

**QQI**Quality and Qualifications Ireland  
Dearbhú Cáilíochta agus Cáilíochtaí Éireann

# Independent Evaluation Report on an Application for Validation of a Programme of Education and Training

## Part 1 A

<b>Provider name</b>	DBS
<b>Date of site visit</b>	15 <sup>th</sup> April 2019
<b>Date of report</b>	27 <sup>th</sup> August 2019
<b>Is this a re-validation report (Yes/No)</b>	Yes

## Overall recommendations

<b>Principal programme</b>	<b>Title</b>	BA (Hons) Counselling and Psychotherapy
	<b>Award</b>	Bachelor of Arts (Hons)
	<b>Credit<sup>1</sup></b>	240 ECTS
	<b>Recommendation</b> <i>Satisfactory OR Satisfactory subject to proposed conditions<sup>2</sup> OR Not Satisfactory</i>	Satisfactory

<sup>1</sup> Specify the credit units because more than one system of units is in use. E.g. 20 (ECTS).

<sup>2</sup> Normally an application that fails to meet the criteria in any of its aspects will be considered as not satisfactory. Nevertheless, so as to ensure that the validation process will not be implemented unreasonably, if an independent evaluation finds that a programme virtually meets the validation criteria but needs some minor modifications, the independent evaluation could conclude "Satisfactory subject to recommended special conditions" where the special conditions prescribe the defects that require to be corrected.

Further, in exceptional cases the 'special conditions' may be used to identify parts of the application that are considered satisfactory on a stand-alone basis. For example, an application might propose a programme to be provided at two locations but the independent evaluation report may find the application satisfactory on condition that it be provided only at one specified location and not at the other. These conditions will not however be used to recommend that QQI can be satisfied with a programme conditional on a different QQI award (e.g. at a lower NFQ level or having a different CAS award title) being sought than the one identified in the application.

<b>Embedded programme<sup>3</sup></b>	<b>Title</b>	Higher Certificate in Applied Social Studies
	<b>Award</b>	Higher Certificate in Arts
	<b>Exit award (Yes/No)</b>	Yes
	<b>Credit</b>	120 ECTS
	<b>Recommendation</b> <i>Satisfactory OR Satisfactory subject to proposed conditions OR Not Satisfactory</i>	Satisfactory

## Evaluators

<b>Evaluators</b>		
<b>Name</b>	<b>Role</b>	<b>Affiliation</b>
Donna Bell	Chair	Independent Consultant, Education and QA
Mary Jennings	Secretary	Independent Consultant
Gerry Moore	Subject Expert	Associate Professor and Chair of the Masters in Psychotherapy, DCU
Gerry Myers	Subject Expert	Course Director for MA in Integrative Psychotherapy, University of Limerick; Psychotherapist in Private Practice
Alan Dignam	Learner Representative	MA student in Psychotherapy IICP College, Tallaght, Dublin
Eileen Prendiville	Employer Representative	Private Practitioner, psychotherapist, Director of Academic Affairs, Children's Therapy Centre.

All members of the panel have declared that they are independent of DBS and have no conflict of interest.

<sup>3</sup> Copy this panel for each embedded programme.

## Part 1 B

### BA (Hons) Counselling and Psychotherapy (Principal Programme)

Names of centres where the programmes are to be provided	Maximum number of learners ( <i>per centre</i> )	Minimum number of learners
DBS Dublin Campus	120	12

<b>Enrolment interval (<i>normally 5 years</i>)</b>	<b>Date of first intake</b>	September 2019
	<b>Date of last intake</b>	August 2024
<b>Maximum number of annual intakes</b>	2 – September and January	
<b>Maximum total number of learners per intake (over all centres)</b>	120	
<b>Programme duration (<u>months</u> from start to completion)</b>	Part-time, 2 semesters of 12 weeks each completed each academic year (8 semesters over 4 years) 24 months	
<b>Target learner groups</b>	<p>The BA (Hons) in Counselling and Psychotherapy programme is aimed at applicants who are drawn to study and work involving the exercise of listening who have encountered counselling and psychotherapy in some capacity and have been drawn to pursue formal study and training in the field. They may or may not have engaged in prior formal study of counselling and psychotherapy but will possibly have been involved experientially in areas related to psychology or psychotherapy or have engaged in their own personal therapy. The programme is aimed at those who wish to acquire an undergraduate qualification in the practice of counselling and psychotherapy. The programme introduces learners to the core theoretical and practical elements of the disciplines and brings them to the point of sufficient knowledge, know-how and skills and competence to match those of a graduate of award Level 8. Thus, it will enable students to graduate with a relevant qualification suited to a broad range of career and professional development options and progress on the path towards becoming a professional working in this field. On completion of this course, learners will have acquired a broad undergraduate education and the practical and intellectual skills required for postgraduate education and a variety of career paths.</p> <p>This programme is also aimed at those who wish to learn counselling and psychotherapeutic skills, and to practice those skills, whether as a professional or in related fields such as social care, community work, in the Gardaí, in an education setting or in the voluntary sector.</p>	
<b>Approved countries for provision</b>	Ireland	
<b>Delivery mode: Full-time/Part-time</b>	Part-time	
<b>The teaching and learning modalities</b>	<ol style="list-style-type: none"> <li>1. Classroom lectures</li> <li>2. Case-based learning</li> <li>3. Practical skills sessions</li> </ol>	

	<p>4. Workshops</p> <p>5. Tutorials</p> <p>6. Individual and group work</p> <p>7. Blended Learning</p>
<p><b>Brief synopsis of the programme (e.g. who it is for, what is it for, what is involved for learners, what it leads to.)</b></p>	<p>The BA (Hons) in Counselling and Psychotherapy (BACAP) award, consists of: experiential training groups, personal development through the experience of psychotherapy and process groups and supervised clinical practice. These components are represented throughout the modules over the four years of the BA (Hons) programme. Personal psychotherapy, undertaken at the latest in the second year of the programme, is a requirement that is not represented in the modules of the course. The other major component of personal exploration and development, namely the Process Group Work is represented.</p> <p>The orientation of the programme is integrative/humanistic, and learners are introduced to the principles of psychoanalysis, developmental psychology, existential psychotherapy, cognitive behavioural therapy (CBT) and so on. The programme is centred around the learners' personal development, and also provides them with experience of counselling and psychotherapy through both group and individual settings. Alongside the learners' own experiential learning, the programme develops knowledge of different forms of psychopathology and theories of psychotherapy and counselling. The programme includes the required counselling skills, personal development and theoretical components which mean it is recognised by the Irish Association for Counselling and Psychotherapy (IACP).</p> <p>The programme is constructed as a four-year part-time programme of 30 modules leading to an award of BA (Hons) in Counselling and Psychotherapy.</p>
<p><b>Summary of specifications for teaching staff</b></p>	<p>Lecturing staff will have a minimum of a Masters and/or PhD in Counselling and Psychotherapy.</p> <p>They should also have teaching, training, supervising or research experience within the counselling and psychotherapy field but also specific to the modality being taught. Staff, in a practice-oriented programme should have considerable practical/clinical experience in mutually supporting theory and practice learning opportunities for learning.</p>
<p><b>Summary of specifications for the ratio of learners to teaching-staff</b></p>	<p>1:30 for classroom sessions</p> <p>1:15 for skills and training modules</p> <p>1:12 for process sessions</p> <p>1:4 for group supervision</p>

<b>Overall WTE staff/learner ratio.<sup>4</sup></b>	Overall WTE ratio staff to learner is 0:129
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### Programmes being replaced by the Principal Programme

Programmes being replaced (applicable to applications for revalidation)			Arrangement for enrolled learners	Date when replaced programme is planned to cease completely
Code	Title	Last enrolment date	Indicate whether "Teach out" or "Transfer to replacement programme"	
PG21086	BA (Hons) Counselling and Psychotherapy	September 2018	Transfer to replacement programme	September 2019

### Higher Certificate in Applied Social Studies

Names of centres where the programmes are to be provided	Maximum number of learners (per centre)	Minimum number of learners
DBS Dublin Campus	120	12

<b>Enrolment interval (normally 5 years)</b>	<b>Date of first intake</b>	January 2019
	<b>Date of last intake</b>	August 2024
<b>Maximum number of annual intakes</b>	2 – September and January	
<b>Maximum total number of learners per intake</b>	120	
<b>Programme duration (months from start to completion)</b>	Part-time, 2 semesters of 12 weeks, each completed each academic year. 6 months in total.	
<b>Target learner groups</b>	The Higher Certificate in Applied Social Studies is an embedded award in the BA (Hons) Counselling and Psychotherapy and, similar to the principal programme, is aimed at applicants who are drawn to study and work involving the exercise of listening who have encountered counselling and psychotherapy in some capacity and have been drawn to pursue formal study and training in the field. They may or may not have engaged in prior formal study of counselling and psychotherapy but will possibly have been involved experientially in areas related to psychology or psychotherapy or have engaged in their own personal therapy. The programme introduces learners to the core theoretical of the disciplines and brings them to	

<sup>4</sup> This is the total wholetime equivalent number of staff dedicated exclusively to this programme divided by the maximum number of learners that can be enrolled with that complement of staff.

