

ENQA TARGETED REVIEW

**BRITISH  
ACCREDITATION  
COUNCIL  
(BAC)**

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ENQA TARGETED  
REVIEW 2025

**enqa.**

European Association for  
Quality Assurance in Higher Education

# CONTENTS

<b>CONTENTS</b> .....	<b>1</b>
<b>EXECUTIVE SUMMARY</b> .....	<b>3</b>
<b>INTRODUCTION</b> .....	<b>5</b>
<b>BACKGROUND OF THE REVIEW AND OUTLINE OF THE REVIEW PROCESS</b> .....	<b>5</b>
BACKGROUND OF THE REVIEW .....	5
SCOPE OF THE REVIEW .....	5
MAIN FINDINGS OF THE 2019 REVIEW .....	6
REVIEW PROCESS.....	7
<b>CHANGES WITHIN THE AGENCY</b> .....	<b>10</b>
HIGHER EDUCATION AND QUALITY ASSURANCE SYSTEM .....	10
BAC'S ORGANISATION/STRUCTURE.....	10
BAC'S FUNDING .....	11
BAC'S FUNCTIONS, ACTIVITIES, PROCEDURES .....	11
<b>FINDINGS: COMPLIANCE OF BRITISH ACCREDITATION COUNCIL (BAC) WITH THE STANDARDS AND GUIDELINES FOR QUALITY ASSURANCE IN THE EUROPEAN HIGHER EDUCATION AREA (ESG) WITHIN THE SCOPE OF THE REVIEW</b> .....	<b>12</b>
<b>ESG PART 3: QUALITY ASSURANCE AGENCIES</b> .....	<b>12</b>
ESG 3.1 ACTIVITIES, POLICY, AND PROCESSES FOR QUALITY ASSURANCE.....	12
ESG 3.3 INDEPENDENCE.....	15
ESG 3.4 THEMATIC ANALYSIS.....	16
<b>ESG PART 2: EXTERNAL QUALITY ASSURANCE</b> .....	<b>19</b>
ESG 2.1 CONSIDERATION OF INTERNAL QUALITY ASSURANCE.....	19
ESG 2.2 DESIGNING METHODOLOGIES FIT FOR PURPOSE .....	23
ESG 2.5 CRITERIA FOR OUTCOMES .....	25
ESG 2.6 REPORTING.....	27
<b>ENHANCEMENT AREAS</b> .....	<b>30</b>
<b>ESG 3.5 RESOURCES</b> .....	<b>30</b>
<b>CONCLUSION</b> .....	<b>36</b>
<b>SUMMARY OF COMMENDATIONS</b> .....	<b>36</b>
<b>OVERVIEW OF JUDGEMENTS AND RECOMMENDATIONS</b> .....	<b>36</b>

<b>SUGGESTIONS FOR FURTHER IMPROVEMENT .....</b>	<b>36</b>
<b>ANNEXES.....</b>	<b>38</b>
<b>ANNEX 1: PROGRAMME OF THE SITE VISIT .....</b>	<b>38</b>
<b>ANNEX 2: TERMS OF REFERENCE OF THE REVIEW .....</b>	<b>43</b>
<b>ANNEX 3: GLOSSARY .....</b>	<b>51</b>
<b>ANNEX 4. DOCUMENTS TO SUPPORT THE REVIEW .....</b>	<b>52</b>
I. DOCUMENTS PROVIDED BY BAC.....	52
II. ADDITIONAL DOCUMENTS PROVIDED BY BAC, BEFORE AND DURING THE VISIT, ON REQUEST OF THE REVIEW PANEL.....	53
III. OTHER SOURCES USED BY THE REVIEW PANEL .....	53



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## EXECUTIVE SUMMARY

This report analyses the compliance of the British Accreditation Council for Independent Further and Higher Education (BAC) with the *Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG 2015) Part 2 and 3*. The report is based on an ENQA targeted peer review, following the methodology described in the Guidelines for ENQA Targeted Reviews and considering the *Use and Interpretation of the ESG* by the EQAR's Register Committee. In addition to the agency and its stakeholders, the report is meant to provide information for the ENQA Board's decision on BAC's renewal of membership and to EQAR to support the agency's reapplication to the register.

The external targeted review was conducted from March 2024 to February 2025, with a site visit of the review panel in charge of the evaluation taking place between September 23 and 25, 2024.

BAC was established by law in 1984 by the Department for Education and British Council to provide comprehensive quality assurance for independent further and higher education in the UK. The agency has kept, over time, the initial purpose for which it was established, at the same time expanding its activity outside the UK. Currently, it carries out accreditations under six accreditation schemes, one of which is intended for higher education.

Based on the Terms of Reference for this targeted review, the panel has analysed the sole activity related to higher education falling under the scope of the ESG: Accreditation of higher education institutions. This activity has been conducted by the agency since its beginning, currently being achieved under the 'Independent Higher Education Scheme', which has been operational since 2015, with a slight revision in 2023.

The ESG specifically addressed in this targeted review are *2.1 Consideration of internal quality assurance*, *ESG 2.6 Reporting* and *ESG 3.4 Thematic analysis*, of which the latter two were found partially compliant at the last EQAR Register Committee's renewal decision, and *ESG 2.2 Designing Methodologies Fit for Purpose*, *ESG 2.5 Criteria for Outcomes*, *ESG 3.1 Activities, Policy and Processes for Quality Assurance*, *3.3 Independence* - standards under EQAR's attention because of the substantive changes occurred in the agency's activity since the last ENQA review. *ESG 3.5 Resources* is addressed in the report as an enhancement area selected by BAC.

The panel considered the evidence given in the self-assessment report, additional evidence requested by the panel and provided by the agency (full list of additional documentation is in Annex 4) and performed an onsite visit which included meetings with a wide range of participants. The panel thoroughly analysed and discussed all the evidence and concluded that BAC complies with the ESG as presented in the summary table below. Since the last ENQA review, the agency has made certain progress in relation to ESG 3.4 and 2.6, which were previously found partially compliant; however further work is expected from BAC for these standards to be entirely fulfilled.

Regarding the self-selected enhancement area, i.e., ESG 3.5 Resources, the review panel sees a great potential in linking it with the further development of the agency's thematic analysis activity (ESG 3.4), including the publication of reports on general findings and themes from BAC inspections, and with the further development of the analytical content of BAC's inspection reports (ESG 2.6), so that reports may better support the production and publication of thematic analyses. In the panel's view, such measures would support several of the goals set by BAC for the enhancement area, for example, added value for the agency's stakeholders, increased visibility of BAC's expertise and activities, and intensified participation in policy and system-level discussions, all of which may in turn contribute to BAC's overarching goal to sustain its quality brand and to expand and attract new providers.

Finally, the panel applauds the agency's constant preoccupation with maintaining its accreditation standards fit for purpose and for the high relevance of the IHE Scheme reviews for providers and development of their internal quality assurance systems.

### Summary of agency's compliance with the ESG (Parts 2 and 3)

ESG	Compliance according to the targeted review <sup>1</sup>	Compliance transferred from the last full review <sup>2</sup>
2.1	Compliant	N/A
2.2	Compliant	N/A
2.3	N/A	Fully compliant → Compliant
2.4	N/A	Substantially compliant → Compliant
2.5	Compliant	N/A
2.6	Partially compliant	N/A
2.7	N/A	Fully compliant → Compliant
3.1	Compliant	N/A
3.2	N/A	Fully compliant → Compliant
3.3	Compliant	N/A
3.4	Partially compliant	N/A
3.5	N/A	Substantially compliant → Compliant
3.6	N/A	Fully compliant → Compliant
3.7	N/A	Fully compliant → Compliant

Overall, the review panel found BAC to be compliant with the ESG.

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<sup>1</sup> Compliance refers to the focus areas that were evaluated in depth and are part of the Terms of Reference, i.e., standards that were only partially compliant with the ESG during the last full review, ESG Part 2 for newly introduced or changed QA activities of the agency, ESG 2.1 for all QA activities and any standard affected by substantive changes since the last full review. If any of the standards of Part 2 of the ESG are covered due to the newly introduced or changed QA activities, a remark “for new or changed QA activities only” is added in brackets to the compliance assessment.

<sup>2</sup> Compliance refers to the last EQAR Register Committee decision for renewal of inclusion on the Register, or in case when an agency is not renewing its registration in EQAR, compliance refers to the last ENQA Agency Review report and should its judgement differ from that of the panel, the judgement of the ENQA Board, as stipulated in the membership decision letter by the ENQA Board. Compliance refers to the QA activities of the agency that were reviewed during the previous full review.

