

Principles for Professional Engagements with Education Providers, including Programme Validation, Professional Accreditation and Approval

Introduction and Scope

This statement provides high-level principles for the accreditation and approval (for exemptions, and other such engagements) of provider programmes by professional bodies, professional regulatory and/or statutory bodies (PSRBs). It will also apply to autonomous providers accrediting/validating their own programmes, to Quality and Qualifications Ireland (QQI) in its capacity as an awarding and validating body, and to providers of higher education programmes leading to QQI awards. The statement will be mindful of European directives and international professional agreements that may impact on aspects of the principles.

The purpose of this document is to ensure a complementary approach by PSRBs, awarding bodies and independent providers of programmes of education leading to QQI awards ('private independent providers') in order to:

- harmonise¹ separate academic programme validation and professional accreditation/approval processes².
- agree **overarching principles** for these processes.
- avoid unnecessary duplication and overlap between related processes where possible; and
- **reduce the administrative burden** on those academic providers subject to many professional, regulatory and state processes and requirements.

These principles are not statutory and do not have any legally binding force or compulsory obligation on the organisations that subscribe to them. Any references to harmonisation of processes, and other aims and ambitions outlined in this document, are intended to apply insofar as this is possible, and with regard to the independent, autonomous nature of the institutions and their associated regulatory environment.

Shared responsibilities are highlighted for all, while acknowledging that all parties have **individual responsibilities**, including those arising under legislation.

In addition to accreditation, the principles in this document will include all other significant engagements between PSRBs and providers that require approval by PSRBs of academic programmes, including where applicable student output, for the purpose of entry by graduates to professional programmes, professional apprenticeship style programmes and other engagements of significance (yet to be identified).

The objectives of this statement are set out below.

¹ 'Harmonise' is used here – and throughout the document – in its broadest sense to refer to how organisations may facilitate a complementary approach between related processes – where possible, sharing outputs and ensuring that processes do not come into conflict with each other.

² The terminology used to refer to both the academic and professional accreditation processes reflects the diversity of terminology employed by HEIs and PSRBs, which is often drawn from the legislation of those organisations.

Preamble

All parties referenced in this document place a high priority on pursuing initiatives to enhance quality within the professions and increasing the contribution that the professions make to the broader community. While recognising that the overall professional accreditation process is a wider public good, all acknowledge that the immediate beneficiaries of robust professional accreditation processes are **students** and **professionals**.

The members of PSRBs in Ireland³ (referred to as "the PSRBs" hereinafter) continue to work in partnership with the universities, institutes of technology, private independent higher education providers, and further education colleges (referred to as "Providers" hereinafter) in Ireland and in some instances more broadly through their:

- programme accreditation/approval activities.
- engagements for the granting of exemptions, and
- other activities to ensure quality in professional education as the key foundation to entry to practise or register as a professional in Ireland or to gain entry (course exemptions) to professional programmes post-graduation⁴.

Academic programme validation processes are self-regulated by universities and institutes of technology in line with:

- institutional policies and criteria for the validation/accreditation of the institution's programmes,
- the requirements of the <u>Standards and Guidelines for Quality Assurance in the European Higher</u> Education Area and QQI's suite of Statutory Quality Assurance Guidelines,
- the requirements of the National Framework of Qualifications.

QQI regulates programme validation for private independent providers in private HE and FET providers as well as public FET providers (see QQI's Policies and criteria for the validation of programmes of education and training).

It is recognised that a complementary approach is necessary by all to harmonise the separate academic validation and professional accreditation processes to – ultimately – avoid duplication of effort.

In this context, the programme accreditation/validation processes of provider, PSRB and QQI are undertaken in a way that accords with the general principles of:

- integrity,
- proportionality,
- risk,
- transparency,
- collegiality,
- agility,
- enhancement,
- necessity, and
- shared responsibility.

³ For a comprehensive list of PSRBs active in accrediting and approving the programmes of Irish HEIs, see <u>Professional Body Accreditation in Higher Education Institutions in Ireland</u> (the 'PARN Report', QQI 2017).

⁴ For example, as is the case for professional programmes in the disciplines of accountancy and law, among others.

Definitions

For the purposes of this document, the following definitions are used.

