ENQA AGENCY REVIEW

QUALITY ASSURANCE AGENCY FOR HIGHER EDUCATION (QAA)

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European Association for
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CONTENTS

EXECUTIVE SUMMARY

This report analyses the compliance of Quality Assurance agency for Higher Education (QAA), United Kingdom, with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG). The purpose of the review is to verify whether QAA acts in compliance with the ESG as adopted at the Yerevan ministerial conference of the Bologna Process in 2015. ENQA requires all member agencies to undergo an external cyclical review at least once every five years and compliance with the ESG is a condition for membership. The agency wishes to use the results of this review for the renewal process of the ENQA membership and also the EQAR registration for the period 2023 to 2028.

This is the QAA fourth review. The bulk of the external review was conducted between December 2022 when the Self-Assessment Review (SAR) document was received, and April 2023 when the draft report was submitted to ENQA. In light of the documented and oral evidence considered by the review panel regarding the activities, decisions, and bodies in place at the time of the site visit, the panel concluded on the agency's compliance with the ESG as presented in this summary below.

Established in 1997, QAA operates in the UK, considering the policy differences in each nation which causes one of the most complex institutional environments. The agency also works internationally, by participating in projects, offering independent peer reviews and trainings. In addition of this complex multi-nation landscape, QAA have been operating under circumstances where change is the only constant for quite some time now. It is important to highlight that since the last review, in July 2022, QAA has announced its decision that it will no longer consent to be the Designated Quality Body in England (DQB). QAA has ceased to operate as DQB on 31 March 2023. QAA has decided not to continue in the DQB role because the requirements related to the current regulatory approach in England are not consistent with standard international practice for quality assurance bodies, as reflected in the Standards and Guidelines for Quality Assurance in the EHEA (ESG). This fact evidences the dedication to the values and principles of the European Higher Education Area and QAA's strong international orientation.

QAA is regarded by the stakeholders as a competent quality assurance agency that is managed efficiently and effectively. The agency also enjoys a good level of satisfaction among external stakeholders (institutions and reviewers) and internal ones (staff). The panel notes high reputation and solid position of the agency in UK, Europe and the international higher education community. This is among other things due to the way QAA provides information, guidance, and support to higher education.

QAA handles and involves an impressive array of stakeholders and has fostered a culture of effective dialogue with everyone involved in the procedures. The involvement of students in the organisation and in quality assurance procedures is exemplary and a good practice for other quality agencies.

Nevertheless, the panel did identify some challenges and key areas for further development during the review process.

The panel considers that QAA should reflect on the follow-up of its internal quality assurance system, through a clear feedback-related internal improvement plan and using a more quantitative and summative approach.

Another crucial aspect concerns the validation process regarding the final decision. The current set up leaves the final decisions with the reviewers, which makes it difficult to guarantee consistency between reviews. The fact that the final decision is equivalent with the report does not help, in

particular if it is sometimes unclear when a report is really final. The panel finds that QAA should revise its traditional approach and consider establishing a commission like for its international reviews. Alternatively, the agency could assign this responsibility to the two newly established agency bodies, namely the Assessment and Review Group and the Assessment and Review Operations Group or could adopt best practices from its international reviews.

Another challenge relates to thematic analysis, where QAA should consider a more systematic and comparative approach to thematic reports in service of achieving convergence across the four nations. The panel felt that finding a coherent and convincing narrative will be key in light of the great diversity and divergence with which QAA is dealing.

In light of the presented evidence in the review report, the panel finds QAA compliant with the following standards of the ESG:

- 3.1 Activities, policies and procedures for quality assurance
- 3.2 Official status
- 3.3 Independence
- 3.5 Resources
- 3.6 Internal quality assurance and professional conduct
- 3.7 Cyclical external review of agencies
- 2.1 Consideration of internal quality assurance
- 2.2 Designing methodologies fit for purpose
- 2.3 Implementing processes
- 2.4 Peer review experts
- 2.6 Reporting
- 2.7 Complaints and appeals.

Next, according to the judgment of the panel, QAA is found to be partially compliant with the following two ESG standards:

- 3.4 Thematic analysis
- 2.5 Criteria for outcomes

Based on QAA's compliance with the ESG standards presented above and based on the review panel's analysis provided in this report, the review panel considers that QAA is compliant with the ESG.

INTRODUCTION

This report analyses the compliance of the Quality Assurance agency for Higher Education (QAA), United Kingdom, with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG). It is based on an external review conducted in the period from September 2022 (Agreement on Terms of Reference) until June 2023, when the external review report (ERR) was scheduled for validation by ENQA Agency Review Committee.

BACKGROUND OF THE REVIEW AND OUTLINE OF THE REVIEW PROCESS

BACKGROUND OF THE REVIEW

ENQA's regulations require all member agencies to undergo an external cyclical review, at least once every five years, in order to verify that they act in compliance with the ESG as adopted at the Yerevan ministerial conference of the Bologna Process in 2015.

As this is the QAA fourth review, the panel is expected to provide clear evidence of results in all areas and to acknowledge progress from the previous review. The panel has adopted a developmental approach, as the Guidelines for ENQA Agency Reviews (2021) aim at the constant enhancement of the agencies.

After the external review in 2018, QAA was granted ENQA membership for five years and inclusion on the EQAR Register until 30 June 2023. The EQAR Register Committee concluded in its last decision that the agency complied only partially with some ESG, namely ESG 2.4, and ESG 3.1.

On 27 June 2022, EQAR suspended the agency's registration following an extraordinary revision of its registration. The reasons for this decision were: the lack of students on the review panels for Quality and Standards Review (QSR), Quality and Standards Review Monitoring and Intervention (QSRMI) and New Degree Awarding Powers Test (New DAP's Test), and the lack of publication of review reports for external QA reviews carried out in England for QSRMI and DAP.

Following the consideration of the agency's response and actions, the Register Committee lifted QAA's suspension on 10 August 2022 (RC35/C74). Further information on this can be found in chapter on ESG 3.2.

With this report, QAA is applying for the renewal of EQAR registration and renewal of membership in ENQA.

SCOPE OF THE REVIEW

QAA is carrying out the following activities within the scope of the ESG:

1. Enhancement-led Institutional Review (Scotland).

2. Degree Awarding powers and University Title (Wales/Scotland).

3. Quality Enhancement Review (Wales).

4. Gateway Review (Wales).

5. Higher Education Review (Alternative providers/Foreign providers) (UK wide) (including the follow-up activity, Annual Monitoring). In England, the higher education review of alternative providers is only available for those institutions who cannot register with the OfS.

6. Review Scheme for Education Oversight (Educational Oversight) (UK-wide) (including the follow-up activity, Annual Monitoring).

7. Educational Oversight Exceptional Arrangements (Educational Oversight) (UK-wide) (including the follow-up activity, Annual Monitoring).

8. International Quality Review (IQR) and IQR for African Higher Education Centers of Excellence (ACE) (International).

9. International Programme Accreditation (IPA) (the activity is due for implementation in 2022/2023) (International).

The following external QA activities of the agency are under development, therefore they have been reviewed only to the extent the procedures and methodologies are available and contextual information on their development provided. The activities under development are:

1. Scottish Quality Enhancement Arrangements (Scotland), to be implemented in two phases between 2022/23 and 2024/25.

2. Quality Enhancement Review (Wales) due for implementation in 2023/2024.

The following activities, while in the scope of the ESG are not relevant to the agency's renewal of application on EQAR or membership in ENQA as the activities will be ceased to be carried out since QAA no longer consents to be the Designated Quality Body in England (DQB) after the current DQB year ends on 31 March 2023:

1. Quality and Standards (England).

2. Degree awarding powers (England).

Finally, the following activities of the agency are out of the scope of the ESG:

1. Quality Evaluation and Enhancement of UK Transnational Higher Education: this is a non-cyclical evaluation; with the thematic based process and the focus on the country, not on individual institutions or programs. Due to the fact that this process is out of the scope of this review, in consequence, the thematic analysis derived from these evaluations has not been considered in this review process. QAA has been carrying out these activities since 2009.

2. Investigatory schemes (Scotland and Wales): it is a non-cyclical activity undertaken in response to specific concerns that have been identified about academic standards and quality raised by students, staff and other parties.

In this review, by decision of EQAR, and following the ToR, QAA's activity as DQB in England has not been evaluated, given that in 2023 it will no longer be recognized for evaluation purposes. However, from the last review in 2018 until 2022, QAA has been operating in England. In the panel's opinion, it would have been appropriate to therefore include the procedure in the scope of the visit.

MAIN FINDINGS OF THE 2018 REVIEW

The previous ENQA coordinated review took place in 2018. The panel concluded that QAA complied with the ESG as follows:

Fully compliant:

- ESG 3.1 Activities, policy and processes for quality assurance
- ESG 3.2 Official status

- ESG 3.3 Independence
- ESG 3.4 Thematic analysis
- ESG 3.5 Resources
- ESG 3.6 Internal quality assurance and professional conduct
- ESG 3.7 Cyclical external review of agencies
- ESG 2.1 Consideration of internal quality assurance
- ESG 2.2 Designing methodologies fit for purpose
- ESG 2.3 Implementing processes
- ESG 2.5 Criteria for outcomes
- ESG 2.6 Reporting
- ESG 2.7 Complaints and appeals

Substantially compliant:

- ESG 2.4 Peer-review experts.

The 2018 review also listed some examples of good practices; one recommendation given and eighteen suggestions for improvement.

In 2020, the agency submitted to ENQA a follow-up report. The Board approved the report in October 2020 with no remarks.

REVIEW PROCESS

The 2023 external review of QAA was conducted in line with the process described in the Guidelines for ENQA Agency Reviews (2021) and in accordance with the timeline set out in the Terms of Reference. The panel for the external review of QAA was appointed by ENQA and composed of the following members:

- Oliver Vettori, Dean Accreditation and Quality Management, Vienna University of Economics and Business, Austria, Chair, academic (EUA nominee)
- Núria Comet Señal, Internal Quality Assurance and Project Coordinator, Catalan University Quality Assurance agency, Spain, Secretary, QA professional (ENQA nominee)
- Kirsty Williams, Education Quality Improvement Manager, Royal College of Veterinary Surgeons, UK, panel member, QA professional (ENQA nominee)
- Liv Teresa Muth, PhD student in "Industrial Biotechnology", Ghent University, Belgium, panel member, student (ESU nominee, member of the European Students' Union Quality Assurance Student Experts Pool).

The panel was supported by Goran Dakovic, ENQA Head of Agency Reviews, as the coordinator of the review. The ENQA review coordinator's contribution was significant in assuring smoothness of the visit to the agency and overall quality of the review.

The review panel was initially provided with the self-assessment report (SAR) and access to a document repository in SharePoint, where the panel could find all the evidence. After a preliminary analysis based on the information provided in the SAR, the panel requested additional information, for example, financial planning documents, further information about the reviewer pool, a more detailed descriptions of all of the assessment procedures and the appeals procedures, and a list of the report among others, which was promptly and extensively provided by the agency. During the site visit, the panel requested further information, for example more information about the follow up process and the results of the reviews, which was provided timely to the panel.

The ENQA review coordinator organised a preparatory online briefing for the panel on 21 December 2022. In addition, the panel held some additional preparatory online meetings during January and February 2023.

Ms. Laura Porter, QAA Quality Enhancement Manager, acted as the agency resource person and supported the overall organisation of the review. She and Mr. Alastair Delaney (Executive Director of Operations and Deputy CEO) participated in the online pre-visit meeting of the review. The panel found this meeting of a great value and beneficial in understanding the complex nature of the agency's operations in the UK and elsewhere.

The panel conducted a site visit in Gloucester, UK from 27 February to 1 March 2023.

After the site visit, the review panel produced the final report based on the self-assessment report, additional information provided, the site visit findings, and the panel's reflections. Last but not least, the panel provided the agency an opportunity to comment on the factual accuracy of the draft report. The review wishes to express its gratitude to the QAA and its management and staff for the supportive and open attitude throughout the review, which contributed significantly to the work of the panel.

Self-assessment report

As described in the QAA's self-assessment report (SAR), the process of preparing the SAR began in May 2021. QAA joined the development of the SAR with the development of the IQA Manual (September 2022); this manual sets out in detail the approach outlined in the IQA policy statement.

A project team was established to produce the SAR. The Core team consisted of the project sponsor (Chief Executive), senior responsible officer (Executive Director of Operations and Deputy CEO), project lead (Quality Enhancement Manager, QAA Scotland), project manager (Continuous Improvement Manager, Quality Assessment England) and two project members (lead Policy Officer, Nations and Europe; and Quality Manager Lead, International and Professional Services). The Core team was supported by a working group which included representatives of external quality assurance activities across the agency.

The phases that the agency followed were:

- June 2021- October 2021: a project team was established to develop the self-assessment report (SAR) supported by a working group to explore strengths, weaknesses, opportunities and threats for each ESG and by each QA activity of the agency.
- November 2021 – February 2022: The development of the SWOT that included internal and external consultation and workshops.
- January 2022 – May 2022: SAR drafting.
- June 2022- September 2022: SAR feedback. All agency staff and Board members were offered the opportunity to comment.
- November 2022: The SAR was approved by QAA's Board and the Chief Executive; submission of the SAR to ENQA.

During this process, in July 2022, the agency took the difficult decision that it can no longer consent to remain the Designated Quality Body (DQB) reporting to the English regulator (the Office for Students), because the policy and regulatory approach in England made it impossible to comply with the ESG.

The SAR includes:

- A description of the higher education and quality assurance of higher education in the context of the agency, the history, profile, and activities of QAA. A description of the main changes since the last review.
- The compliance with Standards and Guidelines for QA in the EHEA.
- The opinions of stakeholders.
- The recommendations and main findings from the previous review and the agency's resulting follow-up.
- The SWOT analysis and a description of the key challenges and areas for future development.
- A glossary of terms.
- Annexes: QA activities and responsibilities in UK nations, Alignment of key principles with the methods in scope for the QAA review, a map of the ESG to the UK Quality Code for Higher Education; Alignment of ESG Part 1 Standards to review methods

QAA has also prepared a SharePoint space, where all the evidence was accessible to the review team.

The SAR provided the basis for conducting the review. The panel found it comprehensive and well structured, but also at places rather sparse (e.g., in some sections where compliance was/is argued). In addition, the panel expected a more analytical report, with more summative and quantitative data that would provide a more objective view of the processes and their results. However, it should be noted that all the data that were requested throughout the process were provided quickly by QAA.

Given the complexity of the activities of the agency, the use of more diagrams or tables we believe could facilitate a better and more intuitive understanding of the agency's external QA processes.

Finally, the group would like to stress that although the use of weblinks was very useful to facilitate consultation of further supporting documents, in several cases, many of them did not provide directly related information which led to an excess of information. The panel would have appreciated a more targeted selection of documents related to the external review.

Site visit

The review panel agreed with ENQA and QAA that the site visit should be conducted in Gloucester (UK).

The site visit was spread across three days on 28-29 February and 1 March 2023 in the QAA's office in Gloucester. Although it was a face-to-face site visit, the panel was surprised that more than half of the hearings were conducted in hybrid format or fully online. Although most of the participants on-line did not have problems with the connection, in some individual cases this unfortunately was the case.

The panel considers that it is necessary for the majority of interviewees to meet the panel and travel to the reviewed agency, since this benefits to the openness of the discussion and its dynamics. The panel is therefore of the opinion that more on-site participants to the site visit would have provided for overall richer debates. The panel understands the convenience of joining of a short meeting online, nevertheless, it suggests that the number of on-line participants in ENQA reviews in future should be reduced and provided as an option in exceptional circumstances solely, since a review against the ESG occurs only every five years.

Nonetheless, during the three days, the panel confirms it had the opportunity to talk to all interviewees as planned in the site visit schedule.

The panel appreciated the contributions from all members of the QAA staff, directors, and the members of the internal commissions, and especially the Board. Their dedication and professionalism to QAA were visible throughout the visit.

The panel is also grateful to all the external participants (experts, representatives of government and institutions, employers and other external stakeholders) contributing to the review with their input, which was found as important in building an informed and rounded view on the agency's work.

For the detailed schedule of meetings, see Annex 1.

HIGHER EDUCATION AND QUALITY ASSURANCE SYSTEM OF THE AGENCY

HIGHER EDUCATION SYSTEM

The term 'higher education provider' describes any institution or organisation that delivers or contributes to all or part of a higher education (HE) programme. Providers fall into three main groups in the UK:

- Universities
- Colleges, university colleges or smaller specialist institutions
- Alternative providers.

The number of students, academic staff and non-academic staff for year 2020/21 in the UK is specified in the table 1 below:

Table 1: Student and staff numbers by provider UK region 2020-21

Provider UK nation	Student numbers	Academic staff	Non-academic staff
England	2,230,690	185,965	151,605[15]
Northern Ireland	66,245	3,585	2,415
Scotland	282,875	24,940	27,060
Wales	145,170	10,045	13,345
UK total	2,724,980	224,535	194,425

Source: SAR

Higher education providers in the UK are obliged to undergo an external quality evaluation in order to receive public funding. Each funding body has different requirements for quality assessment.

The bodies providing public funding are:

- the Office for Students (OfS) in England;
- the Scottish Funding Council (SFC);
- the Higher Education Funding Council for Wales (HEFCW);
- the Department for the Economy in Northern Ireland (DfE-NI).

There are different types of degree awarding powers that an institution can obtain, following the type of degree (see the table below on 'UK degrees and the powers to award them'):

- foundation degree awarding powers (FDAP) for England and Wales;
- taught degree awarding powers (TDAP);
- research degree awarding powers (RDAP).

Table 2: UK degrees and the powers to award them

| Type of degree | Level in UK Qualifications Frameworks[1] | | Level in European qualifications framework[2] | Powers necessary |
	England, Wales and Northern Ireland	Scotland		
Doctoral degree (or doctorate)	Level 8	Level 12	Third cycle	Research degree awarding powers (RDAP)
Research master's degree[3]	Level 7	Level 11	Second cycle	
Taught master's degree[4]				Taught degree awarding powers (TDAP)
Bachelor's degree with honours	Level 6	Level 10	First cycle	
Ordinary bachelor's degree		Level 9		
Foundation degree	Level 5		Short cycle	Foundation degree awarding powers (FDAP)

Source: SAR, the Right to Award UK Degrees as elaborated by QAA

All valid UK degrees are awarded by a university or other legally approved degree-awarding body that has overall responsibility for the academic standards and quality of the qualification. These are known by the UK government as 'recognised bodies'. There are around 175 of them in the UK.

QUALITY ASSURANCE

The central reference point for quality assurance in the UK is the UK Quality Code for Higher Education (Quality Code).

The Quality Code for Higher Education is defined as the "key reference point for UK higher education, protecting the public and student interest, and championing UK higher education's world-leading reputation for quality. It has been developed by QAA on behalf of the UK Standing Committee for Quality Assessment (UKSCQA), in consultation with the higher education sector" (Source: Quality Code, QAA web).

Importantly, the document articulates fundamental principles that should apply to higher education quality across the UK, irrespective of changing national contexts. These include principles such as emphasising the role of providers in assuring the quality of the experience they offer to students, supporting student engagement, and ensuring external referencing is used to ensure the integrity of awards and the quality of provision. On the website, QAA has produced a document that illustrates how the ESG 2015 maps to the Quality Code and associated reference points. Providers can use the table to ensure their processes for quality assurance and enhancement align with the European Standards and Guidelines.

The Quality Code has a range of supporting reference points:

• The Frameworks for Higher Education Qualifications of the UK Degree Awarding Bodies. QAA maintains and publishes the qualifications frameworks for UK higher education:

- The qualification framework for higher education in England, Wales and Northern Ireland (FHEQ).

- The qualification framework for higher education in Scotland (FQHEIS).

These frameworks are the principal national reference points for academic standards in the UK higher education.

• Advice and Guidance: divided into 12 themes and designed to support new and existing providers in meeting the mandatory requirements of the Quality Code. These reference points have been developed in partnership with the higher education sector and include the guiding principles, practical advice and further resources.

• Subject Benchmark Statements, written by subject specialists and facilitated through QAA, which describe the nature of the study and the academic standards expected of graduates (bachelor's degrees with honours and master's degrees) in the specific subject areas. The Statements show what graduates might reasonably be expected to know, do and understand at the end of their studies. Higher education institutions could use them as reference points in the design, delivery and review of academic programmes.

