

08 June 2020

Dear Victoria

Below is the PEB's response to the announcement of changes to accreditation processes.

### Annual Reports

1. As an examination only body, some of the evidence sources (page 2) that are related to teaching are not applicable to the PEB e.g. modes of teaching provision; staff/student ratios; how any extremes of cohort entry will be supported; teaching staff information/ Staff and Student Liaison Committee information and minutes of meetings and destination data.
2. With regard the timeline for reporting, PEB would wish to submit its annual report by 31<sup>st</sup> July, which is at the end of our examination cycle.

### Accreditation Withdrawal Procedure

*Question 1: What are your views on the circumstances in which accreditation would be withdrawn?*

This is difficult to comment on as the circumstances described are not clearly defined and we would appreciate specific criteria.

*Question 2: Do you have any comments on the proposed procedure?*

1. It is not clear who would make the decision to recommend or withdraw accreditation, other than it would require approval of the IPReg Education Group and the Board.
2. Review "by the IPReg Chair in discussion with the IPReg Executive Team" would not constitute a formal, independent and transparent appeals process. Appeals should be carried out by an independent person who has had no previous involvement in the case. The IPReg Chair, presumably, would have had previous involvement as part of the IPReg Board.
3. There is some ambiguity on what the process is; paragraph 14 calls it a "review", whilst question 3 use the term 'appeal'.

*Question 3: Is five working days an appropriate timeframe for an attorney qualification provider to put together a (different) case for consideration on appeal?*

Five working days is very short to put together an appeal. We consider a reasonable timeframe to be 20 working days.

*Other comments*

The word “extenuating” (paras 1 and 13) is misleading; extenuating indicates “circumstances that tend to diminish culpability”. Perhaps, ‘exceptional’ would be more appropriate.

Para 14, first sentence implies that the qualification provider carries out the review.

Regards



Michael Yates  
Chair PEB Governance Board