	<p>the point of sufficient knowledge, know-how and skills and competence to match those of a graduate of award Level 6. The Higher Certificate is an exit award for those who are not considered eligible or professionally suitable to progress on to supervised client practice in year 3 of the BA (Hons) in Counselling and Psychotherapy. A learner may in fact take it upon themselves to exit at the end of the two years and avail of the exit award of a Higher Certificate in Arts in Applied Social Studies.</p>
<b>Approved countries for provision</b>	Ireland
<b>Delivery mode: Full-time/Part-time</b>	Part-time
<b>The teaching and learning modalities</b>	<ol style="list-style-type: none"> <li>1. Classroom lectures</li> <li>2. Case-based learning</li> <li>3. Practical skills sessions</li> <li>4. Workshops</li> <li>5. Tutorials</li> <li>6. Individual and group work</li> <li>7. Blended Learning</li> </ol>
<b>Brief synopsis of the programme (e.g. who it is for, what is it for, what is involved for learners, what it leads to.)</b>	<p>The Higher Certificate in Applied Social Studies is an embedded award in the BA (Hons) in Counselling and Psychotherapy.</p> <p>It is an award only for those learners whom the team cannot recommend for progression to client work but who have managed to successfully complete the academic assessments of the first two years.</p> <p>The Higher Certificate in Applied Social Studies consists of three interconnected strands: experiential training groups, personal development through the experience of psychotherapy and process groups. Personal psychotherapy, undertaken at the latest in the second year of the programme, is a requirement that is not represented in the modules of the course. The other major component of personal exploration and development, namely the Process Group Work is represented.</p> <p>In summary, the division between the first two years and the second two years of the four-year BA (Hons) is crucial to allow a decision to be made on the basis of a knowledge of a learner's work and participation concerning their suitability for supervised clinical practice. The first two years is therefore a period primarily of personal development for the learner and allowing for DBS to establish a profile of the learner so that a fair and balanced informed decision can be made regarding suitability for supervised clinical practice.</p>
<b>Summary of specifications for teaching staff</b>	<p>Lecturing staff will have a minimum of a Masters and/or PhD in Counselling and Psychotherapy.</p> <p>They should also have teaching, training, supervising or research experience within the counselling and</p>

	psychotherapy field but also specific to the modality being taught. Staff, in a practice-oriented programme should have considerable practical/clinical experience in mutually supporting theory and practice learning opportunities for learning
<b>Summary of specifications for the ratio of learners to teaching-staff</b>	1:30 for classroom sessions 1:15 for skills and training modules 1:12 for process sessions 1:4 for group supervision
<b>Overall WTE staff/learner ratio.</b>	Overall WTE ratio staff to learner is 0:129

### Programmes being replaced by the Embedded Programme

Programmes being replaced (applicable to applications for revalidation)			Arrangement for enrolled learners	Date when replaced programme is planned to cease completely
Code	Title	Last enrolment date	Indicate whether "Teach out" or "Transfer to replacement programme"	
PG21107	Higher Certificate in Arts in Applied Social Studies	September 2018	Transfer to replacement programme	September 2019

### Other noteworthy features of the application

The panel evaluated the observations, comments and suggestions from internal and external stakeholders and these were duly factored into the review process. Internal stakeholders consisted of students and staff. Professional bodies included the Irish Association of Counselling and Psychotherapy (IACP) Irish Council for Psychotherapy (ICP) Irish Association of Humanistic and Integrative Psychotherapy (IAHIP) and CORU, Ireland's multi-professional health regulator. Consultations were conducted with key stakeholders such as the Health Service Executive (HSE), private counselling and psychotherapy providers such as Pieta House, Dublin Rape Crisis Centre and CAHMS.

The review process was also informed by the comparator analysis undertaken by DBS, a review of External Examiner reports and feedback obtained from industry and professional organisations.

The panel found that the consultation process had been comprehensive and it was concluded that the proposed programmes were fit for purpose.

### Quantitative analysis

A quantitative analysis was provided for programme covering the areas specified in the Programme Review Manual 2016/2017 Section 3.

The panel made the observation that in choosing programmes for benchmarking purposes, DBS needs to ensure that they have access to the learning outcomes of those programme so that a more comprehensive data gathering and analysis can be undertaken.

- Enrolment analysis

It was noted that the numbers enrolled on the principal programme have decreased over the period under review, since 2014. In part this is due to the launch of the Higher Diploma in Counselling and Psychotherapy, whereby students who already possess a primary degree would have traditionally enrolled on the BA (Hons) in Counselling and Psychotherapy are choosing to enrol on the Higher Diploma in Counselling and Psychotherapy . This option is being taken because of the further progression possibility to the Masters of Arts in Psychotherapy, and thereby completing a postgraduate qualification in Psychotherapy at Level 9 on the NFQ.

It was noted that there is currently a time of uncertainty surrounding statutory regulation and what this will mean for undergraduate programmes in this area is unclear. In addition, the number of competitors offering a qualification in Counselling and Psychotherapy has also increased over the years.

- Attrition, transfer, progression and completion by stage

It was noted by the panel that applications from students wishing to transfer from other higher education institutions (including universities) with stage or award qualifications are welcomed onto the programme. Applicants must have passed the stage examinations and have achieved the learning outcomes for transfer or progression to the BA (Hons) Counselling and Psychotherapy. Transfer may be into year 3 as appropriate to the learning and suitability of the transfer student. In the past four years, no one has transferred in to the BA programme from outside of DBS.

The percentage of students who pass each programme year exceeds the DBS benchmark of 85%, with the exception of first and second year students in the academic year 2014/15, where the pass rate was 78.13% and 80% respectively.

The percentage of students who fail is at 0% for the period between 2014 and 2018. The analysis showed that one reason for this pass rate was the introduction of the Academic Coordinator in 2010/2011 who was put in place to support learners who have required academic support. The number of students exiting at the end of year 2 is relatively low, with the highest percentage of students exiting in the academic year 2015/16.

Drop-out rates are influenced by the nature of the programme in that the clinical team will arrive at the conclusion that a student should step back from the programme or indeed take time out between year 2 and year 3. Some learners are deferred due to personal mitigating circumstances and on rare occasions are academically withdrawn for non-completion of the course. For those who have not completed the required hours for Supervised Clinical Practice, they will have to complete a 5th year. During this time learners will be expected to remain in Clinical Supervision and personal therapy.

- Analysis of grades and QQI award classifications



The analysis showed that the pass rates are relatively high in comparison to the fails and non-active percentages. It was noted that since the introduction of the coordinator roles in 2010, the pass rates have steadily increased.

The panel noted that strong performance at the top two classifications in each cycle. A major contributing factor to the profile of these grades is the kind of programme the BA (Hons) in Counselling and Psychotherapy programme is which requires such considerable personal investment that demands a major personal investment in the material of the programme in a way that more purely academic programmes do not.

Overall, 16.67% of graduates have graduated with a H1 and 78.33% of graduates have graduated with a 2:1. Very few students graduate with a pass award, with 0% of students in the academic year 2017/18 attaining a pass award. The percentage of students graduating with a H2:1 range from 70% in the academic year 2017/18 to 85.71% in the academic year 2015/16.

- Benchmarking against corresponding results published by other providers

The panel noted that, in the academic years from 2014/15 up to 2017/18, the awards have been increasingly represented with the H2:1 band and less so in the H2:2 and pass bands. It was further noted that DBS is planning to review its grading criteria and welcomed this approach

#### **Destination of learners who have graduated and employment/advancement opportunities**

Data specific to the BA (Hons) in Counselling and Psychotherapy programme since 2010 indicates 82% of graduates were employed, and 18% of graduates were seeking employment. Graduate job titles, across private, statutory and community and voluntary sector include the following:

- Administrator Health Care Assistant Psychotherapist
- Business Development
- Higher Executive Officer, Civil Service
- Family Support Worker
- Client Service ICT Support Senior Youth Worker
- Community Youth Worker Legal Secretary Social Care Worker
- Consultant Management Consultant Supervisor
- Counsellor
- Psychotherapist – private practice
- Support Worker
- Diagnostic Assistant Negotiator Trade Marketing Manager
- Editor Policy Advisor
- Talent Manager & Psychotherapist

Detailed commentary is provided by the panel on each criterion in Part 2A below.

## Part 2A Evaluation against the validation criteria

QQI's validation criteria and sub-criteria are copied here in grey panels.