The Subject Benchmark Statements are reviewed on a cyclical basis to ensure they are as useful for discipline communities and can inform a range of purposes across the sector. The higher education community and other stakeholders participate in the consultations of these Statements before their publishing.

In 2022, QAA updated 15 Statements and these are the first ones to incorporate consideration of how practice within disciplines addresses the wider social goals of equality, diversity and inclusivity; education for sustainable development; requirements of disabled students; and topics of enterprise and entrepreneurship.

QAA has planned to update the following Statements in the coming years:

- 14 Subject Benchmark Statements in 2022-23; and
- 11 Subject Benchmark Statements in 2023-24.

• Characteristics Statements which describe the distinctive features of qualifications at particular levels within the Qualifications Frameworks. They describe the qualifications in terms of their purpose, general characteristics and generic outcomes, but do not include subject level detail (e.g., doctorate degree, master's degree or micro credentials).

All listed documents serve as reference points and guidance to support higher education providers in setting and maintaining academic standards, assuring quality and promoting quality enhancement. In Wales and Scotland, Subject Benchmark Statements and Characteristics Statements are additional regulatory requirements alongside the Quality Code and qualifications frameworks.

QAA

QAA was established in 1997 as a single quality assurance service for providers of HE in the UK. QAA brought together:

- The Higher Education Quality Council (HEQC) and the quality assessment divisions of the Higher Education Funding Council for England (HEFCE).

- The Higher Education Funding Council for Wales (HEFCW).

- The Scottish Higher Education Funding Council (SFC) agreed to contract its quality assurance activities to QAA soon afterwards, completing full UK coverage.

QAA operates in the UK and takes into consideration policy differences in each of the four nations. The agency also works internationally on behalf of its members and the wider HE sector.

QAA is represented internationally through membership of several organisations and networks including ENQA, INQAAHE and CHEA International Quality Group.

QAA defines its purpose and mission as: "The purpose of QAA is to safeguard academic standards and ensure the quality and global reputation of UK higher education. It does this by working with higher education providers, regulatory bodies and student bodies with the shared objective of supporting students to succeed".

QAA's extant strategy (published in 2020) runs to 2025, but developments since its publication, including QAA's decision to demit the DQB role in England, have necessitated the development of a replacement. The intention is to seek the Board's approval for this document in March 2023, and to publish the new strategy in April 2023. As the new strategy was not part of the evidence provided during the site-visit, therefore was not analysed.

At the heart of the strategy is a commitment to a continued collaboration with institutions and stakeholders across the higher education sector. The current strategy outlines three strategic priorities that have guided QAA since 2020:

- To be the trusted expert independent body supporting the enhancement and regulation of higher education across a diverse UK;
- To provide expert advice that secure standards and supports quality enhancement;
- To strengthen the global reputation of the UK higher education.

QAA's ORGANISATION/STRUCTURE

QAA is governed by its Board. The Board is composed by 18 members:

- Four members nominated by bodies representing UK HE providers;
- Four members nominated by funding bodies;
- Seven independent members including a student representative appointed by the Board of Directors;
- One member nominated by the National Union of Students;
- One member nominated by UK Colleges;
- One member engaged in the governance or management of alternative provider.

The responsibilities and the way the Board works is described in the QAA Code of Best Practice (date April 2020), and is published on the agency's website. The panel noted that the minutes of the meetings are available on the website as well.

The responsibilities of the Board are:

- To provide effective leadership and direction for QAA by implementing prudent and efficient controls, ensuring accountability, and managing risk effectively;
- To support QAA's strategic objectives and goals;
- To ensure that QAA has adequate resources to meet its objectives and achieve its goals;
- To assess and evaluate management performance;
- To establish QAA's core values;
- To determine QAA's cybersecurity strategies.

QAA currently has eight governance committees and the Honorary Treasurer in place. The committees are made up of members of the Board and other external expert members:

- The Audit and Risk Committee (ARC);

- The Nomination and Remuneration Committee (NRC).

Committees with a specific remit for safeguarding academic standards and quality are the following ones:

- The Advisory Committee for Degree Awarding Powers (ACDAP);
- The Access Recognition and Licensing Committee (ARLC);
- The Scotland Strategic Advisory Committee;
- The Wales Strategic Advisory Committee;
- The Student Strategic Advisory Committee.

The Board can establish and dissolve the agency's committees as the need arises.

Operationally, QAA is divided into two main groups of functions:

- Central functions that support the work across all areas of QAA: Finance and infrastructure and Corporate Affairs composed by 38 HC (Headcount).
- Review and enhancement: divided by directorates in charge of the review activities:
  - Quality Assessment in England composed by a group of 20 HC;
  - International & Professional Services composed by a group of 20 HC;
  - Enhancement and Review in Scotland, Wales & Northern Ireland by a group of 17 HC;
  - Membership, QE & Standards by a group of 22 HC.
  - In addition, there is also the CEO and DCEO.

Furthermore, QAA has two groups in charge to ensure that there is consistent implementation of the principles of internal quality assurance across the different directorates and their review methods:

- The Assessment and Reviews Group (ARG) reports to QAA's Senior Leadership Team and has representation from across all of QAA review methods at a senior level. The group provides strategic oversight of QAA's quality assurance work.
- The Assessment and Review Operations Group (AROG) which reports to the ARG. The focus of this Group is to consider the operational delivery of QAA's quality assurance work, particularly the relationship with the expert reviewers.

QAA is also organised by nations, QAA Wales and QAA Scotland, since part of the funding comes from each nation. The overall organisational structure of the agency is presented in the figure 1 below.

Figure 1: QAA's organisational structure

QAA'S FUNCTIONS, ACTIVITIES, PROCEDURES

The external QA activities of QAA can be divided depending of the area of application:

UK-wide:

Higher Education Review for alternative providers (HER-AP) is QAA's review method for alternative providers who require educational oversight or course designation and who are not eligible to register with the OfS in England. The four-year cycle operates UK-wide to include alternative providers in Scotland, Wales and Northern Ireland.

There are a number of related methods that all derive from the HER-AP method with similar processes and outcomes:
  - Educational Oversight-Exceptional Arrangements (EOEA) which applies to colleges operating as autonomous providers with close links to a single higher education institution (normally a university).
  - Higher Education Review Foreign Providers (HER -FP) covers overseas providers offering full courses in the UK, leading to non-UK awards.
  - Review Scheme for Educational Oversight (RSEO) applies to third-party providers of short-term study-abroad programmes in the UK, which form part of degree courses offered by providers based in the United States of America.

All alternative providers, irrespective of the review method, are subject to the same annual monitoring process. The annual monitoring process is a follow-up to a full review and serves as a short check on the provider's continuing management.

Nation-specific (Scotland, Wales, and Northern Ireland):

  - Enhancement-led Institutional Review (ELIR) is the review method for higher education providers in Scotland. It is a five-year cyclical review method and has a focus on the institution's strategic approach to enhancement, placing a particular emphasis on the arrangements for improving the quality of the student learning experience and the institution's ability to secure the academic standards of its awards.

- Quality Enhancement Review (QER) is the review method for higher education providers in Wales. It is a six-year cyclical review method and is an enhancement-oriented method. It provides a review structured around the strategic priorities of the provider and the nature of its student body - and how the two interrelate to define the provider's priorities for enhancing the student learning experience.
- Gateway Quality Review (GQR) is the review method in Wales. It is a four-year cycle review method. Its purpose is to test providers against the baseline regulatory requirements in Wales, thereby establishing that academic standards are secure, and a high-quality student academic experience is being delivered. Providers that have successfully completed two reviews may apply to become a regulated provider and would then be reviewed under the QER method.
- Degree Awarding Powers is a review method to determine whether the providers in Scotland, Wales and Northern Ireland meet the criteria for degree awarding powers. QAA reviewers carry out a scrutiny for the specific purpose of determining whether the applicant meets the criteria for degree awarding powers. Then the QAA Board provides advice to the relevant government for consideration by the Privy Council, which has the authority to grant degree awarding powers. In England, this power has been delegated to the Office for Students. The criteria are common across the UK, but they have some differences according to where the applicant is based and for what level of powers it is applied.

International activities:

One of the strategic goals of QAA is "*Strengthening the global reputation of UK higher education*". In this sense, QAA takes a proactive role in international developments in standards and quality in order to:

- Secure academic standards in UK higher education delivered internationally;
- Be an authority on international quality assurance and enhancement matters;
- Maximise the influence of QAA in international quality assurance developments.

The international reviews of the agency in the scope of the ESG are:

- International Quality Review (IQR) offers providers outside the UK the opportunity to have an independent peer review which may lead to accreditation by QAA. Re-accreditation depends on undergoing a five-year cyclical review. IQR is designed to analyse and reflect on the provider's own quality assurance approaches, to challenge and benchmark their existing processes against the ESG, and to support them to drive improvement and excellence in their own quality assurance approach.
- International Programme Accreditation (IPA) is a programme review method for institutions outside the UK that want an independent peer review of its curriculum development and quality assurance process. Re-accreditation depends on undergoing a five-year cyclical review.

Table 3 below summarises the number of performed QA activities of the agency that fall within the scope of the ESG, 2018-19 to 2022-23.

Review method	2018-19	2019-20	2020-21	2021-22	2022-23
UK – Wide					
HER -AP	I0	2	5	0	1
HER –FP	I	2	1	0	1
RSEO	I	I0	0	1	1
EOEA	6	2	0	1	3
Annual monitoring	I2I	I8	I2	28	24
Nation-specific					
ELIR	4	4	4	4	N/A
QER	I	I	3	5	N/A
GQR	2	2	2	3	1 to date
DAP	0	0	0	1	1 to date
International					
IQR	0	3	2	7	6
IPA	0 to date				

Table 3: Number of performed external QA activities of the agency that fall within the scope of the ESG (Source SAR)

As defined in the ToR, the following activities fall out of the scope of the ESG:

Investigatory schemes

This is a non-cyclical activity of QAA. QAA operates schemes to investigate concerns about academic standards and quality raised by students, staff and other parties. For QAA, the term 'concern' means a serious issue about how HEIs manage their academic standards, the quality of learning opportunities and/or the information they make available about their provision. Where such concerns indicate serious systemic or procedural challenges, a detailed investigation will be conducted. The aim of this investigation is to promote public confidence in the university sector by offering a responsive means for exploring concerns brought to QAA's attention outside the regular review arrangements.

Access to Higher Education Diploma (AHE)

The Access to Higher Education Diploma (the Diploma) is a nationally recognised Level 3 qualification designed to prepare adults to study in higher education.

QAA has been responsible for assuring the quality of recognised Access to HE Diplomas through the management of the Recognition Scheme for Access to HE.

Capacity-building services

QAA offers several specially designed services aimed at supporting the development of quality assurance and quality assurance professionals worldwide. This includes capacity-building programmes, training and consultancy for universities, governments and quality assurance agencies.

<u>Quality Evaluation and Enhancement of UK Transnational Higher Education (QE-TNE) (International activity)</u>

It is a non-cyclical activity of QAA. TNE is defined by the agency as "the delivery of higher education level awards by recognised UK degree-awarding bodies in a country, or to students, other than where the awarding provider is based".

TNE offers students worldwide the chance to access UK degrees closer to where they live, and it is an important component of UK degree-awarding providers' global engagement. In 2019-20, 156 UK providers had students on TNE programmes, accounting for 453,390 students studying for UK awards through transnational provision, including through open and distance learning.

QAA'S FUNDING
QAA is currently funded through four main channels:

- Membership fees from higher education providers across the UK and overseas.
- Fees for work performed as the Designated Quality Body in England chargeable to all providers on the Office for Students register, as set out in the Higher Education and Research Act 2017.
- A service-level agreement (SLA) with Scottish Funding Council and Universities Scotland.
- A fee paid by providers seeking an IQR or QE-TNE.

Other income comes from:

- Grants from HEFCW for services in Wales.
- A framework agreement with regulated providers in Wales to pay QER review fees, plus fees paid by providers in Wales for Gateway Review (or expressed as specific course designation and/or educational oversight).
- An annual fee paid by Access Validating Agencies (AVAS) to maintain and manage the scheme for the recognition and quality assurance of Access to HE Diplomas in England, Wales and Northern Ireland.
- A fee and an annual maintenance charge paid by providers of higher education seeking educational oversight from QAA.
- Other private contracts, consultancy and business development work.

The figure below shows the changing income profile for the four years from 2018-19 through to the projections for 2022-23.

(Source: SAR)
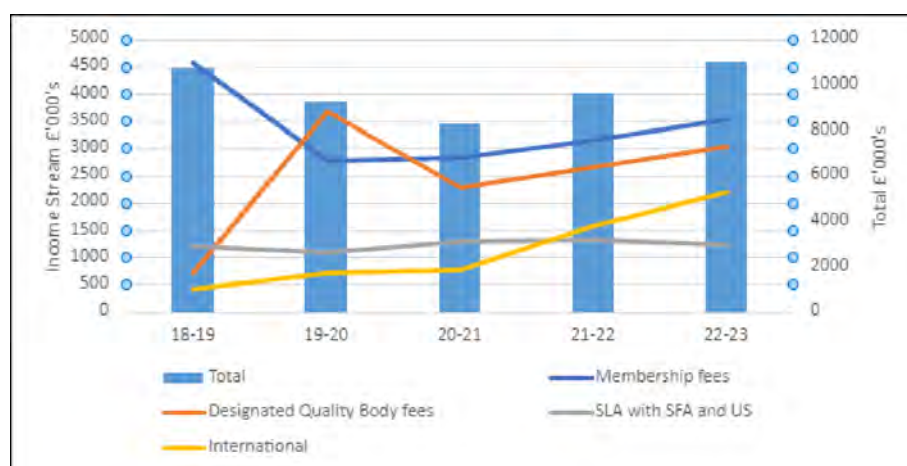
QAA has developed a 5-year plan to maintain financial sustainability and enable growth, looking at the actual scenarios. This financial plan takes into account the different risks such as the loss of income related to the cease of Designated Quality Body activity or the rise of inflation. In order to compensate for these losses, QAA is thinking of new strategic opportunities, one of the most relevant is the increase of international activity. For example, taking into account the worst scenario, QAA expects to maintain and increase the benefits in the next years, from £1.8.m in 2023-2024 to £ 3.16 m in 2025-2026.

FINDINGS: COMPLIANCE OF QAA WITH THE STANDARDS AND GUIDELINES FOR QUALITY ASSURANCE IN THE EUROPEAN HIGHER EDUCATION AREA (ESG)

ESG PART 3: QUALITY ASSURANCE AGENCIES

ESG 3.1 ACTIVITIES, POLICY, AND PROCESSES FOR QUALITY ASSURANCE

> Standard:
>
> Agencies should undertake external quality assurance activities as defined in Part 2 of the ESG on a regular basis. They should have clear and explicit goals and objectives that are part of their publicly available mission statement. These should translate into the daily work of the agency. Agencies should ensure the involvement of stakeholders in their governance and work.

Evidence

The vision of QAA is "for world leading and independently assured higher education. As the independent body entrusted with monitoring and advising on standards and quality in UK higher education, we are dedicated to checking that the three million students working towards a UK qualification get the higher education experiences they are entitled to expect. We ensure that students are involved in all aspects of our work".

The purpose of QAA, defined in the Strategy 2020-2025, is to safeguard academic standards and ensure the quality and global reputation of UK higher education. As the agency states: "We do this by working with higher education providers, regulatory bodies and students' bodies with the shared objective in supporting students to succeed".

The document QAA Strategy (21.07.2020) sets out QAA's strategic priorities and main directions of activities that the agency will carry out over the next five years. For the period 2020-2025, QAA has described three strategic priorities:

- The trusted expert independent body supporting the enhancement and regulation of higher education across a diverse UK.
- Providing expert advice that secures standards and supports quality enhancement.
- Strengthening the global reputation of UK higher education.

QAA defines an Annual Plan. The QAA Board approves the plan and the budget. The 2021-2022 Plan is structured around priorities and KPIs for each area.

Each area has its own "Monthly Team Performance Dashboard", where the activities, risk and budget are analysed. The activities and KPI are reviewed quarterly through the KPI Dashboard by the Board.

The cornerstone of UK-wide work of the agency is the <u>UK Quality Code for Higher Education</u>. However, due to different national contexts, QAA delivers tailored approaches for each of the four nations of the UK, which means that higher education policy is determined separately by each nation:

- In England, through the UK Government;
- In Northern Ireland, usually through the Northern Ireland Executive;
- In Scotland, through the Scottish Government;
- In Wales, through the Welsh Government.

As explained before, Table 3 below summarises the number of performed QA activities of the agency that fall within the scope of the ESG.

Review method	2018-19	2019-20	2020-21	2021-22	2022-23
UK - Wide					
HER -AP	10	2	5	0	1
HER –FP	1	2	1	0	1
RSEO	1	10	0	1	1
EOEA	6	2	0	1	3
Annual monitoring	121	18	12	28	24
Nation-specific					
ELIR	4	4	4	4	N/A
QER	1	1	3	5	N/A
GQR	2	2	2	3	1 to date
DAP	0	0	0	1	1 to date
International					
IQR	0	3	2	7	6
IPA	0 to date				

Table 3: Number of performed external QA activities of the agency that fall within the scope of the ESG (Source SAR)

QAA's primary stakeholders are higher education (HE) providers across the UK and internationally, as well as funding bodies and regulators supporting the UK's higher education systems. QAA also collaborates closely with other sector stakeholders, such as governments, student bodies, and mission groups.

Systematic stakeholders' participation is mainly secured through the governance of the agency and some activities directed at this:

- To gather information and feedback, QAA holds webinars, events, and workshops, and manages various networks, training programs, and conferences. For example, in the 2020-21 academic year, QAA held 40 webinars with 2,275 delegates from 289 organisations, as well as a further 31 events and workshops with delegates from 312 organisations.
- To support regular engagement between its members and professional, statutory and regulatory bodies QAA also convenes regular Forum meetings and values feedback from its governance and committee structures, including the QAA Consultative Board, which provides opportunities for stakeholder groups to offer support and guidance on how QAA can continue to support the sector. QAA's Board that is composed of different stakeholders (HE, colleges and alternative providers, members of funding bodies, students) and staff are also active stakeholders in the agency's work and strategic development.
- QAA defines student engagement as "empowering students to shape their own educational experience and creating excellent teaching and learning". In this sense, QAA promotes the engagement of the students, by involving them actively in the quality assurance of higher education. This is further ensured via QAA's participation in several organisations, such as The Student Engagement Partnership or Student Partnerships in Quality Scotland and organising and two annual conferences for students – Quality Matters and Evolving Student Engagement. Students are also involved in the Student Strategic Advisory Committee (SSAC), a committee composed of 22 students, and two of them are also QAA Board members. The

SSAC meets three times a year to facilitate discussions between students and QAA on developments in the higher education sector. The main activities are to participate in national student-centred projects, to introduce student reviewers into QAA review teams, and to influence QAA's overall strategy.

The panel wishes to emphasise QAA's mission especially in regard to student engagement: QAA Membership "provides vision, expertise, practical support, resources and guidance on the topics that matter to staff and students. QAA work in partnership with, and for, our members to deliver high-quality services that:

- secure UK higher education's global reputation for excellence;
- safeguard academic standards and champion academic integrity;
- enhance the quality of the student learning experience, wherever students are studying."

All national providers and IQR accredited higher education institutions could be members of QAA. The topics to be covered by the agency and its working groups to serve membership in 2022-2023 will be: Future Approaches for Learning and Teaching, Reassessing Assessment, Flexible Pathways and Micro Credentials, Quality and Standards, Academic Integrity, Evaluation, and use of Data, Employability, Enterprise and Entrepreneurship, Apprenticeships, Education for Sustainable Development (ESD), Global Engagement. Membership allow the providers constant communication with QAA. This cooperation is never an individual cooperation or individual consultancy; the focus is always a global focus, with topics that are interesting for all the members.

During the interviews, the higher educational institutions also highlighted the possibility to communicate with and to express their concerns with the agency through various meetings and seminars.

