



# Royal Pharmaceutical Society of Great Britain

Helping pharmacists achieve excellence

To: Jayne Mitchell  
Quality Assurance Agency  
Response to Circular Letter CL04/08

By email

Date: 6 June 2008

## **The framework for higher education qualifications in England, Wales and Northern Ireland – Draft for consultation April 2008**

The Royal Pharmaceutical Society of Great Britain is glad to have this opportunity to comment on the Quality Assurance Agency's 2008 revision to the FHEQ. The Society's first observation is that while some revisions in the document are significant and helpful, it is a testament to the robust nature of the original 2001 document that it remains largely intact. Of all the components of the Academic Infrastructure, the FHEQ has been one of the most useful. The Society has two general points and a number of more specific ones:

### **1. The visibility of PSRBs in the document**

The Society's general comment on the FHEQ draft is that it could do more to recognise PSRBs as key stakeholders in the use of such a document and in the definition and use of qualifications. Many such bodies use qualifications and descriptors on a daily basis, especially in a European context, when clarity on such matters can often aid academic or professional mobility. However, when other stakeholder groups such as 'parents' and 'employers' seem to be ubiquitous, PSRBs tend to be relegated to the general category of 'other'.

Specifically:

P3, para. 2: In the final sentence as 'PSRBs' to the main stakeholder list;

P5, para. 10: Add 'PSRBs' to the first sentence: PSRBs do this out of legal necessity and this should be recognised here;

P6, para. 12: Add 'PSRBs' to the second bullet point;

P13, para. 28: Add 'PSRBs' to the second sentence.

### **2. Consistent use of terms**

In Section 4 the terms 'discipline' seems to be used most frequently to define a body of knowledge, but there are some discrepancies, which do not appear to be logical.

The least consistent section seems to be the Level 5 descriptor, which refers to:

- Principles....of *areas of study*;

- Methods of enquiry in *subjects*;
- Approaches to solving problems in the *field of study*;
- Key techniques of the *discipline*.

Level 6 uses *field of study* and *discipline* in the same sentence.

With reference to Level 7, the distinction between *academic discipline* and *area of professional practice* is logical but the use of *field of study* is less convincing. Perhaps the first two could be conflated into *academic or professional discipline* and *field of study* removed?

### 3. Individual points

1. P7, para 15: Missing ‘)’ in first sentence.
2. P8, para. 18: The use of “ ‘proper authorities’ “ seems a little odd. The common legal term for a responsible body of that sort would be competent authority (without a syntactic qualification). Might this be adopted?
3. P13, para. 30: The second sentence, about short programmes and CPD, seems out of place in a paragraph which is otherwise much more general. Perhaps it would be better to add a separate paragraph somewhere about the interaction between the *Framework* and CPD. The point that needs to be made is that employers, employees and PSRBs do value university-based CPD, which deserves to be included in the *Framework* on level grounds (even though it is primarily a qualifications framework).
4. P18, first bullet: Would ‘work-based setting’ or ‘workplace’ be better than ‘organisation’? We are unsure of the intention here?
5. P18: The second bullet is virtually identical to the final sentence, which seems redundant.
6. P22, third ordinate bullet, first subordinate (indented) bullet: might this be expanded to include professional as well as personal responsibility? The distinction is important.
7. P23, para.45: Please add ‘pharmacy’ to the list. In terms of numbers of graduates, the MPharm is possibly the most important integrated master’s degree of all but often seems to have been left off the list.

Allow me to conclude by reiterating the point I made at the beginning of this response: the FHEQ is a robust and useful tool. The Society welcomes this revision and hopes the Agency finds its comments useful.

Yours sincerely,

Damian Day  
Head of Accreditation and Secretary, Education Committee, RPSGB