### Criterion 1

<b>The provider is eligible to apply for validation of the programme</b>	
a) The provider meets the prerequisites (section 44(7) of the 2012 Act) to apply for validation of the programme.	
b) The application for validation is signed by the provider's chief executive (or equivalent) who confirms that the information provided is truthful and that all the applicable criteria have been addressed.	
c) The provider has declared that their programme complies with applicable statutory, regulatory and professional body requirements. <sup>5</sup>	
<b>Satisfactory (yes, no, partially)</b>	<b>Comment</b>
Yes	

BA (Hons) in Counselling and Psychotherapy (Principal programme)

Higher Certificate in Applied Social Studies (Embedded programme)

As an established provider of higher education programmes DBS has met the prerequisites (section 44(7) of the 2012 Act) to apply for validation of these programmes. It was noted that DBS has in place procedures for access, transfer and progression as set out in Section 4 of the Programme Document. DBS has also established arrangements for the Protection of Enrolled Learners (PEL) which have been approved by QQI. The panel was informed that DBS is currently taking part in the re-engagement process with QQI and has completed the Pilot Phase. As part of the re-engagement process, policies and procedures were being reviewed.

At the site visit, DBS provided a copy of the letter to be submitted to QQI with the application for the revalidation of the programmes. The letter contained the signature and declaration required under sub-criteria 1b) and 1c).

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<sup>5</sup> This criterion is to ensure the programme can actually be provided and will not be halted on account of breach of the law. The declaration is sought to ensure this is not overlooked but QQI is not responsible for verifying this declaration of enforcing such requirements.

## Criterion 2

### The programme objectives and outcomes are clear and consistent with the QQI awards sought

- a) The programme aims and objectives are expressed plainly.
- b) A QQI award is specified for those who complete the programme.
  - (i) Where applicable, a QQI award is specified for each embedded programme.
- c) There is a satisfactory rationale for the choice of QQI award(s).
- d) The award title(s) is consistent with unit 3.1 of QQI's *Policy and Criteria for Making Awards*.
- e) The award title(s) is otherwise legitimate for example it must comply with applicable statutory, regulatory and professional body requirements.
- f) The programme title and any embedded programme titles are
  - (i) Consistent with the title of the QQI award sought.
  - (ii) Clear, accurate, succinct and fit for the purpose of informing prospective learners and other stakeholders.
- g) For each programme and embedded programme
  - (i) The **minimum intended programme learning outcomes** and any other educational or training objectives of the programme are explicitly specified.<sup>6</sup>
  - (ii) The minimum intended programme learning outcomes to qualify for the QQI award sought are **consistent with** the relevant QQI awards standards.
- h) Where applicable, the **minimum intended module learning outcomes** are explicitly specified for each of the programme's modules.
- i) Any QQI minor awards sought for those who complete the modules are specified, where applicable.

For each minor award specified, the minimum intended module learning outcomes to qualify for the award are consistent with relevant QQI minor awards standards.<sup>7</sup>

Satisfactory (yes, no, partially)	Comment
Yes	

BA (Hons) in Counselling and Psychotherapy (Principal programme)

Higher Certificate in Applied Social Studies (Embedded programme)

The panel found that the aims, objectives and rationales for the programmes were expressed clearly as set out in Section 2.1 of the Programme Document. It was noted that the 120 ECTS Higher Certificate in Applied Social Studies will be available to learners who have successfully completed the first two years of the programme but who are not deemed suitable for clinical practice that commences in year three of the programme.

It was concluded that the programme and module learning outcomes have been clearly outlined and were appropriate to the level of the awards. The titles of the programmes were deemed to be appropriate and in line with the QQI standard for the award type on the NFQ. It was noted that the titles of the programmes will be kept under review and account will be taken by DBS of any changes that may be proposed by the new regulatory body CORU that impact the titles of the award at a later stage. See Criterion 3 for further comment on this topic.

<sup>6</sup> Other programme objectives, for example, may be to meet the educational or training requirements of a statutory, regulatory or professional body.

<sup>7</sup> Not all modules will warrant minor awards. Minor awards feature strongly in the QQI common awards system however further education and training awards may be made outside this system.

It was noted that the minimum intended programme learning outcomes for the BA (Hons) in Counselling and Psychotherapy were informed by the QQI Counselling and Psychotherapy Awards Standards and have been mapped against these standards.

### Criterion 3

**The programme concept, implementation strategy, and its interpretation of QQI awards standards are well informed and soundly based (considering social, cultural, educational, professional and employment objectives)**

- a) The development of the programme and the intended programme learning outcomes has sought out and taken into account the views of stakeholders such as learners, graduates, teachers, lecturers, education and training institutions, employers, statutory bodies, regulatory bodies, the international scientific and academic communities, professional bodies and equivalent associations, trades unions, and social and community representatives.<sup>8</sup>
- b) The interpretation of awards standards has been adequately informed and researched; considering the programme aims and objectives and minimum intended programme (and, where applicable, modular) learning outcomes.
  - (i) There is a satisfactory rationale for providing the programme.
  - (ii) The proposed programme compares favourably with existing related (comparable) programmes in Ireland and beyond. Comparators should be as close as it is possible to find.
  - (iii) There is support for the introduction of the programme (such as from employers, or professional, regulatory or statutory bodies).
  - (iv) There is evidence<sup>9</sup> of learner demand for the programme.
  - (v) There is evidence of employment opportunities for graduates where relevant<sup>10</sup>.
  - (vi) The programme meets genuine education and training needs.<sup>11</sup>
- c) There are mechanisms to keep the programme updated in consultation with internal and external stakeholders.
- d) Employers and practitioners in the cases of vocational and professional awards have been systematically involved in the programme design where the programme is vocationally or professionally oriented.
- e) The programme satisfies any validation-related criteria attaching to the applicable awards standards and QQI awards specifications.

Satisfactory (yes, no, partially)	Comment
Yes	

BA (Hons) in Counselling and Psychotherapy (Principal Programme)  
Higher Certificate in Applied Social Studies (Embedded Programme)

The panel found that the consultation process with stakeholders has been comprehensive and feedback received had been factored into the programmes.

The panel made the observation that in choosing programmes for benchmarking purposes, DBS needs to ensure that they have access to the learning outcomes of those programmes so that a more comprehensive data gathering and analysis can be undertaken.

<sup>8</sup> Awards standards however detailed rely on various communities for their interpretation. This consultation is necessary if the programme is to enable learners to achieve the standard in its fullest sense.

<sup>9</sup> This might be predictive or indirect.

<sup>10</sup> It is essential to involve employers in the programme development and review process when the programme is vocationally or professionally oriented.

<sup>11</sup> There is clear evidence that the programme meets the **target learners'** education and training needs and that there is a clear demand for the programme.

The panel noted that the title of the principal programme, which reflects the programme content, may be running the risk of raising graduates' expectations about future registration once statutory regulation is introduced. Currently, the Minister for Health has indicated that there will be two separate registers for counselling and psychotherapy, Further work remains to be done by the incoming regulatory body CORU on clarifying what this entails in terms of accreditation regulation for counselling and psychotherapy. In conversation with staff, the panel learned that DBS was actively engaged in forums with professional and statutory bodies concerned with the topic and that, as a team, they were actively keeping possible developments that might affect the programme under review.

In meeting with students and a graduate, the panel noted some concern about how possible developments and the current ambiguity that exists in this area might impinge on topics such as career choice or entry requirements for further study progression. For instance, graduates gaining a grade of 2.1 on the BA may gain entry onto the DBS MA Counselling and Psychotherapy but would not be eligible for accreditation as a psychotherapist with the professional body IAHIP on completion of this higher degree. The group expressed the view that they did not have sufficiently transparent information from DBS to allay concerns about the on-going developments with regard to regulation and accreditation.

**It is recommended that the ambiguity in relation to transparency of information around possible regularity requirements for counselling and psychotherapy is clearly signposted to students and DBS remain alert to possible future needs to address this concern.**

In its response document, DBS has confirmed a commitment to act upon any requirements made by CORU and IACP in a timely manner. It is noted that this commitment will be added to Student Handbooks and the DBS website in order to reach both current and prospective learners. The recommendation is met.