Analysis

Following the analysis of the provided evidence the panel found the activities of QAA to be very broad, covering several areas and having a variety of functions within the four nations of the UK and internationally:

- The agency is a regulatory entity that performs the periodic reviews commissioned by the Governmental and Funding Bodies. All external QA activities of the agency have clear and explicit goals and objectives defined for these purposes. Processes and criteria are described in the related Manuals, always considering the national context. It must be noted, though, that in the last year, QAA took the decision to cease regulatory work in England. The panel enquired during the site visit as to how QAA deals with the impact of stepping away from the role of the Designated Quality Body (DQB) in England. The panel noted that although it had been a disruptive decision to the agency's portfolio of activities, the positive efforts by the entire organisation avoid major negative effects on overall operability. The QAA's strong commitment to the ESG while "keeping the door open" to resume discussions with the OfS, should the opportunity arise.

- Activities related to QAA' role as a membership organisation giving support to all its members, with activities aimed at improving quality in higher education at large. QAA Membership activities and other consultancy services that are offered are kept separate from review activities, through consultancy agreements. Quality enhancement activities take place for the benefit of the sector rather than individual institutions. In this sense, just like in the previous review, the panel did not detect any evidence that QAA is not clearly separating consulting activities and external review activities. With (as explained on standards 2.4, 2.5 and 2.6) the reviews very much owned by the review panels, which are not involved in any consulting capacity, there is also little risk in blurring the lines. In addition, in the external quality assurance activities reviewed by the panel, there was no evidence of any prior consulting activity that could have influenced the evaluation outcome.

- QAA offers several specially designed services aimed at supporting the development of quality assurance and quality assurance professionals worldwide. For example, capacity-building programs, training for international universities or organisations such as NAQA (Ukraine), the British Council in Vietnam, NAQAAE (Egypt), or Commission for Academic Accreditation (United Arab Emirates). The panel noted that the agency significantly increased its international activities in recent years.

In the SAR, QAA provided general information of the number of external review activities done every year (*Table 3: Number of performed external QA activities*), but the agency's website did not provide numerical data on the performed external review activities; also it is not easily to find a summary with the final outcome of each external review, it is necessary to look at each report.

Another aspect for which no information was available in the agency's documents is on the follow-up of the activities as listed in the Annual Plan or the Strategic Plan. Before starting the new Strategic Plan, the panel would expect the agency to disclose the degree of the objectives achieved in the previous plan.

A new approach to the use and dissemination of QAA's performed activities and their results could allow for a better understanding and knowledge of the activity that QAA carries out.

Regarding the stakeholder involvement in the agency's governance and work, the panel wishes to highlight the following:

- The panel found QAA's role it played in championing the student experience commendable. In this regard, the panel wishes to especially emphasise student representation and strong engagement of students in the quality assurance of higher education throughout all the review activities of the agency, the information disseminated on the website especially aimed at students, and the structure of the QAA's commissions that support the role of the students.

- The panel praises the agency for its high and varied number of activities carried out periodically with different stakeholders, which allows QAA to gather their opinion both directly and indirectly. With this information, QAA produces reports and allows for feedback on the knowledge.

Panel commendations-01

The panel commends QAA on the systematic and effective management of the wide array of stakeholders and their involvement in the agency's work in external QA.

Panel commendations-02

The panel commends the student engagement on various levels of QAA's organisation and activities and the role QAA has played in championing the student experience and student representation within the sector.

Panel's conclusion: compliant

ESG 3.2 OFFICIAL STATUS

Standard:

Agencies should have an established legal basis and should be formally recognised as quality assurance agencies by competent public authorities.

QAA is an independent body, a registered charity and a company limited by guarantee, across all four countries of the UK. The organisation of QAA is described in the Articles of Association, dated 22 April 2021, that are published online.

The Articles of Association describe QAA's objectives as the following:

- The promotion and maintenance of quality and standards in higher education in the UK and elsewhere.

- The enhancement of teaching and learning, and the identification and promotion of innovation and best practice in teaching and learning.

- The provision of information and the publication of reports on quality and standards in higher education in the UK and elsewhere.

- The provision of advice to governments, as requested, on access course recognition and in relation to all or any of the above objects.

QAA is recognised as a quality assurance agency by the respective public authorities (governments, funders, regulators). QAA's formal role in the assessment and regulation of higher education varies in each of the nations of the UK, as follows:

- In Scotland, its work is enhancement-led, in line with the Quality Enhancement Framework (QEF). The outcomes of QAA's Enhancement-led Institutional Reviews enable the Scottish Funding Council to discharge its statutory responsibility for quality assessment and quality enhancement.

- In Wales, Universities Wales commissioned QAA to be the independent external quality reviewer for the current cycle of Quality Enhancement Review. In addition, QAA undertakes Gateway Quality Reviews as part of HEFCW's external quality assurance framework for higher and further education in Wales which enables providers to apply for programmes to be designated for funding in Wales.

- In Northern Ireland, QAA has worked with the Department for the Economy to maintain the quality and academic standards within the higher education sector. The regulatory framework in Northern Ireland is currently under review.

- In England, since 2018, QAA had been tasked by the Secretary of State with providing assessments for the Office for Students (OfS), as the Designated Quality Body in England (DQB). In July 2022, QAA has announced its decision that it will no longer consent to be the Designated Quality Body in England (DQB). QAA will therefore cease to operate as DQB on 31 March 2023. QAA has decided not to continue in the DQB role because the requirements related to the current regulatory approach in England are not consistent with standard international practice for quality bodies, as reflected in the ESG. This role has been carried out separately from other work in England, which means that QAA continues to provide services and advice to its member institutions in England, including support for quality enhancement activities. QAA is the educational oversight body for those providers not eligible to register with the OfS.

Analysis

During the site visit, the panel was able to confirm that QAA has a clearly established legal basis and it is formally recognised across the UK.

It should be noted that apart from being legally recognised, all stakeholders interviewed, including funding bodies, highlighted QAA's prestige in the country and its role in promoting the standards and values of the European Higher Education Area.

Panel's conclusion: compliant

ESG 3.3 INDEPENDENCE

Standard:

Agencies should be independent and act autonomously. They should have full responsibility for their operations and the outcomes of those operations without third party influence.

Evidence

Organisational independence

QAA is an independent body, a registered charity and a company limited by guarantee, working in each of the four nations of the UK and internationally to benefit the sector and students. Its Articles of Association, dated 22 April 2021, are published online. Additionally, the agency has a Companies House Certificate of Incorporation. The Charity Commission, the regulator for charities in England and Wales, makes it clear that charities must be independent from governmental authorities.

As explained in ESG 3.2, QAA has decided not to continue in the DQB role because the requirements for the DQB by the current regulatory approach in England are not consistent with the ESG. The main areas of non-compliance with ESG were the non-publication of all the reports of DQB reviews and the requirement to appoint committees without student participation.

QAA's work in other nations of the UK and internationally depends on QAA's registration on the European Quality Assurance Register for Higher Education (EQAR).

QAA's Board is responsible for developing and overseeing the organisation's strategic direction, policy development, finances and performance. Board members are recruited and selected in accordance with good practice and QAA policies to safeguard transparency, fairness and thoroughness of process, to ensure equality and to encourage diversity. They represent a wide range of interests, within higher education as well as other areas. All members are appointed by the Board itself in accordance with the Articles of Association. All the members operate according to the Code of Best Practice for Board members (2018, reviewed in 2020), published on the website.

In addition, the Members of the Board are required to adhere to the Trustee Code of Conduct and to the following QAA policies: Equality and Diversity; Ethical Conduct and Anti-bribery; Whistle Blowing; Conflicts of Interest and Data Protection Policy.

Operational independence

QAA consults key stakeholders in the development and evaluation of the review methodologies, but it entirely holds the responsibility to finalise the review methodologies and thus ensure its operational independence. This operational independence is ensured through the efforts of the review method officers, the Assessment and Reviews Operational Group, the Strategic Advisory Committees, and the guidance provided in the IQA manual.

The work QAA does with its member organisations is not on an individual consultancy basis. None of the agency's external QA activities provide an individualised advice nor a set of specific solutions to the evaluated institution. Rather, the result of the activities is a group of recommendations against the pre-defined set of standards, or an opportunity for a HE institution to self-reflect on the selected areas

for improvement. Benefit of QAA's activities is thus rather for the sector as a whole through the development of advice and guidance to support the enhancement of the student learning experience.

QAA's selection criteria for reviewers include mechanisms to avoid conflicts of interest. In addition, there is a Conflict of interest policy and the IQA Manual in Section 2.3 include a Code of Conduct for those involved in QAA reviews and reviewer contract.

<u>Independence of formal outcomes</u>

The government or funding bodies cannot modify the outcomes of the external review carried out by QAA. This is regulated and secured by the Articles of Association. The panel confirmed through the interviews that the review teams are responsible for the final judgements and the outcomes (the written report) of all of the quality assurance processes; the decision is based on their expertise and skills.

Analysis

The panel studied documents that enable and support the agency's organisational independence as listed in the evidence section. Furthermore, through the interviews with the agency leadership and staff and the agency stakeholders, the panel checked whether there was any influence on the agency's operations by the governments of the four nations or HEI. The panel learned that QAA has taken all necessary measures to ensure their organisational independence and the interviews did not provide any reason to think otherwise. With this, the panel confirms that QAA acts autonomously and independently as an organisation, the reviews, and its outcomes not being influenced by the government or higher education institutions.

Furthermore, the panel finds that the operational independence of the agency is well ensured through its staff and their professional and independent work, organisational structure and the agency's capacity to autonomously define its criteria and methodologies. Besides the written documentation we could also confirm with QAA's staff and stakeholders in the interviews that QAA has the oversight of the development of methodology, recruitment of experts and involvement of stakeholders.

All the members of the Board, commissions and expert panels act in an individual capacity and do not represent the organisation to which they belong. Through the policy on conflict of interest, published on the agency's website, QAA maintains high ethical standards and ensures that assessment and review outcomes are impartial and uphold the standards of QAA. The panel checked that the policy covers all aspects of the work of QAA and not just contractual obligations and is applicable to everyone working for QAA in any capacity.

Regarding the outcomes of the agency's external assurance in higher education, the panel checked during the site visit that the reviewers are solely responsible for the outcomes of the reviews. (see also ESG 2.5).

Finally, the panel wishes to emphasise that in the current context, the organisational independence of the agency's work from third parties, such as the funding bodies, has been clearly demonstrated by QAA's decision to cease the activity as a regulatory body in England, in order to protect the compliance with the ESG. QAA has assumed the risk in order to guarantee its independence. As an independent organisation, QAA has not taken up the pressure to follow the DQB requirements, and it has maintained its internal criteria and loyalty to the ESG.

Panel commendations -03

The panel commends QAA for its measures in place to secure the agency's independence, as well as the organisational strength to follow and maintain the spirit of ESG.

Panel conclusion: compliant

ESG 3.4 THEMATIC ANALYSIS

Standard:
Agencies should regularly publish reports that describe and analyse the general findings of their external quality assurance activities.

Evidence

QAA's IQA Manual describes the policy approach, information and guidance on thematic analysis of the agency. In the view of QAA, "*thematic analysis could arise not only from looking across a set of external review reports but also from other outputs in order to identify common themes and general findings with the purpose of enabling shared learning and providing opportunities for enhancement*" also the Manual states that "*it is expected that each method produces a retrospective thematic analysis at least every six years*". However, the IQA Manual was only adopted 09/22 (source: IQA Manual).

QAA employs two types of analyses, with some differences between the four nations. QAA mentioned in the interviews that in future QAA wishes to develop an approach that would align these analyses across the UK. The two types of QAA analyses are:

1. The production of thematic analyses of QAA's external review activities

In Scotland, thematic analyses are part of the overall approach involved with ELIR. For example, the last report published (September 2022) is titled "An Overview of Quality and Enhancement Activity 2018-22 (ELIR 4 cycle)". This external QA activity (ELIR) has been analysed by QAA Scotland in some reports in 2017, 2018 and 2020.

In Wales, QAA has published sector-wide reports which provide an anonymised summary of the provision and findings for all the reviews and make recommendations for the future delivery of degree apprenticeship programmes. However, after examining the provided evidence, the panel has only found only one such report on the agency's website (dated 2020).

In 2021, at the request of the Home Office and later from the Department for Education (UK), QAA published the report: "The Quality Assurance of Alternative Providers: A Retrospective View (2011-21)". In this report QAA analyses the work and the impact the agency has had on the quality assurance and enhancement of the alternative provider sector.

The panel found no other thematic analysis analysing the external review activities in England, Northern Ireland or internationally on the website. As the activity QE-TNE is out of the scope of this review, the thematic analysis derived from this activity has not been considered by the panel.

2. Thematic work

QAA identifies common challenges and areas of effective practice from across all its external quality assurance operations, its relations and interactions with the higher education stakeholders, nationally and internationally. Following this, QAA supports collaborative sector-led thematic projects. There are several examples of this type of thematic work. One of the main related projects on this is organised in Scotland, i.e., the "Enhancement Themes and Focus On" project. The Enhancement Themes are a group of initiatives that involve the entire higher education sector in Scotland. Staff and students at all levels can collaborate on one or more topics to improve strategy, policy and practice. The Enhancement Themes are a key component of Scotland's quality enhancement strategy. The panel learned that the Programme has been operating for 20 years. For example, the last report published (dated 9 February 2023) is titled "Enhancement Themes - Overview of Year 3 Institutional Plans". This report provides an overview of the institutional activity drawn from higher education institution plans but does not analyse the external quality assurance activities in Scotland

for its strength, weaknesses or lessons learned.

Another example is the "QER Case Studies" in Wales. QAA produces case studies from commendations identified in Quality Enhancement Reviews to promote good practice across the sector. In the website, it is possible two find two reports dated June 2022:

- Quality Enhancement Review Case Study: on-campus research internships - the Cardiff undergraduate research opportunities programme.
- Quality Enhancement Review Case Study: programme and portfolio management at Swansea university

Analysis

The panel considers that among the current publications and projects of QAA only the analyses of the results of QAA's evaluations can be considered as thematic analyses, following the requirements of the standard as defined in the ESG (2015).

With the exception of the reports made in Scotland, a few reports on some of the agency's external QA activities do not cover for the QAA's entire portfolio of activities as carried out in all nations of the UK. In line with the ESG criteria, there is a considerable unevenness between the nations in terms of thematic analysis production. The analyses presented to the panel as evidence are also not performed periodically.

For instance, the outcomes of the International Quality Review (IQR) have not yet been analysed, as IQR has only been operational since 2019-2020.

In the IQA Manual, QAA namely points out that all methods will conduct a reflective overview at the end of a cycle or after six years. The panel thus considers that QAA has followed up on the requirements of this standard rather weakly since the agency's last review against the ESG. In the panel's view, QAA defined practice in the IQA Manual is not yet fully followed.

Additionally, except for Scotland, the panel found it difficult to find the thematic reports on the QAA website. QAA website has no section dedicated to the dissemination of reports of thematic analyses. Some of the reports are localised in the "News & Events" section, which is not the usual section to look at it. The panel found that QAA is arguably using other ways to disseminate the results, e.g., in a more dynamic way such as short videos, events, or workshops. The panel appreciates the presented summative user-friendly formats, but again it is difficult to find them by themes. The entire analyses should be easily available to the agency's stakeholders.

Furthermore, although the QA methodologies of the agency are rather distinct, they all follow the Quality Code, thus QAA could have carried out thematic analyses that compare the outcomes of the activities at the national level, which would also benefit the agency's wider mission in achieving convergence across the nations.

Given the size of the agency, and in consequence the volume of data available, the agency could be using such data for a wide range of thematic analyses across the HE sector.

Nonetheless, the panel wishes to recognise that the projects and reports, defined as "thematic work" by QAA, are of much relevance and are widely appreciated by the agency's stakeholders, with an overall great interest for this work in the higher education sector of the UK and wider. The panel lists some good examples of such thematic work, such as the Study of academic integrity in UK or the Enhancement Themes in Scotland.

The panel concludes that only for Scotland thematic analyses in the most formalistic view of reading the requirements of the standard are well-established and consolidated. The panel finds an established

and consolidated approach to production of regular thematic analyses across all nations of the UK is missing.

Panel commendations-04

The panel commends QAA for its exemplary exploratory and communicative work on "new frontiers" of quality assurance and higher education in general, which has led to QAA being internationally recognised as a well-established hub for information and guidance.

Panel recommendations-01

The panel recommends QAA to develop a clearer plan for thematic analyses for all of its external QA activities in the spirit of ESG 3.4 and to regularly implement this plan, leading to a systematic and nations-wide production of such analyses in spirit of the standard.

Panel conclusion: partially compliant

ESG 3.5 RESOURCES

> Standard:
>
> Agencies should have adequate and appropriate resources, both human and financial, to carry out their work.

Evidence

Human resources

QAA is composed of 116 employees (as of September 2022), divided in two types of contracts; full time and flexible part-time.

There are 85 (full-time equivalent) employed staff and approximately 20 employees working on a flexible part-time basis. The latter category consists of a pool of senior professionals, whose experience can be used in a wide range of QAA's work as and when required to meet the needs and demands of the organisation. In the last 2018 review, QAA had 147 staff members (119.9 full-time equivalents).

Laying back the DQB mandate in England has had an impact on the staff who works in this area. QAA managers explained that this impact had been relatively lower than one would expect as most of the staff had been found alternative positions in the organisation. Also, the plan is to increase other activities of QAA.

QAA has a Recruitment Policy and Procedure in place. In this document QAA describes the procedure to recruit new employees, including, for example, the requirements or the selection criteria for the recruitment. Also, QAA has a Learning and Development Policy to ensure that managers and staff are supported in the achievement of QAA's organisational objectives.

During the last few years QAA has developed two programmes to adapt the organisation to the latest changes in the way of working after the pandemic and changes in the external regulatory framework:

- QAA launched and completed in 2019 the Transformation, Capability and Change (TCC) initiative, a programme that ensured the agency had the resources needed through a period of considerable change.

- QAA has also adopted a Flex+ Policy that introduces greater flexibility to working arrangements, to reflect changes in working patterns and practices in recent times.

To support external quality assurance, QAA has an information technology system in place (certified ISO 27001).

To date, QAA has offices in Gloucester and Glasgow. In order to reduce the organisational costs, QAA will no longer maintain its large premises. That implies that most staff will at least to a large degree work remotely. Nevertheless, QAA will provide a small space for the staff who wishes to work in an office in Gloucester. This option allows QAA to recruit from across the country and reduce commuting/travelling times.

In several meetings, the panel asked about this change. In the opinion of QAA managers, working from home has increased productivity, and new ways of communication between the teams have been implemented without any risk for the quality of the reviews.

Financial resources

QAA has four main sources of income: membership fees, fees chargeable as the Designated Quality Body (DQB) in England, the Service Level Agreement (SLA) with the Scottish Funding Council and Universities Scotland, and other fee-based contract work delivered internationally (including IQR and QE-TNE) (see also introduction to the report). QAA's total income for year 2021-22 was £9.6 million, and reserves amounted to £2.5 million.

The panel had access to the document "Annual Report and Financial Statements 2019-2020" and a presentation on the 5-year financial plan, where the agency described some possible scenarios for the coming years.

The change of DQB activity in England will also have an impact on the revenue, as this activity was between 20% and 25% of the budget annually. QAA has prepared several plans to partially replace this revenue, such as through increase of the international reviews and the reduction of the cost for office space or permanent staff.

The Audit and Risk Committee of the agency is responsible for internal controls and risk management systems, internal and external audits, and financial reporting. It is made up of both Board and external members and meets three times per year. In the Board's opinion, QAA has a robust financial planning reporting system in place that ensures the agency's financial sustainability.

Analysis

The panel learned that QAA is undergoing massive changes, not least due to laying back the DQB role in England. This fact has affected resources directly with the loss of two jobs. Nevertheless, the panel considers that QAA has and will have enough human and financial resources to carry out external quality assurance activities and most of its current related activities in the UK and internationally, following the presented evidence.

Looking at the financial resources, the panel does not observe a risk in the short or medium term that could affect the activities of the agency. Two factors influence this finding: QAA is a non-profit organisation, so QAA does not expect benefits and profits from its activities; and the seasoned experts on the Board and the Audit and Risk Committee who are responsible for internal controls and risk management systems have analysed the current situation in detail. The panel found the respective projections sound and robust, even in the worst-case scenario.

