

Making the Law Work for Human Resources for Health (HRH) Training in Zambia

Mabvuto Katwizi Kango

Department of Public Health, Texila American University, Lusaka, Zambia

Abstract

There are several institutions in Zambia that play an important role in regulating the quality of higher education, including Human Resources for Health (HRH) training. However, there were reports of overlaps in the legal mandates of these institutions. In 2021, one of the institutions, the Higher Education Authority (HEA), responded to this challenge by successfully facilitating the amendment of the laws that regulated the quality of higher education. This research investigated whether the amended laws were still suitable enough to ensure quality in higher education and in HRH training.

Keywords: Actors, HRH, Law, Regulators, Training, Quality.

Introduction

Before the year 2013, Zambia only had two Universities, the University of Zambia and the Copperbelt University, which were established in 1965 and 1987, respectively. Later, the Higher Education Act No. 4 of 2013 was enacted, and it provided for the establishment of more institutions of higher learning, both public and private. The Act also led to the creation of the Higher Education Authority (HEA) of Zambia, which was created to provide quality assurance, regulation of private and public higher education institutions and registration of private higher education institutions. The Higher Education Act of 2013 gave Authority to the HEA to compliment the efforts of the already existing regulators of Human Resources for Health (HRH), such as the Health Professionals Council of Zambia (HPCZ).

In the year 2019, there were signs that the coordination and working relationship among the regulators of HRH training was not working well, as could be observed from several incidents that occurred during that year. The HPCZ at

one time closed the Copperbelt University School of Medicine, but the decision was opposed by the HEA who, reopened the institution. The dispute ended up being resolved by the Attorney General [1]. On another occasion, the HPCZ closed a number of health facilities and training institutions, but this decision was over-ruled by the Minister of Health. The incidents indicated the presence of overlaps in Authority and possibly different interpretations of quality standards. In an apparent response to these overlaps and conflicts, in 2021, the HEA had the Higher Education Act of 2013 amended. The amended Act, the Higher Education Authority, 2021, gave the HEA more Authority, among other privileges, over other regulators to assure quality in higher education, including regulation of HRH training.

It is yet to be seen if this amended law fosters quality training in HRH training than the one it replaced. The amended law was just about a year old at the time of this research, so it was too early to measure its impact on the quality of HRH training. However, this initial period of implementing the amended Act also

serves as an opportunity for collating “lessons learned” that could in turn lead to further improvement of the said law and its application. This If these lessons around the amended Act are not harnessed, opportunities to improve the inquiry were aimed at studying some of the operational aspects of the amended Higher Education Act and how they could potentially influence the quality of HRH training in Zambia, especially in the wake of the Zambia Medical Association report [2] that indicated that there as more work to be done improving the quality in HRH training.

In 2018, the Zambia Medical Association (ZMA) sanctioned a study on the state of post-graduate medical training (HRH training) in Zambia. The study was in response to the establishment of additional post-graduate training programs in Zambia. The assessment evaluated the state of medical training institutions in seven thematic areas of governance, academic progression assessment processes, accreditation and affiliation status, human resource, the existence of innovation alongside the learning and training activities, training resources/funding, and availability of learning/training facilities. The assessment targeted a total of 23 medical training institutions with a total of 91 training program activities in provinces. The following are the key findings:

1. Management: it was found that management structures were established across all the training institutions/sites of the respective training programs, but there was generally lacked documentation, worse so in public institutions compared to private institutions threatening not only the respective institutional memory but also weakening the running of the various programs.
2. Academic Progression Assessment Processes: The assessment found strong progression and assessment processes in each of the training programs across the sites, but once again, this was done generally with weak documentation.
3. Accreditation and Affiliation Status: The majority of the assessed training institutions did not meet the required standards of accreditation and affiliation.
4. Human Resource Development (HRD) Status: Generally, the institutions offering the programs were noted to have invested in human resource development as well as in its documentation. The HRD referred to by the report was the capacity of teachers.
5. Availability of Training Innovations: With a few exceptions, there was not much innovation going on in the training institutions amongst the programs.
6. Training Resources: although the human resources for teaching were there in most institutions, there were still a few that lacked adequate teaching capacity.
7. Funding: Funding across all the programs in all the institutions under study, especially the public institutions, was low.
8. Adequacy of training Facilities: With a few exceptions, the assessment across all programs and training sites found key training facilities such as library services, specialized lab services, specialised clinical equipment/clinical skills services, and Information and Communication Technology (ICT) services for the training activities generally to be either not available or inadequate [2].