# INTRODUCTION

This report analyses the compliance of the British Accreditation Council for Independent Further and Higher Education (BAC) with the *Standards and Guidelines for Quality Assurance in the European Higher Education Area* (ESG). It is based on an external review conducted in eleven months (from March 2024 until February 2025) and should be read together with the external review report of the agency's last full review against the ESG. The review has been commissioned to provide information for the ENQA Board's decision on BAC's renewal of membership and to EQAR to support the agency's reapplication to the register.

## 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.

Registration on EQAR is the official instrument established by the European Higher Education Area (EHEA) for demonstrating an agency's ESG compliance. An external review is a prerequisite for registration.

BAC has been a member of the ENQA since 2015 and, also since that year, it has been registered on EQAR. As BAC has undergone two successful reviews against the ESG Parts 2 and 3, it is eligible and has opted for a targeted review. The purpose of a targeted review is to ensure the agency's compliance with the ESG by covering standards that were found partially compliant during the agency's last renewal of registration in EQAR and on standards that could have been affected by substantive changes<sup>3</sup> during the past five years while at the same time further strengthening the enhancement part of the review.

### SCOPE OF THE REVIEW

From the beginning of the review process, the panel took note of the Terms of Reference (ToR), which set the scope for the review. The following external quality assurance activity conducted by BAC is deemed to be within the scope: Accreditation of Higher Education Institutions.

This report also deals with each of the focus areas below (ToR, p. 2):

A) Standards with a partial compliance conclusion in the Register Committee's last renewal decision:

a. ESG 2.6 – Reporting

Consider how the agency ensures that the external review reports consistently include evidence, analysis, and findings so as to demonstrate how the conclusions are reached.

Consider how the agency ensures that the external review reports include enough qualitative insights so the Accreditation Committee of the agency can examine institutions' internal quality assurance processes based on the reports.

b. ESG 3.4 – Thematic Analysis

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<sup>3</sup> e.g. organisational changes, the launch of new external QA activities.

Consider how the agency ensures the thematic review reports to be analytical and how they have addressed this issue since the last external review.

- B) Standards affected by other types of substantive changes<sup>4</sup>:
- a. ESG 2.1 Consideration of Internal Quality Assurance  
Analyse whether the revised standards of Accreditation of Higher Education Institutions cover all aspects of ESG in practise.
  - b. ESG 2.2 Designing Methodologies Fit for Purpose  
Address whether the updated standards of Accreditation of Higher Education Institutions are fit for purpose to achieve the aims and objectives set for it.
  - c. ESG 2.5 Criteria for Outcomes  
Consider whether the revised standards of Accreditation of Higher Education Institutions are consistently implemented.
  - d. ESG 3.1 Activities, Policy and Processes for Quality Assurance  
Analyse whether the updates in the Terms of References of BAC's Board of Trustees, Standing Committee and Audit Committee changed stakeholders' involvement in the agency's governance and work compared to the last review.
  - e. ESG 3.3 Independence  
Analyse whether the updates in the Terms of References of BAC's Board of Trustees, Standing Committee and Audit Committee changed stakeholders' involvement in the agency's governance and work compared to the last review.
- C) ESG 2.1 Consideration of internal quality assurance.  
D) Selected enhancement area: ESG 3.5 Resources.

The agency also carries out activities which are outside the scope of the ESG and are not included in this review: Accreditation and inspection of non-higher education institutions and Non-accreditation activities.

For the ToR, please see Annex 2. For the glossary of terms used, please see Annex 3.

## MAIN FINDINGS OF THE 2019 REVIEW

The previous ENQA review took place in 2019, and its findings were also used for BAC's listing on EQAR. With respect to the ESG (2015) EQAR found BAC compliant with all the standards except for *ESG 2.6 Reporting* and *ESG 3.4 Thematic analysis*, where the agency was found partially compliant. These are further elaborated in the section of this report presenting the current review's findings of BAC compliance with ESG (starting at p. 12). EQAR concluded that, overall, BAC continued to comply substantially with the ESG.

The 2019 review also listed a couple of points of attention as recommendations to BAC on the specific standards:

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<sup>4</sup> See the EQAR Register Committee decision on the [Substantive change report of 2024-07-02](#)

- Strengthen BAC’s approach to strategic planning, ensuring that plans are robust, that they explicitly translate into the daily work of the organisation, and that the success of their implementation is routinely considered by the Council (ESG 3.1);
- Introduce student and international members of the Accreditation Committee who attend every meeting during their term, rather than rotating attendance between a pool of members (ESG 3.1);
- Develop an approach to thematic reviews which is more analytical in nature with appropriate commentary on the issues identified, more clearly driven by predetermined outcomes, and has an impact on the approach to quality assurance taken by BAC and accredited higher education providers (ESG 3.4);
- Build capability in the core staff team that better enables it to enhance their understanding of international higher education trends and developments and hence to better reflect on current practice and to inform member institutions and the public about its activities in line with its strategic plan (ESG 3.5);
- Strengthen the coverage of ESG 1.4 in the inspection process so that the provider’s policy on the recognition of qualifications is specifically considered, taking note of most recently available international guidance on the matter (ESG 2.1);
- Evolve the inspection process and the Accreditation Committee’s decision making to more explicitly address the effectiveness of the internal quality assurance processes described in Part I of the ESG (ESG 2.1);
- Clearly separate the functions of staff and inspectors, including the role of the Chief Inspector (ESG 2.4);
- Further strengthen the transparency of how inspections consider the effectiveness of providers’ internal quality assurance processes in the published reports by increasing their analytical content and listing the inspectors involved (ESG 2.6).

After the external review in 2020, BAC was granted ENQA membership for five years and inclusion on the EQAR Register until 28 February 2025.

In 2022, the agency submitted to ENQA a follow-up report on recommendations in the panel report, which was approved by the ENQA Board. Some of the actions taken by the agency to address the recommendations, such as revision of standards of Accreditation of Higher Education Institutions and updating the Terms of References of BAC's Board of Trustees, Standing Committee and Audit Committee, were considered to have led to substantial changes. As a result, in 2024 the agency submitted to EQAR a substantive change report for introducing the changes in the agency’s activity (Accreditation of Higher Education Institutions) and those in the agency’s committee regulations. The Register Committee approved the changes while noting that the current review should analyse whether the revised standards are in line with ESG 2.1, ESG 2.2 and ESG 2.5, as well as whether the changes in the committee regulations have substantial impact on stakeholders’ involvement in the agency’s governance (ESG 3.1) and on the agency’s independence and autonomy (ESG 3.3).

The review panel therefore acknowledges, in this report, the status of the ESG standards that were found to be in compliance with the ESG during the last full review, at the same time addressing EQAR’s remarks.

## REVIEW PROCESS

The 2024 external targeted review of BAC was conducted in line with the process described in the *Guidelines for ENQA Targeted Reviews*, the EQAR Procedures for Applications, and in accordance with

the timeline set out in the Terms of Reference. The panel for the targeted review of BAC was appointed by ENQA and composed of the following members:

- Ulf Hedbjörk, Senior Analyst, Department of Quality Assurance, Swedish Higher Education Authority (UKÄ), Sweden, Chair, quality assurance professional (ENQA nominee);
- Simona Lache, Professor and Vice-Rector for Internationalisation and Quality Evaluation, Transilvania University of Brasov, Romania, Secretary, academic (EUA nominee);
- Harry Michael Williams, Senior Scientist, Bernhard Nocht Institute for Tropical Medicine (BNITM), Hamburg, Germany, Quality assurance professional (ENQA nominee);
- Ana Gvritishvili, PhD Student, Ivane Javakhishvili Tbilisi State University, Georgia, Student (ESU nominee, member of the European Students' Union Quality Assurance Student Experts Pool).

Ms. Milja Homan (project and reviews officer at ENQA), acted as the review coordinator.

BAC elaborated a self-assessment report (SAR) which, in conjunction with the documents produced for and as a result of the 2019 ENQA review, provided the basis for the review panel's work. Panel members received the SAR from BAC on 18 July 2024 and immediately began to evaluate its contents according to the provisions of the ToR. The panel's introductory meeting with the ENQA coordinator took place online, on 19 July 2024 (as initially scheduled), and was followed by the panel's kick-off session and the clarification meeting with the agency's resource person – both held online, on 10 September 2024. The meeting with the agency's resource person, also attended by the Chief Executive of BAC, helped to clarify the agency's changes since the last full review against the ESG and to understand the background and motive of the agency's choice of the self-selected ESG standard for enhancement (next to the overall HE and QA context of the agency).