With regard to human resources, the panel evaluates that even though there was a significant reduction of staff, around 30%, the agency is able to manage its operations and the implementation of

QAA's strategy. The staff interviewed showed a motivated and collegiate team spirit that allows everyone to take responsibility and at the same time feel appreciated and heard. The panel noted the swift response to the pandemic regarding online working. Although the modus operandi of QAA (i.e., to work flexibly) has been existing in the agency for several years, further reduction of office space could have an impact on informal relations within the staff. The panel is aware of the advantages of online working, which were also emphasised by the staff members, but after some time it raises a word of caution how such new modes of work can impact the agency's internal or informal communication, or the sense of belonging. The fact that employees relish the flexibility or efficiency related to working largely remote, does not mean that the organisation will indeed benefit from this in the long term. The panel thus feels that the agency should also pay attention to monitor this cultural and social change inside the agency and contemplate some aspects of counterbalancing it. The panel sees this also in the light of a considerable number of the interviews having been organised as hybrid or online interviews during this review, which came with notable (even if not serious) drawbacks, as bad connection, people attending the meeting while traveling including background noise.

Panel conclusion: compliant

ESG 3.6 INTERNAL QUALITY ASSURANCE AND PROFESSIONAL CONDUCT

> Standard:
>
> Agencies should have in place processes for internal quality assurance related to defining, assuring and enhancing the quality and integrity of their activities.

Evidence

The Strategic Plan of the agency for the period 2020-2025 describes three strategic priorities (see ESG 3.1). The implementation of the Strategic Plan is made through the annual plan organised by areas of work. The annual plan incorporates the foreseen KPIs and outcomes that are monitored by the agency's dashboard.

QAA constantly monitors the compliance and performance of its work through:

- Monthly monitoring of performance against the annual plan for each operational area by the Senior Leadership Team.
- Oversight of monthly monitoring submitted to QAA's Board periodically.
- End-of-year reporting done by directors and senior managers at the end of the operating year on the strategic aims and priorities.
- Annual reports: the Annual Report and Consolidated Financial Statements, annual reports to partner organisations, funding bodies and/or regulators in each UK nation are prepared and submitted to QAA's Senior Leadership Team, Honorary Treasurer, Audit Committee and, finally, the full Board. QAA Scotland also develops its own specific annual report.

The panel learned that the above listed reports are not published on the agency's website.

Furthermore, QAA has an Internal Quality Policy in place, titled "QAA Approach to Internal Quality Assurance of Assessment and Review Activity (2021)". This document is publicly available, but the panel had difficulties in finding it online, as it is not published under the section "QAA Policies".

The Internal Quality Manual is an internal document that describes:

- Internal Quality Assurance: Principles, context, and overview;
- IQA policy statements and guidance;

- – Additional information on specific types of review;
- – Models and examples of practice;
- – The description of all the processes for internal quality of the agency's external QA activities.

The panel learned during the site visit that communication between the agency and the related authorities is periodic. The stakeholders confirmed this. The agency also demonstrated this to the panel prior to the visit, in the form of a grid stating when and how often the main UK stakeholder organisations are in contact with the QAA team.

After each review, the agency collects feedback from stakeholders: the panel experts, providers, and QAA officers. The IQA Manual states the following: "*Review evaluations are sent to the provider and to the members of the review team. Post review evaluation is short and focused.*" The Manual includes the templates of the questionnaire. Nevertheless, the reviewers interviewed explained to the panel that they do not receive any feedback or summary about the recommendations or commendations that they provided.

The Code of Ethics signed by employees and experts contains general provisions on corporate ethics, work relations, and other standards of ethical conduct. The Code also establishes ethical standards, regulates potential issues of conflict of interest, and requires honesty and objectivity in the review processes.

The agency ensures that all the experts involved in its activities are competent and act professionally and ethically. As a formal act of confirmation, all the experts that participate in the review procedures confirm that there is no potential conflict of interest. In addition, the agency informs the respective higher education institution about the composition of the expert group. The provider is granted the right of a well-founded objection on the proposed panel.

In 2022, QAA introduced the annual monitoring report. The panel had access to the Annual Report and Financial Statements document for 2019-2020. Regarding this, the panel learned that this report has a financial focus but does not include a follow-up or regular self-analysis of the internal and external processes using quantitative indicators that could measure the outcomes of the processes. Also, the panel found very difficult to find summative quantitative information about reviews or outcomes on the QAA website (See also ESG 3.1).

Although changes and improvements are evident to the panel, the agency does not present a plan of internal improvements, where all proposals and improvements are collected in one place. Such a plan would help QAA to monitor the subsequent actions and follow up. This said, the panel acknowledges that QAA's external stakeholders were satisfied with the agency's responsiveness, but at the same time stated a certain lack of transparency regarding its quality development actions.

QAA's commitment to encouraging diversity and eliminating discrimination amongst its employees is described in the Equality Policy Document (dated July 2014). The panel accessed the document to verify its content.

Analysis

The panel learned that QAA has an internal quality system in place, as fully described in the Internal Quality Manual, the different handbooks and some supportive documents. These documents aim to ensure that the entire QAA workforce works in an adequate and homogeneous manner. Specifically, the Internal Quality Manual has become a relevant document at a time when most staff work from home.

The internal quality system, following the PDCA cycle, includes:

- A set of regular and well-defined planning activities, such as the Strategic Plan and the Annual Plan.
- The activities are carried out following the procedures and the Quality Manual, which includes the description of these activities, forms, or checklists.
- QAA is structured through a set of internal committees (see Organisation chapter) that review the agency's activities. However, the panel considers that monitoring and measurement is not fully carried out on a regular and structured basis, with the help of internal quantitative indicators, nor are the related indicators easily identifiable to any related party outside the organisation. The Quality Manual does not include such indicators, nor has evidence of their existence been presented.
- QAA does not present monitoring activities that end in an internal improvement plan. Such an improvement plan could include measures taken based on the feed-back results collected through surveys, meetings, or seminars, but also those from external reviews against the ESG (see also comments on ESG 3.7).

The integrity and professional conduct of staff and reviewers is clearly defined in several documents; moreover, none of the people interviewed, particularly external stakeholders, reported any problems or incidents with the conduct of the experts or QAA officers. On the contrary, praise was given for the way these parties acted.

Panel commendations-05

The panel commends the agency for its comprehensive IQA manual, which serves as a great reservoir of internal knowledge and regulates a vast array of issues and processes within the agency.

Panel recommendations-02

The panel recommends complementing the internal QA system with clear feedback-related internal improvement plan that also includes a kind of quantitative "coordinates" which would allow QAA to track the success of its developmental efforts.

Panel suggestions for further improvement-01

The panel suggests that QAA should publish the "QAA Approach to Internal Quality Assurance of Assessment and Review Activity" to make the internal quality policy of QAA more easily available on their website.

Panel conclusion: compliant

ESG 3.7 CYCLICAL EXTERNAL REVIEW OF AGENCIES

> Standard:
>
> Agencies should undergo an external review at least once every five years in order to demonstrate their compliance with the ESG.

Evidence

This is the fourth external review of QAA against the ESG; the previous ones took place in 2008, 2013, and 2018, respectively. Following the agency's last review in 2018, the agency has developed an action plan to deal with the recommendations and suggestions of ENQA. In September 2020, QAA sent the follow up report to ENQA on this.

The panel has studied the recommendations and suggestions from 2018. On this, the panel notes that most of them have been implemented rather slowly or are still in process. For example, the recommendation on ESG 2.4 stated that "students should be included in all review methods aligned with the ESG as a standard feature, without reservations and special clauses". This was implemented in the academic year 2020-21 only.

Furthermore, the previous review panel recommended QAA to intensify its activity with respect to TNE reviews overseas. In the follow up report the related improvement activity was postponed. In the current review cycle, this activity was declared to be out of the scope of ESG, therefore the panel could not check if the recommendation had been followed up.

The ENQA Board further encouraged QAA to give more attention also to the wider inclusion of international experts as well as employers/professional practitioners in its procedures. In 2023 the increase of international members in national reviews is not significant, nor is involvement of professional practitioners.

Regarding ESG 3.1, the panel urged QAA to review its structures and procedures and include, at a minimum, an international member on its Board and expand the involvement of international representatives on review panels. After changing the Statues of the Board, this international member will finally be introduced in 2023 (hence after the next review cycle). For the involvement of international panel members, see above.

Currently, regarding reporting, the reports published on the QAA website are searchable by the title of the provider, year and month. With regard to ESG 2.6, the previous panel suggested that the agency could add more options for search. This improvement action was still in progress by the time of the current site visit.
Finally, in the last review, the panel suggested QAA "to carefully consider all recommendations put forward by the ENQA review panel, not only those highlighted in the letter to the agency issued by the ENQA Board".

Analysis

After examination of evidence and interviews with the agency's stakeholders, the panel is of the view that QAA fulfils its formal obligations towards continuous membership in ENQA and EQAR and undergoes the regular reviews that form the basis for this. Nevertheless, the panel finds that QAA is approaching the recommendations from such reviews with less speed and effectiveness than could be expected; QAA should clearly demonstrate that it has a continuous approach to improving its processes and evaluation methods. Not least, such recommendations and suggestions are regarded as valuable inputs to improve the policies and activities of QAA.

Panel recommendations-03

The panel recommends QAA to follow up more swiftly and effectively on any recommendations and suggestions stemming from their own external reviews against the ESG - and/or to communicate more transparently and proactively, when and why such follow ups need to be delayed or rethought.

Panel conclusion: compliant

ESG PART 2: EXTERNAL QUALITY ASSURANCE

ESG 2.1 CONSIDERATION OF INTERNAL QUALITY ASSURANCE

Standard:

External quality assurance should address the effectiveness of the internal quality assurance processes described in Part 1 of the ESG.

Evidence

The central reference point of QAA's external quality assurance activities in higher education is the UK Quality Code for Higher Education (see also chapter Quality Assurance of this report). Equally relevant, QAA has developed its methodologies and procedures on the basis of ESG 2015, as further elaborated in this chapter. For the purpose of this review, QAA has provided the panel with the mapping of the ESG against the UK Quality Code and the Quality Code Advice and Guidance (see Annex 3 of the SAR).

Importantly, to demonstrate specific alignment of the agency's external QA activities with Part 1 of the ESG, QAA provided a table with the summary of report headings and/or documentation requested as part of each review method listed in the Terms of Reference (see Annex 4 of the SAR or the table below).

Table 4: Alignment of ESG Part 1 standards to review methods

1.1 Policy for Quality Assurance

Institutions should have a policy for quality assurance that is made public and forms part of their strategic management. Internal stakeholders should develop and implement this policy through appropriate structures and processes, while involving external stakeholders.

Method	Report headings	Documentation requested/review method criteria
ELIR	**Report section:** *4.1 - Key features of the institution's approach to managing quality and setting, maintaining, reviewing and assessing academic standards*	• Section 4 of the **Reflective Analysis** is: *Academic standards and quality processes* and should include: Key features of the institution's approach to managing quality and setting, maintaining, reviewing and assessing academic standards. • Within the **Advance Information Set** institutions provide details of their policies and links to policies and handbooks for quality assurance. • Institutions also include their SFC annual quality return. QAA works with SFC to develop the quality return so that it aligns with the review method.
HER (AP) and derivatives	**Report section:** All the sections in the report covered by the quality of student learning experience will be relevant to this Standard	• Institutions are expected to provide policy, procedures and guidance on quality assurance and enhancement as part of their review **self-evaluation submission**.
IQR	**Report section:** *Standard 1.1 - Policy for quality assurance*	• Policies and procedures linked to the ESG standard and evidence demonstrating how effectively these processes and policies work in practice.

QER	Report section: Technical report heading: *Academic standards and quality process;* subheadings: *Key features of the provider's approach to managing quality and how students are involved in contributing to the management of the quality of learning; and Key features of the approach to setting, maintaining, reviewing and assessing academic standards*	• The **Prior Information Pack** requires 'policy, procedures and guidance on quality assurance and enhancement (this may be in the form of an academic manual or regulations, or code of practice)'.
GQR (Wales)	Report section: All the sections of the report for the Quality Code will apply	• **Indicative evidence list** includes: policy, procedures and guidance on quality assurance and improvement (this may be in the form of a manual or code of practice).
DAP (SWNI)	Report section: Headings reflect the DAP Criterion	**Scotland - 1999 Criteria** **Criterion 1:** Institutions should demonstrate that: ○ policies and systems are developed, implemented and communicated in collaboration with staff and students ○ its operational policies and systems are monitored, and that it identifies where, when, why and how changes might need to be made. **Wales - 2017 Criteria** **Criterion A1:** ○ Its financial planning, quality assurance and resource allocation policies are coherent and relate to its higher education mission, aims and objectives. ○ Its higher education mission and associated policies and systems are understood and applied consistently both by those connected with the delivery of its higher education programmes and, where appropriate, by students.
IPA	*Report section: Standard 1.1 - Policy for quality assurance*	• Policies and procedures linked to the ESG standard and evidence demonstrating how effectively these processes and policies work in practice.

1.2 Design and approval of programmes

Institutions should have processes for the design and approval of their programmes. The programmes should be designed so that they meet the objectives set for them, including the intended learning outcomes. The qualification resulting from a programme should be clearly specified and communicated, and refer to the correct level of the national qualifications framework for higher education and, consequently, to the Framework for Qualifications of the European Higher Education Area.

Method	Report headings	Documentation requested
ELIR	Report section: *4.1 - Key features of the institution's approach to managing quality and setting, maintaining, reviewing and assessing academic standards*	• Section 4 of the **Reflective Analysis** is: *Academic standards and quality processes* and should include: Key features of the institution's approach to managing quality and setting, maintaining, reviewing and assessing academic standards.
HER (AP) and derivatives	Report section: *Core practice (Q2) - The provider designs and/or delivers high-quality courses*	• **Core practice Q2** requires providers to demonstrate that they design and deliver high-quality courses. Evidence for this would include a provider's regulations or policies for course design and delivery, and course documentation that indicates that teaching, learning and assessment design enable students to meet learning outcomes.
IQR	Report section: *Standard 1.2 - Design and approval of programmes*	• Policies and procedures linked to the ESG Standard and evidence demonstrating how effectively these processes and policies work in practice.
QER	Report section: Technical Report - heading: *Academic standards and quality processes;* subheadings: *Key features of the provider's approach to managing quality and how students are involved in contributing to the management of the quality of learning; and Key features of the approach to setting, maintaining, reviewing and assessing academic standards*	• **Prior Information Pack** asks for illustrative examples of quality procedures in practice, including programme approval, annual monitoring and periodic programme review reports from the preceding academic year and any available from the current academic year.

GQR (Wales)	**Report section:** Heading: *Reliability and comparability of academic standards;* subheadings for *FHEQ,* and *Core practice 1 of the Quality Code for standards*	• **Indicative evidence** includes programme approval documentation (Note: Providers undergoing GQR (Wales) are delivery partners, therefore their involvement in programme design and approval is limited.)
DAP (SWNI)	**Report section:** Headings reflect the DAP Criterion	**Scotland - 1999 Criteria** **Criterion 3:** ○ The institution seeks to ensure that its programmes of study consistently meet stated objectives and outcomes. **Criterion 2:** ○ Its programmes of study are offered at levels that correspond to the levels of the overall qualifications framework for higher education. **Wales - 2017 Criteria** **Criterion B2:** ○ Its programme approval, monitoring and review arrangements are robust, applied consistently, have at all levels a broadly-based external dimension, and take appropriate account of the specific requirements of different levels of award and different modes of delivery.
IPA	**Report section:** *Standard 1.2 - Design and approval of programmes*	Policies and procedures linked to the ESG Standard and evidence demonstrating how effectively these processes and policies work in practice.

1.3 Student-centred learning, teaching and assessment		
Institutions should ensure that the programmes are delivered in a way that encourages students to take an active role in creating the learning process, and that the assessment of students reflects this approach.		
Method	**Report headings**	**Documentation requested**
ELIR	**Report section:** *2 - Enhancing the student learning experience*	Student Partnership is one of the five pillars of the Quality Enhancement Framework and underpins all the documentation.
	2.1 - Student representation and engagement, including responding to student views *2.2 - Recognising and responding to equality and diversity in the student population, including widening access and mode and location of study* *2.3 - Supporting students in their learning at each stage of the learner journey from pre-admission to post-graduation, including outreach, admissions, articulation, graduate attributes, assessment, employability, and enterprise and entrepreneurship* *2.4 - Postgraduate taught and research student experience* *2.5 - Learning environment, including the use of technology*	Section 2 of the **Reflective Analysis** - *Enhancing the student learning experience* - would contain details on how students take an active role in learning, teaching and assessment.

HER (AP) and derivatives	**Report section:** *Core practice (Q5) - The provider actively engages students, individually and collectively, in the quality of their educational experience*	**Core practice Q5** expects the provider to demonstrate active engagement with students - individually and collectively - in the quality of their educational experience.
IQR	**Report section:** *Standard 1.3 - Student-centred learning, teaching and assessment*	Policies and procedures linked to the ESG Standard and evidence demonstrating how effectively these processes and policies work in practice.
QER	**Report section:** Technical Report, heading: *Academic standards and quality processes;* subheadings: *Key features of the provider's approach to managing quality and how students are involved in contributing to the management of the quality of learning*	**Prior information pack** asks for existing documentation in relation to active student roles that are relevant to this Standard. They are: Consideration at institution level of student feedback and views, information on the provider's relationship with its student body, such as student charters, relationship/partnership agreements and annual student statements (if available), information illustrating the provider's approaches to student engagement and provision of student support.
GQR (Wales)	**Report section:** *Quality of the student academic experience: Quality Code Core practices 2, 5 and 9*	Annex 2 of the Handbook - **the provider submission** - should consider the effectiveness of the provider's pedagogical approaches in ensuring that the combined input of teaching staff and students enables students to achieve the learning outcomes of their programmes. Suggested documentation includes examples of student feedback and provider response.
DAP (SWNI)	Not covered by a specific criterion	**Scotland - 1999 Criteria** **Criterion 5:** ○ The effectiveness of the institution's learning and teaching infrastructure is carefully monitored. **Criterion 8:** ○ Feedback from students, staff and external interest groups is secured and evaluated and clear mechanisms exist to provide feedback to interested stakeholders. ○ Use is made of feedback at departmental, programme or programme-element. ○ Information arising from feedback is disseminated within programmes and across the institution.

		Wales - 2017 Criteria **Criterion D:** ○ Feedback from students, staff, and (where possible) employers and other institutional stakeholders is obtained and evaluated, and clear mechanisms exist to provide feedback to all such constituencies.
IPA	**Report section:** *Standard 1.3 - Student-centred learning, teaching and assessment*	Policies and procedures linked to the ESG Standard and evidence demonstrating how effectively these processes and policies work in practice.

1.4 Student admission, progression, recognition and certification

Institutions should consistently apply pre-defined and published regulations covering all phases of the student "life cycle", e.g. student admission, progression, recognition and certification.

Method	Report headings	Documentation requested
ELIR	**Report section:** *2.3 - Supporting students in their learning at each stage of the learner journey from pre-admission to post-graduation, including outreach, admissions, articulation, graduate attributes, assessment, employability, and enterprise and entrepreneurship*	• Section 2.3 of the **Reflective Analysis** will contain information on supporting students in their learning at each stage of the learner journey from pre-admission to post-graduation, including outreach, admissions, articulation, graduate attributes, assessment, employability, and enterprise and entrepreneurship.
HER (AP) and derivatives	**Report section:** *Core practice (Q1) - The provider has a reliable, fair and inclusive admissions system. Core practice (Q9): The provider supports all students to achieve successful academic and professional outcomes*	• **Core practice Q1** expects providers to demonstrate that they have a reliable, fair and inclusive admissions system; **Core practice Q9** expects providers to support all students to achieve successful academic and professional outcomes.