The findings from the report of the ZMA can be addressed if there is an effective HRH training regulatory system in place, supported by good law. It should also be noted that the mere presence of a good law will not be enough to get the desired results, but that law needs to be fully implemented to be effective. The Interviews with several regulators, including the HEA, HPCZ, Zambia Qualifications Authority, and the Lusaka City Council (which falls under the Ministry of Local Government), revealed mixed views on the amended Higher Education Act. Some opined that the amended

act presented the best opportunity to improve higher education training quality, including HRH training. Some opined it was counter-productive to HRH training quality, and others had no opinion at all. The concern of this inquiry was the possibility of the law not being effective in fostering the quality of HRH training. This inquiry, therefore, examined at the law to determine if it was effective enough to address challenges such as those identified in the ZMA’s report.

The presence of the law was a big step towards quality HRH training as long as the law is adequate for that purpose. Further, even when

the law is adequate, the manner in which it is applied influences the achievement of the desired QA outcomes. If the law was not working for assuring quality in HRH training as per Stage 3, then it is not working. What can be done to Stage 1, Stage 2, or both? This was the question that this inquiry was responding to attempting to answer. Figure 1 below depicts how the law can be made to work for the improvement of the quality of HRH training.

To examine the challenges and opportunities of the amended Higher Education Act of 2021 of Zambia on Human Resources for Health training.

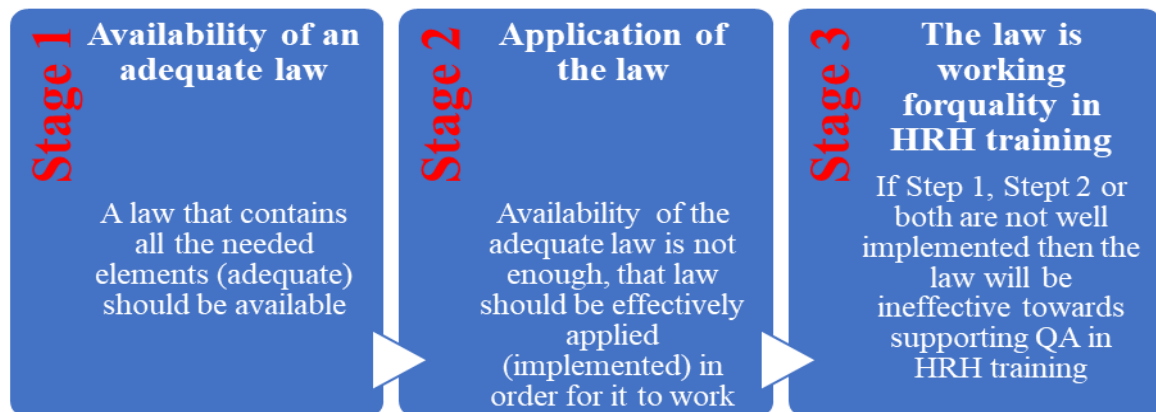


Figure 1. A Depiction of how to Make the Law Work for Quality HRH Training

Materials and Methods

The inquiry was a qualitative case study, whose data was obtained from desk reviews and interviews.

