechanisms and inter-agency collaboration and maintaining clear, open communication lines.

Confluence of Processes

HECA believes the shared responsibilities referred to can be best achieved through structures which might ensure a confluence of validation and professional recognition processes. Providers engage in complex academic and professional approval processes which are currently undertaken as separate processes, leading to a lack of cohesion and potentially contradictory outcomes. To address this, the integration of the Academic Awarding Body validation and CORU professional accreditation processes should be considered. This integration could take the form of a single panel undertaking a unified process ensuring programmes are fit for shared purposes³.

This approach can also mitigate unnecessary duplication, thus reducing the administrative load on providers, QQI, and CORU, without compromising the rigour and protective essence of both processes.

¹ Joint Roles and Responsibilities Pg 9 <https://www.qqi.ie/sites/default/files/media/file-uploads/Towards%20Principles%20for%20Accreditation%20and%20other%20Professional%20Engagements.pdf>

² O Keeffe D (2023) ['We won't be able to work here': MTU social care course not yet approved by regulator](#) Evening Echo

³ The present separate validation and accreditation procedures may create a situation where multiple versions of the programme emerge, post each respective process. This consequently can lead to a perpetual lack of synchronisation between reapproval and revalidation procedures and at times such discrepancies can have a detrimental effect on the clarity of information available to students before enrolling in the programme and throughout its delivery.

Establishment of a National Working Group

We advise the Committee to consider recommending the establishment of a national working group. This working group should comprise key stakeholders, including representation from private and/or independent providers, to support the improved cohesion of these separate legislative processes⁴. This would serve the best interests of students, clients, and the public, preventing future contradictory outcomes.

Early Accreditation

The public's best protection is ensured when every student reaching the end of their course achieves the qualifying proficiency standard. This outcome is best attained through continuous consultation and early accreditation by CORU.

Recognition of Prior Learning (RPL)

A specific instance of policy divergence between CORU and the QQI arises with Social Care programmes. Here, the Recognition of Prior Learning (RPL) does not appear to be endorsed by CORU, conflicting with national Access, Transfer, and Progression policies outlined by QQI⁵. Such inconsistency may not serve the best interests of all students, especially those considering a transfer during their studies due to diverse reasons. It may also provide impediments to academic bonding arrangements for Protection of Enrolled Learners involving course transfer⁶.

Transparency

In general, we would stress the need for enhanced clarity, transparency and timely information from CORU to all providers to improve common understanding.

Counselling, Psychotherapy and Psychology

Current uncertainties in the areas of Counselling, Psychotherapy, and Psychology have caused anxiety among students and deterred potential applicants, which could lead to future professional shortages. Clear precise information and timelines for statutory regulation could help students make informed decisions regarding their courses. Additionally, providers should be enabled to deliver accurate information to students about progression routes and programme accreditation status.

With respect to psychology, some further clarity on the fields within psychology that will be regulated is required and how this may affect higher education programmes such as Work & Organisational, Educational, Clinical and Sports Psychology.

⁴ For example, in order to achieve this, we suggest that a national working group of relevant stakeholders (including publicly and privately and/or independent funded HEI's, CORU, QQI, DFHERIS, Department of Health, Learner representatives and public interest members) is convened and required to make recommendations as to how such processes might be operationalised which would be chaired by an independent Chair and report within a six-month period.

⁵ Recognition of Prior Learning for Providers <https://www.qqi.ie/what-we-do/qqi-awards/recognition-of-prior-learning-provider>

⁶ A further consequence of RPL not being recognised is that it challenges the requirements for the Protection of Enrolled Learners (PEL) set out in [Section 65 \(4\) \(a\) of the Qualifications and Quality Assurance \(Education & Training\) Act 2012](#), which states that "*an agreement between the provider of the programme and at least 2 other providers that an enrolled learner may transfer to a similar programme of those other providers*". Most HECA providers have arrangements in place to meet the requirements of Section 65 (4) (a) and those arrangements cannot protect the learner if prior learning is not recognised.

Conclusion

In conclusion, to support professional training and education provision, safeguard students, and maintain public confidence, it is crucial to streamline validation and accreditation processes, establish a national working group, harmonise policies, and address uncertainties in the fields of Counselling, Psychotherapy, and Psychology.

Thank you.