IQR	Report section: *Standard 1.4 - Student admission, progression, recognition and certification*	• Policies and procedures linked to the ESG Standard and evidence demonstrating how effectively these processes and policies work in practice.
QER	Report section: *Technical Report, heading: Academic standards and quality processes; subheadings: Key features of the provider's approach to managing quality and how students are involved in contributing to the management of the quality of learning; and Effectiveness of how approaches to quality are used to enhance learning and teaching*	• Although not explicit in the list of information to be included in the provider's **Prior Information Pack**, this would be covered by: policy, procedures and guidance on quality assurance and enhancement (this may be in the form of an academic manual or regulations, or code of practice); illustrative examples of quality procedures in practice, including programme approval, annual monitoring and periodic programme review reports from the preceding academic year and any available from the current academic year; and the **provider's mapping of its policies and practices to the ESG**.
GQR (Wales)	Report section: *Quality of student academic experience heading: Quality Code Core practice 1*	• Admissions policy/procedure • Assessment frameworks regulations
DAP (Nations)	Report section: Headings reflect the DAP Criterion	**Scotland - 1999 Criteria** **Criterion 9:** The institution's administrative systems are sufficient to manage its operations now and in the foreseeable future. ○ The institution should be able to demonstrate its administrative support systems are able to monitor student progression and performance, and provide timely and accurate information to satisfy academic and non-academic information needs. **Wales - 2017 Criteria** **Criterion B1:** An organisation granted taught degree awarding powers has in place an appropriate regulatory framework to govern the award of its higher education qualifications. ○ The regulatory framework governing its higher education provision (covering, for example, student admissions, progress, assessment, appeals and complaints) is appropriate to its current status and is implemented fully and consistently.
IPA	Report section: *Standard 1.4 - Student admission, progression, recognition and certification*	• Policies and procedures linked to the ESG Standard and evidence demonstrating how effectively these processes and policies work in practice.

1.5 Teaching staff

Institutions should assure themselves of the competence of their teachers. They should apply fair and transparent processes for the recruitment and development of the staff.

Method	Report headings	Documentation requested
ELIR	Report section: *3 - Strategy and practice for enhancing learning and teaching; specifically, 3.4 - Engaging, developing and supporting staff*	• Section 3.4 of the **Reflective Analysis** will provide information on engaging, developing and supporting staff.
HER (AP) and derivatives	Report section: *Core practice (Q3): The provider has sufficient appropriately qualified and skilled staff to deliver a high-quality academic experience*	• **Core practice Q3** expects providers to demonstrate that they have sufficient appropriately qualified and skilled staff to deliver a high-quality academic experience.
IQR	Report section: *Standard 1.5 - Teaching staff*	• Policies and procedures linked to the ESG Standard and evidence demonstrating how effectively these processes and policies work in practice.
QER	Report section: *Technical Report, subheadings: Key features of the provider's approach to managing quality; and Effectiveness of how approaches to quality are used to enhance learning and teaching*	• **Prior Information Pack's** requirement for a mapping of the provider's policies and practices to the ESG.
GQR (Wales)	Report section: *Quality of the student academic experience heading, Quality Code Core practice 3 subheading*	• Strategies for staff development • Communications with staff.

DAP (SWNI)	**Report section:** Headings reflect the DAP Criterion	**Scotland - 1999 Criteria**
		Criterion 5: The effectiveness of the institution's learning and teaching infrastructure is carefully monitored.
		  o Institutions should be able to demonstrate: the effectiveness of teaching and learning is monitored in relation to stated objectives and learning outcomes.
		
		Criterion 10: The qualities and competences of staff are appropriate for an institution with taught degree awarding powers.
		Criterion 11: Evidence requirements include:
		  o there are institutional and local level strategies of staff development designed to establish, develop and enhance staff competences
		  o an extensive portfolio of teaching development activities has been established.

		Wales - 2017 Criteria **Criterion C1:** The staff of an organisation granted powers to award taught degrees will be competent to teach, facilitate learning and undertake assessment to the level of the qualifications being awarded. o Providers should have: staff development and appraisal opportunities aimed at enabling them to develop and enhance their professional competence and scholarship. **Criterion D:** The staff involved with supporting the delivery of its higher education provision are given adequate opportunities for professional development.
IPA	**Report section:** *Standard 1.5 - Teaching staff*	Policies and procedures linked to the ESG Standard and evidence demonstrating how effectively these processes and policies work in practice.

1.6 Learning resources and student support		
Institutions should have appropriate funding for learning and teaching activities and ensure that adequate and readily accessible learning resources and student support are provided.		
Method	**Report headings**	**Documentation requested**

ELIR	**Report section:** *2.3 - Supporting students in their learning at each stage of the learner journey from pre-admission to post-graduation, including outreach, admissions, articulation, graduate attributes, assessment, employability, and enterprise and entrepreneurship and 2.5 - Learning environment, including the use of technology*	• Two sections of the **Reflective Analysis** will provide information on this:
		  o 2.3 Supporting students in their learning at each stage of the learner journey from pre-admission to post-graduation, including outreach, admissions, articulation, graduate attributes, assessment, employability, and enterprise and entrepreneurship
		  o 2.5 Learning environment, including the use of technology.

HER (AP) and derivatives	**Report section:** *Core practice (Q4) - The provider has sufficient and appropriate facilities, learning resources and student support services to deliver a high-quality academic experience*	• **Core practice Q4** expects providers to demonstrate they have sufficient and appropriate facilities, learning resources and student support services to deliver a high-quality academic experience.
IQR	**Report section:** *Standard 1.6 - Learning resources and student support*	• Policies and procedures linked to the ESG Standard and evidence demonstrating how effectively these processes and policies work in practice.
QER	**Report section:** Technical Report, heading: *Academic Standards and quality processes*; subheading: *Effectiveness of how approaches to quality are used to enhance learning and teaching*	• The **Prior Information Pack** requires evidence of 'other key strategies relating to the student learning experience and updates on the progress of the strategy' as well as a **mapping of the provider's policies and practices to the ESG**.

GQR (Wales)	**Report section:** Quality of the student academic experience heading, Quality Code Core practice (Q4) - The provider has sufficient and appropriate facilities, learning resources and student support services to deliver a high-quality academic experience	• Strategies for provision of learning resources and student support.
DAP (SWNI)	**Report section:** Headings reflect the DAP Criterion	**Scotland - 1999 Criteria** **Criterion 5:** The effectiveness of the institution's learning and teaching infrastructure is carefully monitored. **Criterion 9:** The provider should be able to demonstrate that: ○ it provides access to comprehensive library and computing services, support and demand for which is regularly monitored and, where appropriate, improved ○ high-quality and confidential support services are provided for students and staff. **Wales - 2017 Criteria** **Criterion D1:** The teaching and learning infrastructure of an organisation granted taught degree awarding powers, including its student support and administrative support arrangements, is effective and monitored. ○ Organisations that award their own degrees are expected to have in place mechanisms for monitoring whether their teaching and learning infrastructure is meeting stated objectives and for responding to identified limitations in a timely and effective manner. ○ The effectiveness of its learning and teaching activities is monitored in relation to stated academic objectives and intended learning outcome. ○ Available learning support materials are adequate to support students in the achievement of stated purposes of their study programmes. ○ The effectiveness of any student and staff advisory and counselling services is monitored and any resource needs arising are considered.
IPA	**Report section:** *Standard 1.6 - Learning resources and student support*	Policies and procedures linked to the ESG Standard and evidence demonstrating how effectively these processes and policies work in practice.

1.7 Information management		
Institutions should ensure that they collect, analyse and use relevant information for the effective management of their programmes and other activities.		
Method	**Report headings**	**Documentation requested**
ELIR	**Report section:** *4.4 - Approach to using data to inform decision-making and evaluation*	• Information will be provided in the **Reflective Analysis** in 4.4 on Approach to using data to inform decision-making and evaluation.
HER (AP) and derivatives	**Report section:** Not a dedicated section but expectation that data will feature in the section: *Common practice (1): The provider reviews its Core practices for quality regularly and uses the outcomes to drive improvement and enhancement*	• Documents requested as part of the **self-evaluation** include: last three years of student performance data (enrolment, retention, completion and achievement data). • Providers are also asked to reference 'evidence that your organisation uses to assure itself that these Core and Common practices are being met and that you are managing the area effectively, as well as any relevant benchmarked datasets'.
IQR	**Report section:** *Standard 1.7 - Information management*	• Policies and procedures linked to the ESG Standard and evidence demonstrating how effectively these processes and policies work in practice.
QER	**Report section:** Two subheadings within the *Academic standards and quality processes* section of the Technical Report: *Approach to using data to inform decision-making and evaluation;* and *Effectiveness of the approach to self-evaluation, including the effective use of data to inform decision-making.*	• The **Prior Information Pack** requires evidence of 'the consideration at institution level of student feedback and views'. The provider is expected to structure its **self-evaluative analysis** on the Technical Report headings and the guidance on the SA states it should indicate how the provider has evaluated its policy and practice, including the ways in which it uses data to inform its decision-making and identification of priorities, and current and future plans for development, including how the provider intends to build on good practice and address areas for development.
GQR (Wales)	**Report section:** Quality Code Standards *Common practice 1 - The provider reviews its Core practices for Standards regularly and uses the*	• Analysis of retention and progression data • Examples of student feedback and provider response.

	outcomes to drive improvement and enhancement. Plus Quality Code Common practice 1 - The provider reviews its Core practices for quality regularly and uses the outcomes to drive improvement and enhancement	

DAP (SWNI)	**Report section:** Headings reflect the DAP Criterion	**Scotland - 1999 Criteria**
		Criterion 9: The institution's administrative systems are sufficient to manage its operations now and in the foreseeable future.
		  ○ Its administrative support systems are able to monitor student progression and performance and provide timely and accurate information to satisfy academic and non-academic information needs.
		
		Wales - 2017 Criteria
		Criterion D1: The teaching and learning infrastructure of an organisation granted taught degree awarding powers, including its student support and administrative support arrangements, is effective and monitored.
		  ○ Its administrative support systems are able to monitor student progression and performance accurately and provide timely and accurate information to satisfy academic and non-academic management information.

IPA	**Report section:** *Standard 1.7 - Information management*	• Policies and procedures linked to the ESG Standard and evidence demonstrating how effectively these processes and policies work in practice.

1.8 Public information		
Institutions should publish information about their activities, including programmes, which is clear, accurate, objective, up to date and readily accessible.		
Method	**Report headings**	**Documentation requested**
ELIR	There is no specific heading in the ELIR report but public information is one pillar of the Quality Enhancement Framework	• Policies and publicly available documentation triangulated as part of the review.
HER (AP) and derivatives	**Report section:** Encompassed in sections such as Q1 and Q6	• **Core practice Q1:** Admission system providers are expected to provide information to applicants which is transparent, accessible and fit for purpose. • **Core practice Q6:** Complaints and appeals requires providers to have information that is fair, clear and accessible.
IQR	**Report section:** *Standard 1.8 - Public information*	• Policies and procedures linked to the ESG Standard and evidence demonstrating how effectively these processes and policies work in practice.
QER	**Report section:** Encompassed under *Key features of the provider's approach to managing quality, how students are involved in contributing to the management of the quality of learning*	• **Prior Information Pack** requirement for 'The provider's mapping of its policies and practices to the ESG'.
GQR (Wales)	**Report section:** Encompassed in sections such as Quality Code Q1 and Q6	

Method	Report headings	Documentation requested
DAP (SWNI)	**Report section:** Headings reflect the DAP Criterion	**Scotland - 1999 Criteria** **Criterion 3:** The institution seeks to ensure that its programmes of study consistently meet stated objectives and outcomes. **Wales - 2017 Criteria** **Criterion D1:** The teaching and learning infrastructure of an organisation granted taught degree awarding powers, including its student support and administrative support arrangements, is effective and monitored. ○ The information that it produces concerning its higher education provision is accurate and complete.
IPA	**Report section:** *Standard 1.8 - Public information*	Policies and procedures linked to the ESG Standard and evidence demonstrating how effectively these processes and policies work in practice.

1.9 Ongoing monitoring and periodic review of programmes

Institutions should monitor and periodically review their programmes to ensure that they achieve the objectives set for them and respond to the needs of students and society. These reviews should lead to continuous improvement of the programme. Any action planned or taken as a result should be communicated to all those concerned.

Method	Report headings	Documentation requested
ELIR	**Report section:** *4.1 - Key features of the institution's approach to managing quality and setting, maintaining, reviewing and assessing academic standards*	• Section 4 of the **Reflective Analysis** is: **Academic standards and quality processes** and should include: Key features of the institution's approach to managing quality, and setting, maintaining, reviewing and assessing academic standards. Within the **Advance Information Set**, institutions provide details of their policies and links to policies and handbooks for QA. Institutions also include their SFC annual quality return. QAA works with SFC to develop the quality return so that it aligns with the review method. This guidance gives specific details about Institution-led Review.
HER (AP) and derivatives	**Report section:** Common practices (Quality) reports include a section on *'The provider reviews its Core practices for quality regularly and uses the outcomes to drive improvement and enhancement'*	• Documents requested as part of the self-evaluation include: policy, procedures and guidance on quality assurance and enhancement (this may be in the form of a manual or code of practice); and annual overview reports (for example, on external examining or annual monitoring).
IQR	**Report section:** *Standard 1.9 - Ongoing monitoring and periodic review of programmes*	• Policies and procedures linked to the ESG Standard and evidence demonstrating how effectively these processes and policies work in practice.
QER	**Report section:** Technical Report, heading: *Academic Standards and quality processes;* subheadings: *Key features of the provider's approach to managing quality, how students are involved in contributing to the management of the quality of learning;* and *Key features of the approach to setting, maintaining, reviewing and assessing academic standards.*	• **Prior Information Pack** to provide evidence of policy, procedure and guidance on QA and QE along with illustrative examples of quality procedures in practice, including annual monitoring and periodic programme review reports.
GQRW	**Report section:** Common practices (Quality) reports include a section on *'The provider reviews its Core practices for quality regularly and uses the outcomes to drive improvement and enhancement'*	• A sample of annual overview reports (for example, on external examining or annual monitoring) where these have a bearing on the assurance of quality and standards for the two years prior to the Gateway Quality Review.
DAP (SWNI)	**Report section:** Headings reflect the DAP Criterion	**Scotland - 1999 Criteria** **Criterion 8:** Effective action is taken to address weaknesses, promote strengths and demonstrate accountability. The institution should be able to demonstrate that: ○ a rigorous approach is adopted in response to matters raised through self-assessment ○ actions are regularly monitored to ensure the maintenance of quality and standards

43/81

		feedback from students, staff and external interest groups is secured and evaluated, and clear mechanisms exist to provide feedback to interested stakeholders
		use is made of feedback at departmental, programme or programme-element level
		external views and involvement are sought in programme design and review, teaching and student learning
		information arising from feedback is disseminated within programmes and across the institution; the effectiveness of student advisory and counselling services is monitored and resource demands arising from such activities are considered and acted upon
		effective means exist for encouraging the continuous improvement of quality of provision and student achievement.
		Wales - 2017 Criteria **Criterion B4:** An organisation that has powers to award its own taught degrees must have in place the means of reviewing critically its own performance. ○ Critical self-assessment is integral to the operation of its higher education provision and that action is taken in response to matters raised through internal or external monitoring and review.
IPA	**Report section:** *Standard 1.9 - Ongoing monitoring and periodic review of programmes*	Policies and procedures linked to the ESG Standard and evidence demonstrating how effectively these processes and policies work in practice.

1.10 Cyclical external quality assurance

Institutions should undergo external quality assurance in line with the ESG on a cyclical basis

ELIR, IQR, HER (AP) and QER are cyclical review methods as outlined in the handbooks. In addition, this will include local regulatory bodies in respect of IQR and IPA. Evidence of relevant cyclical reviews of programmes and how these are incorporated into the institutional approach is considered as part of the review methods. DAP and GQRW are elective specific-purpose review and entry review methods respectively and providers are not part of a cyclical engagement but, following the process, would be subject to the cyclical review method for that nation.

Furthermore, the panel notes that the IQA Manual includes a checklist that QAA's teams should use in developing their method so that they are confident that QAA requirements have been considered in the design of the methodology before their approval. One of the requirements in this regard is whether a new handbook includes QAA's standard statement on EHEA values, the ESG and other Bologna tools and approaches.

Finally, to show the explicit alignment with each of the ESG, in QER reviews, the provider should assess their policy and practice against ESG Part 1 and demonstrate the alignment in the external review. This mapping enables providers to outline to QAA how they meet or respond to baseline regulatory requirements and the ESG Part 1.

Analysis

The panel notes that QAA's reviews and handbooks refer to the ESG as their basis. After examination of the provided mapping and supporting evidence, the panel confirms that the QAA standards are built on the ESG and reflect the standards in Part 1. With this, the panel confirms that procedures implemented by QAA do address the effectiveness of the IQA processes within provider institutions.

The panel has checked a number of reports and the panel can confirm that the ESG standards have been included in the reviews. During the meetings with quality assurance officers, heads of higher education institutions and experts, the panel learned that the external quality assurance of QAA aims at improving the quality of institutions and has a strong focus on the effectiveness of the internal quality assurance, in particular the enhancement dimension.

The panel concludes that the commitment of QAA to the ESG is thus well embedded in the agency's methodologies and put into practice. This is also symbolically mirrored in QAA's decision regarding its DQB position in England.

Finally, the panel considers the QER reviews to be a particularly good practice where the HE providers showcase their policy against the ESG Part 1. The panel believes this practice could be incorporated into more procedures.

Panel commendations-06

The panel commends QAA for its strong commitment to the ESG Part 1 and the agency's clear enhancement orientation in its external QA activities.

Panel conclusion: compliant

ESG 2.2 DESIGNING METHODOLOGIES FIT FOR PURPOSE

> Standard:
>
> External quality assurance should be defined and designed specifically to ensure its fitness to achieve the aims and objectives set for it, while taking into account relevant regulations. Stakeholders should be involved in its design and continuous improvement.

Evidence

QAA is officially recognised by regulators and funding bodies to undertake independent assessments and evaluations (see ESG 3.2), which are in turn used to inform regulatory decision-making. Consequently, QAA uses several different methods, depending on the nation, to conduct the assessments of higher education providers. The aims and objectives of each external QA activity of this review is presented in the Handbooks.

QAA's processes and criteria have been developed, reviewed, and updated by the agency itself for all activities as included in this review. Following the publication of handbooks, supplementary guidelines and briefings are produced for providers.

The external quality assurance processes are defined in the following handbooks:

UK- Wide:

- Higher Education Review for alternative providers (HER-AP). Handbook for Providers (updated 2022)
- Higher Education Review for foreign providers: Handbook for providers, (updated 2022)
- Recognition Scheme for educational oversight: Handbook for providers, (updated 2022)
- Educational oversight - exceptional arrangements: Handbook for providers, (updated 2022)

Nations specific:

- Enhancement-led Institutional Review Handbook (4th edition 2017) (ELIR)-Scotland.
- Quality Enhancement Review Handbook (April 2020) (QER)-Wales.
- Gateway Quality Review Handbook (GQR) (November 2020) (GQR)-Wales.
- Degree Awarding Powers:
    - Degree awarding powers in Wales: handbook for applicants (July 2022).
    - Degree awarding powers and university title in Scotland: guidance and criteria for applicants (July 2022).
    - There is still no handbook for Northern Ireland. The handbook is in process.

International:

- International Quality Review: Method Handbook for Higher Education Institutions outside the UK (October 2022).
- International Programme Accreditation: Method Handbook for Higher Education Institutions outside the UK.

The methodologies are prepared by the staff of the agency in collaboration with different stakeholders to ensure their fitness for purpose. QAA methodologies are thus developed through consultative processes. At the end of the collaborative process, QAA approves the handbooks which describe the methods in detail. Feedback from providers is also sought during/after the implementation phase. QAA has also established informal advisory groups to provide specialist advice and guidance on the development of methods. By doing so QAA wishes to ensure that the methodologies are fit for purpose.

According to the SAR, QAA further intends to develop its methodologies in accordance with the ESG and the requirements of the related regulators or funders and in alignment with the four national contexts. For example, in Wales and Scotland, Subject Benchmark Statements and Characteristics Statements have been considered as the additional regulatory requirements alongside the Quality Code and qualifications frameworks.

Next, as explained in the SAR, the ELIR Handbook (ELIR) 4 was developed by QAA Scotland with the support of an External Institutional Review Advisory Group comprising members of the sector with experience of being reviewed and being the reviewers, including student reviewers. The proposals on the revised methodology were shared with all higher education institutions in Scotland. Lately, developments in the method were also discussed in sector groups such as the Universities Scotland Learning and Teaching Committee, the Scottish Higher Education Enhancement Committee and the Teaching Quality Forum.

Since the last review against the ESG, QAA has established and formalised the role of the Assessment and Reviews Group (ARG) to provide strategic oversight and consideration of the new external QA methods, as well as improvements to them.

