

Validation Report of Expert Panel

Part 1

General Information

Provider	International College for Personal and Professional Development (ICPPD)
Date of Visit	11 December 2013

Proposed Programmes

1. Bachelor of Arts in Holistic Counselling and Psychotherapy (Level 7)
2. Certificate in Holistic Counselling and Psychotherapy (30 credit Minor Award, Level 6)

Expert Panel

Name	Areas of Expertise	
Danny Brennan	QA, Programme Validation, Bologna Expert	Former Registrar with LYIT
Dr Eve Watson	Programme design and delivery. Clinical Practitioner	Head of Psychotherapy Programmes and a Senior Lecturer in Independent College
Prof Denis Ryan	Programme design and delivery. Clinical Practitioner	Head of Academic Affairs / Director of Graduate Studies Irish College of Humanities and Applied Sciences (ICHAS)
Enda Murphy	Clinical Practitioner	Assistant Director, Specialist General Practitioner training Scheme, Health Service Executive and CBT Project Director, Irish College of General Practitioners.

QQI, Quality Assurance Services personnel (in attendance)

Colette Harrison	Manager, Provider Recognition
Anne Maher	Administration Executive, Provider Recognition

Summary

The Expert Panel (the Panel), having reviewed the documentation presented by **the International College for Personal and Professional Development (ICPPD)** and considered the responses of the programme team during the course of the evaluation meeting, does not recommend for approval to QQI the proposed *Bachelor of Arts in Holistic Counselling and Psychotherapy* NFQ Level 7 or *Certificate in Holistic Counselling and Psychotherapy* NFQ Level 6.

It is the view of the panel that the programmes as presented do not appropriately address the criteria and requirements for an academic programme leading to an NFQ Level 6 or Level 7 award.

Specifically the Panel has identified issues with the:

- overall structure and content of the programmes;
- proposed title of the programme given the balance of programme content;
- programme and module learning outcomes;
- assessment strategy proposed for the programme.

The Panel is of the view that having the proposed NFQ Level 6 minor award as an entry requirement for access to the *ab initio* Level 7 programme is inappropriate.

The Panel recommends to QQI that ICCPD should be permitted to make a resubmission of a Bachelor of Arts Programme at Level 7 with an exit award at Level 6 after the successful completion of 60 credits of that programme. The Panel understands that resubmission will be considered using the legacy processes of HETAC.

The Panel further recommends that the programme should be re-designed having regard to the soon to be published QQI award standards for Counselling and Psychotherapy.

Part 2 Findings of the Panel

2.1 Introduction

Since its establishment in 2009, ICCPD offers a range of programmes at its premises in Athlone and a number of other centres. The programmes offered relate to counselling, personal development, art therapy and mindfulness.

The programmes offered include a 3 year Professional Diploma in Holistic Counselling and Psychotherapy accredited by the National Association for Pastoral Counsellors and Psychotherapists (NAPCP) and a one year Foundation programme in Holistic Counselling and Psychotherapy. These programmes are offered on a part time basis only. In effect, it is these two programmes that are the subjects of the current QQI validation process.

ICCPD applied to HETAC to become a recognised provider in July 2010. HETAC undertook an Institutional Approval panel visit in June 2011, and further to conditions and recommendations made by the panel, a resubmission was required. The resubmission was received in July 2012 and HETAC reconvened the Panel to conduct a further evaluation on 18 September 2012. This Panel recommended institutional approval subject to a number of conditions and recommendations. A deadline of 12 April 2013 was agreed with QQI for submission of a programme to be evaluated under HETAC's legacy processes, as per the savings provisions of the Education and Training Act 2012, including Protection of Enrolled Learner arrangements.

ICCPD submitted two programmes for evaluation: an NFQ Level 7 Bachelor of Arts award and an NFQ Level 6 Certificate.

Following its review of the programmes as presented, the Panel is of the view that elements of the NFQ Level 6 programme might be incorporated in a re-designed Level 7 programme with 120 credits at level 6 followed by 60 credits at level 7. This would overcome the current issue of the suite of programmes having 180 credits at level 6 with 60 credits at level 7 and the consequent repetition of content at level 6. Having determined that it was inappropriate to view the NFQ Level 6 programme as a separate award, the Panel considered the NFQ Level 7 programme in detail. This position was

explained to ICPPD at the beginning of the visit.

2.2 Examination of the Programme

2.2.1 Education and Training Requirements

ICPPD'S aim in developing this programme is to enable learners to develop into competent professional practitioners in the field of counselling. The programme clearly targets adult learners and is structured to be delivered in part-time mode with delivery at weekends. The College also explained the selection process used when assessing the suitability of applicants to access the programme. To date the cohort of learners have been drawn from a variety of occupational and educational backgrounds.