A qualitative case study is a method that has the power to explore a broad and complex topic [3] like the one that was studied in this inquiry, and they it gives more detailed responses [4]. Qualitative case studies have the power to explore a broad and complex topic within a real-life setting [5-7] like the topic studied here, hence the selection of the approach. Qualitative approaches are recommended for the evaluation of policy, regulations, and governance

frameworks in health [5]. The inquiry involved a desk review of the Higher Education Act and related documents and also included interviewing purposefully selected persons from the regulators, namely, HEA, HPCZ, ZAQA and Lusaka City Council. The interviews were done using a Narrative approach (not pre-set questions), where the respondents spoke freely, allowing the study to emerge from the interviews, which is an appropriate approach for exploring details of social settings and interactive relations [6], such as the interactions of the regulators of HRH training in Zambia. Observations were also

made in one of the stakeholder meetings, the Program Core Elements Review Meeting.

Results

Interviews and desk reviews revealed that on 21st March 2013, Parliament assented to the Higher Education Act No. 4 of 2013. This Act provided for the establishment of the Higher Education Authority and defined its functions and powers. The Act further provided for quality assurance and quality promotion in higher education, among others. The Act repealed and replaced the University Act of 1999 [10]. The University Act of 1999 [10] was the law that guided the only two Universities that existed at the time, the University of Zambia, and the Copperbelt University, which were established in 1965 and 1987 respectively. The Higher Education Act No. 4 of 2013, which replaced the University Act of 1999, provided for the establishment of more universities, both public and private.

After several universities were established by the Higher Education Act of 2013, it was amended by parliament in 2021. The main reason given for the amendment was what was described as “duplication.” The full statement read: *“It has been noted that various higher learning institutions have Authority to accredit LPs both for foreign and local higher learning institutions. This has created a duplication of functions between HEA and other higher learning institutions. Cabinet felt the need to remove the duplication that currently exists between the Authority and other higher education learning institutions and bring about order in terms of accreditation of LPs for both local and foreign learning institutions”* [11]. Relevant parts of the amended Act [12] were reviewed, and the following were some of the notable findings:

Powers of Actors

After examining the amended Act, it was noted that almost all the authority to assure quality e.g., accreditation, was taken away from

other actors and awarded to one actor, the HEA. As part of the repeal and replacement of section 20 of the Act of 2013, specifically on the Criteria for registration of private higher education institutions, the powers to approve an application for registration of a private higher education institution were awarded to the HEA. The HEA was also granted Authority to de-register institutions. Previously, other regulators such as HPCZ would do registration and deregistration of institutions offering health-related programs.

In being granted the power to register, the HEA was also mandated to consider the suitability of the name of the applying institution, premises suitability, institution responsiveness to learner needs, presence of operational plan, health & safety standards are met, availability of adequate financial provision, presence of qualified teaching personnel and presence of suitable training facilities. This broad mandate indicated that the HEA had the overall Authority to decide who is accredited and who is not. However, some aspects, such as premises suitability, health, and safety, etc. will need the support of other regulators, such as the Ministry of Local Government- but the final decision is made by the HEA.

Part IVA on Accreditation of Learning Programmes in Higher Education Institutions (23A), the Act reads, *“Despite any other written law, the Authority (HEA) shall, in consultation with relevant professional institutions, accredit learning programmes offered in a higher education institution for the purpose of— (a) setting and safeguarding the quality of learning programmes; (b) recognising learning programmes; and (c) ensuring the continuous improvement of the quality of learning programmes.”* This part of the Act promotes collaboration of HEA with professional institutions such as HPCZ, but it also overrules all the laws that could have been mandating the other institutions (by stating *“despite any other written law.”*), the laws that

previously gave power to the other regulators, which in turn reduces their role in HRH training QA. The question is whether this reduction in power of other stakeholders promotes QA or does the opposite. It reduces the potential for conflicts but reduces the participation of other regulators whose role has been partly pacified by law.