The process to review and approve a method or handbook is described in the IQA Manual (point 2.1 and appendix 3). The IQA Manual indicates that methods are designed in consultation with stakeholders and that the Assessment and Reviews Group (ARG) approves methodologies across the agency.

Finally, the panel notes that the handbooks do not refer to ARG as the body who approves these handbooks or the dates of the meetings when the methodology/amendment was approved. Likewise, the specific responsibilities of this group (ARG) are not defined on the agency's website or the IQA Manual.

Analysis

The panel confirms that the examined handbooks describe in detail the external quality assurance procedures and their aims and objectives at QAA. The involvement of the stakeholders and primary providers in this is crucial, either through consultations or periodic meetings. However, the panel notes a lack of formal information regarding which QAA body or individual is responsible for approving each handbook or in which meeting it was approved.

During the site visit, the panel was further interested in exploring the realistic possibilities of converging the external QA methodologies across the nations. However, the panel learned that differences in the current regulatory contexts limit the agency's options in this regard, at least for the

time being. For example, in the case of Northern Ireland, while the sector is inspired by the processes carried out in Wales, they will still keep their own methodology for the time being. Therefore, the panel learned that various methodologies will continue to coexist regardless if they have the same or similar objectives. This even includes differences in the length of review cycles.

The panel considers the agency's focus on process improvement in Wales and Scotland a success, as it allows HE institutions and their centres to demonstrate their improvement and innovations. This approach has been implemented for over 20 years.

Furthermore, the panel wishes to highlight the agency's focus on enhancement, mainly in Scotland, i.e., throughout the national programme of Enhancement Themes. The programme aims to improve the learning experience of students studying within the Scottish higher education sector. In this programme, institutions, academic staff, support staff and students are encouraged to work together on specific areas (known as Themes), to generate ideas and find innovative ways to enhance the learning experience of students. Each Theme allows the sector to share and learn from current and innovative national and international practice. All institutions actively contribute to the Enhancement Themes and benefit from them by supporting enhancement within their own institutions.

Panel suggestions for further improvement-01

The panel suggests QAA to formalise more clearly the process of adopting methodologies, including a clear and transparently communicated description on who takes formal decisions and what is the timeline for such decisions.

Panel conclusion: compliant

ESG 2.3 IMPLEMENTING PROCESSES

Standard:

External quality assurance processes should be reliable, useful, pre-defined, implemented consistently and published. They include:

- a self-assessment or equivalent
- an external assessment normally including a site visit
- a report resulting from the external assessment
- a consistent follow-up

Evidence

External quality assurance procedures in QAA vary slightly depending on their aims and objectives in each of the four countries, thus the panel size, prescribed timelines, and vocabulary will differ accordingly. Nevertheless, all of the activities are described in the different handbooks and follow the key four evaluation stages, as follows:

- 1st stage: Preparation of the self-assessment by the HEI provider:
  - This report includes a self'reflection by the HEI, including the student voice either in the self-evaluation part or in a separate report. The information provided by students in advance of an evaluation is of vital importance to QAA reviews as it provides teams with insight into the nature of the student experience and the effectiveness of providers' management of the quality of the student experience.

- 2nd stage: External assessment, including:
    - Desk-based analysis undertaken by the members of the review team.
    - Preparatory meeting, planning meeting or first team visit (depending on the activity): these meetings take place at the provider's premises some time before the review visit. They enable the QAA officer and the review panel to hold a detailed discussion on the method and scope of the evaluation as well as to confirm what information needs to be made available.
    - Review visit: the review visit will last between one and five days, depending on the size of the provider or the type of review. During the review visit, the review team will consider documentary evidence and hold meetings with staff, students, and representatives of the diversity of institutional bodies.
- 3rd stage: Reporting:
    - After the review visit, the panel produces a report, which includes the analysis of the situation, commendations on the achievements and recommendations for further improvements (see also ESG 2.6). QAA shares the draft report with the provider who can identify any factual inaccuracies. The report is finalised after consideration of any factual inaccuracies.
    - All reports are published on the QAA website irrespective of the outcome.
- 4th stage: Action plan or follow up report:
    - After the report has been published, the provider publishes an action plan, addressing QAA's recommendations and affirmations, and explaining how it will capitalise on the commendations. In some reviews, like QER, and when the judgement "does not meet requirements or meets requirements with conditions", the institution submits a follow-up report. Follow-up reports indicate the actions taken (or in progress) by the institution to address the outcomes of the review. Follow-up reports are published on the QAA website.
    - QAA evaluates the follow up differently in different approaches. In ELIR the published follow-up report is supported by the annual institutional liaison visits where the outcomes of ELIR are considered; in HER (AP) and its derivatives, the procedure includes an annual monitoring approach; IQR and IPA include a mid-cycle review of successful outcomes.
    - Institutions are supposed to engage their student representatives in the preparation of these reports and the reports themselves should indicate the ways in which students are involved in the follow-up activity.

The agency summarised the alignment of key principles of the standard with the methods in scope for the QAA review against the ESG, as shown in the table below:

Table 6: Alignment of key principles of ESG 2.3 with the methods in scope for the QAA review by ENQA 2023

Review method	Method includes the following principles:								Comments
	Self-assess-ment	Site visit	Published report	Consistent follow-up	Peer reviewers	Student reviewers	Published outcome criteria	Com-plaints and appeals	
Enhancement-led Institutional Review (Scotland)	√	√	√	√	√	√	√	√	Cyclical review method
Higher Education and derivatives UK-wide	√	√	√	√	√	√	√	√	Cyclical review method
International Quality Review	√	√	√	√	√	√	√	√	Cyclical review method
Quality Enhancement Review	√	√	√	Published action plan required for all reviews; further follow-up if the review	√	√	√	√	Cyclical review method

Review method	Method includes the following principles:								Comments
	Self-assess-ment	Site visit	Published report	Consistent follow-up	Peer reviewers	Student reviewers	Published outcome criteria	Com-plaints and appeals	
				has an un-satisfactory outcome					
Gateway Quality Review (Wales)	√	√	√	Follow-up of un-satisfactory outcomes (see comment)	√	√	√	√	Entry method, thus follow-up is participation in the national cyclical method; as an entry method, good practice is not identified
Degree Awarding Powers (Scotland, Wales and Northern Ireland)	√	√	√	QAA undertakes assess-ments on behalf of relevant nation's government and follow-up via the cyclical	√	√	√	√	Elective specific-purpose method and, accordingly, follow-up is through the cyclical method

Review method	Method includes the following principles:								Comments
	Self-assess-ment	Site visit	Published report	Consistent follow-up	Peer reviewers	Student reviewers	Published outcome criteria	Com-plaints and appeals	
				review method					
International Programme Accreditation	√	√	√	√	√	√	√	√	

Most QAA evaluations are institutional level activities. The primary objective of QAA's external quality assurance activities is to enhance and manage changes in learning and teaching at a HEI. Also, the procedures are intended to encourage innovation. This all impacts the way the procedures are conducted, as elaborated in the examined handbooks.

Analysis

After examining each of the agency's procedures, the panel confirms QAA follows the four key review stages as required by the ESG 2.3. The panel finds that the review processes as performed by QAA are clearly defined, consistently implemented and made public.

In the interviews, experts and institution representatives all agreed that the phases of the processes are clearly defined and well-documented; in particular, the role of the QAA coordinators was explicitly appreciated by the agency's stakeholders and higher education institution representatives praised the usefulness of the procedures.

QAA has carried out between 30 and 50 external reviews every year, from 2019 to 2021 all of them following the established phases. The panel finds that the review processes performed by QAA are pre-defined, implemented consistently and published. The reliability is supported by the IQA handbook, the publically available methodology description and the QAA officers.

The panel wishes to highlight two aspects in relation to the findings under ESG 2.3. Firstly, the strong and clear student involvement in the agency's review methods, such as during the development of the institution's self-analysis report, by nominating a Lead Student Representative who will lead on student engagement in the review, or with special guidelines for students (see "Student Guide for QAA Reviews in Wales"), is much appreciated by the panel. Secondly, the commitment to enhancement, as a key component of QAA. Namely, methodologies, such as ELIR or QER, require institutions to embed an enhancement-led approach to improving learning, teaching and the wider student experience during the review process.

The panel wishes to use this opportunity to also reflect on the agency's follow-up approach:

- The panel learned that all institutions have to submit a follow-up report or an improvement plan (action plan) to show evidence of progress being made. Although the panel understands that each methodology is different due to national regulations, it would be advisable to unify the monitoring (follow-up) to the maximum possible level, both in terms of scheduling/frequency, name, forms of monitoring, and including details such as when it is necessary to send a follow-up report or to organise a follow-up site visit.
- QAA evaluates the action plan in different ways depending on the methodology, for example with experts (QER) or jointly with the provider (GQR). This action plan review along with follow-up activity may modify the compliance level obtained in the Review report. The panel did not receive/review any formal examples of these action plan reviews.

- The panel also learned that not all the reports of the expert groups on the implementation assessment (after a follow-up visit) are published. Furthermore, it is not well defined what happens if the provider does not follow up on the actions. QAA explained that the funding council is informed, and there may be a consequence for funding. However, this point remained rather opaque during the visit.

Panel commendations-07

The panel praises the agency on how systematically and effectively it involves students in essentially every stage of the review process.

Panel recommendations-04

The panel strongly advises QAA to formalise and (as far as possible) standardise their approach to follow up across methodologies and nations, in particular as some individual review types can be regarded as a best practice that could lead the way for others. Such a standardization effort would also make it more transparent where the responsibility of QAA begins and ends in comparison to that of the funding authorities

Panel conclusion: compliant

ESG 2.4 Peer-review experts

Standard:

External quality assurance should be carried out by groups of external experts that include (a) student member(s).

2018 review recommendation

ESG 2.4: Students should be included in all review methods aligned with the ESG as a standard feature, without reservations and special clauses.

Evidence

QAA engages with approximately 270 reviewers, including 14 international reviewers and about 50 student reviewers.

QAA has a Conflicts of Interest Policy that advises reviewers of their obligation to disclose conflicts of interest and maintain high ethical standards. Reviewers should inform QAA immediately if any such conflict arises.

The criteria for selecting reviewers are described in each of the QA activities' handbooks. Requirements for the experience, competences, and qualities of peer reviewers are specifically outlined, including specific requirements for student reviewers and international reviewers and any other particular expertise, should this be required for the specific review methods.

Academic reviewers are selected from all types of providers of higher education and from the main subject disciplines. Student reviewers are typically current undergraduate or postgraduate students or recent graduates with experience of representing student interests.

The constitution of review panels is outlined in the related handbooks as well. Since September 2022, a student member is involved in all the review methods without exception. QAA panels do not include labour market representatives as reviewers, as QAA primarily undertakes reviews at institutional level.

In expert panels for international reviews (IQR and IPE), there is always an international member, while in national review panels, international panel members have only been included from the fourth cycle of ELIR reviews.

Review panels are constituted by experts from UK with no restriction regarding the national origin of the reviewer. That means that home nation experts can participate in their nation's review.

QAA explains that although the number of international experts is not high, the UK higher education sector is highly international and many QAA reviewers have direct experience of working internationally or have been involved with collaborative provision outside the UK. Therefore, the distinction between 'home' and 'international' reviewers is increasingly blurred.

The reviewer training involves two parts:

- An initial on-line training covering matters such as Health and Safety, Data Protection regulations and Cyber Security.
- Review and method-specific training, including information on the ESG. This training can be done just before the visit. Students follow the same training that may be supplemented with additional briefings for them.

Some experts in the interview requested for more training between reviews to consolidate their knowledge. Nevertheless, all of them indicated that the QAA officers have been very helpful and supportive during the reviews once they actually occur.

To stay updated, reviewers receive newsletters and are invited to forums or webinars, but QAA does not offer periodic compulsory training for updates or refresher courses before each cycle.

The experts' performance is evaluated at the end of the process through feedback of the QAA staff and the provider involved. This information helps in the selection of experts for future reviews.

Some experts in the interview explained that they do not receive feedback on their performance.

Currently, QAA is engaged in the project "Reviewer Experience Improvement Project" that aims to improve the reviewer experience with a centralised reviewer management team. All reviewers will thus have one contact point regarding recruitment, selection, training and performance management.

Analysis

Firstly, regarding to competence development, the panel confirms that all of the interviewed experts possessed extensive knowledge of the evaluation processes and have considerable previous experience in QAA's activities. The experts, including students and a few international experts, expressed appreciation for the support provided by QAA as well as the usefulness of the guides and templates provided.

With regard to the composition of the panels, QAA has changed its policy since the last review, which addresses the concerns from EQAR's side. The panel notes there is always a student in the QAA's panels for all of the activities under review, except during the follow-up visits.

All evaluated institutions expressed satisfaction with the competence and independence of the expert panels.

The panel suggests that while many of the reviewers have international experience, increasing the number of international experts on the panels could bring a new dimension and provide additional insights into the reviews. This had already been brought up by the previous panel, with little progress made in this respect, which prompts the current panel to emphasise this topic more strongly.

Regarding the trainings, the panel notes that the initial training seems adequate for those who have previous experience. However, given the varying methodologies employed by QAA and the constant changes in the sector, more periodic, compulsory updates may be necessary and could be provided by the agency.

Although no providers have expressed complaints about the panel composition, the panel believes it is important for QAA to ensure independence, in terms of "home nationality". Although the committee does not have exact figures, after interviewing the panel members, the panel learned that the practice of having experts from each nation who evaluate institutions within their own nation is common in QAA.

The panel further believes that the joint management of all experts is a good approach, as it could increase efficiency and allow for the identification of the most appropriate experts for each review.

Panel suggestions for further improvement-02

The panel strongly recommends QAA to extend its pool of international reviewers, in particular in light of its own increasing rate of international reviews.

Panel conclusion: compliant

ESG 2.5 CRITERIA FOR OUTCOMES

Standard:

Any outcomes or judgements made as the result of external quality assurance should be based on explicit and published criteria that are applied consistently, irrespective of whether the process leads to a formal decision.

Evidence

QAA's external quality assurance activities are built on the notion that it is the panels' ultimate responsibility to make final judgements at the end of each review process. This is the rule for all of the agency's activities.

These judgements are supported by:
- The criteria and reference point in the external review' handbooks published on the website.
- Training of reviewers which includes specific sessions related to making judgements.
- The support from QAA officers during each review, who ensure that judgements are made with reference to the explicit criteria and with the aim of safeguarding the integrity of methods and judgements.
- A moderation or second-reader process undertaken by review managers. This process is intended to ensure that the wording of outcomes is clear and that criteria have been consistently applied.

The Internal Quality Manual at QAA describes the different types of judgements and explains that all judgements and findings in QAA reports must be grounded in the evidence explored by the review

team, tested in discussion with the QAA Officer supporting the review and confirmed through moderation within QAA. There is no formal body though who challenges or confirms the decision. Each review team takes their own final decision.

In the case of International Reviews (IQR and IPA), however, there is an International Accreditation Panel (IAP) that considers recommendations made by review teams. Draft review reports and recommendations are presented to the International Accreditation Panel, which determines if an institution should be awarded QAA Accreditation. The Panel is composed of 8 members, including a student and 4 international members. In the opinion of QAA, this group of international experts brings credibility to the process. Yet at the same time QAA argues that this is not necessary for reviews within the UK.

Once the decisions have been taken, QAA informs the founders of HEIs and the respective governments of the outcomes.

Analysis

QAA has methodologies and written support documentation in place where the criteria for outcomes, as well as the possible outcomes, are defined. The panel found evidence for this in each handbook, where the criteria that review teams use to come to their judgements are set out.

Importantly, the panel notes that the application of QAA's criteria for its activities falls on the reviewers that conduct the visits, who then also take the final decision. This final decision is reviewed and validated by staff of QAA. The fact that there is no independent commission that reviews and checks all reports and their application across the agency raises a question about whether the criteria are being applied uniformly. The panel notes a threat that as there is not any formal meeting or act to approve the final decision, or to approve the report itself as provided by the panel, it might appear that the report could in theory be amended by QAA officers. Furthermore, the panel learned that in one international review the final report was withdrawn after the review panel had made their decision. During the site visit, the QAA leadership informed the panel that for international reviews, the final report could be withdrawn at any time after the visit.

Moreover, given the high number of methodologies in place at the agency, each with its significant variations, the panel is in doubt as to whether their decision making processes are homogeneous despite the safeguarding mechanisms in place, mainly handbooks. The moderation process puts a lot of responsibility on review managers and their line managers. It has to be said, though, that this way of working has been functioning for years in QAA, and universities did not raise any complaint during the visit.

Last but not least, it is surprising to the panel that in the case of international evaluations, there is an accreditation commission in place, consisting of members from the UK and of the international members. The panel notes that the body '¡adds to the importance to the process and provides for a consistency of QAA's work internationally. Thus, in international evaluations, QAA follows the practice of most quality agencies in the EHEA in an attempt to give the process more homogeneity.

Summing up, the panel was frequently reassured that the practice was "probably unique" in the EHEA but is working for QAA – yet references to the processes of ensuring consistency remained vague, suggesting a "black box" like approach. The panel considers ESG 2.5 to be one of the crucial standards related to any agency's operation and was not convinced of the argument that this approach to decision making has always been the way the agency operates. Finally, in the case of international reviews, the agency itself actually uses a reverse set of arguments.

Panel recommendations-05

QAA should strongly reflect on its approach to ensuring the consistency of outcomes including the potential need to establish an independent commission that validates reports and makes the final decision. This role could be fulfilled by the two new groups at the agency: the Assessment and Review Group, and the Assessment and Review Operations Group. Alternatively, the agency could follow the model from its international reviews.

Panel conclusion: partially compliant

ESG 2.6 REPORTING

> Standard:
>
> Full reports by the experts should be published, clear and accessible to the academic community, external partners and other interested individuals. If the agency takes any formal decision based on the reports, the decision should be published together with the report.

Evidence

The IQA Manual describes the general policies and guidelines to produce and publish a report. Once the site visit is finished, the expert panel is responsible for writing the report with the contributions of all the panel members. There is no role of a chair or secretary in charge of writing the report. During the process of drafting the report, the panel has the help of the QAA's officers, and the related guidelines, e.g., the "Enhancement-led Institutional Review-(ELIR) 4: Guidance for reviewers on working with the Technical Report", or "HER- Instructions on Report Writing". The final version of the review report is agreed upon by all review panel members and then submitted to QAA's officer.

The officer has the responsibility to check that the report follows the methodology in place. After the officer has checked the report, the draft report is sent to the institution to be checked for factual inaccuracies. If the institution provides comments or objections on the external report, the review panel makes the necessary revisions. Once all panel members agree with the assessments contained in the report, the report will be made final.

The report is then sent to the QAA manager who checks for its consistency in order to reduce subjectivity in the assessments. If any change is proposed by the QAA manager, this should be approved by the review team. This is considered the final report, as there is no commission or council who takes the formal decision on validation of review reports.

The QAA review reports are different depending on the external QA activity. Nevertheless, they all have key common features, such as:

- An introduction to the basic data and description of the institution under review.
- Information about the process (review team, date of the visit).
- Judgements or key findings: including commendations and recommendations.
- Explanation of findings: this section explains the review findings in greater detail.

Each report has a QAA code (report log).

In some methods, such as ELIR and QER, the procedures result in two reports:

- The outcome report that summarises the outcomes of the review.

- The technical report that outlines the detailed findings of the review. These are primarily intended to support the institution and enable thematic reporting.

Some reviews are awarded with labels, such as "QAA Review Graphic" or "QAA Quality Mark". The "QAA Quality Mark" is only awarded to QAA subscribers. The document "Terms and conditions of use (2018)" explains the conditions to be an eligible subscriber and the rules to obtain such mark.

All QAA reports are published on the agency's website, including the ones with a negative decision. The search of a report can be done only by the name of the provider, but not by the review methodology, nation or year. During the review process, as the search of the reports was quite difficult to the panel, QAA provided a useful summary Excel document. This Excel was subsequently published on the agency's website.

The panel additionally notes that during this review the agency's reports were not available on DEQAR Database. Nevertheless, QAA informed the panel that they intent to do so as soon as possible.

Finally, the panel notes that during the site visit the higher educational providers in general expressed their satisfaction with the quality of the reports.