## Criterion 4

### The programme's access, transfer and progression arrangements are satisfactory

- a) The information about the programme as well as its procedures for access, transfer and progression are consistent with the procedures described in QQI's policy and criteria for access, transfer and progression in relation to learners for providers of further and higher education and training. Each of its programme-specific criteria is individually and explicitly satisfied<sup>12</sup>.
- b) Programme information for learners is provided in plain language. This details what the programme expects of learners and what learners can expect of the programme and that there are procedures to ensure its availability in a range of accessible formats.
- c) If the programme leads to a higher education and training award and its duration is designed for native English speakers, then the level of proficiency in English language must be greater or equal to B2+ in the Common European Framework of Reference for Languages (CEFR<sup>13</sup>) in order to enable learners to reach the required standard for the QQI award.
- d) The programme specifies the learning (knowledge, skill and competence) that **target learners** are expected to have achieved before they are enrolled in the programme and any other assumptions about enrolled learners (programme participants).
- e) The programme includes suitable procedures and criteria for the **recognition of prior learning** for the purposes of access and, where appropriate, for advanced entry to the programme and for exemptions.
- f) The programme title (the title used to refer to the programme):-
  - (i) Reflects the core *intended programme learning outcomes*, and is consistent with the standards and purposes of the QQI awards to which it leads, the award title(s) and their class(es).
  - (ii) Is learner focused and meaningful to the learners;
  - (iii) Has long-lasting significance.
- g) The programme title is otherwise legitimate; for example, it must comply with applicable statutory, regulatory and professional body requirements.

Satisfactory (yes, no, partially)	Comment
Yes	

BA (Hons) in Counselling and Psychotherapy (Principal Programme)

Higher Certificate in Applied Social Studies (Embedded Programme)

The panel was satisfied that the programmes' access, transfer and progression arrangements are clearly articulated and working in practice. Information on access, transfer and progression is available through DBS website, promotional material and the Student Handbooks. This includes information on EU and non-EU entry requirements and information for students with disabilities.

<sup>12</sup> Each of the detailed criteria set out in the Policy and criteria for access, transfer and progression in relation to learners for providers of further and higher education and training must be addressed in the provider's evaluation report. The detailed criteria are (QQI, restated 2015) arranged under the headings

- Progression and transfer routes
- Entry arrangements
- Information provision

<sup>13</sup> [http://www.coe.int/t/dg4/linguistic/Source/Framework\\_EN.pdf](http://www.coe.int/t/dg4/linguistic/Source/Framework_EN.pdf) (accessed 26/09/2015)

The panel noted that the entry requirements included those with a leaving certificate or Level 5 FETAC award and those with or without a primary degree. Given the necessary life experience needed to satisfactorily participate in the programme, the panel was advised that it was deemed to be most suitable for mature learners. Applicants need to provide references from two referees, one professional/educational and one testifying to their good and suitable character as well as submitting a 400-word personal statement articulating the basis of their interest in the programme.

The panel learned that there are programme-specific Recognition of Prior Learning (RPL) for entry, advanced entry and direct access on a case-by-case basis. Over the past five years, DBS has accepted applicants under its RPL policy onto the programme from other institutions including PCI College, NUI Maynooth and National Counselling Institute of Ireland (NCHI).

Discussions with students and a graduate confirmed that graduates from the programmes have obtained employment as therapists in the health and social care areas, or, in business organisations, as managers or HR professionals. They indicated that many of the skills learned were transferable to a range of occupations. Some had begun the process of accreditation and towards private practice in the profession.

Graduates of the BA (Hons) in Counselling and Psychotherapy may progress to further study at DBS in the MA programmes in Psychotherapy, Psychoanalytic Psychotherapy and Addiction Studies.

From the documentation provided and in discussion with staff, the panel was made aware that careful consideration is given to learners who may progress into year 3 of the programme, when clinical practice commences. Those who are not deemed suitable to continue into year 3 are eligible for the exit award of Higher Certificate in Applied Social Studies, provided they reach the required academic standard.



## Criterion 5

### The programme's written curriculum is well structured and fit-for-purpose

- a) The programme is suitably structured and coherently oriented towards the achievement by learners of its intended programme learning outcomes. The programme (including any stages and modules) is integrated in all its dimensions.
- b) In so far as it is feasible the programme provides choice to enrolled learners so that they may align their learning opportunities towards their individual educational and training needs.
- c) Each module and stage is suitably structured and coherently oriented towards the achievement by learners of the intended *programme* learning outcomes.
- d) The objectives and purposes of each of the programme's elements are clear to learners and to the provider's staff.
- e) The programme is structured and scheduled realistically based on sound educational and training principles<sup>14</sup>.
- f) The curriculum is comprehensively and systematically documented.
- g) The credit allocated to the programme is consistent with the difference between the entry standard and minimum intended programme learning outcomes.
- h) The credit allocated to each module is consistent with the difference between the module entry standard and minimum intended module learning outcomes.
- i) Elements such as practice placement and work based phases are provided with the same rigour and attentiveness as other elements.
- j) The programme **duration** (expressed in terms of time from initial enrolment to completion) and its **fulltime equivalent contact time** (expressed in hours) are consistent with the difference between the minimum entry standard and award standard and with the credit allocation.<sup>15</sup>

Satisfactory (yes, no, partially)	Comment
Yes	

### BA (Hons) in Counselling and Psychotherapy (Principal Programme)

The panel was generally satisfied that the programme and related modules were appropriately structured and scheduled.

The panel noted that the BA (Hons) in Counselling and Psychotherapy programme had been reviewed against the QQI Counselling and Psychotherapy Award Standards and combined knowledge in areas of humanistic, integrative and psychodynamic modalities, cultural and contemporary issues and ethics. The programme develops competence through in-depth study, meaningful structured reflection and the integration of theory with experiential learning through supervised clinical practise and a Research Project. Special attention is placed on the skills and self-care aspect of the training.

In summary, the programme consists of three interconnected strands:

- Experiential training and supervision group.
- Personal development through the experience of psychotherapy and process groups.
- Theoretical modules which support the two strands named above.

<sup>14</sup> This applies recursively to each and every element of the programme from enrolment through to completion.

In the case of a modular programme, the pool of modules and learning pathway constraints (such as any prerequisite and co-requisite modules) is explicit and appropriate to the intended programme learning outcomes.

<sup>15</sup> If the duration is variable, for example, when advanced entry is available, this should be explained and justified

In conversation with students and a graduate, the panel found that they were appreciative of the transferable skills gained during the course which they had been able to apply in their existing employment over the course of their studies. These included capacity for team building and team work, decision-making critical thinking, self-awareness and self-regulation around stress, for instance.

The panel noted that Supervised Clinical Practice and Supervision (both group and individual) were introduced in the third year of the programme in accordance with best practice and the recommendation of the professional body. Personal psychotherapy, undertaken at the latest in the second year of the programme, is a requirement. In conversation with teaching staff, the panel was advised of the importance placed on the value of the Process and Group Work component of the curriculum as a way for learners to explore their own processes and group interaction. The work often provided good entry points to other core theoretical elements of the curriculum.

The panel found that the documentation provided in relation to clinical practice on placements does not adequately align with QQI standards applicable for 3rd year students, particularly QQI standards in relation to safe practice (controlled practice with volunteers under supervision) and professional practice (with volunteers). The point was discussed with teaching staff, including those with responsibility for clinical placements and clinical supervision. It was concluded that the application of these standards in relation to safe practice was not clear.

**It is recommended that DBS develop a suite of documents, both for students and placement partners, that would set out suitable clinical practice for Levels, 7, 8 and 9, in accordance with QQI standards.**

In its response document, the panel was informed that DBS had reviewed the two documents: BACAP Suitability for Clinical Practice Level 7, and BACAP Suitability for Clinical Practice Level 8. Both documents have been updated with respect to the QQI Awards Standards for Counselling and Psychotherapy, to explicitly distinguish between Level 7 and 8 practice. The panel noted that it is now specified that Level 7 learners will be working only with volunteer clients, with a lower level of needs. Further criteria are laid out to ensure the learner's level is explicit and expectations of learners are clear. Practice is linked back to learning in years 1 and 2 of the programme and their own personal therapy. Likewise, in the Level 8 document, expectations for practice are linked explicitly back to the QQI Awards Standards, and building upon experience at Level 7. The panel was informed that these documents will be collated into the Placement Handbook, which is provided to learners and placements. The panel concluded that the recommendation has been met.

### Higher Certificate in Applied Social Studies (Embedded Programme)

The panel was generally satisfied that the programme and related modules were appropriately structured and scheduled.

The panel was informed that the availability of the Higher Certificate in Applied Social Studies, which is structured as an academic programme, is an effective mechanism for the management of the question of suitability for clinical practice which is central to the delivery of the principal programme.

The programme is recognised by IACP which ensures that the hours accrued during this training contribute towards the student's accreditation. Each learner will still have to present to IACP once

they complete the pre-accreditation hours required post-graduation. Hours for client work will be increasing to 120 as per the IACP Course Guidelines from September 1st of 2020.