The review panel's pre-visit meeting and preparations for day 1 were organised in person on 22 September 2024. The panel conducted an onsite visit to BAC from 23 to 25 September 2024, where it further examined both the claims made in the self-assessment report and cross-checked other evidence as provided by the agency. The panel was also able to clarify any points at issue. Finally, the review panel produced the external review report based on the following sources: the SAR, additional information provided by the agency upon the panel's request, information collected during the site visit, and other evidence (e.g., website, previous external evaluation reports). In doing so, the panel provided an opportunity for BAC to comment on the factual accuracy of the draft report. The review panel confirms that it was given access to all documents and persons it wished to consult throughout the review process.

### **Self-assessment report**

For conducting the self-evaluation process and producing the SAR, the agency appointed the Higher Education Manager as internal lead, who worked together with a group consisting of the Chief Executive, Deputy Chief Executive and BAC Senior Advisor (External). Throughout the process, both the agency's staff and members of the Council and the Standing Committee were periodically informed about the timeline and development of activities. At the same time, the development of the SAR was done with the active involvement of the staff and the consultation of various stakeholders - committee members, trustees, inspectors (i.e., peer-review experts), representatives of accredited providers - within the events organised by the agency in this regard. The SAR was formally approved by the Standing Committee and submitted to the Council at its June 2024 meeting.

Following ENQA's screening of the SAR, it was found that some of the changes introduced by BAC in its activity since the last review should be reported to EQAR as substantive changes. The agency

followed this recommendation and submitted the substantive changes report to EQAR in June 2024. As a result of EQAR's approval of the report (on 2 July 2024), the SAR was supplemented with information related to other four standards (ESG 3.1, 3.3, 2.2 and 2.5) regarding which EQAR considered it necessary to be analysed as a part of BAC's next renewal of registration. This was achieved after ENQA and BAC agreed on revising the ToR in accordance with EQAR provisions and explained the delayed term to which the SAR was provided to the review panel members.

The SAR was structured in four parts: the first presents the background and context of the organisation, how the self-assessment process was conducted and the developments of the agency since the previous ENQA review; the second part includes a discussion on focus areas: standards where the organisation is focused on compliance (ESG 2.1 and ESG 2.6 and 3.4 which were found as 'partial compliant' at the 2019 review), ESG 3.5 where the focus is on enhancement and standards on request from the EQAR Register Committee following the submission of substantive changes reports to EQAR (ESG 2.2, 2.5, 3.1 and 3.3). The SAR mentions that the information provided about this last category of standards is not designed to address the whole standard, but to demonstrate that the changes made by BAC do not affect their compliance with the ESG. The last two parts of the document present the SWOT analysis and the Conclusions.

The review panel considers that the SAR was very well prepared and structured, the information presented being sound and clear, relevant and useful for the panel members, but also for the agency to support further enhancement. In its attempt to understand as much as possible the context in which BAC operates and its activities, the review panel analysed the SAR together with the documents of the previous ENQA full review (SAR, ERR, etc.) and with other additional material requested from and provided by the agency previously to the site visit.

### **Site visit**

The site visit took place in person at BAC's premises in London, between 23-25 September 2024, and was preceded by pre-visit and preparatory meetings, according to the visit schedule agreed upon with the agency (Annex I). The visit was well organised and allowed the panel to meet and interview key internal and external stakeholders of the agency: BAC's Chief Executive and the Chair of the Council (Board of Trustees), Deputy Chief Executive, Chief Inspector, Higher Education Manager, Accreditation Manager, chairs of the Accreditation, Standing and Audit committees, members of the Accreditation Committee, BAC's permanent staff in charge with the day-to-day managing in relation to HE accreditation, members of the experts' pool including students, heads and quality officers of the higher education institutions accredited by BAC. The findings from the meetings were triangulated with the self-assessment report and the documentary evidence as provided by the agency in advance, which altogether allowed the panel to come to conclusions and judgements on the compliance as presented in this report. A special attention was given by the panel to how to approach the enhancement session, which was finally organised as a workshop with participants from the agency's leadership, staff and an external expert who was also involved in the self-evaluation process. The agency staff responded swiftly to panel's requests, and they were open to panel's feedback, thus fostering engagement in meaningful discussions carried out in a collegial working atmosphere.

The panel wishes to convey its thanks to all involved parties that dedicated their time to meet with and help the panel to better understand the activities of BAC and the context within which it operates. The frankness of communication and the openness shown by the interviewees are very much appreciated.

At the end of the site visit, the panel held a final internal meeting to discuss and agree on the preliminary conclusions on the level of compliance of BAC on each of the ESG standards under the scope of the targeted review. At the same time, the panel discussed the main findings on ESG 3.5 and formulated suggestions for enhancement accordingly. An oral feedback report was provided to the agency during the final debriefing session. The panel secretary drafted the report in cooperation with the rest of the panel. The draft report was submitted to BAC for fact checking on 4 December 2024. The final version was sent to ENQA on 20 December 2024.

## CHANGES WITHIN THE AGENCY

### HIGHER EDUCATION AND QUALITY ASSURANCE SYSTEM

The higher education system in the United Kingdom (UK) is well-established and highly regarded globally, known for its rich history, diversity of institutions, and academic rigour. It includes universities, university colleges, further education colleges and alternative providers that offer a wide range of degree programmes and qualifications.

Up to 31 March 2023 the primary body responsible for overseeing quality assurance in UK higher education was the Quality Assurance Agency for Higher Education (QAA). After QAA stepped back from this position UK has continued to maintain the standards of education through the Office for Students (OfS) - the independent regulator for higher education in England that oversees funding, student interests, and quality. The OfS focuses on ensuring that institutions deliver quality education that meets the needs of students, particularly in relation to teaching standards, employability, and overall value for money.

In the devolved nations, Scotland, Wales, and Northern Ireland have their own quality assurance mechanisms. Scotland, for instance, operates under a system called Enhancement-led Institutional Review (ELIR), which places a strong emphasis on continuous improvement and student engagement. Welsh institutions work with the Higher Education Funding Council for Wales (HEFCW), while Northern Ireland aligns more closely with the frameworks of both QAA and OfS.

In the UK higher education quality assurance landscape, BAC's position has not changed since the last ENQA review: 'it continues to be non-regulatory, with all directions for accreditation being independently governed and autonomously implemented' (SAR, p. 7).

### BAC'S ORGANISATION/STRUCTURE

In recent years, BAC's organisation/ structure and governance has registered slight changes, which the agency explains by its attempt to comply with the recommendations made by ENQA in the previous review, on one hand, and to respond to needs identified by collecting feedback from internal stakeholders, on the other hand. The following changes are to be mentioned:

- The inclusion of international members and student representatives in both the Council and Accreditation Committee.
- The inclusion of an independent financial expert, a non-Council member, in the Audit Committee since May 2024.
- The establishment of the position of Deputy Chief Executive, to support the Chief Executive in overseeing BAC processes and improve governance.
- The revision of ToR for each of the committees, to ensure their continued fitness for purpose.

Despite these small revisions of the structure and governing documents, the panel found that the agency maintains its governance by the Council consisting of 12 trustees, as well as the operational

structure through the three committees - Audit Committee, Standing Committee and Accreditation Committee - to which the operational attributions are delegated and which report to the Council. The day-to-day activity is carried out by 9 permanent staff consisting of the senior management team (Chief Executive, Deputy Chief Executive, Chief Inspector, Higher Education Manager and Accreditation Manager) and all other staff who sit in roles that report to that team.

## BAC'S FUNDING

BAC continues to be registered as a UK charity, as it always has; the review panel did not see any changes in its funding since the previous full review in 2019. As read in the Annual Report 2021-2022, most of the agency's income comes from the fees paid by providers upon application and for each inspection undertaken, while expenditure is related to salaries of the staff and run cost of the services provided, charitable activities and investments. The Annual Report summary 2022-2023 mentions a total income of £735,709 (increased by £115,262 compared with the previous year) and direct expenditure, increased by approximately 16%, reaching £185,843 in 2023 compared with £152,578 in 2022. Investments in this period registered a slight decrease, explained by the agency as being due to the trends on the global financial market.