Analysis

The panel checked and confirmed that all of the agency's reports are published in full on the website. Nevertheless, the panel identified some issues related to publishing that could be improved:

- The search function of reports can only be done by the name of the provider, but not by the review methodology, nation, or year. The panel thus encourages QAA to improve the search feature by adding more filters, as suggested in the previous review (see the recommendation "The panel suggests the agency could add more options for search").
- The way information is presented on the agency's website is not consistent across all reports. For example, in some reports the website provides a short explanation of the main findings, which the panel considers very useful. In other examples, reports have a link to the action plan provided by the institution: while this is a good idea, after a short random analysis, the panel noted that the provided link leads only to the institution's website and not to the action plan itself.

Regarding the content of the reports, although they provide clear and relevant outcomes for the providers, the panel found that in some reports, the specific judgements or outcomes for each standard are not clearly presented. For example, adding a table with the level of compliance for each standard into the reports could be very useful for students or external stakeholders.

Finally, the panel compared both reports for methods where there are two reports resulting a review. Although these reports are adapted to meet the needs of different audience, in some analysed examples (for example for University Abertay) the panel found that the information outlined in the outcome report is not easy to find in the technical report. The panel suggests that the list of recommendations and commendations should be identical and more easily identifiable in both reports.

Panel recommendations-06

The panel emphasises the previous panel's recommendation to develop an extended search functionality on the agency's website, thus making it possible to customise search queries by year, by nation, by process.

Panel suggestions for further improvement-03

The panel suggests implementing the plan for publishing reports on DEQAR as swiftly as possible.

Panel suggestions for further improvement-04

The panel sees a need for the list of recommendations and commendations to be identical in both reports of those activities where there are two reports (outcome report and technical report) resulting the activity. The published information (e.g., short explanation of findings, links to action plans) should be standardised as much as possible.

Panel conclusion: compliant

ESG 2.7 COMPLAINTS AND APPEALS

Standard:

Complaints and appeals processes should be clearly defined as part of the design of external quality assurance processes and communicated to the institutions.

Evidence

QAA has the complaints and appeals processes in place and makes a distinction between the two:

- The agency considers an appeal to be used when an institution challenges the outcome of a QAA review or another decision made by QAA.
- A complaint is a process of expressing dissatisfaction with any matters of dealing with QAA. A complaint might be raised by any individual involved with the QA activity, or a HEI that takes part in the QA activity.

The QAA Complaints Procedure (dated 3 November 2021) clearly defines the process for handling a complaint. Firstly, the procedure explains how to submit a complaint. If members, stakeholders or customers are not satisfied with the service received from QAA, they can submit a complaint. The Director of Corporate Affairs will consider the complaint and decide how to handle it. An officer who has no direct involvement in the complaint will be appointed to investigate it.

In the SAR, QAA provides information on the number of complaints received in the last five years.

Table 7: Number of complaints over the last five years

Complaints				
Year	Upheld	Rejected	Total	Unresolved
2017-18	1	6	7	
2018-19	2	7	9	
2019-20	1	3	5	1 in progress from 2019-20
2020-21	0	7	7	
2021-22 (to date)	0	1	2	

In relation to appeals, institutions have the right to appeal against an unsatisfactory outcome of any review conducted by QAA, on the grounds that the procedure was not followed correctly, or the outcome of the process was not based on evidence. All appeals are assessed independently by experts and overseen by 2 member of the Governance team.

The Consolidated Appeals Procedure document, last updated in March 2022, outlines the procedures for consideration of an appeal made by a higher education provider against a QAA review team's judgement in all the methods within the scope of the ESG.

QAA has a group of independent reviewers (Appeal Panel) and QAA review managers trained to handle appeals.

The process is managed by two members of the Governance team who determine which reviewers are suitable to handle the appeal, taking into account their training, recent review experience and potential conflicts of interest.

Initially, an independent reviewer will analyse the appeal. The independent reviewer can reject an appeal, or part(s) of an appeal. In this case, the provider will be informed in writing of the decision and the reasons for rejecting it. There is no appeal to this decision.

In some cases, the independent reviewer may refer some or all of the appeal to an Appeal Panel.

The Appeal Panel, consisting of between two and five members, depending on the review method, are experienced reviewers, with one of them serving as the chair. The Governance team provides secretarial support to the process. Each Appeal Panel is always assembled ad hoc for a specific case; there is not standing body for this purpose at QAA.

An expert adviser who is an experienced QAA review manager with no prior involvement in the particular review under appeal, will be made available to provide guidance to the Appeal Panel on the application of the QAA review method. The expert adviser will not receive or consider the documentation at any stage and will advise only on procedural matters when requested by the Appeal Panel.

Table 8: Number of appeals over the last five years

Year of review	Providers eligible to appeal	Eligible providers that did appeal	Eligible providers that did not appeal	Appeals upheld
2017-18	17	4	13	0
2018-19	3	2	1	0
2019-20	0	0	0	0
2020-21	1	0	1	0
2021-22	1	1	0	0

Source: table provided by the QAA.

Since the last review of the agency against the ESG, QAA has implemented several enhancements to its appeals and complaints processes, including:

- Refreshing the webpage related to appeals with a clearer signposting for providers.
- Conducting staff briefing sessions and developing an annual open session for all staff on the complaints procedure to ensure currency.
- Reporting outcomes from complaints and appeals to the QAA Board annually, and monitoring appeals and complaints for trends.
- Providing feedback to review teams on complaints investigations.

The review panel was granted access to the latest Annual Report on Complaints, Appeals and Legal, where the Director of Corporate Affairs analyses the complaints and appeals received during the year 2020-21. For instance, the report provides an explanation for why most of the complaints were rejected.

Additionally, the panel notes that the appeal reports have been standardised with a template for reviewers to complete.

Analysis

The panel confirms that the complaints process is well defined and published on the QAA website. Interestingly, upon reviewing the data provided in the SAR, the panel learned that most complaints have been rejected, with only one upheld and another having been in progress for three years. The panel has thus observed a high rate of rejection of complaints after investigation, which may suggest a need for reflection by QAA. The high rejection rate could potentially generate doubts among users or indicate that the criteria for addressing complaints are too strict or at least not well presented to the complainant prior to engaging in the process. As a recommendation, the panel recommends that QAA reviews its current processes for defining, disseminating, receiving and analysing complaints.

During the site visit, the panel conducted a more detailed analysis of the appeals process. The panel observes that this process involves several stages, including a preliminary review to determine whether an appeal can proceed, followed by a group of reviewers analysing the appeal. The expert support to the appeal may differ from case to case, and there is no fixed group of trained individuals with knowledge of previous cases to validate appeals.

Additionally, the panel notes that the institution has only five days to respond after receiving the report on the appeal, which is in the view of the panel a too short deadline.

In 2021-2022, there is one appeal closed, where the institution indicated that the response given was not satisfactory, leading to the appeal being refused. The reasons provided were not considered sufficient by this provider.

All in all, following the presented evidence, the panel notes that the stages of the appeals process are clear, but the criteria by which an appeal continues to be evaluated by a group of experts are not clearly defined. Furthermore, the previous decision on whether an appeal is to be rejected is based on the opinion of only one person. Due to this, the panel suggests that all appeals should be handled by a standing panel of experts to improve the consistency of decisions.

Finally, during the interviews, the panel observed that, in the context of a voluntary review, after submitting an appeal for a negative result, institutions could request the withdrawal of the outcome/the review report (see also ESG 2.5). The panel is of the opinion that it should not be possible for any institution to withdraw from the external QA activity after a negative decision, even if the review is voluntary in nature. In the view of the panel, this could potentially undermine QAA's credibility as the quality assurance agency.

Panel recommendations-07

The panel recommends QAA to reconsider its current processes for receiving and analysing complaints.

Panel suggestions for further improvement -05

The panel suggests that all appeals be handled by a standing panel of experts, with equal stakeholder representation, in order to improve the consistency of decisions. Additionally, the panel suggests that the screening of appeals for eligibility should not be done by only one person.

Panel conclusion: compliant

ADDITIONAL OBSERVATIONS

THE FUTURE OF QAA IN ENGLAND AFTER RESIGNING AS DQB.

Since the last review, QAA's main concern has been its decision to resign as DQB. This has been a challenging process that resulted in QAA not being registered in EQAR for a short period of time.

Ultimately, QAA has decided to follow the common European framework (in the concrete form of the ESG) and to again seek registration in EQAR, in order to maintain its visibility and enable operations in the field of quality assurance in Europe. However, there are still some considerable drawbacks and risks for the future attached to this decision.

The fact that England has taken a different direction from the rest of the UK could create confusion internationally and might also impact QAA's international operations, depending on which institution takes on DQB responsibilities in the future.

This review and especially the site visit made it very clear how the four UK nations are drifting apart policy-wise, mainly with England moving in a different direction from the rest of the nations. Wales, Scotland and Northern Ireland have the opportunity to connect with each other, work together and share best practice, such as through the enhanced review approach. This will challenge the ambitions of QAA to reach more convergence on the UK level and have effects on the perception of higher education in/from the UK as a whole.

QAA, as a membership organization servicing all UK HEIs including those in England, has an important role to play in disseminating good practices, organising discourses and exchange and providing support and solutions to the higher education sector. Servicing members that will go through reviews organised by other bodies and agencies while at the same time keeping relevance of QAA membership will be a balancing act to the agency.

Finally, the budgetary repercussions, as discussed under ESG 2.5, require QAA to compensate for the loss of the DQB income by untapping other sources. The agency has developed a clear plan, but financial risks remain.

Summing up, the panel feels that QAA is more than aware of the various risks repercussions and stays fairly optimistic on the future of the agency.

CONCLUSION

ESG 3.1 – 01 The panel commends QAA on the systematic and effective management of the wide array of stakeholders and their involvement in the agency's work in external quality assurance.

ESG 3.1 - 02 The panel commends the student engagement on various levels of QAA's organisation and activities and the role QAA has played in championing the student experience and student representation within the sector.

ESG 3.3 – 03 The panel commends QAA for its measures in place to secure the agency's independence, as well as the organisational strength to follow and maintain the spirit of ESG.

ESG 3.4 - 04 The panel commends QAA for its exemplary exploratory and communicative work on "new frontiers" of quality assurance and higher education in general, which has led to QAA being internationally recognised as a well-established hub for information and guidance.

ESG 3.6 - 05 The panel commends the agency for its comprehensive IQA manual, which serves as a great reservoir of internal knowledge and regulates a vast array of issues and processes.

ESG 2.1- 06 The panel commends QAA for its strong commitment to the ESG Part 1 and the agency's clear enhancement orientation in its external QA activities.

ESG 2.3 -07 The panel appreciates how systematically and effectively QAA involves students in basically every stage of the review process.

OVERVIEW OF JUDGEMENTS AND RECOMMENDATIONS

In light of the documentary and oral evidence considered by it, the review panel is satisfied that, in the performance of its functions, QAA is in compliance with the ESG.

The panel finds QAA compliant with the ESG standards:

- 3.1 Activities, policies and procedures for quality assurance
- 3.2 Official status
- 3.3 Independence
- 3.5 Resources
- 3.6 Internal quality assurance and professional conduct
- 3.7 Cyclical external review of agencies
- 2.1 Consideration of internal quality assurance
- 2.2 Designing methodologies fit for purpose
- 2.3 Implementing processes
- 2.4 Peer review experts
- 2.6 Reporting
- 2.7 Complaints and appeals

According to the judgment of the panel, QAA is partially compliant with the ESG standards:

- 3.4 Thematic analysis

- 2.5 Criteria for outcomes

ESG 3.4 -01 The panel recommends QAA to develop a clearer plan for thematic analyses for all of its external QA activities in the spirit of ESG 3.4 and to regularly implement this plan, leading to a systematic and nations-wide production of such analyses in spirit of the standard.

ESG 3.6-02 The panel recommends complementing the internal QA system with clear feedback-related internal improvement plan that also includes a kind of quantitative "coordinates" which would allow QAA to track the success of its developmental efforts.

ESG 3.7-03 The panel recommends QAA to follow up more swiftly and effectively on any recommendations and suggestions stemming from their own external reviews against the ESG - and/or to communicate more transparently and proactively, when and why such follow ups need to be delayed or rethought.

ESG 2.3-04 The panel strongly advises QAA to formalise and (as far as possible) standardise their approach to follow up across methodologies and nations, in particular as some individual review types can be regarded as a best practice that could lead the way for others. Such a standardization effort would also make it more transparent where the responsibility of QAA begins and ends in comparison to that of the funding authorities.

ESG 2.5-05 QAA should strongly reflect on its approach to ensuring the consistency of outcomes including the potential need to establish an independent commission that validates reports and makes the final decision. This role could be fulfilled by the two new groups at the agency: the Assessment and Review Group, and the Assessment and Review Operations Group. Alternatively, the agency could follow the model from its international reviews

ESG 2.6-06 The panel emphasises the previous panel's recommendation to develop an extended search functionality on the agency's website, thus making it possible to customise search queries by year, by nation, by process.

ESG 2.7-07 The panel recommends that QAA reconsider its current process for receiving and analysing complaints.

SUGGESTIONS FOR FURTHER IMPROVEMENT

ESG 2.2.-01 The panel suggests QAA to formalise more clearly the process of adopting methodologies, including a clear and transparently communicated description on who takes formal decisions and what is the timeline for such decisions.

ESG 2.4-02 The panel strongly recommends for QAA to extend its pool of international reviewers, in particular in light of its own increasing rate of international reviews.

ESG 2.6-03 The panel suggests implementing the plan for publishing reports on DEQAR as swiftly as possible.

ESG 2.6-04 The panel sees a need for the list of recommendations and commendations to be identical in both reports of those activities where there are two reports (outcome report and technical report) resulting the activity. The published information (e.g., short explanation of findings, links to action plans) should be standardised as much as possible.

ESG 2.7-05 The panel suggests that all appeals be handled by a standing panel of experts, with equal stakeholder representation, in order to improve the consistency of decisions. Additionally, the panel suggests that the screening of appeals for eligibility should not be done by only one person.

ANNEXES

Annex 1: Programme of the site visit

SESSION NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW	LEAD PANEL MEMBER
[14.02.2023] - Online meeting with the agency's resource person				
1	16.00-17.00 (CET) 15.00-16.00 (GMT) (60 min)	Review panel's kick-off meeting		
2	17.00-18.00 (CET) 16.00-17.00 (GMT) (60 min)	An online clarifications meeting with the agency's resource person regarding the specific national/legal context in which an agency operates, specific quality assurance system to which it belongs and key characteristics of the agency's external QA activities	Executive Director of Operations and Deputy Chief Executive Officer Quality Enhancement Manager	
[26.02.2023] – Day 0 (pre-visit) - Sunday				
0.1	18.00-19.00 (60 min)	Review panel's pre-visit meeting and preparations for day 1		
[27.02.2023] – Day 1- Monday				
	8.00-8.30 (30 min)	Health and safety briefing, office tour and IT set up	Continuous Improvement Manager	
	8.30-9.00 (30 min)	Review panel's private meeting.		
1.1	9.00-10.00 (60 min)	Meeting with the Head of Agency and Chief Executive	Chief Executive Officer	
	15 min	Review panel's private discussion		

SESSION NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW	LEAD PANEL MEMBER
1.2	10.15-11.00 (45 min)	Meeting with quality assurance officers of some HEIs reviewed. From different HEI and nations. Note: Institutions that have participated in meeting n.2.3 should not be represented in this meeting.	Academic Director - Washington International Studies Council

Head of Quality Assurance - QAHE (Ulst) Limited

Head of Quality and Academic Services University of South Wales

Director of Academic Experience, University of Wales Trinity St David.

Head of Quality Assurance and Enhancement, University of Edinburgh

Proctor, University of St Andrews

Head of Quality Enhancement, Edinburgh Napier University | |
| | 15 min | Review panel's private discussion | | |
| 1.3 | 11.15-12.30 (75 min) | Meeting with representatives from the Senior LeadershipTeam (7 members) including members of Assessments and Reviews Group (ARG) | Finance Director

Director of Corporate Affairs

Executive Director of Operations and Deputy CEO

Director of Membership, Quality Enhancement and Standards | |

SESSION NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW	LEAD PANEL MEMBER
			Director of Quality Assessment England	
			Director of International and Professional Services	
			Head of Public Affairs	
	15 min	Review panel's private discussion		
	12.45-13.45 (60 min)	Lunch (panel only)		
1.4	13.45-15.15 (90 min)	Meeting with Staff: in charge of reviews or responsible for procedures. Including all the contracts: partial, contracted, full time- Including procedures in 4 nations and Assessment and Reviews Operational Group (AROG)	Quality Enhancement Manager Operations Manager Quality Enhancement Manager Operations Manager Quality Specialist Facilities and Compliance Manager Lead Quality Manager	
	15 min	Review panel's private discussion		
1.5	15.30-16.00 (30 min)	Meeting with Staff: internal management (People, Financial, IT)	Head of HR and Organisational Development Financial Controller Head of IT and Digital Services	

SESSION NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW	LEAD PANEL MEMBER
			Facilities and Compliance Manager	
			Head of Business Development	
	15 min	Review panel's private discussion		
1.6	16.15-16.45 (30 min)	Meeting with students. Including: – Student representative bodies, – QAA advisory committees, – Reviewers	4 Student reviewers Student reviewer and Former Board Member and SSAC co-chair Student - NUS Wales President Student NUS/Co-Chair and Board member Student -Former SSAC Student former NUS VPHE, former board member and former SSAC co-chair	
	16.45-17.45 (60 min)	Wrap-up meeting among panel members and preparations for day 2		
		Dinner (panel only)		
[28.02.2023] – Day 2- Tuesday			
	8.00-8.15 (15 min)	Review panel's meeting with the agency's contact person	Quality Enhancement Manager	
	8.15-8.30 (15 min)	Review panel's private meeting		
2.1	8.30-8.45 (15 min)	Meeting with people involved in appeals: HEI that had appealed	Vice President, Accreditation and Quality Assurance, Al Ain University	

SESSION NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW	LEAD PANEL MEMBER
	8.45-9.00 (15 min)	Review Panel's private meeting		
2.2	9.00-9.45 (45 min)	Meeting with Government representatives Representatives from the 4 nations and including funders/ regulators (Note there is not an equivalent in England in respect of EQA activity in scope)	Senior Policy Officer, Higher Education Governance and Quality, Scottish Government Head of Quality and Governance, Higher Education Division, Department for the Economy Northern Ireland Head of Student Experience, Higher Education Funding Council for Wales Assistant Director (Learning and Quality), Scottish Funding Council Senior Policy Analysis Officer, Scottish Funding Council	
	15 min	Review panel's private discussion		
2.3	10.00-10.45 (45 min)	Meeting with Head/Vice- Chancellors (VC) of some HEIs reviewed (publicly funded higher education providers, further education colleges, alternative providers) and covering all nations	College Director - International College Dundee Deputy Vice Chancellor, Bangor University, Board member Principal and Vice-Chancellor, Queen Margaret University Principal and Vice-Chancellor, Abertay University	

SESSION NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW	LEAD PANEL MEMBER
			Director, Glasgow School of Art	
	15 min	Review panel's private discussion		
2.4	11.00-11.45 (45 min)	Meeting with international HEIs. International Quality Review (Note no reviews have taken place for International Programme accreditation)	Academic Quality and Learning Manager at University of Gibraltar Dean of Institutional & Programme Accreditation at the Higher Colleges of Technology Chancellor, The Gulf Medical University, UAE. Registrar and Chief Academic Officer, British University in Dubai	
	15 min	Review panel's private discussion		
2.5	12.00-13.00 (60 min)	Meeting with representatives from the reviewers' pool Including: - Academic and labour market representatives. - All nations procedures should be included International reviewers	University Registrar, BRAC University Former Associate Dean Birmingham City University Assistant Principal (Higher Education), Neath Port Talbot College Emeritus Professor, Liverpool John Moores University	

SESSION NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW	LEAD PANEL MEMBER
			Former Deputy Vice Chancellor (Learning and Teaching), York St John University	
			Academic Registrar, University of the Arts London	
			Head of Academic Quality, Heriot Watt University	
			Head of Learning and Teaching, Glasgow School of Art	
	13.00-14.00 (60 min)	Lunch (panel only)		
2.6	14.00-14.30 (30 min)	Meeting with International stakeholders,	Assistant Director, Higher Education and Skills, British Council Vietnam National Agency for Higher Education Quality Assurance (NAQA), Ukraine President, National Authority for Quality Assurance and Accreditation of Education (NAQAAE), Egypt Director, Commission for Academic Accreditation, UAE	
	15 min	Review panel's private discussion		
2.7	14.45-15.15 (30 min)	Meeting with UK stakeholders, (e.g. national groups, professional, statutory and regulatory bodies)	Education and Skills Senior Executive, Engineering Council	