Further reduction of powers of other regulators was made as consequential amendment of legislation that mandated other regulators, and the full statement was as follows:

“Following the approval by Cabinet to amend the Higher Education Authority Act No. 4 of 2013, Cabinet also approved amendments of other consequential legislation across the higher learning institutions, and these are as follows:

1. *The Zambia Institute of Purchasing and Supply (Amendment) Bill, 2021, and The Accountants (Amendment) Bill, 2021, under the Ministry of Finance;*
2. *The Zambia Institute of Advanced Legal Education (Amendment) Bill, 2021, under the Ministry of Justice;*
3. *The Zambia Institute of Marketing (Amendment) Bill, 2021, under the Ministry of Commerce, Trade and Industry;*
4. *The Zambia Chartered Institute of Logistics and Transport (Amendment) Bill, 2021, and The Engineering Institution of Zambia (Amendment) Bill, 2021 under the Ministry of Transport and Communications;*
5. *The Health Professions (Amendment) Bill, 2021 under the Ministry of Health;*
6. *The Zambia Institute for Tourism and Hospitality Studies (Amendment) Bill, 2021, under the Ministry of Tourism and Arts; and,*
7. *The Urban and Regional Planners (Amendment) Bill, 2021 under the Ministry of Local Government.*”¹³

In the above consequential amendments, the Authority of all the listed actors to independently undertake QA activities such as

registration and accreditation was removed from them. Previously, HRH training institutions were registered, accredited, and monitored by the HPCZ. That Authority was now solely in the hands of the HEA. However, the HPCZ could be called upon to perform limited contributions, such as approving a learning curriculum and providing peer review in learning program evaluations. The HPCZ is a specialized agency designed to foster quality in HRH, while the HEA has more general skills. Therefore, moving Authority from the former to the latter appeared to be a step back in QA for HRH training as it reduced the benefits of specialization.

Section 23D states: *“The Authority shall accredit a learning programme of a higher education institution if.....(j) the staff to be employed are adequate for the efficient delivery of the learning programmes and possess the necessary qualifications and experience in the relevant field;”* This is a great law, as the qualifications of the staff have an impact on the quality, so that should be examined before accreditation. However, its application has been questioned by some stakeholders during the interviews. Those who questioned it opined that for programs such as the Master of Medicine (MMed), which are highly specialised and is more of a “job on training”, the HEA may not be fully equipped to monitor who is teaching whom and what is being taught, as such kind of monitoring requires someone who is embedded in the program and understands the intricacies of the medical profession. It was, therefore, suggested that for such specialised HRH training programs, the Authority to ensure QA should be left to the HPCZ.

Before the Higher Education Act amendment, the Ministry of Local Government used to approve and accredit some institutions and recognize some foreign qualifications under the Urban and Regional Planners Act, of 2011. The amendment of the Higher Education Act led to the consequential amendment of the Urban and Regional Planners Act, 2011.

Removing the Authority from the Ministry of Local Government to approve and accredit some institutions and also recognize some foreign qualifications appears justified as the Local Government is unlikely to have the expertise in training, so this was a positive change of the amendment. The consequential amendment of the Urban and Regional Planners Act involved the deletion of the following paragraphs:

“29. The Minister may, by statutory instrument, on the recommendation of the Council, make regulations to provide for— (a) the terms and conditions for the issuance of practising certificates; (b) the type of continuous professional development and training, and any other information required for the issuance of a practising certificate; and.” This paragraph was deleted from the Urban and Regional Planners Act. All the mandate in the deleted paragraphs was accorded to the HEA. Unlike that of the Health Professional Council of Zambia Act, this amendment appears justifiable, as higher education training is not a specialty of the Local Government. Other paragraphs deleted from the Urban and Regional Planners Act were as follows:

“42. (1) The Minister may, on the recommendation of the Institute, by statutory instrument, recognise any foreign institution providing training in planning. (2) The Institute may register a person as a planner under subsection (2) of section fifteen who is not a citizen of Zambia or is not practising or working as a planner in Zambia prior to the application if that person— (a) is engaged to work as a planner in Zambia under an international agreement entered into by the Government of the Republic of Zambia; or (b) undertakes the such number of courses as the Institute may determine and passes the final examination for the courses.” This deletion appeared justifiable as institutions such as HEA were already performing this function, and their specialty places them in a better position to

undertake this work, and not the Ministry of Local Government. The other deleted paragraph was:

“60. (1) (g) the requirements and conditions for the recognition of local and foreign qualifications accredited by the Institute for purposes of registration under this Act;” The deletion of this paragraph also appeared justifiable because the ZAQA was already performing that role. On amendment of such parts of the law, the identified “duplication” appeared to hold.

