

INTO Submission

Public Consultation on Draft Standards and Criteria for Educational Psychologist regulation

November 2024

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Submission on behalf of the INTO

To CORU - Regulating Health & Social Care Professionals

On Public Consultation on draft Standards and Criteria for Educational Psychologist regulation



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The Irish National Teachers' Organisation (INTO) welcomes the opportunity to contribute to the consultation process being conducted by CORU on the standards of proficiency and education and training criteria for Educational Psychologists in Ireland.

The Irish National Teachers' Organisation (INTO) is the oldest and largest teachers' trade union and education professional body on the island of Ireland representing 54,000 teachers and organising in primary and special schools in the Republic of Ireland (ROI) as well as in nursery schools, primary schools and post-primary schools in Northern Ireland (NI). the INTO, as a key stakeholder in the primary education sector, wishes to be proactive in ensuring that its members voices are heard.

The INTO fully supports an inclusive approach to education and recognises the constitutional right of all children to receive an education suitable to their needs, provided by the state. As stated in the Education Act, 1998, section 7, the Minister is responsible for ensuring that; "there is made available to each person resident in the State, including a person with a disability or who has other special educational needs, support services and a level and quality of education appropriate to meeting the needs and abilities of that person."

We greatly value the contribution made by educational psychologists to the children we teach, and indeed the support they give to us as fellow professionals. We welcome the development of draft Standards of Proficiency and Education and Training criteria for Educational Psychologists. Ireland needs a strong regulated Educational Psychologist profession to support the vast range of needs of our children and young people in our schools. We also recognise the need to ensure that Educational Psychologists in Ireland meet a consistent level of professional competence, while also protecting the public by safeguarding the use of the title Educational Psychologist.

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.

The INTO believes that all children with additional needs are entitled to a full assessment with an appropriately trained professional regardless of where in the country they reside. However, our members have repeatedly voiced concern about gaps in the service and the need to appoint additional educational psychologists. The INTO has long campaigned for the expansion of the NEPS service as we believe that Ireland's schools and vulnerable pupils require a strong NEPS service to support an inclusive education system. Teachers and schools are often the first and at times only, stakeholders providing support to children who have additional needs and who are waiting an unnecessarily long time to go through a process of being assessed by either the National Educational Psychological Service (NEPS) or the Health Service Executive (HSE). Teachers are limited in the supports they can offer these children without the advice, input, guidance and support of the appropriately qualified professionals. Collaborative multidisciplinary assessment should also be readily available in a pre-school setting to maximise early intervention. For these reasons, it is imperative that NEPS has a well-staffed and highly skilled workforce and that the current staffing levels at NEPS are dramatically increased.



We understand that if the draft Standards of Proficiency and Education and Training criteria are published in their current form there will be a risk of having fewer educational psychologists available to NEPS to carry out their work. The Standards proposed are such that Educational Psychologists who have been trained to doctorate level in the UK, a cohort that we understand currently provides for 25% of the NEPS staffing, will not be eligible for registration as Educational Psychologists in Ireland into the future.

We understand also that there would be a requirement for this professionally qualified group of Educational Psychologists to demonstrate post-graduation in the UK, the CORU standards of proficiency in two healthcare settings (Child & Adult Disability and Adult Disability) before being eligible for registration in Ireland. These criteria are not easily obtainable, post-graduation, as 'top-up' courses. They would be a significant additional and disproportionate burden on this cohort of professionally recognised Educational Psychologists, on which NEPS depends for a significant proportion of its workforce and upon which INTO members rely to provide essential educational psychological services for children and young people in their schools.

Secondly, we suggest that the Draft Education and Training criteria as proposed by CORU for Educational Psychologists are <u>disproportionately restrictive</u>, insisting as they do that training placements take place in two health settings, in addition to an education setting. We assert that the standards of proficiency can be demonstrated in the broad range of education settings (mainstream schools, special schools, special classes) in which educational psychologists work in Ireland, and with the broad range of children with whom NEPS works. Schools include children with special or additional educational needs, existing on a continuum ranging from mild to more significant/complex, and from transient to long term. They also include children who are at risk of marginalisation due to environmental and other factors including child poverty, trauma and displacement. There is no reason to believe that the standards of proficiency for Educational Psychologists cannot be demonstrated across education settings, given that most children who receive services from health also attend school daily.

This is a very worrying development for our all-island organisation and flies in the face of efforts made by the Shared Island initiative under Roinn an Taoisigh which advocates strongly for a joined-up approach to higher education across the island of Ireland. It is also inconsistent with the approach of other regulatory bodies, notably the Teaching Council, who have provided a clear route for the registration of teachers from NI and the UK by continuing to adhere to the European mutual recognition of professional qualifications post-Brexit. It would have a disproportionate impact on those living and working in Border areas, where many people do their post graduate studies in the UK and NI.

INTO is committed to an inclusive education system that meets the needs of all children, especially those with special education needs, but teachers cannot provide this on their own. They need support from other professionals, including Educational Psychologists working in a fully staff and expanded NEPS. Any barriers to professionals educated in other jurisdictions becoming registered will diminish the current service. The recognition of qualifications from outside the state is a matter which has been dealt with appropriately by other regulatory bodies using instruments such as conditional registration, adaptation periods and the provision of appropriate professional development. In the interests of improved outcomes for



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the children who use the NEPS service and the teachers who work with them each day, we would urge that the proposals would be revisited.

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