Professional accreditation or approval⁵ of provider programmes of study, and where applicable student output, is intended:

- to ensure that a programme of study meets essential criteria or standards in the training and
 education of its students in the relevant professional discipline, and that graduates from
 programmes in that discipline demonstrate that they have achieved the professional competencies
 and learning outcomes necessary for entry into the relevant level of professional practice, or
- to meet requirements for *inter alia* entry with exemptions from parts/modules of a professional programme post-graduation; to allow access to, or to give exemptions from, specified professional examinations; or to permit application for professional membership.

Professional accreditation/approval can be either regulated or non-regulated. Governments (via regulators), on behalf of the public, regulate some professions where they wish to assure public safety – and serve other equally important objectives – and designate authority for bodies to accredit professions.

In non-regulated professions⁶ professional associations may establish an accreditation function or approval process as part of their wider professional services and operations.

PSRBs are autonomous independent bodies that review and/or evaluate and/or endorse provider programmes of study, and, where applicable, student output, to ensure that the required standards are met for the relevant professions with the goal of act as evaluators of provider programmes of study with the goal of:

- professional accreditation/approval of those programmes, or
- for the purpose of granting entry to those programmes that require postgraduate entry.

Academic accreditation or programme validation refers to the evaluation of a programme of study by a self-accrediting provider such as a university, institute of technology, technological university, RCSI University of Medicine and Health Sciences, or by QQI, in line with:

- programme requirements specified in the Standards and guidelines for quality assurance in the European Higher Education Area,
- QQI's <u>Core Statutory Quality Assurance Guidelines</u>, as well as any relevant QQI <u>Topic</u>- and <u>Sector-specific QA Guidelines</u>
- institutional or national policies and criteria for programme validation and
- the National Framework of Qualifications

These national guidelines, policies and criteria (set out above) include specific standards and requirements for academic governance, programme design, delivery, and assessment, staffing, facilities, and infrastructure, learning resources and educational support and, as applicable, require that staffing and resourcing for programmes are sufficient to ensure that students achieve programme learning outcomes.

⁵ Depending on the PSRB in question, a programme may be 'accredited' or 'approved' for the above purposes.

⁶ See the 'PARN Report' for further details.

Providers, some of which are autonomous self-accrediting institutions, regularly demonstrate that they have robust academic quality assurance processes for academic programme accreditation and validation and the supporting internal quality assurance infrastructure. Non-self-accrediting providers seek validation of programmes through QQI processes. QQI is responsible for the development of a suite of statutory quality assurance guidelines applicable to all providers and in line with the *Standards and guidelines for quality assurance in the European Higher Education Area*, all of which relate to academic quality assurance.

Provider programme means a programme of study that leads to an award on the National Framework of Qualifications conferred by an autonomous Irish provider or by QQI on behalf of other providers. For the purpose of this document, 'provider programme' means any programme that is the subject to any engagement with a PSRB.

Professional accreditation/approval standard(s) means the published key accreditation/approval criteria used by the relevant PSRB to evaluate a provider programme, and where applicable demonstrated learning outcomes, for professional accreditation/approval purposes.

Professional accreditation/approval processes mean the published processes and/or procedures by which a provider programme is evaluated against the professional accreditation/approval standards, with the aim of reaching a conclusion about whether a provider programme meets the minimum standards set by the relevant PSRB for a range of purposes associated with that profession including approval for exemptions (and any minimum standards that have to be met).

Objectives of this Statement

This statement is designed to:

- provide jointly agreed principles for the professional accreditation/approval and validation of provider programmes that prepare students for
 - o entry into the relevant level of professional practice in a specific professional discipline.
 - o approval for exemptions for entry to a professional course following completion/graduation from provider programmes.
 - o other relevant purposes.
- encourage national consistency of the professional accreditation/approval standards and processes⁷
 at the discipline level, including between state, QQI, self-accrediting providers and professional
 accreditation/approval panels, and consistency at the level of principle in a discipline's
 requirements.
- be widely applicable and inclusive to reflect the diversity in the educational design, delivery, quality
 processes and institutional structures that exist within the education sector, to reflect the different
 context and quality processes of the PSRBs and to meet any regulatory requirements set by
 regulators.
- ensure that professional accreditation/approval processes and all programme validation and related review processes operate with integrity in a transparent, accountable, efficient, effective, and fair way.