Notifying/Warning the Public:

The amended Higher Education Act also contains clauses on what should be done when a learning institution does not comply with QA requirements. One of those measures is to notify the public by publishing the names of defaulting institutions.

Section 23G subsection (5) reads, *“The Authority shall, where it revokes the accreditation of a learning programme, publish a notice of the revocation in the Gazette and a daily newspaper of general circulation in the Republic.”* Desk review revealed that on this part of the Act, the HEA had performed well in informing the public about universities that are operating illegally. For example, on 18 March 2021, the HEA published on its website a list of universities operating illegally [14], and this was also published in the local press, including the Zambia National Broadcasting Corporation [15] website. These publications have even spread to foreign newspapers [16]. This amendment is reasonable as it safeguards prospective students from enrolling with unaccredited universities.

On Penalties for those Breaking the Law

The amended Act also gives the HEA a mandate to penalize the institutions that break the law, and the parts of the Act that do so include the following:

Section 23 reads in part *“(A) (5) A person who contravenes subsection (4) or operates a*

de-registered private higher education institution or institute commits an offence and is liable, on conviction, to a fine not exceeding three hundred thousand penalty units or to imprisonment for a term not exceeding three years, or to both”.....23B. (1) A higher education institution shall not offer a learning programme that is not accredited. (2) A higher education institution which contravenes subsection (1) commits an offence and is liable, on conviction, to a fine not exceeding two hundred thousand penalty units or to imprisonment for a term not exceeding two years, or to both.”

Similarly, Section 23G subsection (1) reads, *“The Authority may suspend or revoke a certificate of accreditation if the holder of that certificate of accreditation— (a) obtained the certificate on the basis of fraud, negligence or misrepresentation; (b) assigns, cedes or otherwise transfers the certificate without the prior approval of the Authority; (c) fails to comply with any term or condition of the certificate; or (d) operates the registered higher education institution in contravention of this Act or any other relevant written law.”*

The above-mentioned sections of the law appear sufficient to deter malpractices. However, a check on the Zambia Legal Information Institute portal [17], a repository for court cases, couldn't reveal any learning institution that has ever been taken for prosecution for breaking the law, and yet, according to HEA publications, there are many who frequently break the law. The amended Act is in itself adequate in how to respond to defaulters, but it appears it is not fully applied. If there have been a lot of offenders since the law was enacted and no one has ever been convicted in a court of law, then it suggests that the law is not being fully applied. The HEA would probably need to establish closer collaboration with institutions such as the National Prosecution Authority, Zambia Police Service, etc, who could help in fully applying the law for QA. That could make the law work

for QA in HRH. Otherwise, the lack of application could promote impunity.

Along with the powers to penalize that were given to the HEA, the learning institutions were given room to exculpate themselves when accused. Section 23G subsection (2) reads, *“The Authority shall, before suspending or revoking a certificate of accreditation under subsection (1), notify the holder of the certificate of its intention to suspend or revoke the certificate, giving reasons for its decisions and requesting the holder of the certificate to show cause within a reasonable period that may be specified in the notice, why the certificate should not be suspended or revoked.”* This part of the Act is commendable, in a fair society, the suspected institution should be given a chance to explain. It demonstrates that the Act is not meant to be punitive but also seeks to explore reasons behind a suspected wrong. This approach could enable HEA and partners to help the offenders to comply.

