

Response to HEFCE consultation 2015/11

The General Pharmaceutical Council (GPhC) is the regulator for pharmacists, pharmacy technicians and registered pharmacy premises in Great Britain. It is our job to protect, promote and maintain the health, safety and wellbeing of patients and the public who use pharmaceutical services in England, Scotland and Wales. A core part of our work is setting standards for pharmacy education and accrediting courses which lead to registration as either a pharmacist, pharmacy technician or pharmacist prescriber.

We have noted HEFCE's proposals in their entirety but have only commented on proposals linked directly to the work of PSRBs. We have, therefore, responded to questions 19 and 20.

Question 19: Do you agree that it would be helpful to explore approaches to the calibration of academic output standards in different disciplinary and multi-disciplinary contexts?

We understand the appeal of calibration work to assure the public about standards across higher education. We agree with HEFCE that further work needs to be done to explore whether taking this idea forward in the long term is viable, but would caution that there may be too much variation in the sector for meaningful calibration to be undertaken.

Allied to this, we wonder if calibration of outcomes is too narrow a measure, when the learning experience and student ability is more complex than outcomes alignment and difficult to measure. Uniformity should not be mistaken for quality.

From a regulatory perspective, standards are calibrated already by setting outcomes for courses, which are then tested through accreditation. For this reason there is less variation and more uniformity in the regulated sectors of higher education than there is elsewhere. It is not clear to us whether the same could be replicated reliably in other disciplines where there is no binding external scrutiny, but the idea could be explored.

We run a national examination, passing which is a requirement for registration as a pharmacist. What it shows is that while all MPharm degrees teach to the same outcomes, there is considerable variation in pass rates across the sector. We wonder if this shows that a national calibration exercise is unrealistic, given the multifactorial nature of achievement.

One final point: we wonder how HEFCE will include students in calibration exercises to avoid calibration exercises being the academy talking to the academy?

Question 20: Do you agree that providers should use the accreditation activities of at least some PSRBs more centrally in future approaches to quality assessment?

We do agree that the work of PSRBs should be better integrated into the quality assurance architecture of higher education, which is a point we have made before through the QAA's PSRB forum. PSRBs invest a significant amount in accreditation processes, to ensure that they are independent, robust, evidence based and of use to institutions and subject communities. While it is true that subject communities use accreditation reports extensively, we are unsure if institutions do the same. Reports provide extensive commentaries on individual courses but could also be used collectively to form a view of the performance of institutions across a range of courses. This could be a function undertaken by governing bodies, as suggested in HEFCE's proposals.

We would like to record that there have been significant changes in the regulation of academic/professional courses in at least the last decade. Previously regulators often had close links with course providers and often used input model rather than outcomes focussed processes. The modern way of regulating courses, especially in healthcare is to ensure that there is full separation between the independent statutory regulator and course providers.

We recognise that there is variability between PSRBs, often explained by different roles and function and we understand the need for HEFCE to understand that variation. We suggest that HEFCE considers recognising the work of PSRBs based on a core set of principles, which could include:

- outcomes-based accreditation
- public reporting of accreditation outcomes
- public appointment of accreditors
- lay representation on accreditation panels
- student/recent registrant representation on accreditation panels
- full disclosure of conflicts of interest
- adherence to a code of conduct for accreditors, and
- an independent appeals process for accreditation decisions

We think that adopting principles along these lines would give HEFCE and appropriate degree of confidence in the work of PSRBs. We would be willing to work with HEFCE to develop this idea further.

There is a more generally applicable principle here, which is not present across the entirety of the quality assurance landscape for higher education and it is that the system requires externality and independence. We require both but other parts of the proposed external system do not – external examining would be a case in point. If we applied the same principles to professional regulation then accreditors would know staff in the departments they were examining in and while there would be some externality, there would not true independence. We hope that HEFCE considers how externality and genuine independence can be embedded as widely as possible.

Damian Day
Head of Education on behalf of the GPhC

Submitted by email and online

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