## BAC'S FUNCTIONS, ACTIVITIES, PROCEDURES

The agency's functions, activities, and procedures are being implemented as described in the 2019 ENQA review report. The Accreditation of Higher Education Institutions continues to be the only external quality assurance activity conducted by BAC within the scope of the ESG and it is implemented under the Independent Higher Education (IHE) Scheme.

As presented in the SAR, the IHE Scheme has been operational since 2015 and has been revised in 2023, which contributed to its alignment with the other schemes offered by BAC and to the development of the Common Quality Framework of the agency. The SAR describes the key outcomes of this revision (avoid repetition, ensure the scheme was still fit for purpose, up to date, continues to serve the needs of BAC providers and demonstrates that it responded to the recommendations given by ENQA in the previous full review relating to the inspection of internal quality assurance arrangements at providers being accredited under the IHE Scheme). At the same time, it is mentioned that the revision has not affected the eligibility criteria, methodology applied, quality standards and processes underpinning decision-making, which have remained the same since the previous ENQA review and none of the procedural elements have been subject to significant changes.

# FINDINGS: COMPLIANCE OF BRITISH ACCREDITATION COUNCIL (BAC) WITH THE STANDARDS AND GUIDELINES FOR QUALITY ASSURANCE IN THE EUROPEAN HIGHER EDUCATION AREA (ESG) WITHIN THE SCOPE OF THE REVIEW

## 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.

#### 2019 review recommendation and ToR's provision:

ENQA: 'Strengthen BAC's approach to strategic planning, ensuring that plans are robust, that they explicitly translate into the daily work of the organisation, and that the success of their implementation is routinely considered by the Council.'

'Introduce student and international members of the Accreditation Committee who attend every meeting during their term, rather than rotating attendance between a pool of members.'

ToR, paragraph 2.1, pct. C)-d: 'Analyse whether the updates in the Terms of References of BAC's Board of Trustees, Standing Committee and Audit Committee changed stakeholders' involvement in the agency's governance and work compared to the last review'.

#### Evidence

This standard was found 'substantially compliant' at the previous ENQA review and 'compliant' by the EQAR Register Committee. It was however included in the current targeted review due to substantial changes made by the agency in the ToR of the Council (Board of Trustees), Standing Committee and Audit Committee. The review team was tasked by EQAR to analyse whether the updates in the ToR fundamentally changed stakeholders' involvement in the agency's governance and work compared to the last review.

BAC explains in the SAR the reason for revising the ToRs of the Council and committees as a consequence of reviewing its Articles of Association, to ensure their continued fitness for purpose. The revision of the ToRs focused particularly on ensuring consistency across the documents, improving the clarity of the language used, simplifying the documents where possible, removing or revising items that were out of date or no longer required; updating procedures that reflected current practices, such as moving meetings online (facilitating stakeholder participation in governance activities). The updated ToRs were approved by the Council in June 2022 and are reviewed on an annual basis. During the site visit, the review panel was able to confirm that annual reviews of all committees' ToRs took place in October 2022 and 2023 and were scheduled for

review in October 2024. No substantive changes beyond those made in 2022 have resulted from the two annual reviews available to the panel.

According to the SAR, the annual revision of ToRs 'ensures ongoing responsiveness to stakeholders' needs, further supporting their involvement in BAC's governance and work. [...] By focusing on consistency, clarity, and simplicity, the changes make it easier for stakeholders to understand and engage with BAC's governance processes. The removal of outdated items helps ensure the processes are efficient and effective. This therefore has had positive implications for stakeholder involvement.' All stakeholders the panel spoke to see the revision of ToRs as a consistent process, with very good results in terms of improved clarity and soundness.

During the interviews with heads and quality assurance officers of some recently reviewed HEIs, all participants appreciated the annual stakeholders' events, webinars and other BAC support activities, which were considered of great help for understanding the agency's processes and procedures and to provide feedback. The same opinion was found when discussing with inspectors and student inspectors; they are invited to the annual events for inspectors, considered as a good communication platform providing opportunities for getting updated information about the agency's developments and for offering feedback on processes conducted by inspectors.

Regarding its governance, the agency addressed the recommendation of the previous review and included a student and an international member in the Accreditation Committee. This is stated in the current ToR of the committee (article 3.2: 'The committee will include an international member and a student member [...]'), which also regulates the fixed term position (no longer rotating) of the student (article 3.4: 'Student members will be appointed to the committee for a term of three years and may be reappointed for one further term.'). At the time of the site visit, the panel was able to confirm that the composition of the Accreditation Committee had been updated according to the ToR. From the discussion with the student member in the Council the panel understood that students were sometimes individually invited by the agency to apply for different positions in committees, not necessarily applying through the open call.

At the same time, the review panel noticed that the participants in the panel's site visit meeting with stakeholders, such as employers, students, local community were all Council members and not external partners, as the panel would have expected. The agency explained that given their specific role in the external quality assurance landscape of the UK (i.e., not being a governmental organisation/regulator body) it does not interact directly with student organisations and the student voice is heard solely through the student inspectors they collaborate with for implementing processes and student meetings during the inspections.

The EQAR Register Committee noted (2024-07-03) that an independent financial expert had been added to the Audit Committee in May 2024, and that BAC had also introduced a new position in its governance structure - Deputy Chief Executive. The review panel found that the inclusion in the Audit Committee of an independent financial expert is in compliance with the ToR of the Audit Committee (article 3.1), and with BAC's Articles of Association (article 16.2). At the same time, the panel read in the SAR and confirmed during interviews that the Deputy Chief Executive is the former Governance and Business Development Manager, created in 2021, whose key responsibilities include oversight of the maintenance of the BAC strategy and related actions; oversight and management of the Council and Committees such as recruitment, preparation of papers and governance reviews; as well as support to the Chief Executive with responsibilities for general management and day to day running of BAC.

## **Analysis**

Based on the evidence from the SAR, annexes, and interviews mentioned above, it was clear to the review panel that the updates in the Terms of Reference of BAC's Board of Trustees (Council), Standing Committee, and Audit Committee have strengthened stakeholders' involvement in the agency's governance and work compared to the last review. This was especially facilitated by the updates made to the terms of reference, the clearer provisions and templates of the supportive documents, which ensured their continued fitness for purpose and gave the opportunity to establish a very good communication between the agency and its stakeholders (mainly providers and inspectors). In the panel's view, BAC attaches great importance to stakeholders' involvement in the agency's governance and operations and succeeds to achieve this even better since the revision of the ToRs. In addition, the annual reviews of the ToRs are likely to bring any further needs for amendments of the ToRs to the attention of Council and Committees, and to the stakeholder representatives in these.

The panel welcomes BAC's initiative to introduce a fixed term position for the student member of the Council, instead of the rotating option applied in the past. However, it thinks it might be to the benefit of the organisation to recruit students for its Council and committees more actively by open calls and not by relying on individual invitations, as the panel heard during interviews is sometimes the case now.

At the same time, although it is acknowledged that BAC is a non-governmental organisation and, therefore rather able to listen to the voice of students, as stakeholders, than to convey their messages to regulatory bodies, the review panel encourages BAC to adopt a far more proactive approach to engaging student representatives and working with student bodies; this could enhance the agency's operations, while also contributing to increased promotion of BAC on the quality assurance market. In this respect, the panel believes it would be both possible and beneficial to the agency's strategic plans for them to at least consider establishing a regular relationship with student associations or the like. If not always possible in the agency's international accreditation and growth plans, they are an important QA body for the independent HE sector in the UK, where such relationships would seem natural and beneficial to both agency and students.

The review panel is convinced that the creation of the two new positions in BAC's governance structure, Deputy Chief Executive and independent financial expert added to the Audit Committee, has had no impact on stakeholders' involvement in the agency's governance and work. During the interviews, the panel did not detect any concerns in relation to this matter.

### **Panel suggestions for further improvement**

1. The panel suggests that the agency use open calls more actively when recruiting students for its governing bodies.
2. The panel suggests that the agency consider the value of adopting a more proactive approach to involving student representatives and working with student bodies.

### **Panel 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.

**ToR's provision:** ToR, paragraph 2.1, pct. C)-e: 'Analyse whether the updates in the Terms of References of BAC's Board of Trustees, Standing Committee and Audit Committee affected agency's independence and autonomy compared to the last review'.