Section 23G subsection (6) reads:” *The Authority may, in addition to a suspension or revocation of a certificate of accreditation of a learning programme, charge the holder of a certificate of accreditation the cost of carrying out the enforcement action.”* Passing to cost of enforcement to the offender appears to be a just call, but maybe more costs need to be passed on too. However, there is no mention of making any reparations to students who may fall victim to poor-quality teaching or end up out of class because their learning institution is closed as a result of default. The students who pay high fees and place their trust in learning institutions to give them quality training end up in limbo if the institution is closed or suspended. A check was done with the Zambia Competition and Consumer Protection Commission on whether there is a law to protect students (consumers) in such cases. From the response, the only law mentioned was that such reparations are only available when an organization becomes insolvent. The insolvent company is liquidated, and the proceeds could be used for

compensation of various stakeholders. There was no law found on what should happen to end-users/consumers in cases where a university licence is suspended, or a university closed for reasons other than insolvency. The law in Zambia that protects consumers in the event of company insolvency is captured under the Zambia Corporate Insolvency Act No. 9 of 2017 [18]. In a situation where a university is suspended or closed by the powers mentioned in the Higher Education Act, the student will have to take the more difficult route of suing the learning institution for breach of contract. The Higher Education Act should have a provision to protect students as well.

On Implementation of the Amended Higher Education Act of 2021

For the law to be applied, there must be some policies and practices to support its implementation. As a means of applying the law, the regulators, led by the HEA, were making efforts towards increasing collaboration. As part of the practices to apply the law, there were some platforms that were created for the various regulators to interact.

The HEA was noted to be making efforts to foster cooperation among the stakeholders. The HEA had been convening quarterly meetings with Quality Assurance Agencies and Awarding Bodies, a platform consisting of the Nursing and Midwifery Council of Zambia (NWCZ), Teaching Council of Zambia (TCZ), Health Professions Council of Zambia (HPCZ), Zambia Institute of Marketing (ZIM), Zambia Institute of Chartered Accountants (ZICA), Examinations Council of Zambia (ECZ), Ministry of General Education (MoGE), Technical Education, Vocational and Entrepreneurship Training Authority (TEVETA), Higher Education Authority (HEA), and Zambia Qualifications Authority (ZAQA). More stakeholders may need to be included into this platform. For example, the stakeholder in charge of approval land use and building suitability may also need to be part of

such a platform, considering that land and building approval plays a key role in the whole quality assurance process.

The HEA has also been playing another positive role in doing the law work for quality higher education training. In 2021, the HEA embarked on undertaking sensitization workshops on the amended Higher Education Act to make all stakeholders how the law can support QA. The HEA also mentioned in the sensitization workshops that they were developing guidelines to assist the implementation of the amended Act. Sensitizing stakeholders on the Act is an important and commendable initiative. The HEA could also use this platform to get feedback from stakeholders on how they feel about this amended Act. This feedback could guide the development of the guidelines they referred to in the sensitization meetings. If this is not done, then the sensitization meetings could create an impression of a one-way flow of information as opposed to one that generates consensus among regulators.

It was also found that the HEA had created provisions for interaction with other regulators, notably, the Program Core Elements Review Meetings and Quarterly Meetings. One of the positive things that emerged from the HEA's reforms in 2021 was the creation of the Program Core Elements Review. This is a platform where universities present their programs, and the core elements of that program are reviewed by a panel and later subjected to validation by their peers. The outcome ensured that universities were offering programs that have undergone a more rigorous curriculum review than previously when universities would design their own programs and deliver them to students. This platform promoted the incorporation of expert views provided peer review, and increased collaboration between the HEA and the training providers and to some extent, between the HEA and other regulators. Sitting as an observer in this platform was part of the investigation

process of this inquiry that revealed that the Program Core Elements Review Meetings could be the most relevant and effective platform that has been created to support the implementation of the Higher Education Act.

Discussion

It has been opined that some laws were only good on paper but proved ineffective in assuring quality [19]. This inquiry identified the potential pitfalls, if not addressed, that could render the amended Higher Education Act a law only good on paper. The Higher Education Act of 2021 was a positive step towards improving the quality of HRH training as it strengthened the role of the HEA and reduced the possible recurrence of conflicts with other regulators. However, more work may need to be done on both its adequacy and application to make it work better for quality HRH training.