SESSION NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW	LEAD PANEL MEMBER
			Policy Manager, Universities UK	
			Senior Policy Officer, Universities Scotland	
			Business Manager, Universities Wales	
			Deputy Chief Executive, Guild HE	
			Chief Executive, Independent HE	
			Chief Executive, Office of the Independent Adjudicator for HE	
			Senior Policy Manager, Association of Colleges	
	15 min	Review panel's private discussion		
2.8	15.30-16.15 (45 min)	Meeting with the Board of QAA. Different background (industry, professionals, student, HEI) Appointed from bodies representing UK higher education institutions and by the higher education funding councils.	Chair Deputy Chair PhD Student, University of Bristol Professor of Economics, Heriot Watt University Senior Vice Principal, University of Aberdeen CEO and Managing Director, Kantar Public UK	

SESSION NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW	LEAD PANEL MEMBER
			Chief Executive, Chartered Governance Institute UK & Ireland	
	15 min	Review panel's private discussion		
2.9	16.30-16.45 (15 min)	Meeting with people involved in appeals: reviewers	Higher Education Consultant, formerly Pro Vice Chancellor University of Bath Independent, formerly Deputy Vice-Chancellor University for the Creative Arts	
	16.45-18.00 (75 min)	Wrap-up meeting among panel members: preparation for day 3 and provisional conclusions		
		Dinner (panel only)		
[01.03.2023] – Day 3 -Wednesday				
3.1	9.00-10.00 (60 min)	Meeting with CEO to clarify any pending issues	Chief Executive Officer Executive Director of Operations and Deputy CEO	
	10.00-11.30 (90 min)	Private meeting between panel members to agree on the main findings		
3.3	11.30-12.00 (30 min)	Final de-briefing meeting with staff and Board members of the agency to inform about preliminary findings	Chair Deputy Chair Chief Executive Officer Executive Director of Operations and Deputy CEO Quality Enhancement Manager Lead Quality Manager	

SESSION NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW	LEAD PANEL MEMBER
			Lead Policy Officer (Nations and Europe) Continuous Improvement Manager	

External review of the Quality Assurance Agency for Higher Education (QAA) by ENQA

Annex I:
TRIPARTITE TERMS OF REFERENCE BETWEEN QAA, ENQA AND EQAR
9 September 2022

1. Background and context

The Quality Assurance Agency for Higher Education (QAA) is the independent quality body for UK higher education. QAA was established in 1997 as a single quality assurance service for providers of HE in the UK. QAA is trusted by higher education providers and regulatory bodies to maintain and enhance quality and standards. QAA works with its members and with institutions and bodies throughout the UK and internationally to deliver their shared commitment to the promotion and maintenance of quality and standards. This includes the identification, promotion and enhancement of innovation and good practice in teaching and learning. As a membership organisation, university and college members are working together to enhance the quality of their provision, and to protect and promote UK higher education.

QAA has been a member of the European Association for Quality Assurance in Higher Education (ENQA) since 2000 and is applying for ENQA renewal of membership.

QAA has been registered on the European Quality Assurance Register for Higher Education (EQAR) since 2013. On 27 June 2022, EQAR suspended the agency's registration following an extraordinary revision of its registration[1]. Following the consideration of the agency's response and actions, the Register Committee lifted QAA's suspension on 10 August 2022 (RC35/C74). QAA is applying for the renewal of EQAR registration.

2. Purpose and scope of the review

This review will evaluate the extent to which QAA (the agency) complies with each of the standards of Parts 2 and 3 of the *Standards and Guidelines for Quality Assurance in the European Higher Education Area* (ESG) and support the agency in its efforts to continually review and enhance its work. Such an external review is a requirement for agencies wishing to apply for ENQA membership and/or for EQAR registration.

2.1 Activities of the agency within the scope of the ESG

To apply for ENQA membership and EQAR registration, this review will analyse all of the agency's activities that fall within the scope of the ESG, e.g., reviews, audits, evaluations or accreditations of higher education institutions or programmes that relate to teaching and learning (and their relevant links to research and innovation). All activities are reviewed irrespective of geographic scope (within or outside the EHEA) or whether they are obligatory or voluntary in nature.

The following activities of the agency must be addressed in the external review:

1. **Enhancement-led Institutional Review (Scotland).**
2. **Degree Awarding powers and University Title (Wales/Scotland).**
3. **Quality Enhancement Review (Wales).**
4. **Gateway Review (Wales).**

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[1] See here: https://backend.deqar.eu/reports/EQAR/C74_QAA_ExtraordinaryRevisionOfRegistration.pdf.

5. **Higher Education Review (Alternative providers/Foreign providers) (UK wide[2])** (including the follow-up activity, Annual Monitoring).
6. **Review Scheme for Education Oversight (Educational Oversight) (UK-wide)** (including the follow-up activity, Annual Monitoring).
7. **Educational Oversight Exceptional Arrangements (Educational Oversight) (UK-wide)** (including the follow-up activity, Annual Monitoring).
8. **International Quality Review (IQR) and IQR for African Higher Education Centers of Excellence (ACE) (International).**
9. **International Programme Accreditation (IPA)** (to be reviewed to the extent possible, since the activity is due for implementation in 2022/2023) **(International).**

The following external QA activities of the agency that are under development will not need to be comprehensively reviewed, but only to the extent that procedures and methodologies are available and contextual information on their development is provided. The activities under development are:

1. Scottish Quality Enhancement Arrangements (Scotland), to be implemented in two phases between 2022/23 and 2024/25.
2. Quality Enhancement Review (Wales) due for implementation in 2023/2024.

The following activities, while in the scope of the ESG are not relevant to the agency's renewal of application on EQAR as the activities will be ceased to be carried out since QAA no longer consents to be the Designated Quality Body in England (DQB) after the current DQB year ends on 31 March 2023:

- Quality and Standards (England).
- Degree awarding powers (England).

2.2 Other matters relevant to QAA's application for Registration on EQAR

Considering the renewal of QAA's application to EQAR, the self-evaluation report and the external review report is expected to also cover issues where the Register Committee concluded in its last decision that the agency complied only partially with the ESG, namely ESG 2.4, and ESG 3.1, and to consider all substantive changes (as applicable) in the agency following the last review.

QA activities of the agency that fall outside of the scope of the ESG, are not relevant for the agency's application only in terms of their clear and transparent separation from its other activities within the scope of the ESG (see EQAR's Use and Interpretation of the ESG subsection 4.2 and Annex 2):

1. QE-TNE (a non-cyclical, thematic based process with the focus on the enhancement of provision above base line standards) (UK-wide). The review is expected to consider how QAA ensures that its services provided as part of the QE-TNE activities are distinguishable from other reviews that fall within the scope of QAA's registration on EQAR (See EQAR's Substantive Change Report of 5/10/2022).
2. Investigatory schemes (Scottish Concern Scheme/Concerns Investigation process (Wales)/Concerns Scheme for Alternative Providers reviewed by QAA) (a non-cyclical activity undertaken in response to specific concerns that have been identified about academic standards and quality raised by students, staff and other parties).

In case of any substantive changes taking place following the confirmation of the Terms of Reference and the review i.e., including introduction or change in the activities within and outside of the scope of the ESG, the agency is expected to inform EQAR at the earliest convenience.

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[2] In England, the higher education review of alternative providers only available for those institutions who cannot register with the OfS.

3. The review process

The review will be conducted following the methodology of ENQA Agency Reviews. The process is designed in line with the *Guidelines for ENQA Agency Reviews* and the requirements of the *EQAR Procedures for Applications*.

The review procedure consists of the following steps:

- Formulation of, and agreement on the Terms of Reference for the review between QAA, ENQA and EQAR (including publishing of the Terms of Reference on ENQA's website[3]);
- Nomination and appointment of the review panel by ENQA;
- Notification of EQAR about the appointed panel;
- Self-assessment by the agency, including the preparation and publication of a self-assessment report;
- A site visit of the agency by the review panel;
- Preparation and completion of the final review report by the review panel;
- Scrutiny of the final review report by ENQA's Agency Review Committee;
- Publication of the final review report;
- A decision from the EQAR Register Committee on the agency's registration on EQAR;
- A decision from the ENQA Board on ENQA membership;
- Follow-up on the panel's recommendations to the agency, including a voluntary progress visit.

3.1 Nomination and appointment of the review panel

The review panel consists of four members: one or two quality assurance experts (at least one of which is currently employed by an ENQA member agency), an academic employed by a higher education institution, a student member, and potentially a labour market representative (if requested). One of the members serves as the chair of the review panel, and another member as a review secretary. For ENQA Agency Reviews at least one of the reviewers is an ENQA nominee (most often the QA professional[s]). At least one of the reviewers is appointed from the nominees of either the European University Association (EUA) or the European Association of Institutions in Higher Education (EURASHE), and the student member is always selected from among the ESU-nominated reviewers. If requested, the labour market representative may come from the Business Europe nominees or from ENQA. An additional panel member may be included in the panel at the request of the agency. In this case, an additional fee is charged to cover the reviewer's fee and travel expenses.

The panel will be supported by the ENQA Review Coordinator (an ENQA staff member) who will monitor the integrity of the process and ensure that ENQA's requirements are met throughout the process. The Review Coordinator will not be the secretary of the review and will not participate in the discussions during the site visit interviews.

Current members of the ENQA Board are not eligible to serve as reviewers.

ENQA will provide the agency with the proposed panel composition and the curricula vitarum of the panel members to establish that there are no known conflicts of interest. The reviewers will have to agree to a non-conflict of interest statement that is incorporated in their contract for the review of this agency.

3.2 Self-assessment by the agency, including the preparation of a self-assessment report

The agency is responsible for the execution and organisation of its own self-assessment process and must adhere to the following guidance:

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[3] The agency is encouraged to publish the ToR on its website as well.

- Self-assessment is organised as a project with a clearly defined schedule and includes all relevant internal and external stakeholders;
- The self-assessment report is expected to contain:
  - a brief description of the HE and QA system;
  - the history, profile, and activities of the agency;
  - a presentation of how the agency addresses each individual standard of Parts 2 and 3 of the ESG for each of the agency's external QA activities, with a brief, critical reflection on the presented facts;
  - opinions of stakeholders;
  - the instances of partial compliance noted in the most recent EQAR Register Committee decision of inclusion/renewal and any other aspects that may have been raised by the EQAR Register Committee in subsequent change report decisions (if relevant);
  - reference to the recommendations provided in the previous review and actions taken to meet those recommendations;
  - a SWOT analysis;
  - reflections on the agency's key challenges and areas for future development.
- All the agency's external QA activities (as defined under section 2.1) are described and their compliance with the ESG is analysed in the SAR.
- The report is well-structured, concise, and comprehensive. It clearly demonstrates the extent to which the agency performs its tasks of external quality assurance and meets the ESG.

The self-assessment report is submitted to the ENQA Secretariat, which has two weeks to carry out a screening. The purpose of a screening is to ensure that the self-assessment report is satisfactory for the consideration of the panel. The Secretariat will not judge the content of information itself but rather whether or not the necessary information, as outlined in the *Guidelines for ENQA Agency Reviews*, is present. If the self-assessment report does not contain the necessary information and fails to respect the requested form and content, the ENQA Secretariat reserves the right to ask for a revised version within two weeks.

The final version of the agency's self-assessment report is then submitted to the review panel a minimum of eight weeks prior to the site visit. The agency publishes the completed SAR on its website and sends the link to ENQA. ENQA will publish this link on its website as well.

3.3 A site visit by the review panel

The review panel will draft a proposal of the site visit schedule which must be submitted to the agency at least six weeks before the planned dates of the visit. The schedule is to include an indicative timetable of the meetings and other exercises to be undertaken by the review panel during the site visit, the duration of which is usually 2,5 days. The approved schedule must be given to the agency at least one month before the site visit to properly organise the requested interviews.

In advance of the site visit (ideally at least two weeks before the site visit), the panel will organise an obligatory online meeting with the agency. This meeting is held to ensure that the panel reaches a sufficient understanding of:

- The specific national/legal context in which the agency operates;
- The specific quality assurance system to which the agency belongs;
- The key characteristics of the agency's external QA activities.

The review panel will be assisted by the ENQA Review Coordinator during the site visit. The review coordinator will act as the panel's chief liaison with the agency, monitor the integrity of the review process and its consistency, and ensure that ENQA's overall expectations of the review are considered and met.

The site visit will close with a final debriefing meeting in which the panel outlines its general impressions and provides an overview of the judgement on the agency's ESG compliance. The panel will not comment on whether or not the agency would be granted/reconfirmed membership with ENQA or registration on EQAR.

3.4 Preparation and completion of the final review report

Based on the review panel's findings, the review secretary will draft the report in consultation with the review panel. The report will follow the purpose and scope of the review as defined under sections 2 and 2.1. It will also provide a clear rationale for the panel's findings concerning each standard of Parts 2 and 3 of the ESG. When preparing the report, the review panel should also bear in mind *EQAR's Policy on Use and Interpretation of the ESG for the European Register of Quality Assurance Agencies*[4] to ensure that the report contains sufficient information for the Register Committee to consider the agency's application for registration on EQAR.

A draft will first be submitted to the ENQA Review Coordinator who will check the report for consistency, clarity, and language, and it will then be submitted to the agency – usually within 10 weeks of the site visit – for comment on factual accuracy and grave misunderstandings only. The agency will be given two weeks to do this and should not submit any additional material or documentation at this stage. Thereafter, the review panel will take into account the agency's feedback on possible factual errors and finalise and submit the review report to ENQA.

The report should be finalised within three months of the site visit and will normally not exceed 40-50 pages in length.

3.5. Publication of the report and a follow-up process

The agency will receive the review panel's report and publish it on its website once the Agency Review Committee has validated the report. The report will also be published on the ENQA website together with the statement of the Agency Review Committee validating external review reports by assessing the integrity of the review process and checking the quality and consistency of the reports. Importantly, during this process, and prior to final validation of the report, the Agency Review Committee has the option to request additional (documentary) evidence or clarification from the review panel, review coordinator or the agency if needed. The review report will be published on ENQA website regardless of the review outcome.

As part of the review's follow-up activities, the agency commits to react on the review recommendations and submit a follow-up report to ENQA within two years of the validation of the final external review report. The follow-up report will be published on the ENQA website.

The follow-up report may be complemented by an optional progress visit to the agency performed by two members of the original panel (whenever possible). The visit, which normally takes place 2-3 years after the verification of the final external review report (and after submission of the follow-up report), aims to offer an enhancement-oriented and strategically driven dialogue that ordinarily might be difficult to truly integrate in the compliance-focused site visit. The progress visit thus does not have the objective of checking the agency's ESG compliance or how the agency has followed up on the recommendations, but rather provides an arena for strategic conversations that allow the agency to reflect on its key challenges, opportunities, and priorities. Should the agency not wish to take advantage of this opportunity, it may opt out by informing the ENQA Review Coordinator about this.

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[4] Available at: https://www.eqar.eu/about/official-documents/#use-and-interpretation-of-the-esg

4. Use of the report

ENQA will retain ownership of the report. The intellectual property of all works created by the review panel in connection with the review contract, including specifically any written reports, will be vested in ENQA.

The report is used as a basis for the Register Committee's decision on the agency's registration on EQAR. In the case of an unsuccessful application to EQAR, the report may also be used by the ENQA Board to reach a conclusion on whether the agency can be admitted/reconfirmed as a member of ENQA. The review process is thus designed to serve two purposes. In any case, the review report should only be considered final after validation by the Agency Review Committee. After submission to ENQA but before validation by the ARC, the report may not be used or relied upon by the agency, the panel, or any third party and may not be disclosed without ENQA's prior written consent. The approval of the report is independent of the decision on EQAR registration or ENQA membership.

For the purposes of EQAR registration, the agency will submit the review report (once validated by the Agency Review Committee) to EQAR via email before expiry of the agency's registration on EQAR. The agency should also include its self-assessment report (in a PDF format), a Declaration of Honour, and any other documents that may be relevant for the application (i.e., annexes, statement to the review report, updates). EQAR is expected to consider the review report and the agency's application at its Register Committee meeting as stipulated in the indicative review schedule below and before the decision on ENQA membership by the ENQA Board.

To apply for ENQA membership, the agency is also requested to provide a letter addressed to the ENQA Board outlining its motivation for applying for membership and the ways in which the agency expects to contribute to the work and objectives of ENQA during its membership. This letter will be considered by the Board together with the confirmation of EQAR listing when deciding on the agency's membership. Should the agency not be granted the registration in EQAR or the registration is not renewed, the decision on ENQA membership will be taken based on the final review report, the application letter, and the statement from the Agency Review Committee. The decision on membership will be published on ENQA's website.

5. Indicative schedule of the review

Agreement on Terms of Reference	August 2022
Appointment of review panel members	October 2022
Self-assessment completed	15 November 2022
Screening of SAR by ENQA Review Coordinator	End November 2022
Preparation of the site visit schedule and indicative timetable	January 2023
Briefing of review panel members	January 2023
Review panel site visit	End February/Early March 2023
Draft of review report and its submission to ENQA Review Coordinator for verification of its compliance with the Guidelines	End April 2023
Draft of review report to be sent for a factual check to the agency	May 2023

Agency statement on the draft report to the review panel (if necessary)	May 2023
Submission of the final report to ENQA	End May 2023
Validation of the review report by the Agency Review Committee	End June 2023
Publication of report	End June 2023
EQAR Register Committee meeting and initial consideration	October/November 2023
Decision on ENQA membership by the ENQA Board	December 2023

ANNEX 3: GLOSSARY

ARG	Assessment and Reviews Group
AROG	Assessment and Reviews Operational Group
DAP SWNI	Degree awarding powers scrutiny Scotland, Wales and Northern Ireland
DAPs	Degree awarding powers
DfE(NI)	Department for the Economy in Northern Ireland
DQB	Designated Quality Body
ELIR	Enhancement-led Institutional Review
ENQA	European Association for Quality Assurance in Higher Education
EOEA	Educational Oversight - Exceptional Arrangements
ESG	*Standards and Guidelines for Quality Assurance in the European Higher Education Area, 2015*
FHEQ	Framework for Higher Education Qualifications in England, Wales and Northern Ireland
FQHEIS	Framework Qualification for Higher Education in Scotland
GQR	Gateway Quality Review Wales
HE	higher education
HEFCE	Higher Education Funding Council for England and Northern Ireland
HEFCW	Higher Education Funding Council for Wales
HEI	Higher Education Institution
HEQC	Higher Education Quality Council for England
HER (AP)	Higher Education Review: Alternative Providers
HER (FP)	Higher Education Review: Foreign Providers
HEQC	Higher Education Quality Council for England
IPA	International Programme Accreditation
IQA Manual	Internal Quality Assurance Manual
IQR	International Quality Review
OfS	Office for Students
PSRB	Professional, statutory and regulatory bodies
QA	quality assurance
QER	Quality Enhancement Review
QE-TNE	Quality Evaluation and Enhancement of UK Transnational Higher Education
RSEO	Review Scheme for Education Oversight
SSAC	Student Strategic Advisory Committee
SAR	self-assessment report
SFC	Scottish Funding Council
TEF	Teaching Excellence and Student Outcomes Framework
UKSCQA	UK Standing Committee for Quality Assessment

ANNEX 4. DOCUMENTS TO SUPPORT THE REVIEW

DOCUMENTS PROVIDED BY QAA

QAA provided a SharePoint space where all the documents were easily available.

The evidence was ordered by standards.

OTHER SOURCES USED BY THE REVIEW PANEL

https://www.qaa.ac.uk/ - web page QAA

https://dqbengland.org.uk/about/ - web page: Designated Quality Body in England

enqa.

European Association for
Quality Assurance in Higher Education

ENQA AGENCY
REVIEW 2023

THIS REPORT presents findings of the ENQA Agency Review
of the Quality Assurance Agency for Higher Education(QAA),
undertaken in 2023.

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Quality Assurance in Higher Education