As the focus of the programme is to meet the needs of a professional body, there is a requirement on learners to undertake a minimum of 50 hours 'personal therapy' over the three year period. All requirements of the programme need to be amenable to assessment and appropriate credits allocated.

The programme as currently structured requires learners to attend for 30 hours directed learning and 210 self-directed learning per module. The Panel is of the view that ICPPD should increase the quantum of direct class contact in order to ensure that learners are better prepared to meet the programme outcomes.

2.2.2 Protection of Enrolled Learners

Validation of a programme of education and training pursuant to Part 6 (Sections 64-67), of the Qualifications and Quality Assurance (Education and Training) Act 2012 is subject to QQI being satisfied that the provider concerned has arrangements in place in accordance with the Protection of Enrolled Learners: Protocols for the Implementation of Part 6 of the 2012 Act.

2.2.3 Quality Assurance

The need to ensure that appropriate standards will apply to ICPPD academic provision, the role of the Registrar and appropriate governance structures was noted in the Institutional Approval Report and further discussed. The Panel acknowledges that considerable progress has been made since that Report.

The Panel was assured that ICPPD is committed to maintaining appropriate resources and processes to ensure the programme meets the appropriate standards.

The recommendations of that Report appear to have been addressed and the Panel noted:

- the current contract arrangements for a Registrar;
- the resubmission of ICPPD's Quality Assurance procedures document to QQI, in August 2013;
- that active consideration is being given by ICPPD to developing its technical infrastructure to accommodate a distance learning capacity. In this regard the Panel urges that the College should prioritise the provision of a functioning Virtual Learning Environment (VLE)

The Panel was informed that the submission was developed and approved internally in accordance with the College's quality assurance procedures.

The NFQ Level 7 programme as presented by ICPPD is, in effect, the programme approved for the purpose of professional accreditation in January 2012 by the National Association for Pastoral

Counselling and Psychotherapy (NAPCP). ICPPD intends to submit the programme to the Irish Association for Counselling and Psychotherapy (IACP) when it is eligible for consideration by that body.

The programme was designed to meet both the educational and professional preparation requirements for professional membership of these bodies. However, the panel determined that the programme as presented, does not appropriately address the criteria and requirements for an academic programme leading to an NFQ Level 7 award.

2.2.4 Programme Titles and Award Titles

The programme title was discussed by the panel with ICPPD. Clarification was provided by the College on the volume of learning to be undertaken by the learners in counselling and in psychotherapy in order to justify the appropriateness of the proposed title. However, the Panel is of the view that there was not sufficient programme content in the field of psychotherapy to justify the titling of the programme as 'Holistic Counselling and Psychotherapy'. The Panel is also of the view that the programme does not have a sufficient level of integration of module content to warrant the inclusion of 'Holistic' in the title.

The Panel recommends that the College should review in detail the proposed title of any re-submitted programme to ensure it is clear, accurate and fit for the purpose of informing prospective learners and other stakeholders and which meets the requirements of QQI.

2.2.5 Ethics

The Panel was assured of ICPPD's commitment to maintaining the highest ethical standards when engaging with its learners as it adheres to the standards set by its professional body, the National Association for Pastoral Counselling and Psychotherapy.

2.3 Particular Aspects of Programme Provision

2.3.1 Unity

The programme design was observed to be consistent with the Policy on Accumulation of Credits and Certification of Subjects (ACCS).

The Panel discussed its concerns about a number of aspects of the programme design and content with the College which can be summarised under the following headings:

Structure and delivery

- There should be a fundamental review of programme structure and delivery methodologies to address identified weaknesses.
- The practice of delivering modules sequentially rather than in parallel may lead to a lack of a fully integrated understanding of material.
- The inclusion of some five credit modules would have provided a more balanced programme design. In all cases credit allocation must be related to expected learner workload.
- The structure of the programme does not support learners to develop a unified understanding of programme content and thereby meet the outcomes required.
- The perceived lack of integration of theoretical and experiential modules to support the programme outcomes in the current approach is a significant deficit.
- Direct class contact hours for the part-time delivery mode were deemed insufficient in this context.

Programme content and objectives

- The Panel acknowledge that many of the issues with the content and structure of the programme arise from aiming to meet the different demands of both an academically-led versus professionally-led programme. In this regard, the perceived focus of the programme on professional accreditation has led to the inclusion of material inappropriate for an academic programme. The modules on volunteering and the content of the submission relating to the College's role in relation to fitness to practice are two particular examples of this.
- The lack of a comprehensive treatment of a philosophical and conceptual underpinning of the discipline, communications theories, ethics and research skills is a significant omission.
- The opportunity to include a skills module that would add coherence to the programme was a significant omission.
- Having personal therapy as an extra-curricular activity is not advisable and it is better that it be built into the programme. The learning should be appropriately credited and assessed.