Professional Accreditation/Approval Context and Purpose

Professional accreditation/approval of provider programmes serves several purposes, including:

- serving a public good through which stakeholders the public, students, graduates, employers, higher education institutions, government, professional associations and PSRBs can be assured that graduates of a provider programme have demonstrated that they meet the criteria and standards for entry into the relevant level of professional practice in a specific professional discipline; or achieve approval for entry exemptions; or for other purposes.
- providing an independent quality assurance process for registration under government legislation and/or membership of a professional association that a provider programme meets the criteria and standards for entry into the relevant level of professional practice in a specific professional discipline.
- encouraging adherence to a code of ethics or behaviour for the professional discipline.
- aiding student and graduate mobility both within Ireland and overseas, including potentially improving ease of access to further study or employment in Ireland and overseas.

⁷ See <u>Accreditation/Approval of Higher Education Programmes by Professional Bodies (QQI 2019)</u> for further detail on features of the accreditation/approval processes and criteria of 11 PSRBs.

Basic Principles for Professional Accreditation/Approval

The professional accreditation/approval standards and processes will vary in detail between professional disciplines, but ideally should be underpinned by the following guiding principles and characteristics within three core areas of focus:

- professional accreditation/approval standards.
- professional accreditation/approval processes; and
- stakeholder engagement

The basic principles applicable to each area of focus are set out below.

Professional accreditation/approval standards should:

- focus on professional competencies and demonstrated learning outcomes at graduation
- develop criteria for professional accreditation/approval that meet relevant Irish, European, and
 other international benchmarks, including all relevant European directives and international
 professional agreements, and that are demonstrably based on available research and evidence
- take due and realistic account of the wider education environment, including the demands made by
 other external agencies and regulators on the providers; limitations in available resourcing; and
 diverse institutional circumstances.
- be cognisant of, and distinguish between, the respective requirements of QQI responsible for monitoring adherence to the Statutory Quality Assurance Guidelines and National Framework of Qualifications – and PSRBs and sectoral regulators – responsible for professional accreditation/approval – and should not lead to unnecessary duplication of effort or process.
- engage stakeholders, including providers, students, state department and agencies, education
 providers, industry, the profession, and public interest representatives including
 consumers/community in the development and review of professional accreditation/approval
 standards and relevant guidelines and processes.
- be published, together with the accreditation/approval processes to be used by the PSRB.
- be reviewed periodically.

Professional accreditation/approval processes should:

- recognise that providers are responsible for academic accreditation and validation and have wider roles in learning and teaching, scholarship, research, and community engagement.
- consider resources, processes, policies, and practices where appropriate.
- base the evaluation of provider programmes and demonstrated learning outcomes on the published professional accreditation/approval standards.
- be transparent, consistent, and predictable to stakeholders, including providers and students.

- be informed by an understanding of the distinct and complementary roles of PSRBs and providers, which have responsibility for academic accreditation and validation.
- clearly define scope and activities of accreditation/approval panels.
- implement procedures for identifying, recording, and managing perceived or actual conflicts of interest in the professional accreditation/approval process, including those pertaining to the membership of accreditation/approval panels.
- have effective complaints and appeals processes relating to the accreditation/approval process and decisions by PSRBs.
- minimise the cost of professional accreditation/approval on providers, for example by being prepared to share and accept information from complementary accreditation/approval processes, where applicable.
- where possible require that the **reports arising from accreditation/approval are published**.

Stakeholder engagement is enabled by professional accreditation/approval through:

- engaging stakeholders, including students, state department and agencies, education providers, industry, the profession, and public interest representatives including consumers/community in the work of the professional accreditation/approval body beyond the direct development of professional accreditation standards.
- working towards continued dialogue between PSRBs and providers to facilitate mutual trust and confidence between parties.
- working towards such approaches for disciplines that do not have the consistent national professional accreditation/approval processes.
- working towards the development of a complementary approach.
- to programme accreditation/approval between providers and PSRBs where possible; and
- working to resolve overlaps between different accrediting/approving bodies in the same field.

Roles and Responsibilities of Providers, PSRBs and QQI

Together with their respective members, all parties must work in partnership to ensure the maintenance of standards in professional education.

They share a responsibility to develop complementary approaches to programme accreditation/approval as well as to align professional standards and the learning outcomes requirements of the National Framework of Qualifications.