## Criterion 6

### **There are sufficient qualified and capable programme staff available to implement the programme as planned**

- a) The specification of the programme's staffing requirements (staff required as part of the programme and intrinsic to it) is precise, and rigorous and consistent with the programme and its defined purpose. The specifications include professional and educational qualifications, licences-to practise where applicable, experience and the staff/learner ratio requirements. See also criterion 12 c).
- b) The programme has an identified complement of staff<sup>16</sup> (or potential staff) who are available, qualified and capable to provide the specified programme in the context of their existing commitments.
- c) The programme's complement of staff (or potential staff) (those who support learning including any employer-based personnel) are demonstrated to be competent to enable learners to achieve the intended programme learning outcomes and to assess learners' achievements as required.
- d) There are arrangements for the performance of the programme's staff to be managed to ensure continuing capability to fulfil their roles and there are staff development<sup>17</sup> opportunities<sup>18</sup>.
- e) There are arrangements for programme staff performance to be reviewed and there are mechanisms for encouraging development and for addressing underperformance.
- f) Where the programme is to be provided by staff not already in post there are arrangements to ensure that the programme will not enrol learners unless a complement of staff meeting the specifications is in post.

Satisfactory (yes, no, partially)	Comment
Yes	

BA(Hons) in Counselling and Psychotherapy (Principal Programme)

Higher Certificate in Applied Social Studies (Embedded Programme)

The panel was advised that teaching staff are qualified to a minimum of NFQ Level 9 with many qualified to doctoral level or enrolled in doctoral studies. Further details were provided in Section 7 of the Programme Document and CVs of teaching staff were provided in Appendix 2 of the document. The panel noted that a cohort of experienced counselling and psychotherapy practitioners were involved in the delivery of the programme.

The panel was informed that the overall WTE ratio staff to learner is 0:129 and this was deemed to be appropriate.

<sup>16</sup> Staff here means natural persons required as part of the programme and accountable (directly or indirectly) to the programme's provider, it may for example, include contracted trainers and workplace supervisors.

<sup>17</sup> Development here is for the purpose of ensuring staff remain up-to-date on the discipline itself, on teaching methods or on other relevant skills or knowledge, to the extent that this is necessary to ensure an adequate standard of teaching.

<sup>18</sup> Professional or vocational education and training requires that teaching staff's professional/vocation knowledge is up to date. Being qualified in a discipline does not necessarily mean that a person is currently competent in that discipline. Therefore, performance management and development of professional and vocational staff needs to focus on professional/vocational competence as well as pedagogical competence. Professional development may include placement in industry, for example. In regulated professions it would be expected that there are a suitable number of registered practitioners involved.

In conversation with staff, the panel was informed that DBS had mechanisms in place for the large cohort of staff involved in the programme to meet for regular reviews as a team or in small groups to ensure that there was a cohesive and coordinated approach to delivery of the programme. There are a number of coordinator roles specific to the programme, following the distinctions in the programme between experiential, skills-based modules, theoretical modules and supervision and group process modules. The Coordinator assists in the coordination of the faculty as well as the work of the learners.

It was noted that some staff expressed the view that they were not fully up to speed with the consistent and effective use of MOODLE. The panel was informed that DBS have now taken action to increase the competence of staff in the use of this technology, with training initiatives underway through the office of the newly appointed Head of Quality Enhancement and Innovation in Teaching and Learning in the college.

It was further noted that DBS has a research strategy in place to encourage staff to undertake research in their own disciplines. The staff scholarship scheme for research was outlined at the site visit and the panel was informed about the annual Research Day at the college where faculty from different disciplines presented updates on current research projects. DBS publishes its own scholarly journal, featuring research by both staff and students.

The panel was informed that DBS does provide some support to staff to attend conferences or other CPD-related events. In conversation with teaching staff, it was concluded that there was a low level of awareness among staff, including part-time staff, around the process for accessing the support for CPD provided.

**It is recommended that processes around accessing support for CPD are made transparent and accessible to all staff.**

In its response document, DBS outlined the process for accessing support for CPD are made transparent and accessible for all staff. This includes ensuring that the topic is part of the review of DBS's Learning, Teaching and Assessment Strategy. The panel noted that the Head of Quality Enhancement and Innovation in Teaching and Learning is responsible for monitoring, driving and implementing DBS's Research Strategy, as well as Chairing the Research Committee. Any updates to the current strategy will seek to emphasise the commitment to supporting staff in undertaking research and CPD. The panel concluded that the recommendation is met.

## Criterion 7

### **There are sufficient physical resources to implement the programme as planned**

- a) The specification of the programme's physical resource requirements (physical resources required as part of the programme and intrinsic to it) is precise, and rigorous and consistent with the programme, its defined purpose and its resource/learner-ratio requirements. See also criterion 12 d).
- b) The programme has an identified complement of supported physical resources (or potential supported physical resources) that are available in the context of existing commitments on these e.g. availability of:
  - (i) suitable premises and accommodation for the learning and human needs (comfort, safety, health, wellbeing) of learners (this applies to all of the programme's learning environments including the workplace learning environment)
  - (ii) suitable information technology and resources (including educational technology and any virtual learning environments provided)
  - (iii) printed and electronic material (including software) for teaching, learning and assessment
  - (iv) suitable specialist equipment (e.g. kitchen, laboratory, workshop, studio) – if applicable
  - (v) technical support
  - (vi) administrative support
  - (vii) company placements/internships – if applicable
- c) If versions of the programme are provided in parallel at more than one location each independently meets the location-sensitive validation criteria for each location (for example staffing, resources and the learning environment).
- d) There is a five-year plan for the programme. It should address
  - (i) Planned intake (first five years) and
  - (ii) The total costs and income over the five years based on the planned intake.
- e) The programme includes controls to ensure entitlement to use the property (including intellectual property, premises, materials and equipment) required.

Satisfactory (yes, no, partially)	Comment
Yes	

BA (Hons) in Counselling and Psychotherapy (Principal Programme)  
Higher Certificate in Applied Social Studies (Embedded Programme)

A tour of the physical facilities in the Aungier St and Castle House Campuses was undertaken by the panel. The on-going development and upgrading of common meeting and study areas throughout the campus to facilitate group work and peer study support was acknowledged. Section 8 of the Programme Document has further details of the resources available.

The panel found that the library uses technology effectively to support learners and staff, including access to an assignment planner, Kindle lending facilities, a Registrar of Scholarly Activity as well as a user-friendly search engine to enable ease of search for books and academic journals. It was noted that specialist library staff are employed to assist students to develop their research capabilities. The library is engaged in publishing the DBS journals for the School of Arts and the School of Business featuring peer-reviewed research by both staff and students. This initiative is in line with a core pillar of DBS's strategy on achieving academic excellence.

The panel considered that the information technology facilities were of a high standard, with mobile laboratories available to students throughout the campus, providing ease of access to library and

MOODLE resources. The panel noted that the information technology support services had been integrated with other student services making it easier for students to avail of this service on an on-going basis.

## Criterion 8

### The learning environment is consistent with the needs of the programme's learners

- a) The programme's physical, social, cultural and intellectual environment (recognising that the environment may, for example, be partly virtual or involve the workplace) including resources and support systems are consistent with the intended programme learning outcomes.
- b) Learners can interact with, and are supported by, others in the programme's learning environments including peer learners, teachers, and where applicable supervisors, practitioners and mentors.
- c) The programme includes arrangements to ensure that the parts of the programme that occur in the workplace are subject to the same rigours as any other part of the programme while having regard to the different nature of the workplace.

Satisfactory (yes, no, partially)	Comment
Yes	

#### BA (Hons) in Counselling and Psychotherapy (Principal Programme)

#### Higher Certificate in Applied Social Studies (Embedded Programme)

The panel was advised that DBS uses a number of mechanisms to develop and implement supports for students as set out in Sections 5.8 and 5.9 of the Programme Document. The use of class representatives as a mechanism for feedback was working well in practice, as confirmed in conversations with students, the graduate and staff.

Programme-specific arrangements for monitoring progress and guiding, informing and caring for learners were also discussed and the panel found that these were satisfactory. Refer to Criterion 7, Criterion 9 and Criterion 12 for further commentary.

The panel was advised that DBS uses a number of mechanisms to develop and implement supports for students including:

- Learner surveys
- Peer Mentoring Support (with training provided for mentors)
- Student representation on the Academic Board and Board of Studies
- Support for, and engagement with, an elected Student Union
- Student services for:
  - Accommodation
  - Counselling and referral services, including specific contact with the provider of mental health for young people, *Jigsaw*
  - Sports and societies, with many student-led events
  - Entertainment
  - Study and meeting spaces within the campus.

The panel concluded that the staff with responsibility for support services were proactive in responding to student feedback for improvements in facilities which was undertaken on a continuous basis.



## Criterion 9

### There are sound teaching and learning strategies

- a) The teaching strategies support achievement of the intended programme/module learning outcomes.
- b) The programme provides authentic learning opportunities to enable learners to achieve the intended programme learning outcomes.
- c) The programme enables enrolled learners to attain (if reasonably diligent) the minimum intended programme learning outcomes reliably and efficiently (in terms of overall learner effort and a reasonably balanced workload).
- d) Learning is monitored/supervised.
- e) Individualised guidance, support<sup>19</sup> and timely formative feedback is regularly provided to enrolled learners as they progress within the programme.