2.3.2 Teaching and Learning

The Panel was impressed with the enthusiasm, commitment and subject knowledge of the staff. ICCPD's proposed programme approaches to teaching and learning were discussed. The earlier comments on the level of direct class contact are pertinent in this regard.

It was clear to the Panel that there is a significant commitment to the personal development of each learner on the programme.

2.3.3 Teacher-Learner Dialogue

The modes of interaction between the teaching staff and the learners were elaborated upon satisfactorily.

Teaching staff who met with the Panel indicated a high level of commitment to the College and its learners. Although the majority of the teaching staff are part-time, they collectively displayed a high level of commitment to the College in how they plan to deliver the programme.

Teaching staff were observed by the panel to be generally authoritative in their responses on the subject matter and content proposed for the programme. Some issues were noted in relation to the differences in delivering a prescribed programme leading to professional accreditation with which the staff are familiar and the requirements of delivering and quality assuring an academic programme leading to an NFQ Level 7 award.

2.3.4 Standards/Learning Outcomes

The programme was developed using HETAC's Generic award standards. QQI is currently developing award standards in the areas of counselling and psychotherapy.

The College participated in a consultation event organised by QQI and are well informed about the various issues relating to this development. It was acknowledged that any revision of the programme should be done using the draft counselling and psychotherapy standards. This would ensure the longevity and relevance of the programme for learners seeking to undertake the programme offered by ICCPD.

The Panel indicated general satisfaction with the majority of the programme learning outcomes as stated within the programme document. However it identified that a number of the learning

outcomes were only appropriate in the context of a programme leading to recognition by a professional body.

In its discussions with the teaching staff, the Panel identified that a number of module learning outcomes were inappropriate and there were a number that could not be satisfactorily assessed.

The Panel recommend a review of all the learning outcomes to ensure that each learning outcome is expressed in appropriate language and that each outcome can be assessed.

2.3.5 Learner Assessment

The programme's learner assessment methods were discussed in detail. The panel identified potential issues with the limited range of assessment approaches proposed.

The assessment methods must be capable of demonstrating, amongst other things, attainment of the standards of knowledge, skills or competence, determined by QQI, for the related award, Bachelor of Arts (NFQ, Level 7).

The Panel noted the College's decision to use continuous assessment methods only and have no terminal assessments.

The Panel made the following specific observations on assessment, and the College is advised to consult with the HETAC policies: *Assessment and Standards (December 2009)*, and *Core Validation Policy and Criteria (October 2010)* in this regard:

- Clear criteria for learner assessment relevant to each module needs to be developed;
- A range of continuous assessment approaches should be considered, for example graded group discussions, presentations and Multiple Choice Questions;
- Some rebalancing of the individual assessment instruments is also suggested to reflect the practice elements and theory as appropriate;
- The inclusion of terminal assessments should be considered;
- Steps to be taken to accommodate a range of learning styles within the programme;
- The College should review the balance between assessments and credits to ensure fairness and equity throughout.

2.3.6 Access, Transfer and Progression

The panel is satisfied that the proposed programme is in line with the requirements of the Education and Training Act 2012, the operational principles of QQI, and accommodates a variety of access and entry requirements from applicants who demonstrate interest and experiential learning in this field of study.

The College confirmed that it intends to develop a Level 8 programme in the area in due course. In the meantime a NFQ Level 8 progression opportunity is in place whereby learners completing the Level 7 programme would be eligible to apply for admission to PCI College's Level 8 one year add on programme leading to a BSc (Hons) in Counselling and Psychotherapy.

2.3.7 Staffing and Physical Resources

The Panel was satisfied that the necessary staffing levels will be in place and was generally satisfied with the level of qualifications and competence of the staff concerned. The Panel acknowledges ICPPD's commitment to student support by having dedicated staff in this area.

The physical resources in Athlone and Galway are considered adequate for the provision of the programme. The Panel, however, expressed concerns that the appropriate technical infrastructure, online and library resources are not sufficient to meet the demands of a programme that relies heavily on self-directed learning in order to achieve the programme and module learning outcomes.

The panel acknowledges that some work has been undertaken on the development of such resources in recent months and that ICPPD is committed to making the necessary investment to put these adequate resources in place.

Part 3 Conditions and Recommendations

The Panel is of the view that ICPPD has the capacity to deliver an NFQ Level 7 programme in the field. However, any new programme submission must ensure that it fully meets the requirements of an academic programme leading to an award at that level and addresses the issues identified.

ICPPD is further advised to take account of the new award standards in the area of counselling and psychotherapy in order to assure the learners of the currency and value of the programme offered.