There had been several studies done on the quality of higher education in Zambia, and they have all focused on the shortcomings of the learning institutions. This research explored the role of the law, especially the mandates of the regulators, in improving the quality of education. An insight into the mandates of regulators provided a different perspective of how to address the issue of the quality of HRH training, thus adding to the Body of Knowledge (BOK) on this subject. Overall, a more detailed inquiry is required to evaluate the impact that the amended Act has on each regulator and impact on quality of HRH training. Then this result should inform further amendment for a more comprehensive law. The outcome of the evaluation should be used to further amend the law to address its gaps. The amendment is necessary for promoting QA for HRH training. A more comprehensive law will give an overarching framework to ensure quality training that could further build public trust and confidence in the system. To increase the chances of the Higher Education Act succeeding, there should be specific attention paid to its expected outcomes, where the focus

should be to improve the quality of education and not just to address operational issues like “duplication” or conflicts.

Conclusion

This inquiry set out to explore the challenges and opportunities of the amended Higher Education Act of 2021 of Zambia on Human Resources for Health training, with a view to identifying what could make the law work for quality HRH training. Laws are amended for various reasons, for example, to make them more effective, to increase coherence, etc. When that law is amended, the law should be able to serve the people, and the law should work for the people. The amended Higher Education Act of 2021 has taken a step towards working for the people through its intention of improving the quality of higher education. The amended Act has brought an end to the possibility of conflicting decisions being made by regulators, as it grants the final decision to the HEA. However, it was found that the Higher Education Act of 2021 was not fully adequate and was not being fully applied and this could render it a law that doesn't work for the people. The law needs to be amended to harness the contribution of other regulators that have specific specialties and address the interests of end-users such as students. The application of the law should ensure the full participation of all stakeholders and full enforcement of the law.

The amended Higher Education Act could have done its part of ending conflicts, but it has taken away the benefits of specialization in the regulation of HRH training in Zambia because the Subject Matter Experts (SMEs) are not able to fully contribute to the process. Human Resource Management experts²⁰ note that the benefits of having SMEs is to have leadership in a particular work area that is always abreast of latest developments and research in their area of specialty. SMEs, therefore, tend to have extensive knowledge, which enables organizations to avert or minimize challenges

using their strong knowledge of their domain. SMEs are professionals with a deeper knowledge of how a particular industry operates and it has been opined that the healthcare industry is very distinct from other industries, and it requires specialised industry-oriented knowledge to be successful [21]. The HPCZ are SMEs when it comes to matters related to health and medical training, and in order to get the full benefits of the HPCZ's specialty, they need to be given a bigger role in the regulation of HRH training, but the amended Higher Education Act seems to have done the opposite. The law needs further amendment to grant SMEs more leadership in

the regulation of HRH training if better results are to be achieved.

Conflict of Interest

The author has no conflict of interest on this research.

Acknowledgements

I would like to thank the Health Professionals Council of Zambia (HPCZ), the Higher Education Authority (HEA), the Zambia Qualifications Agency (ZAQA), the Lusaka City Council (LCC), and the Zambia Competition and Consumer Protection Commission for sparing time from the busy schedules to speak to me.

References

- [1] Kalaluka, L. (2019). Attorney General Ponders CBU Conflict. *Zambia Daily Mail*. Available from: <http://www.daily-mail.co.zm/attorney-general-ponders-cbu-conflict/> [Accessed: 22nd July 2019].
- [2] Zambia Medical Association (2019). Report on the State of Medical Training Institutions in Zambia. Medical Education and Research Board (ZMA-MERB).
- [3] Yin, Robert K. (1981). The Case-Study Crisis: Some Answers. *Administrative Science Quarterly*, 26 (1), p.58-65.
- [4] Creswell, J. (2013). *Qualitative inquiry and research design: Choosing among five approaches*, 2nd ed. London: Sage.
- [5] Yin (2002) cited in Yazan, B. (2015). Three Approaches to Case-Study Methods in Education: Yin, R., Merriam, S. and Stake, R. *The Qualitative Report*, 20 (2), p. 134-152. Available from: <http://www.nova.edu/ssss/QR/QR20/2/yazan1.pdf> [Accessed: 13th January 2016].
- [6] Riessman, C.K. (1993) 'Narrative analysis. *Qualitative Research Methods*' Series No. 30. Newbury Park, CA: Sage.
- [7] Stake (1995) cited in Yazan, B. (2015). Three Approaches to Case-Study Methods in Education: Yin, Merriam, and Stake. *The Qualitative Report*, 20 (2), p. 134-152. Available from:

