

QQI Executive Response to the Pharmaceutical Society of Ireland Consultation Paper on education and training of pharmacists.

March 2014

**Introduction**

Quality and Qualifications Ireland was established as a result of the amalgamation of the Further Education and Training Awards Council (FETAC), the Higher Education and Training Awards Council (HETAC), the National Qualifications Authority of Ireland (NQAI) and the Irish Universities Quality Board (IUQB). It is now the single national body responsible for the external quality assurance of further and higher education and training. It is also an awarding body. As an amalgamated entity it interacts with all parts of the education and training and qualifications system; this includes the universities and institutes of technology, the newly established Education and Training Boards, private providers that operate in the areas of further and higher education and training and in English language training, and the community and voluntary sector.

At the centre of how QQI approaches its work is the National Framework of Qualifications (the NFQ) which emerged in 2003 and has become part of the language of education and training. While the Framework is owned nationally, it is the responsibility of QQI to safeguard it. It intends doing so by ensuring that it represents more than the association of a level with a qualification. As its implementation continues, it must be a genuine symbol of the standard and quality of the qualification which a learner has attained; regardless of where within our diverse education and training system it was achieved. The link therefore between qualifications and quality assurance is of paramount importance. We must also ensure that the ten-level Framework and the policies underpinning it keep the learner in focus and act as an enabler for individuals to successfully pursue the learning pathways of their choosing.   
QQI’s interest in the consultation reflects its statutory role in (*inter alia*) assuring the quality of programmes of education and training; access, transfer and progression opportunities for learners and safeguarding the integrity of the National Framework of Qualifications (NFQ).

The Qualifications and Quality Assurance (Education and Training) Act 2012 states in Section 43(3) that each body authorised by law to make awards in the State shall ensure, in so far as is reasonably practicable, that each award that it makes is recognised within the Framework (NFQ)

Section 13 (2) of the 2012 Act requires that professional recognition bodies[[1]](#footnote-1) including bodies which have a function in relation to the regulation of professions under European Union Directives for the Mutual Recognition of Professional Qualifications, co-operate with QQI in the performance of the functions of QQI in so far as those functions relate to the functions of the body.

A Professional Recognition Body may be directly involved in the instruction and assessment of learners seeking its professional awards. Equally, associated programmes of education and training may be provided through the involvement of distinct education and training providers.

QQI welcomes the opportunity to respond to the PSI consultation on pharmacy education.

**Responses to Consultation Paper**

1. QQI welcomes the clear distinction between the Core Competency Framework for Pharmacists and the qualifications or programmes that might allow a candidate to achieve or demonstrate that they have achieved the relevant occupational competency. We support putting the Core Competency Framework on a statutory footing.
2. In specifying eligible masters degrees it would be desirable to refer in the rules to the statutory National Framework of Qualifications (NFQ). This includes a generic descriptor of the outcomes of a master degree which all Irish awarding bodies are required to satisfy (see [http://www.nqai.ie/docs/framework/determinations/determinations.pdf page 39](http://www.nqai.ie/docs/framework/determinations/determinations.pdf%20page%2039)). As the Irish NFQ has been referenced to the European meta-frameworks this may facilitate the mobility of Irish graduates, for example for entry into doctoral studies abroad.
3. The rules for recognition of programmes (Part 3) refer to a duration of 5 years. It would be desirable to complement this with a prescription of minimum academic credit of 300 ECTS. (see *Principles and Operational Guidelines for the Implementation of a National Approach to Credit in Irish Higher Education and Training* <http://www.nqai.ie/docs/framework/policies/principles%20and%20oper%20guidelines%20green.pdf> ).
4. A “recognised institution” should be a provider of higher education and training legally entitled to offer programmes leading to awards as specified in the Qualifications Act, 2012. The providers so entitled include Irish universities, RCSI, providers with awarding powers delegated by QQI (e.g. institutes of technology) and providers with programmes validated by QQI. Such providers are subject to a statutory quality assurance regime which includes national guidelines and periodic independent reviews organised by QQI in line with good international practice.
5. QQI invites the PSI to have regard to the findings of QQI’s quality assurance reviews (see [http://www.qqi.ie/Quality/Pages/Reviews.aspx](https://publicadmin.qqi.ie/Quality/Pages/Reviews.aspx)) in its engagement with institutions. QQI in turn requests that it inform QQI of any concerns that it has regarding the effectiveness of institution’s quality assurance procedures in light of its visits or reviews of institutions providing pharmacy education and training.
6. QQI urges the PSI to have regard to the academic quality assurance procedures operated by institutions for the approval monitoring and review of programmes (see, for example, <http://www.iuqb.ie/info/iuqb-good-practice-guidesed2b.html?article=adf3b2db-44d3-48f8-92dd-5be06100b94e> ) and wherever possible reduce the bureaucratic burden on programmes subject to multiple review processes to the greatest extent compatible with fulfilling statutory obligations. The Irish Higher Education Quality Network, with the cooperation of a range of professional bodies, explored this issue some years ago (see <http://www.iheqn.ie/_fileupload/Publications/IHEQN_Report_FINAL_96798829.pdf>) and QQI intends to reopen these explorations later in 2014. We will invite participation of the PSI.
7. QQI as an awarding body has not set any standards for pharmacy awards nor does it currently validate any programmes leading to such awards. QQI is not aware of any plans for any providers to seek such validation. If QQI were to receive a request for such awards it would consult with the PSI and have regard to the Core Competency Framework of the PSI in setting award standards.

**Concluding Comments**

The QQI Executive again welcomes this opportunity to provide an input into the PSI’s consultation on Rules for integrated courses in pharmacy. The QQI Executive looks forward to liaising further with the PSI in the coming period.

For further information on QQI see [www.QQI.ie](https://publicadmin.qqi.ie/)

ENDS

1. “Professional Recognition Body” means a body (including a professional association, professional institute or any other professional organisation) required or authorised by or under a law of the State to supervise or regulate the conduct of persons engaged in a profession (Qualifications and Quality Assurance (Education and Training) Act 2012. [↑](#footnote-ref-1)