Satisfactory (yes, no, partially)	Comment
Yes	

### BA (Hons) in Counselling and Psychotherapy (Principal Programme)

### Higher Certificate in Applied Social Studies (Embedded Programme)

The panel noted that there was a clear structure for the coordination of the programmes between the 3 strands, with specific responsibility assigned to staff in a coordination role. It was clear that staff are suitably qualified (See Criterion 6) and brought a wide variety of theoretical, practical and specialised knowledge to the programme. Section 5.9 of the Programme Document contains more information on the overall approach.

What was less clear to the panel was any ‘anchoring philosophy’ or pedagogy and delivering the programme among the large cohort of staff, many of whom are part-time.

The panel found that there was a mismatch between the documentation and the subsequent discussion with teaching staff with regard to pedagogy and they concluded that the pedagogy was not clear and explicit.

**It is recommended that, as the teaching team develops, that they make their teaching and learning strategy and pedagogy more explicit.**

In its response document, DBS outlined its commitment to making the teaching and learning strategy and pedagogy of the programmes more explicit, and further developing it. A comprehensive process has been outlined for achieving this objective. The panel was informed that this process will be led by DBS’s Teaching, Learning and Assessment Committee. The recommendation is met.

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<sup>19</sup> Support and feedback concerns anything material to learning in the context of the programme. For the avoidance of doubt it includes among other things any course-related language, literacy and numeracy support.

## Criterion 10

### There are sound assessment strategies

- a) All assessment is undertaken consistently with *Assessment Guidelines, Conventions and Protocols for Programmes Leading to QQI Awards*<sup>20</sup>
- b) The programme's assessment procedures interface effectively with the provider's QQI approved quality assurance procedures.
- c) The programme includes specific procedures that are fair and consistent for the assessment of enrolled learners to ensure the minimum intended programme/module learning outcomes are acquired by all who successfully complete the programme.<sup>21</sup>
- d) The programme includes formative assessment to support learning.
- e) There is a satisfactory written **programme assessment strategy** for the programme as a whole and there are satisfactory module assessment strategies for any of its constituent modules.<sup>22</sup>
- f) Sample assessment instruments, tasks, marking schemes and related evidence have been provided for each award-stage assessment and indicate that the assessment is likely to be valid and reliable.
- g) There are sound procedures for the moderation of summative assessment results.
- h) The provider only puts forward an enrolled learner for certification for a particular award for which a programme has been validated if they have been specifically assessed against the standard for that award.<sup>23</sup>

Satisfactory (yes, no, partially)	Comment
Yes	

BA (Hons) in Counselling and Psychotherapy (Principal Programme)

Higher Certificate in Applied Social Studies (Embedded Programme)

The panel was advised that all assessment for the programmes conforms to the DBS Assessment Regulations which are informed by QQI Assessment and Standards Revised 2013, as set out in Section 5.10 of the Programme Document. The evaluation of assessment is based on feedback from learners, external examiners, employers, as well as feedback from review and validations.

In discussions with staff, students and the graduate, the panel was informed that the level of assessment, particularly exam-based assessment, had been reduced in recent times, in recognition of the workload faced by part-time students and to ensure that there was no over-assessment over the 30 subjects involved in the programme. The panel was informed that the assessment strategy was under review on a continuous basis. The panel noted, for example, that some assessments were done in-class or subjects were combined for the purposes of assessment on a continuous basis where appropriate and some exam-based assessments had been discontinued. The panel noted however that it was not always clear how the assessment strategy aligned with the module learning outcomes. It was further noted that there were no common assessment rubrics used by all staff. See Criterion 9 for further comment.

<sup>20</sup> See the section on transitional arrangements.

<sup>21</sup> This assumes the minimum intended programme/module learning outcomes are consistent with the applicable awards standards.

<sup>22</sup> The programme assessment strategy is addressed in the Assessment Guidelines, Conventions and Protocols for Programmes Leading to QQI Awards. See the section on transitional arrangements.

<sup>23</sup> If the award is a QQI CAS compound award it is not necessarily sufficient that the learner has achieved all the components specified in the certification requirements unless at least one of those components is a capstone component (i.e. designed to test the compound learning outcomes).

The panel noted that some areas, such as the Process Group were not subject to formal assessment but were clearly linked to the development of the learner. This was deemed this to be appropriate.

The panel learned that the assessment schedule was coordinated by the academic coordinators on the programme. Through the class representatives or directly with the coordinator, students had opportunities to gain an extension for assignments or to discuss other difficulties in relation to the assessment process.

It was noted that in conversation with students and the graduate that there is a high work load on the programme and that they are having difficulty in achieving any kind of work life balance as a result. The level of assessment was part of the issued identified in this situation.

**It is recommended that DBS review the assessment strategy with a view to evaluating the nature and effectiveness of assessment, bearing in mind the intended learning outcomes.**

In its response document, the panel noted that a review process has been described as evidence of the commitment of DBS to review the current assessment strategy as part of DBS's Teaching, Learning and Assessment Strategy. The use of marking rubrics for assessment activities is noted. The recommendation is met.

#### **BA (Hons) in Counselling and Psychotherapy (Principal Programme)**

The panel found that the external supervisor was tasked with grading the student for their work on placement. It was confirmed that DBS employs accredited supervisors who are provided with a marking sheet with designated heading for the purpose of assigning a grade. It was noted that, through the oversight of the Practicum Coordinator, any inconsistency in grading was identified and addressed. It was the view of the panel that this process was not fully transparent and that it was inappropriate that the external supervision would contribute to grading student performance on placement.

**It is recommended that the placement supervisor would attest to the competency on an 'achieved or not achieved' basis but would not assign a grade.**

In its response document, the panel noted that DBS will require the supervisor to indicate whether the student work is 'satisfactory' or 'not satisfactory' in their reports. It has been made explicit in the Supervisor's Report that is returned to DBS that no grade is to be assigned. The recommendation is met.

## Criterion 11

### **Learners enrolled on the programme are well informed, guided and cared for**

- a) There are arrangements to ensure that each enrolled learner is fully informed in a timely manner about the programme including the schedule of activities and assessments.
- b) Information is provided about learner supports that are available to learners enrolled on the programme.
- c) Specific information is provided to learners enrolled on the programme about any programme-specific appeals and complaints procedures.
- d) If the programme is modular, it includes arrangements for the provision of effective guidance services for learners on the selection of appropriate learning pathways.
- e) The programme takes into account and accommodates to the differences between enrolled learners, for example, in terms of their prior learning, maturity, and capabilities.
- f) There are arrangements to ensure that learners enrolled on the programme are supervised and individualised support and due care is targeted at those who need it.
- g) The programme provides supports for enrolled learners who have special education and training needs.
- h) The programme makes reasonable accommodations for learners with disabilities<sup>24</sup>.
- i) If the programme aims to enrol international students it complies with the *Code of Practice for Provision of Programmes to International Students*<sup>25</sup> and there are appropriate in-service supports in areas such as English language, learning skills, information technology skills and such like, to address the particular needs of international learners and enable such learners to successfully participate in the programme.
- j) The programme's learners will be well cared for and safe while participating in the programme, (e.g. while at the provider's premises or those of any collaborators involved in provision, the programme's locations of provision including any workplace locations or practice-placement locations).

Satisfactory (yes, no, partially)	Comment
Yes	

BA (Hons) in Counselling and Psychotherapy (Principal Programme)  
Higher Certificate in Applied Social Studies (Embedded Programme)

An overview of the support services available to students is outlined in Section 5.9 of the Programme Document. The panel noted that the Student Handbooks and website contained relevant information in relation to the supports and services available to students. Use was made of notice boards to provide up-to-date information throughout the campus.

Students and the graduate with whom the panel met confirmed that support services are well publicised. Information technology skills were provided and this service is integrated with other student services, making it very accessible for students.

The panel noted from the Programme Review Report that no formal appeals or complaints were lodged by students in the period under review. In discussion with staff, the panel was informed that

<sup>24</sup> For more information on making reasonable accommodations see [www.AHEAD.ie](http://www.AHEAD.ie) and QQI's Policies, Actions and Procedures for Access, Transfer and Progression for Learners (QQI, restated 2015).

<sup>25</sup> See Code of Practice for Provision of Programmes to International Students (QQI, 2015)

learners are systematically provided with feedback on their performance and that this practice is an integral part of the programme. The students and graduate met confirmed that this was the case. This constant dialogue means that any issues arising are dealt with as early as possible at the local level with lecturers and supervisors. The students and graduate further confirmed that they were aware of how to make a complaint or an appeal and that this information was widely disseminated throughout the college.