- <http://www.nova.edu/ssss/QR/QR20/2/yazan1.pdf> [Accessed: 13th January 2016].
- [8] Pyone, T., Smith, H. and van den Broek, N. (2017). Frameworks to assess health systems governance: a systematic review. *Health Policy and Planning*, 32, p. 710–722. doi: 10.1093/heapol/czx007.
- [9] Atkinson (1997). Cited in Riessman, C.K. (1993) 'Narrative analysis. *Qualitative Research Methods*' Series No. 30. Newbury Park, CA: Sage.
- [10] National Assembly (2013). The Higher Education 2013. Act Number: Act 4 of 2013. Available from: <https://www.parliament.gov.zm/node/3097> (Accessed: 9 June 2022).
- [11] HEA (2021). The Higher Education (Amendment) Bill, 2021. Available from: <https://hea.org.zm/the-higher-education-amendment-bill-2021/> (Accessed: 9th June 2022).
- [12] Higher Education Authority (2021). Higher Education (Amendment) Act No. 23 of 2021. Available from: Higher Education Act and Statutory Instruments – Higher Education Authority (Accessed: 3rd June 2022).
- [13] HEA (2019). HEA Reinstates Registration of Africa Research University and Rockview University. Available from: <https://www.hea.org.zm/index.php/component/k2/item/104-hea-reinstates-registration-of-africa-research->

university-and-rockview-university [Accessed: 23rd July 2019].

[14] Higher Education Authority (2021). Illegally Operating Universities in Zambia. Available from: <https://hea.org.zm/illegally-operating-universities-in-zambia/> (Accessed: 7 June 2022).

[15] Zambia National Broadcasting Corporation (2021). Four Universities Operating Illegally. Available from: <https://www.znbc.co.zm/news/4-universities-operating-illegally/#:~:text=Four%20Universities%20in%20Lusaka%20and,as%20Shalome%20University%20in%20Kitwe> (Accessed: 7 June 2022).

[16] Daily Advent Nigeria (2021). Zambian Authority Releases 12 Names of Illegal Universities (Full List) – Daily Advent Nigeria. Available From: <http://ng.dailyadvent.com/education/2019/09/21/zambian-authority-releases-12-names-of-illegal-universities-full-list/> (Accessed: 7 June 2022).

[17] Zambia Legal Information Institute (ZambiaLii, 2022). Judgements. Available from: <https://zambialii.org> (Accessed: 7 June 2022).

[18] Zambia Corporate Insolvency Act (2017) Act No. 9 of 2017. Available from: link <https://osall.org.za/docs/2019/07/Zambia-Corporate-Insolvency-Act-9-of-2017.pdf> (Accessed: 7 June 2022).

[19] Sheikh, K., Saligram, P. and Hort, K. (2015). What explains regulatory failure? Analysing the architecture of health care regulation in two Indian states. *Health Policy and Planning*, 30, pp. 30:39–55. doi:10.1093/heapol/czt095.

[20] Indeed, Editorial Team (2021). What Is a Subject Matter Expert? Indeed. Available from: <https://www.indeed.com/career-advice/career-development/what-is-a-subject-matter-expert> (Accessed: 21 July 2022).

[21] Aarohan Healthcare Services (2020). Importance of Subject Matter Experts in Healthcare Marketing Campaigns. Available from: <https://aarohanhealthcare.com/blog/importance-of-subject-matter-experts-in-healthcare-marketing-campaigns/> (Accessed: 31 July 2022).