

Public Consultation on the Education Quality Assurance Standards for Clinical, Counselling and Educational Psychologists

A.S.T.I Submission, 29th November 2024

Introduction and context

The ASTI is the largest second-level teachers union representing over 20,000 teachers working across all second-level education sectors. It has a long track record of engagement with public consultation and policy formation processes on all aspects of public policy impacting on children and young people not just in the school system but across society as a whole. In this context, we are concerned that we did not receive any communication from CORÚ to advise of the current consultation. This is an unusual departure from the normal communication models employed by many other regulatory bodies. With regard to the latter, it must be pointed out that the three teacher unions – ASTI, INTO and TUI – were both instrumental in securing the establishment of the regulatory body for teachers and teachers constitute 22 out of the 37 members of The Teaching Council. In other words, the ASTI has significant and deep knowledge of the role, work and mission of regulatory bodies and the importance of communication with all the relevant stakeholders on all matters likely to impact on their professional work and mission.

NEPS and second-level schools

The National Educational Psychological Service (NEPS) is the psychological service of the Department of Education and provides an educational psychological service to primary, post-primary and special schools in Ireland. The Department of Education/NEPS is the principal employer of Educational Psychologists in Ireland. There are currently 240 psychologists employed by NEPS providing essential support to children and young people in schools in Ireland and supporting school staff to support the needs of their pupils/students. Each day the national media provide information on the difficulties families encounter in securing appointments with professional services, including that of educational psychologists, to identify and address children's and young people's needs. The demand for educational psychologists in the system is unrelenting and as education policy frameworks such as wellbeing, anti-bullying, codes of behaviour continue to be introduced in schools, this demand will only expand from year to year.

Proposed Standards for Registration

The ASTI is extremely concerned that the proposed pre-registration education and training requirements for each of the three specialisms will have an immediate negative impact on the operation of the NEPS in schools. After years of under-staffing, NEPS is finally moving to a sustainable staffing level which will ensure that schools, families and young people will get the early interventions and professional support to meet needs. We are aware that currently 25% of the NEPS workforce have trained outside of the jurisdiction and largely in the UK, including Northern Ireland. In NEPS Region 2, which includes Counties Monaghan, Cavan and Louth, 31% of the Educational Psychologists were almost exclusively trained in the UK. In NEPS Region 6, which includes Counties Donegal and Leitrim, 53% of the Educational Psychologists were trained in the UK. NEPS needs to continue to recruit outside the jurisdiction to meet its staffing projections. The ASTI has been a member of various NEPS working groups/committees over the years and the appropriateness of UK-accredited psychologists has never

emerged as problematic. NEPS needs to be in a position to continue to recruit educational psychologists who complete their doctorate level training in the UK and ensure that they continue to be eligible to be recruited by NEPS.

The ASTI is of the view that if adopted in their current form, the draft Standards of Proficiency and Education and Training Criteria which required that training placements take place in two health settings, will significantly reduce recruitment to the NEPS service and to many other public and private mental health, disability and care services working with children and young people. Such services are already under-staffed and unduly restrictive registration requirements will impact immediately on recruitment and capacity. From our experience in The Teaching Council, less restrictive criteria can be implemented and reasonable conditionalities required for upskilling and professional learning.

The ASTI believes that the required standards of proficiency can be demonstrated in the broad range of education settings - mainstream schools, special schools, special classes, Youthreach, home-schooled children - in which NEPS works. There is no reason to believe that the standards of proficiency for educational psychologists cannot be demonstrated across these education settings given that the majority of children who receive health services also attend school on a daily basis.

Wider policy issues

The ASTI must also draw the attention of CORU to the wider political project and education policy space of the Shared Island initiative. The latter is a high-level political project located in the Office of the Taoiseach. Education is a key strand in this project and facilitating labour mobility within and across education services is a key priority. Regulatory bodies such as CORU must be mindful of the implications of their work on wider state projects. Moreover, there is an acknowledged and growing workforce shortage in education which is not confined to teachers but includes all the other professionals, including education psychologists. CORU must be part of the solution to these problems in Ireland and develop creative responses and appropriate requirements on foreign accredited professionals.

The ASTI is formally requesting that CORU reconsider these criteria so that their work, which is valuable and being done in the interest of protecting the public, might not inadvertently create a situation whereby the provision of this essential public service is reduced or depleted.