The panel noted the state of uncertainty and ambiguity around upcoming state regulation and accreditation in the area of counselling and psychotherapy and the difficulty this caused in providing clarity to students around accreditation requirements, registration and awards standards. It was stated that senior management and teaching staff were monitoring developments in this area and provided oral briefings to learners on developments on an informal basis.

In discussion with students and a graduate, there was evidence that learners had not been given clear information in relation to current issues regarding professional body accreditation requirements, forthcoming statutory registration (CORU) and clear awards standards.

**It is recommended that transparency is captured in the form of appropriate written material being developed to inform learners in relation to professional body accreditation requirements, forthcoming statutory regulation (CORU) and clear awards standards.**

In its response document, the panel noted the commitment of DBS to act upon any requirements set out by CORU and IAHIP in an appropriate timeframe. The additional material provided in the Student Handbook and DBS website has addressed the recommendation.

## Criterion 12

### The programme is well managed

- a) The programme includes intrinsic governance, quality assurance, learner assessment, and access, transfer and progression procedures that functionally interface with the provider's general or institutional procedures.
- b) The programme interfaces effectively with the provider's QQI approved quality assurance procedures. Any proposed incremental changes to the provider's QA procedures required by the programme or programme-specific QA procedures have been developed having regard to QQI's statutory QA guidelines. If the QA procedures allow the provider to approve the centres within the provider that may provide the programme, the procedures and criteria for this should be fit-for-the-purpose of identifying which centres are suited to provide the programme and which are not.
- c) There are explicit and suitable programme-specific criteria for selecting persons who meet the programme's staffing requirements and can be added to the programme's complement of staff.
- d) There are explicit and suitable programme-specific criteria for selecting physical resources that meet the programmes physical resource requirements, and can be added to the programme's complement of supported physical resources.
- e) Quality assurance<sup>26</sup> is intrinsic to the programme's maintenance arrangements and addresses all aspects highlighted by the validation criteria.
- f) The programme-specific quality assurance arrangements are consistent with QQI's statutory QA guidelines and use continually monitored completion rates and other sources of information that may provide insight into the quality and standards achieved.
- g) The programme operation and management arrangements are coherently documented and suitable.
- h) There are sound procedures for interface with QQI certification.

Satisfactory (yes, no, partially)	Comment
Yes	

### BA (Hons) Counselling and Psychotherapy (Principal Programme)

### Higher Certificate in Applied Social Studies (Embedded Programme)

The panel was satisfied that there are effective structures in place for the governance and management of the programmes under review. The Quality Assurance Handbook (QAH) contains the governance structures for the College and procedures for access, transfer and progression, learner assessments and supports, and teaching and learning. It was noted that the QAH and associated policies and procedures have been developed in line with QQI statutory guidelines.

Programme-specific quality assurance also complies with the guidelines laid down by IACP in relation to clinical training, governance, quality assurance, assessment, access, transfer and progression. Mandatory workshops are provided on DBS's Child Protection Policy and on Clinical Induction, prior to beginning year 3 of the principal programme when learners take up client practice. Learners must sign a declaration that they have read and understood DBS Ethical Guidelines for Research with Human Participants

<sup>26</sup> See also QQI's Policy on Monitoring (QQI, 2014)

## Part 2B Overall recommendation to QQI

### Higher Certificate in Applied Social Studies (embedded programme)

Select one	
Satisfactory	Satisfactory (meaning that it recommends that QQI can be satisfied in the context of unit 2.3) of Core policies and criteria for the validation by QQI of programmes of education and training;
	Satisfactory subject to proposed special conditions (specified with timescale for compliance for each condition; these may include proposed pre-validation conditions i.e. proposed ( <b>minor</b> ) things to be done to a programme that almost fully meets the validation criteria before QQI makes a determination); <sup>27</sup>
	Not satisfactory.

Reasons<sup>28</sup> for the overall recommendation

The criteria have been met.

### BA (Hons) Counselling and Psychotherapy (Principal Programme)

Select one	
Satisfactory	Satisfactory (meaning that it recommends that QQI can be satisfied in the context of unit 2.3) of Core policies and criteria for the validation by QQI of programmes of education and training;
	Satisfactory subject to proposed special conditions (specified with timescale for compliance for each condition; these may include proposed pre-validation conditions i.e. proposed ( <b>minor</b> ) things to be done to a programme that almost fully meets the validation criteria before QQI makes a determination); <sup>29</sup>
	Not satisfactory.

Reasons<sup>30</sup> for the overall recommendation

The criteria have been met.

<sup>27</sup> Normally an application that fails to meet the criteria in any of its aspects will be considered as not satisfactory. Nevertheless, so as to ensure that the validation process will not be implemented unreasonably, if an independent evaluation finds that a programme virtually meets the validation criteria but needs some minor modifications, the independent evaluation could conclude “Satisfactory subject to recommended special conditions” where the special conditions prescribe the defects that require to be corrected.

<sup>28</sup> Give precise reasons for the conclusions organised under each of the 12 criteria (for the programme and each embedded programme and any modules proposed to lead to QQI awards) citing supporting evidence. If any criteria or sub-criteria are not met by the application this must be stated explicitly giving precise reasons with evidence. A “Not Satisfactory” recommendation may be justified if any one of the applicable criteria or sub-criteria are not demonstrated to be satisfied.

<sup>29</sup> Normally an application that fails to meet the criteria in any of its aspects will be considered as not satisfactory. Nevertheless, so as to ensure that the validation process will not be implemented unreasonably, if an independent evaluation finds that a programme virtually meets the validation criteria but needs some minor modifications, the independent evaluation could conclude “Satisfactory subject to recommended special conditions” where the special conditions prescribe the defects that require to be corrected.

<sup>30</sup> Give precise reasons for the conclusions organised under each of the 12 criteria (for the programme and each embedded programme and any modules proposed to lead to QQI awards) citing supporting evidence. If any criteria or sub-criteria are not met by the application this must be stated explicitly giving precise reasons

The panel carried out a comprehensive review of the BA (Hons) in Counselling and Psychotherapy

The programme is due for review under the QQI requirement for periodic monitoring and review, and also requires review to conform with recent policies, including QQI *Core Policies and Criteria for the Validation of Programmes of Education and Training* (QQI, 2016), *Core Statutory Quality Assurance (QA) Guidelines* (QQI, 2016), and in accordance with the QQI *Programme Review Manual 2016/2017*. As advised by QQI, the proposed programme has been mapped to QQI Counselling and Psychotherapy Award Standards.

The review comprised four stages:

- A desk review by the panel of the self-evaluation report on the internal programme review prepared by the Programme Leaders and Programme Team and a review of the initial proposed revised programmes to be submitted for revalidation of the programmes.
- A site visit on 15<sup>th</sup> April 2019 involving a series of meeting with academic staff and administrative staff engaged in programme delivery and support, a meeting with recent graduates and current learners on the programmes and a tour of the DBS campus to review facilities
- The preparation of a panel report, outlining the process and evidence pursued and proposing three recommendations.
- A follow-up desk review of revised documentation provided by DBS addressing the panel's recommendations.

The revised documentation consisted of:

- DBS's updated Programme Document (referred to as Programme Document hereafter)
- The Programme Team's response to the Independent Programme Review Report (referred to as the Response Document hereafter) including the following documents related to the recommendations and the DBS responses:
  - R01 Appendix 5 BACAP Learner Handbook
  - R02 BACAP Suitability for Clinical Practice BA Level 7 and R02 BACAP Suitability for Clinical Practice Level 8
  - R03&R05 Staff Training, CPD and TL&A.
  - R04 Indicative Assessment Schedule
  - R03&R05 Staff Training, CPD and TL&A
  - R06 BA4 Individual Supervisors Rep Form.
  - R01 Appendix 5 BACAP Learner Handbook

Based on the site visit and the revised documentation received, the panel concluded that the BA (Hons) in Counselling and Psychotherapy as presented to QQI for revalidation, satisfies the core policies and criteria for revalidation by QQI of programmes of education and training.

Detailed commentary relating to the Core Validation Criteria is included in Part 2A of this report.

Specifically, for the following programmes:

BA (Hons) Counselling and Psychotherapy (Principal Programme)

Higher Certificate in Applied Social Studies (embedded programme)

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with evidence. A "Not Satisfactory" recommendation may be justified if any one of the applicable criteria or sub-criteria are not demonstrated to be satisfied.



**Under Criterion 1:** As an established provider of higher education programmes DBS has met the prerequisites (section 44(7) of the 2012 Act) to apply for validation of these programmes. It was noted that DBS has in place procedures for access, transfer and progression as set out in Section 4 of the Programme Document. DBS has also established arrangements for the Protection of Enrolled Learners (PEL) which have been approved by QQI.