### Evidence

This standard was found 'fully compliant' at the previous ENQA review. The 2019 external review report explained in detail how BAC ensured organisational and operational independence, as well as independence of formal outcomes. In 2022 the agency revised the ToRs of the Council and the committees; the context of this revision and the updates to ToRs are presented under 3.1.

The panel read the revised documents and found that the changes were made to improve clarity of the text, ensure consistency across all documents and allow practices learned during the pandemic which could increase the accessibility of stakeholders to the agency's governance (e.g., meetings online). All participants in interviews (Chief Executive and Chair of the Council, chairs of the Accreditation, Standing and Audit committees, members of the Accreditation Committee, experts/inspectors – including students, agency staff) confirmed that the updated ToRs had no influence on BAC's independence and autonomy; on the contrary, they contributed to Council and committees' membership enhancement, in the sense of greater consistency and clarity, and reducing overlaps. The agency has maintained the same procedure for selecting members of the Council and committees, as well as inspectors, by launching calls, followed by reviewing expressions of interest and conducting interviews. At the same time, it has kept clear provisions regarding declaration of conflict of interest, which are consistently applied for all activities carried out by the committees or by inspectors.

The review panel read in the SAR about the emergence of two new positions in BAC's flowchart, the context of which is explained under ESG 3.1. During the site visit it became clear to the panel that the Deputy Chief Executive position was established to support the Chief Executive in overseeing BAC processes and improve governance, thus addressing the post-pandemic challenges of the agency (details about responsibilities of this position are presented under ESG 3.1). Regarding the inclusion of the independent financial expert in the Audit Committee, the panel was explained that this was in response to the committee's feedback about having a non-Council member with independent views in overseeing and managing the finances. The financial expert's role is to provide reassurance to the Council that the finances are overseen, but also to launch challenges to the Council from an independent expert position.

### Analysis

It is clear to the panel that BAC has retained its independence and autonomy, factors which have been acknowledged by all previous ENQA reviews. From all the evidence gathered, both documents and outcomes of interviews, the panel is able to affirm the findings and conclusions presented in the 2019 ENQA report. There is no doubt that the updates on the ToR of BAC's Council (Board of Trustees), Standing Committee and Audit Committee had no influence on the agency's independence and autonomy compared to the last review.

**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.

### **2019 review recommendation and ToR's provision:**

ENQA: 'Develop an approach to thematic reviews which is more analytical in nature with appropriate commentary on the issues identified, more clearly driven by predetermined outcomes, and has an impact on the approach to quality assurance taken by BAC and accredited higher education providers.'

ToR, paragraph 2.1, pct. A)-b: 'Consider how the agency ensures the thematic review reports to be analytical and how they have addressed this issue since the last external review.'

### **Evidence**

The SAR describes BAC's approach to thematic analysis, which it began to outline with the publication of the first and only report of this type, prior to the 2019 ENQA review. This was a thematic analysis on the IHE Scheme and, according to the SAR, was used to establish a baseline to extend discussions towards other accreditation schemes offered by BAC, covering all categories of providers.

One of the findings from BAC's 2019 thematic analysis (Thematic Review 2015-2018, p. 22) was that the agency's 'inspection reports provide a reliable and consistent evidence base. They are a valuable resource to BAC, individual institutions, and the wider constituency of stakeholders', and that 'reports offer a consistent and coherent evidence base for thematic reviews'; further, the agency 'could consider how to more systematically capture, evaluate, and report the enhancements that are brought about through its inspections. This would constitute a helpful record at the level of individual institutions, and through periodic collation and reporting, offer a potentially valuable overview of impact, in terms of systematic improvements in the independent higher education sector. It could also potentially function as a resource for identifying and sharing good practice within the BAC community of inspectors and institutions, and more widely in the sector.'

Following the findings from the above-mentioned document, the agency considered the recommendation of the review panel from the last ENQA review and explained, in the Follow-up Report of May 2022 the actions completed so far, i.e., organising focus groups 'to identify key issues and confirm them collectively with inspectors and providers, testing their applicability for other types of providers'. The report also included the planned actions meant to consolidate the impact of thematic analysis: implementation of a CRM system, piloting of the liaison scheme (explained below), review of all schemes and inspection standards as part of BAC's Standard Framework review.

During the site visit, the panel talked to several people, including the independent expert specially hired by BAC to moderate the focus groups; all confirmed the focus groups discussions were helpful and supported BAC in shaping their approach to thematic analysis, which BAC described as 'to ensure full benefit for both the agency's work and for accredited providers, rather than moving into contracting another written thematic analysis report' (SAR, p. 23).

The liaison scheme is mentioned in the SAR as one of the themes emerging from the focus groups, designed for supporting providers to enhance their internal quality assurance. Launched at the 2022 Annual Event organised by BAC, it has been put on hold, but the agency intends to resume the

liaison scheme implementation once issues regarding infrastructure and conflict of interest (of institutions undergoing BAC accreditation and also working with BAC to enhance its internal processes) are clarified. The explanations the panel read in the SAR about the liaison scheme and then, about the fact that it was paused, were confirmed by the comments of participants in interviews with different target groups the panel met during the site visit.

During the site visit the panel learned about the recent investment in the CRM system, which is also described in the agency's action plan as an intended support for data management.

Regarding the common understanding of thematic analysis, BAC's views are stated in the SAR and strongly supported by its leadership during interviews: 'Due to the dispersed nature of (...) providers, with very few clusters of institutions in any one country, as well as the variation in the types of providers, BAC decided not to repeat the same type of written thematic analysis report.' At the same time, the agency presents its own view on thematic analysis approach, as a means 'to developing inspection methodologies and enhancement workshops'. In this respect, the BAC 2021–2026 Strategy includes reference to thematic analysis in a systematic way and the SAR (p. 23-24) describes ways of how the agency sees the implementation of goals related to thematic analysis: 'committed to investing more time and effort into making thematic reviews and analysing common issues emerging from inspections, integrating them into a developmental item in the future'; 'moving towards confirming a multi-activity approach to thematic analysis' (...) 'mixed approach that includes analysis of reports and feedback from reviews, direct discussions as part of focus groups and other types of events so that the prioritisation of conclusions can result in effective resource management' (...) 'small team, BAC must remain responsive and agile. We can do this only if we approach thematic analysis from multiple angles and with multiple activities conducive to stakeholder engagement and considerate of their engagement preferences.'

The panel learned from the interview with BAC's staff that, in their views, the Common Quality Framework offered by the agency and the systematic actions conducted to support providers' quality enhancement are relevant outcomes of thematic analysis.

The interviews with providers (heads of institutions and quality assurance officers) revealed that there was interest in a more direct way to benefit from findings provided in reports on different key issues; in their view, this would complement the already acknowledged indirect way in which institutions are able to access information from BAC by workshops, seminars, stakeholders' events, etc.

## **Analysis**

BAC has used the 2019 thematic analysis report as a starting point for a process to define an approach that is fit for purpose, effective and resource efficient.

In addition, the agency has included a goal in their Strategy 2021-2026, stating that they will continue to develop good practice in its integrated use of the data and information collected from BAC's inspections and other work; this will be achieved by, among others, using thematic reports to influence the direction for the development of inspection methodologies as well as themes for enhancement workshops.

However, the review panel notes that BAC's interpretation of ESG 3.4 does not fulfil the whole standard but covers it partially in a manner fit-for-purpose given their context (as described in the SAR and presented above, in the 'Evidence' section).

At the same time, the panel acknowledges the efforts made by the agency as a response to the recommendation in the last review, by carrying out a reflective process (from the only thematic review report so far) with close stakeholder involvement. This has resulted in a strategic choice on

how to progress with their thematic analysis activity in a multi-activity approach that aims to optimise benefit to providers/stakeholders and responsible use of the agency's human and financial resources. The interviews have confirmed that the agency has advanced in prioritising and accelerating the sharing of themes extracted from inspections and examples of good practice within their provider community. Also, as the agency is not a regulatory body and does not conduct mandatory external quality assurance, it seems natural that they should focus their efforts on thematic activity that is of direct benefit to their diverse provider community, rather than to the national (UK) higher education system.

As BAC has only published one thematic analysis report ('thematic review') in the last five years, which was published just before the last ENQA full review, this is undoubtedly a major shortcoming with regard to compliance with ESG 3.4. A planned second report mentioned by EQAR's Register Committee in their reconfirmation of registration 2020 was never realised (presumably due to the strategic choice of the agency mentioned above not to produce traditional thematic reports). However, the agency's arguments for completely ruling out reports are not convincing to the panel.

