



QQI

Quality and Qualifications Ireland
Dearbhú Cáilíochta agus Cáilíochtaí Éireann

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

30 May 2023

Quality and Qualifications Ireland (QQI) is grateful for the opportunity to provide a submission to the Joint Committee on Education, Further and Higher Education, Research, Innovation and Science.

QQI and what we do

QQI is the qualifications and quality assurance authority of Ireland established by the Qualifications and Quality Assurance (Education and Training) Act 2012.

QQI's role in the quality assurance of higher education programmes

Publicly funded higher education institutions such as universities, technological universities and institutes of technology have the power to make their own awards. QQI has no role in the approval of individual programmes offered by these institutions. Private higher education institutions do not have their own awarding powers but many choose to come to QQI to have their programmes validated so that their learners can receive QQI awards.

The role of professional and statutory regulatory bodies (PSRBs) in the admission of entrants to the professions

There are many professions where the admission of new entrants is legally controlled by professional and statutory regulatory bodies (PSRBs). These bodies admit entrants by approving programmes offered by higher education providers as satisfying the standards for admission to the profession in order to protect members of the public availing of the professional's service. PSRBs generally oversee the register of practitioners and can conduct fitness to practise inquiries into the conduct and continuing competence of a registrant.

Complementary roles of awarding bodies and statutory accreditation/approval bodies for higher education programmes

Public higher education providers and QQI validate professional higher education programmes and make awards. The awards they make to learners are permanent. Programmes are designed to take into account the standards defined by the appropriate PSRB. Providers and QQI have no role in the initial or continuing registration of practitioners.

PSRBs approve programmes offered by higher education providers for the purposes of admission to their respective professions on the basis of criteria or standards set by the PSRB. While some PSRBs make awards, they do not do so for initial admission to professions in health and social care.

I hope it is clear that the process of admission to the professions being discussed today requires both an education awarding body and a PSRB.

Differences and similarities between academic validation and professional regulatory body approval of higher education programmes

When requested to validate a new higher education programme from a provider, whose institutional quality assurance procedures it has already approved, QQI assembles an expert panel to meet with the programme design team to determine if a learner can acquire the knowledge, skill and competence for the appropriate level of the programme on the National Framework of Qualifications.

In the case of a programme designed to prepare a learner for a regulated profession, the provider must declare that the programme complies with applicable statutory, regulatory and professional body requirements and this is assessed as part of the validation process. The process is termed *ex ante* validation as the evaluation must be completed prior to any students being admitted to the programme.

Following the successful validation of a programme, a higher education provider can submit the programme to the relevant PSRB for approval. In the case of some PSRBs such as the Nursing and Midwifery Board or the Teaching Council, this can be done once the programme has been academically validated. That is because these bodies also operate a system of *ex ante* approval.

In the case of PSRBs such as the Dental Council or CORU, *ex ante* approval is not currently practised. Instead, a programme has to be up and running and/or for graduates to have completed the programme before it is approved. This is known as *ex post* approval. The programme approval processes designed by CORU include a site visit to the relevant provider where the visiting panel meets with current students and graduates of the programme.

Regulation of Health and Social Care Programmes

Many of the professions that CORU now regulates are long standing. Using an *ex post* approval system for the admission of long-running programmes from well-established providers in areas like physiotherapy and radiography is relatively unproblematic.

In the case of more recently regulated areas like social care, the use of a system of *ex post* programme approval carries the risk that a programme that is already up and running will not pass the subsequent PSRB approval process. This presents a potential barrier for new entrant providers in that students may be understandably unwilling to take the risk of commencing a programme whereby they have no guarantee of entry to the profession upon graduation.

QQI's work with PSRBs

In 2019 QQI commissioned a report¹ that considered the professional accreditation landscape in Irish higher education. Following the report's publication, QQI began to facilitate the Finding Common Ground programme of engagement with PSRBs. Over 30 PSRBs are currently engaged in a programme of quarterly events and through a dedicated communications hub.

¹ Accreditation/Approval of Higher Education Programmes by Professional Bodies, [Accreditation Approval of Higher Education Programmes by Professional Bodies.pdf \(qqi.ie\)](https://www.qqi.ie/~/media/Files/Reports/2019/Accreditation-Approval-of-Higher-Education-Programmes-by-Professional-Bodies.pdf) QQI (2019).

Building on the research and engagement, QQI has, jointly with the HEIs and PSRBs, developed a set of high-level 'accreditation principles'², aimed at improving quality assurance and eliminating unnecessary administrative burden between professional and academic approval processes. To date, 16 PSRBs, 15 public HEIs and 8 private HEIs have endorsed these principles.

QQI procedures for professional programmes

QQI validates some programmes offered by private providers in the areas of teacher education, nursing and social care.

In the case of nursing and teaching, the QQI validation process precedes the submission of the programme to NMBI or the Teaching Council and QQI sets as a condition of validation that no students can be admitted to the programme prior to the programme receiving accreditation from the relevant PSRB.

QQI has also worked with the Teaching Council to synchronise the QQI validation and programme review period for the teacher education programmes we validate with the timeline for the Teaching Council's programme approval period. When the Teaching Council was unable to undertake their programme approval as scheduled in 2019, QQI extended the validation period for its programmes a number of times so that the processes could proceed in synchrony in 2022.

Potential solutions to the *ex-ante* validation and *ex post* approval dilemma

In the case of a recently validated dental nursing programme, QQI worked with the Dental Council whereby there was cross-membership of the QQI *ex ante* validation panel and the Dental Council's *ex post* accreditation review.

The Health and Social Care Act 2005 provides that CORU can approve or refuse to approve an applicant programme of education and training and may issue guidelines concerning the requirements for its approval of education and training programmes.

There is, to my understanding, therefore, no legislative barrier to CORU operating an *ex ante* programme approval process. However, CORU's *ex post* approval process may be influenced by the current legislation appearing to only permit CORU the binary possibility of approving or refusing to approve a programme without a statutory power to impose follow-up conditions on the provider.

QQI and PSRBs such as NMBI and the Teaching Council have the power legislatively, to refuse or approve a programme, but crucially can also approve subject to conditions, which must be fulfilled by the provider within a specified period of time.

With the imminent statutory regulation of programmes in counselling, psychotherapy and psychology and the recently announced desire of government to allow new entrants in fields such as veterinary medicine, it is imperative that awarding bodies work closely with PSRBs to ensure that the chances of newly validated higher education professional programmes gaining subsequent regulatory body approval are maximised. This may necessitate all regulatory bodies having some form of *ex ante* approval process for new programmes. It is also important that if legislation governing PSRBs needs to be updated to assist in this process, then this should be progressed.

Ends.

² Principles for Professional Engagements with Education Providers, including Programme Validation, Professional Accreditation and Approval, [Principles for Accreditation and other Professional Engagements.pdf](https://www.qqi.ie/Principles-for-Accreditation-and-other-Professional-Engagements.pdf) ([qqi.ie](https://www.qqi.ie)) QQI, 2021.