Roles and Responsibilities of Providers

Providers are responsible for the academic validation of their own programmes. In the case of private independent providers, this responsibility is shared with QQI. For all providers this includes:

- compliance with the National Framework of Qualifications, ESG and Statutory Quality Assurance
 Guidelines established by QQI and, where appropriate, regulatory processes.
- designing, accrediting, validating, and setting final curricula for programmes through rigorous internal processes, based on defensible benchmarks, evidence and research.
- setting and measuring programme learning outcomes and the standard of attainment; and
- allocating resourcing and deciding staffing profiles for programmes to ensure that students achieve
 programme learning outcomes, including the appropriate levels of staff, and reporting and
 management lines.

Providers offering programmes that require (or for which they have sought) professional accreditation/approval are responsible for working with PSRBs in the professional accreditation/approval of their programmes and approval of exemptions by:

- recognising the **role of PSRBs** in the accreditation/approval of provider programmes.
- retaining and providing relevant information and evidence in line with the standards for professional accreditation/approval of programmes and approval of exemptions.
- **disclosing substantial changes** that affect their professional accreditation/approval to the relevant PSRB.

Roles and Responsibilities of PSRBs

PSRBs that accredit/approve programmes or approve provider programmes for exemptions are responsible for the accreditation/approval of provider programmes that aim to achieve the professional competencies and learning outcomes necessary for:

- entry into the relevant level of the profession, or
- entry exemptions for programmes leading to professional awards,

• other relevant purposes8.

These are typically set out in each individual PSRB's procedures for accreditation/approval and include:

- **establishing and publishing the standards** required for professional accreditation/approval and the registration of graduates, based on defensible benchmarks, evidence and research.
- **coordinating and agreeing the timing and sequencing** of validation and accreditation/approval processes, where possible.
- accrediting/approving provider programmes by applying professional accreditation/approval
 processes fairly and transparently against published professional accreditation/approval standards,
 including statutory and regulatory standards.
- ensuring that the members of professional accreditation/approval panels are appropriately skilled, trained, supported and that there are processes to assist them to identify and manage effectively any perceived or actual conflicts of interest.
- recognising their **broader international obligation** to align with international professional accreditation/approval standards, as well as national regulatory standards, as appropriate for their professional discipline.
- recognising and supporting a diversity of provider approaches in meeting professional
 accreditation/approval standards and avoiding prescribing resources, processes, policies, and
 practices.
- recognising that provider programmes prepare students for **entry** into the relevant level of the profession and that **ongoing professional education will ensue post-graduation**.

Roles and Responsibilities of QQI

The roles and responsibilities of QQI, as the national qualifications authority, national quality assurance agency, and awarding body for those private independent providers that present themselves to QQI for validation of their programmes leading to awards on the NFQ, are embedded in QQI's legislation, policies, and procedures⁹. QQI will subscribe to the principles set out in this document in carrying out its roles and responsibilities, which are set out above.

Joint Roles and Responsibilities

PSRBs, providers, and QQI are responsible for:

- acknowledging that the achievement of quality graduate outcomes is the central purpose of professional accreditation/approval and that each party is working genuinely towards this goal.
- promoting continuous improvement in the quality of provider education and professional training to respond to evolving community needs and the needs of professional practice.
- co-operating in the process and keeping each other informed of changes in discipline pedagogy,

⁸ For example, where PSRBs do not accredit, but work with HEIs to ensure that graduates meet the requirements for professional practice. For further detail, see the 'PARN Report', pp. 22-23.

⁹ See gai.ie for further information.

- professional practice experience and other matters that could impact on the professional competencies required of graduates or the manner in which they are educated.
- promoting **ongoing open communication and dialogue** about professional accreditation/approval standards, graduate competencies, and attainment.
- proactively identifying and communicating quality issues with graduate competencies and outcomes.
- using research and evidence to evaluate graduate outcomes and attainment and, where systematic
 evidence may suggest unsatisfactory outcomes, working collaboratively towards their
 improvement.
- **exploring specific practices, processes, and policies** where there is sufficient evidence to substantiate a claim of unsatisfactory graduate outcomes and attainment.

Acknowledgement

This Irish statement of principles has been drafted using as its basis the Joint Statement of Principles established by Universities Australia and Professions Australia with the kind permission of those organisations.