In spite of the agency's arguments against thematic analysis reports in their context, thematic analyses of general findings from the agency's inspections would actually seem feasible and beneficial to their providers, other stakeholders, and the wider national, regional or international higher education context. The agency gathers a great deal of data from inspections, and the recent investment in a CRM system should also be beneficial to producing thematic analysis reports.

The panel also heard from HEIs interviewed during the site visit that they considered that, indirectly BAC already does thematic analysis (through various activities), but also that the agency could do it also directly, i.e., through inspection reports' findings. This is something HEIs believe they could use, for instance, thematic analysis of aggregated findings about particular regions. Additionally, interviews with stakeholders highlighted the potential value of their involvement in selecting topics for thematic analyses. The panel took note about all these considerations and suggests that the agency review how its thematic analysis activity can be further supported by the agency's inspection reports.

At the same time, in the panel's view, there is room for improvement in the agency's approach to thematic analysis, and it seems that the ruling out of reports as outputs of thematic analysis activity is premature. In addition, there is both potential and a certain demand for such reports from the agency's stakeholders. The panel recommends that BAC urgently develop concrete plans for conducting thematic analysis, which should be clearly reflected in the action plan of the agency and start conducting it based on the pre-set timeline.

Since the agency sees outsourcing particular tasks as a preferred model for various purposes, rather than growing the number of employed staff, the suggestion from the panel of the last review to consider commissioning thematic analyses externally still seems valid.

### **Panel recommendations**

1. The panel recommends that the agency urgently develop concrete plans for conducting thematic analysis, which should be clearly reflected in the action plan of the agency and start conducting it based on the pre-set timeline.

### **Panel suggestions for further improvement**

3. The panel suggests that the agency consider commissioning thematic analysis externally.
4. The panel suggests that the agency review how its thematic analysis activity can be further supported by the agency's inspection reports.

### **Panel conclusion: partially 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 I of the ESG.

#### 2019 review recommendations and TOR's provision:

ENQA: 'Strengthen the coverage of ESG 1.4 in the inspection process so that the provider's policy on the recognition of qualifications is specifically considered, taking note of most recently available international guidance on the matter.'

'Evolve the inspection process and the Accreditation Committee's decision making to more explicitly address the effectiveness of the internal quality assurance processes described in Part I of the ESG.'

ToR, paragraph 2.1, pct. C)-a: 'Analyse whether the revised standards of Accreditation of Higher Education Institutions cover all aspects of ESG in practise.'

#### Evidence

In line with its mission, BAC provides inspection-based accreditation to independent further and higher education and training providers. The external quality assurance activity is conducted through six specialised schemes, which fall under a common quality framework. The IHE Scheme is part of this framework and the only one falling under the ESG, therefore the only one included in the ToR of this review.

As explained in the SAR, BAC has revised the IHE standards and key indicators following an internal review, with the aim of ensuring their continued fitness for purpose. The revision was finalised in September 2023, when the updated standards were published on the agency's website. From the SAR and the interviews conducted during the site visit, the panel learned that the current version of the IHE standards is not substantially changed compared to the old one. The amendments are minor and consist of the following: 1- Removal of key indicators where there was duplication; 2- Simplification of the wording used in some key indicators, e.g., those that were long and potentially complicated; 3- Changes in terminology to ensure it remained up to date, e.g., removing the use of terms such as 'library' and replacing it with 'learning resources'. At the same time, the current version includes in a more explicit way the term 'internal quality assurance' to make it clear that the institution's own internal quality assurance processes were being assessed, in this way directly addressing the recommendation of the previous ENQA review. A single key indicator around accessibility of premises was added, for full alignment with the other accreditation schemes of BAC's common quality framework.

However, during the site visit the panel understood that the revision of the IHE Scheme is still an ongoing process and that the agency is planning to conduct a more complex review of the scheme in 2026/ 2027, to further refine the standards and to ensure that they continue to be mapped to the updated ESG.

The current accreditation standards used by BAC for the IHE Scheme correspond to the following inspection areas:

- Governance, strategy and financial management

- General and academic management and administration
- Teaching, learning and assessment
- Student support, guidance and progression
- Premises, facilities and learning resources
- Quality management, assurance and enhancement
- Online, distance and blended learning (if applicable)

Annex I of the SAR depicts the mapping of Part I of the ESG against the IHE Scheme’s minimum standards and is presented in the table below.

Table I. Consideration of ESG Part I in the IHE Scheme’s minimum standards (SAR, p. 36)

BAC Standards & Key Indicators							
European Standards & Guidelines 2015 Internal Quality Assurance	Governance, Strategy, and Financial Management (KI 1–3)	General and Academic Management and Administration (KI 4–10)	Teaching, Learning, and Assessment (KI 11–13)	Student Support, Guidance, and Progression (KI 14–19)	Premises, Facilities, and Learning Resources (KI 20–25)	Quality Management, Assurance, and Enhancement (KI 26–28)	Online, Distance, and Blended Learning (if applicable) (KI 29)
1.1 Policy for quality assurance	1.3–1.5			14.4, 14.7		26.1–26.3 27.1–27.7 28.1–28.4	
1.2 Design and approval of programmes		7.1–7.4 10.4	12.2			27.2, 27.3, 27.7	29.1
1.3 Student-centred learning, teaching, and assessment	1.5		11.1, 11.5–11.8 12.1–12.4, 12.6, 12.7	15.5, 15.6, 15.8 19.4	21.2 24.4		
1.4 Student admission, progression, recognition, and certification	2.1	5.8, 5.10 8.1–8.6 10.2, 10.4	12.4 14.2 15.2–15.4, 15.7, 15.8			27.1, 27.2, 27.5–27.7	
1.5 Teaching staff		6.2, 6.4–6.8 9.1–9.3	11.1, 11.9 13.1–13.4			26.1 28.2	29.2
1.6 Learning resources and student support	2.2 3.1	5.1, 5.2 7.4 10.5	11.6, 11.9 13.1–13.4	14.1–14.7 15.1–15.8 16.1–16.4	22.1–22.3 24.1–24.4 25.1–25.4		
1.7 Information management		5.4	12.1			26.1–26.3 27.1–27.7 28.1, 28.3	
1.8 Public information	2.4	8.1, 8.4 10.1–10.5	12.1			27.4, 28.2	
1.9 Ongoing monitoring and periodic review of programmes	2.2	7.1–7.4				26.1–26.3 27.1–27.7	
1.10 Cyclical external quality assurance	1.2					26.1 27.2, 27.4	

All the interviewees the panel met were positive about the changes made for the improvement of the IHE Scheme standards which, in their opinion, have contributed to uniform use of terminology and clearer guidance given to inspectors (i.e., reviewers as per BAC’s terminology) to look at the internal quality assurance of providers. The heads of the institutions accredited under the updated IHE Scheme whom the panel met highly appreciate the process, also because it helped them to better understand the approach of internal quality assurance and the importance of being continuously involved in a process of self-reflection and enhancement. All the inspectors the panel spoke with seem to be aware of the internal quality assurance of institutions and very clear on how to approach it through the IHE Scheme.

Inspection reports (i.e., external review reports as per BAC’s terminology) produced under the IHE Scheme follow a certain template provided by the agency. They are more of a tick-box/commentary box style and include limited evidence and analysis for explaining the decision taken in relation to different criteria. However, providers noted that reports were clear and extremely helpful to them in developing the quality culture based on the actions points and recommendations proposed by inspectors. More details about reporting are included in the section dedicated to ESG 2.6.

The SAR explains how the agency meets the expectation of ESG 1.4 regarding the provider’s policy on fair recognition of qualifications and admission. BAC ‘expects the institution to present a clear policy on the recognition and accreditation of prior learning and prior experiential learning and that this policy is brought to the attention of prospective students to ensure smoothness for the

admission process' (SAR, p. 14). At the same time, the agency considers possible limitations for recognition arrangements due to national regulations, mainly for providers outside Europe.

## **Analysis**

The panel was able to consult the updated IHE Scheme as part of the documentation provided by BAC and is convinced that the current version of the standards fully covers ESG Part I. The references provided by the agency and presented in the 'Evidence' section (Table I) are largely supported by the evidence found in the specific documentation, as demonstrated below.