**Under Criterion 2:** The panel found that the aims, objectives and rationales for the programmes were expressed clearly as set out in Section 2.1 of the Programme Document. It was noted that the 120 ECTS Higher Certificate in Applied Social Studies will be available to learners who have successfully completed the first two years of the programme but who are not deemed suitable for clinical practice that commences in year three of the programme.

It was concluded that the programme and module learning outcomes have been clearly outlined and were appropriate to the level of the awards. The titles of the programmes were deemed to be appropriate and in line with the QQI standard for the award type on the NFQ.

**Under Criterion 3:** The panel found that the consultation process with stakeholders has been comprehensive and feedback received had been factored into the programmes.

The panel noted some concern among learners about how possible developments and the current ambiguity that exists in this area might impinge on topics such as career choice or entry requirements for further study progression.

**It is recommended that the ambiguity in relation to transparency of information around possible regularity requirements for counselling and psychotherapy is clearly signposted to students and DBS remain alert to possible future needs to address this concern.**

In its response document, DBS has confirmed a commitment to act upon any requirements made by CORU and IACP in a timely manner. The recommendation is met.

**Under Criterion 4:** The panel was satisfied that the programmes' access, transfer and progression arrangements are clearly articulated and working in practice.

It was noted that students who are not deemed suitable to continue into year 3 are eligible for the exit award of Higher Certificate in Applied Social Studies, provided they reach the required academic standard.

**Under Criterion 5:**

#### **BA (Hons) in Counselling and Psychotherapy (Principal Programme)**

The panel was generally satisfied that the programme and related modules were appropriately structured and scheduled. The programme had been reviewed against the QQI Counselling and Psychotherapy Award Standards.

The panel found that the documentation provided in relation to clinical practice on placements does not adequately align with QQI standards. It was concluded that the application of these standards in relation to safe practice was not clear.

**It is recommended that DBS develop a suite of documents, both for students and placement partners, that would set out suitable clinical practice for Levels, 7, 8 and 9, in accordance with QQI standards.**

In its response document, the panel was advised that DBS had reviewed the two documents:

- BACAP Suitability for Clinical Practice Level 7
- BACAP Suitability for Clinical Practice Level 8

The panel was informed that these have been updated with respect to the QQI Awards Standards for Counselling and Psychotherapy, to explicitly distinguish between Level 7 and 8 practice. The panel concluded that the recommendation has been met.

### **Higher Certificate in Applied Social Studies (Embedded Programme)**

The panel was generally satisfied that the programme and related modules were appropriately structured and scheduled.

The panel was informed that the availability of the Higher Certificate in Applied Social Studies is an effective mechanism for the management of the question of suitability for clinical practice. The programme is recognised by IACP which ensures that the hours accrued during this training contribute towards the student's accreditation.

**Under Criterion 6:** The panel was advised that teaching staff are qualified to a minimum of NFQ Level 9 with many qualified to doctoral level or enrolled in doctoral studies. Further details were provided in Section 7 of the Programme Document and CVs of teaching staff were provided in Appendix 2 of the document. The panel noted that a cohort of experienced counselling and psychotherapy practitioners were involved in the delivery of the programme.

It was outlined that the overall WTE ratio staff to learner is 0:129 and this was deemed to be appropriate.

DBS has a research strategy in place to encourage staff to undertake research in their own disciplines with a staff scholarship scheme for research in place. It was concluded that there was a low level of awareness among staff, including part-time staff, around the process for accessing the support for CPD provided.

**It is recommended that processes around accessing support for CPD are made transparent and accessible to all staff.**

In its response document, DBS outlined the process for accessing support for CPD are made transparent and accessible for all staff. This includes ensuring that the topic is part of the review of DBS's Learning, Teaching and Assessment Strategy. The panel concluded that the recommendation is met.

**Under Criterion 7:** A tour of the physical facilities in the Aungier St and Castle House Campuses was undertaken by the panel.

The panel found that the library uses technology effectively to support learners and staff. It was noted that specialist library staff are employed to assist students to develop their research capabilities.

It is acknowledged that the information technology support services have been integrated with other student services. Further details on the physical resources are outlined in Section 8 of the Programme Document.

**Under Criterion 8:** The panel was advised that DBS uses a number of mechanisms to develop and implement supports for students as set out in Sections 5.8 and 5.9 of the Programme Document.

It was concluded that the staff with responsibility for support services were proactive in responding to student feedback for improvements in facilities.

**Under Criterion 9:** The panel found that there was a mismatch between the documentation and the subsequent discussion with teaching staff with regard to pedagogy and they concluded that the pedagogy was not clear and explicit.

**It is recommended that, as the teaching team develops, that they make their teaching and learning strategy and pedagogy more explicit.**

In its response document, DBS outlined its commitment to making the teaching and learning strategy and pedagogy of the programmes more explicit. A comprehensive process has been outlined for achieving this objective. The recommendation is met.

**Under Criterion 10:**

The panel was advised that all assessment for the programmes conforms to the DBS Assessment Regulations which are informed by QQI Assessment and Standards Revised 2013, as set out in Section 5.10 of the Programme Document.

It was noted however that it was not always clear how the assessment strategy aligned with the module learning outcomes. It was further noted that there were no common assessment rubrics used by all staff.

**In relation to the principal programme, BA (Hons), it is recommended that DBS review the assessment strategy with a view to evaluating the nature and effectiveness of assessment, bearing in mind the intended learning outcomes.**

In its response document, the panel was advised that a review process of the assessment strategy was as part of DBS's Teaching, Learning and Assessment Strategy. The recommendation is met.

In relation to the Principal Programme, BA (Hons), the panel found that the external supervisor was tasked with grading the student for their work on placement. It was the view of the panel that this process was not fully transparent and considered that it was inappropriate that the external supervision would contribute to grading student performance on placement.

**It is recommended that the placement supervisor would attest to the competency on an 'achieved or not achieved' basis but would not assign a grade.**

In its response document, the panel noted that DBS will require the supervisor to indicate whether the student work is 'satisfactory' or 'not satisfactory' in their reports. It has been made explicit in the Supervisor's Report that is returned to DBS that no grade is to be assigned. The recommendation is met.

**Under Criterion 11:** An overview of the support services available to students is outlined in Section 5.9 of the Programme Document.

Students and the graduate with whom the panel met confirmed that support services are well publicised. Information technology skills were provided and this service is integrated with other student services..

In discussion with students and a graduate, there was evidence that learners had not been given clear information in relation to current issues regarding professional body accreditation requirements, forthcoming statutory registration (CORU) and clear awards standards.

**It is recommended that transparency is captured in the form of appropriate written material being developed to inform learners in relation to professional body accreditation requirements, forthcoming statutory regulation (CORU) and clear awards standards.**

In its response document, the panel noted the commitment of DBS to act upon any requirements set out by CORU and IAHIP in an appropriate timeframe and to provide this information in a timely manner to learners. The recommendation is met.

**Under Criterion 12:** The panel was satisfied that there are effective structures in place for the governance and management of the programmes under review. It was noted that the Quality Assurance Handbook (QAH) and associated policies and procedures have been developed in line with QQI statutory guidelines.

Programme-specific quality assurance also complies with the guidelines laid down by IACP in relation to clinical training, governance, quality assurance, assessment, access, transfer and progression.

### Summary of recommendations to the provider

1. It is recommended that the ambiguity in relation to transparency of information around possible regularly requirements for counselling and psychotherapy is clearly signposted to students and DBS remain alert to possible future needs to address the concern.
2. It is recommended that DBS develop a suite of documents, both for students and placement partners, that would set out suitable clinical practice for Levels, 7, 8 and 9, in accordance with QQI standards.
3. It is recommended that processes around accessing support for CPD are made transparent and accessible to all staff.
4. It is recommended that, as the teaching team develops, that they make their teaching and learning strategy and pedagogy more explicit.
5. It is recommended that DBS review the assessment strategy with a view to evaluating the nature and effectiveness of assessment, bearing in mind the intended learning outcomes.
6. It is recommended that, in relation to the Principal Programme, BA (Hons) the placement supervisor would attest to the competency on an 'achieved or not achieved' basis but would not assign a grade.
7. It is recommended that transparency is captured in the form of appropriate written material being developed to inform learners in relation to professional body accreditation requirements, forthcoming statutory regulation (CORU) and clear awards standards.

## Declarations of Evaluators' Interests

No interests have been declared.

This report has been agreed by the evaluation panel and is signed on their behalf by the chairperson.

Panel chairperson:

Date: 28<sup>th</sup> August 2019

Donna Bell

Signed:

A handwritten signature in black ink that reads "D. Bell". The letter "D" is written with a large, sweeping loop on the left side. The word "Bell" is written in a cursive style.

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## Part 4: Appendices