### *1.1 Policy for quality assurance*

The IHE Scheme requires institutions to have implemented quality assurance policies and objectives and to demonstrate functional internal quality assurance systems.

Following stakeholders' feedback, the panel is confident that the procedure addresses the presence of processes for internal quality assurance.

### *1.2 Design and approval of programmes*

The IHE Scheme requires institutions to have effective procedures for the proposal, design and validation of study programmes of study, that take account of the mission of the institution and feedback from internal and external stakeholders. The IHE Scheme includes several standards and indicators which ensure an in-depth look into how learning outcomes are designed and fulfilled, and how the information provided ensures students are well informed of the status of the qualifications offered, including the awarding body and level of award.

### *1.3 Student-centred learning, teaching, and assessment*

This standard focuses on how students are encouraged to take an active role in their learning process. The panel noted that the concept of student-centred learning, teaching, and assessment was integrated in the documents: the IHE Scheme includes standards that refer to lecturers having the necessary pedagogic and communication skills to teach the course content and level of course to which they are allocated; academic staff being effective in recognising individual learning needs and adapting their approach to meet the needs of all students; academic staff using effective learning activities to encourage the active participation of all students and to support their learning. At the same time, the institution is required to have appropriate methods in place to encourage and measure student engagement and students are encouraged and enabled to develop independent learning skills. There are also standards that clearly refer to how assessment is student centred.

### *1.4 Student admission, progression, recognition, and certification*

This standard is considered in detail in the IHE Scheme, which includes several standards checking if: 'the institution has processes through which it verifies that the student who registers on the programme is the same student who participates and completes and receives the credit; there are effective procedures for internal and external moderation at pre- and post-assessment stages; entry requirements for each programme are set at an appropriate level and are clearly stated in the programme descriptions that are made available to prospective students; a formal application process ensures that any claimed qualifications and language competency requirements are checked and verified; students are provided with sufficient information to enable them to make a judgement on the suitability of the courses and their delivery methods and can discuss any concerns before registration; there are effective processes in place to confirm that students meet published entry requirements and have the capability to complete the programmes for which they are enrolling; the institution has a clear policy on the accreditation of prior learning and prior experiential learning that is brought to the attention of prospective students; information on the programmes available, their

assessment and progression is comprehensive, accurate, readily accessible and up to date; the information provided ensures students are well informed of the status of the qualifications offered, including the awarding body and level of award; students receive detailed and supportive feedback on their assessments and overall performance and progress, which are effectively monitored’.

#### *1.5 Teaching staff*

Regarding the teaching staff, the IHE Scheme ensures that the inspectors check compliance with the associated BAC requirements, which include stipulations on sufficient teaching and support staff with appropriate qualification, transparent policies for staff periodic evaluation, professional development, and promotion. At the same time, it is checked if ‘academic staff receive effective training and support to ensure the successful delivery of online and distance learning that meets the needs and interests of students’.

#### *1.6 Learning resources and student support*

BAC assesses learning resources and student support under several standards of the IHE Scheme which refer to: adequate administrative procedures and sufficient administrative staff; effective use of learning activities by the academic staff, full access for students and academic staff to learning resources and study materials, adequate and quality study materials and infrastructure. There are also standards that require the institution’s attention to student induction programmes, to fair treatment of students and to avoid discrimination, bullying and harassment, or to students’ mental health and well-being.

#### *1.7 Information management*

This standard is covered in the IHE Scheme, under standards from several ‘inspection areas’, which require, for example, that data collection and collation systems should be well documented, and that students should be provided with an assessment schedule in which required assessments and revision periods are detailed in advance with clear submission deadlines. The inspectors also check if ‘the institution has appropriate formal feedback mechanisms to inform all stakeholders of any action taken as a result of their views’, and if ‘all internal and external quality management policies and procedures are clearly documented and are brought to the attention of staff and, where appropriate, students and other stakeholders, to appropriately inform the institution’s strategic management’. A special emphasis is placed on institutional systems to ensure the effective consideration of programme reports and that appropriate actions are incorporated into action planning’.

#### *1.8 Public information*

The IHE Scheme addresses this criterion through several standards, that ask for effective communication of strategy and other documents, including reports, issued by the institution to all relevant stakeholders, or ensuring transparent information for prospective students on all aspects regarding study programmes.

#### *1.9 Ongoing monitoring and periodic review of programmes*

BAC requires that ‘there are effective procedures for the proposal, design and validation of programmes of study, that take account of the mission of the institution, feedback from students and involve external input as appropriate’; ‘Intended learning outcomes for all programmes are clearly articulated, are understood by students and are publicly available’; ‘There are regularly scheduled and recorded meetings of academic staff where academic programmes are reviewed’; ‘There is an appropriate policy and effective procedures for the acquisition of academic resources to support programmes’. At the same time, the institution has to ‘undertake regular and systematic monitoring of its operations and reviews all aspects of its performance against key performance indicators’; ‘The

nominated programme leader, drawing upon reports from its constituent courses, produces an annual programme report, which may include analysis of year-on-year results on student satisfaction, completion rates, achievement levels and progression to further study or employment, if available'; 'Institutional systems ensure the effective consideration of programme reports and that appropriate actions are incorporated into action planning'.

#### 1.10 Cyclical external quality assurance

BAC requires that 'the institution undertakes regular and systematic monitoring of its operations and reviews all aspects of its performance against key performance indicators'. At the same time, it requires to collect feedback from stakeholders regularly and include it in the periodic reports. The reports with results of the institution's reviews have to be analysed by the management and actions have to be taken.

#### *Summary*

The analysis presented above supports the panel's opinion regarding the fact that the agency pursues, through its accreditation standards, the effectiveness of the institutions' internal quality assurance system. The panel consulted external review reports published on the website and was able to observe that ESG part I was included as described.

At the same time, the panel recognises the agency's efforts to review its own accreditation standards, first of all to keep them fit for purpose but also to respond to ENQA's recommendations from the previous review. All stakeholders that the panel met (providers, inspectors and student inspectors, members of the Accreditation Committee) consider that the updated standards are clearer in addressing internal quality assurance and of much more help than before for institutions to improve their internal quality systems. Some providers felt BAC could have gone further but accepted that this is an ongoing process, which is also confirmed by the agency (SAR, p. 15).

There remains, however, a point of concern for the panel, namely the published inspection reports, which continue to need to increase their transparency to better reflect the evidence and analysis which lead to the judgement of each of the standards. This issue is further covered in this report under ESG 2.6.

#### **Panel commendations**

1. The review panel commends the agency for maintaining the IHE Scheme fit for purpose, thus ensuring its continued relevance for providers.

#### **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.

#### **ToR's provision:**

ToR, paragraph 2.1, pct. C)-b: 'Address whether the updated standards of Accreditation of Higher Education Institutions are fit for purpose to achieve the aims and objectives set for it.'

## **Evidence**

This standard was found 'fully compliant' at the previous ENQA review. In 2024, BAC sent to EQAR a Substantive Changes Report which included updates on the IHE Scheme document; following the EQAR Register Committee decision (see above), ESG 2.2 has been considered in-scope for the current targeted review.

Both the SAR and the Substantive Changes Report explain that the updates on the IHE Scheme regard solely the standard section of the document, e.g., changes in terminology, re-wording and editing of the key indicators. The aim and objective of the IHE Scheme is 'to give higher education institutions, delivering full degree programmes, the opportunity to seek an accreditation status by being inspected against robust, internationally aligned standards' (SAR, p. 15), with no changes recorded since the last ENQA review. The eligibility, criteria and processes have remained the same and therefore none of the procedural elements are significantly different. Therefore, the revision process involved only internal stakeholders.

The review panel largely discussed the fitness for purpose of the current IHE Scheme with the providers met during interviews. The heads of the accredited institutions, as well as quality assurance officers, unanimously agreed that the updated IHE Scheme is robust, clearer in terms of formulation and fit for purpose. However, while acknowledging the benefits of BAC's inspections and the high standards used that ensure global recognition of their programmes, the international providers suggest that greater flexibility in the interpretation of the standards by taking into account the national context would be welcome.

BAC accreditation is appreciated as an important support for institutions to develop their internal quality assurance and, in some cases, a significant push for implementing changes. The process is not perceived as a burden; although the providers recognise it involves significant work, at the same time it contributes to structuring the internal documents and to improving the internal quality system. As a first stage of the accreditation process, the institution (provider) under review receives a good guidance from the agency regarding the procedures and standards. This is a support mechanism from BAC to ensure the good understanding of procedures for achieving the standards and seems to be a particularity of BAC's methodology very much appreciated by providers, as the panel learned during interviews.

The updates made by BAC to the standards of IHE Scheme and the instructions related to the process are clear to providers and communicated effectively by the agency by e-mail and during the annual stakeholders' event. The smooth cooperation with the agency and the constant support institutions get throughout the whole accreditation process have been confirmed by stakeholders during the site visit.

## **Analysis**

Considering the evidence gathered during the site visit, the panel is convinced about the robustness of the updated IHE Scheme, as well as about the positive impact of the revised standards on providers. The interviews with representatives of accredited institutions confirmed that the changes have regarded only the standards and that they have been mostly routine, reflecting their adjustment to times change; however, additional help for institutions to better understand what is expected from them to fulfil the standards would be appreciated by those undergoing review. The panel appreciates the smooth communication between the agency and the institutions to be accredited, and the substantial support offered by BAC throughout the entire process, especially at the pre-accreditation stage. While the panel sees BAC's high standards embedded in the agency's spirit and culture, it is inclined to endorse the opinion of some interviewed international providers about

considering a more flexible approach, adjusted to the context and specificities of the country, when conducting international accreditations.

### **Panel suggestions for further improvement**

5. The panel suggests that the agency continue to offer, at an increased level, support for providers to better understand the expectations regarding fulfilling the IHE Scheme standards.
6. The panel suggests that the agency consider a more flexible approach, adjusted to the context and specificities of the country, when conducting international accreditations.

### **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.

### **ToR's provision:**

ToR, paragraph 2.1, pct. C)-c: 'Consider whether the revised standards of Accreditation of Higher Education Institutions are consistently implemented.'

### **Evidence**

This standard was found 'fully compliant' at the previous ENQA review. In 2024 BAC sent to EQAR a Substantive Changes Report which included updates on the IHE Scheme document; following the EQAR Register Committee decision (see above), ESG 2.5 has been considered in-scope for the current targeted review.

BAC explains in the SAR that the revision to the standards of the IHE Scheme did not impact the process of how providers were inspected. The IHE Scheme document outlines the minimum standards that providers must meet to gain accreditation. All providers were clear in meetings with the review panel that recent revisions to IHE were a positive move by BAC. Some of them were of the opinion that work to further refine the IHE criteria would be welcome; however, this is an ongoing process, as presented under ESG 2.1. They also commented it could be useful to see examples of good practice in relation to the IHE Scheme, as the criteria reflect on minimum expectations only. Overall, it was confirmed that providers understood the procedure and were informed by the agency every time changes had been made regarding the IHE Scheme.

The panel learned from the interviews that inspectors go through an induction process which includes a training event upon appointment. In addition, the agency provides specific documentation – the Inspectors' Handbook – to support teams on the ground in meeting the organisations' expectations. BAC Chief Inspector ensures ongoing support throughout the whole process.

Inspectors record findings in provided templates, which prompt experts to reflect on what they have seen and why they have come to a conclusion rather than just repeating the judgement. During the site visit the panel heard from the inspectors that the supporting documents provided by the agency, including the report writing guidelines, help them ensure consistent application of standards and criteria. All of this comes together in a BAC inspection report.

Reports are typically drafted by the Lead Inspector with support from the panel. Draft reports are reviewed by the Report Editor (typically a senior inspector), Chief Inspector and other BAC staff, where appropriate. Decision on whether to award accreditation sits with the Accreditation Committee, which sees final report, however, not full evidence pack. The review panel had access to a full report pack to see the report drafting, moderation, and consideration (by Accreditation Committee) in practice and considered this process to be robust.

The Chief Inspector conducts routine visits and 'shadowing' of inspectors, in particular new inspectors. This results in both verbal feedback (on the spot, typically) and written feedback, where necessary. Providers are also invited to comment on the work conducted by inspectors, which is forwarded onto inspection teams. The written report by the Chief Inspector reflects on performance of the team overall but mostly focuses on activities of the Lead Inspector. The Lead Inspector is expected to reflect on the performance of other inspectors; however, this is generally on an informal basis. Feedback from the Lead Inspector on team members goes to BAC and, only if there is a problem, is this feedback then provided to individual inspectors. The review panel was able to see evidence of the Chief Inspector's work, as described above.

### **Analysis**

The approach to BAC inspections is well-understood by both providers and inspectors. The agency is keen on keeping all its stakeholders up to date about revisions made to the IHE Scheme and does this during the annual events it organises. The inspection teams are supported in their work by clear documents provided by BAC (e.g. Inspectors' Handbook, Report Writing Guidelines) which, in the panel view, are key to ensuring application of standards and criteria in a consistent way.

Although the decision to award accreditation is taken by the Accreditation Committee based on the final report, without seeing the evidence pack, based on the findings during the site visit the panel is convinced the whole process of report drafting, moderation and consideration for decision-making is robust and has not been affected in any way by the recent reviews of the standards of the IHE Scheme.

The Chief Inspector's 'shadowing' work is considered both helpful in terms of monitoring the work of inspection teams in applying BAC standards but also for the professional development of inspectors. However, the panel understands there is no current formal process for the monitoring or oversight of non-Lead Inspectors. Inspectors with whom the panel met were keen to receive more feedback from BAC on their performance – whether that is positive or negative. Therefore, the agency might consider tightening the monitoring and oversight of non-Lead inspectors, for further improvement of both inspection process and inspectors' performance.

### **Panel suggestions for further improvement**

7. The panel suggests that the agency tighten the monitoring and oversight of non-Lead inspectors, which could improve both the inspection process and the inspectors' performance.

### **Panel conclusion: 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.

### **2019 review recommendation and ToR's provisions:**

ENQA: 'Further strengthen the transparency of how inspections consider the effectiveness of providers' internal quality assurance processes in the published reports by increasing their analytical content and listing the inspectors involved.'

ToR, paragraph 2.1, pct. A)-a: 'Consider how the agency ensures that the external review reports consistently include evidence, analysis, and findings so as to demonstrate how the conclusions are reached.'

Consider how the agency ensures that the external review reports include enough qualitative insights so the Accreditation Committee of the agency can examine institutions' internal quality assurance processes based on the reports.'

### **Evidence**

The outcome of a BAC inspection event is a report, typically drafted by the Lead Inspector and reviewed by a Report Editor (generally a senior inspector) and the Chief Inspector. The report provides a helpful introduction to the institution, a short description of how the inspection was carried out followed by judgements against each of the IHE standards and indicators.

For each standard, a commentary is provided where inspection teams explain why an indicator is met or not met and, therefore, why an overarching standard is met or not met. The end of each report includes a summary of action points and recommendations for improvement. All inspectors of the team, including student inspectors, are expected to contribute equally to the report and are free to express any comments or findings, as the panel heard during the site visit. The names of inspectors contributing towards a given inspection report are listed.

In previous ENQA reviews, panels found the inclusion of evidence and analysis to be limited. The SAR explains that in order to address the recommendation of the 2019 review related to this issue, the report template underwent a revision which resulted in an updated version that 'provides more references to the evidence on which the judgements have been made and its analysis' and 'increases the reports' analytical content' (SAR, p. 17). At the same time, BAC ensured adequate training to inspectors on how to write the reports, which is complemented by feedback provided to inspectors by the Accreditation team and the Chief Inspector throughout the process of elaboration of reports.

The panel met with inspectors and student inspectors who reflected that while inspectors may look at a lot of evidence, and this is clear from the evidence packs provided to the panel, which contain all pieces of documentary evidence collected and collated as part of the inspection process, it is not necessarily the case that this is carried forward into the final published reports. The panel read in the SAR and learned from the agency's staff that this approach was adopted to balance the need for reports to be more analytical with that of ensuring 'reports are not unduly discursive and descriptive'.

The Accreditation Committee members appreciate positively the reports written using the updated template, as more informative than the ones in the past. They acknowledge that the version they

receive for decision-making does not include the full evidence pack which is, however, at their disposal in case clarifying questions are raised.

Providers find BAC inspection reports helpful. The panel heard examples of providers receiving reports, generating internal action plans, which subsequently enhanced providers' internal quality assurance processes demonstrating the value added or enhancement element to a BAC inspection, despite enhancement not being a key component of the BAC IHE framework.

All reports include the decision and, at their end, the inspectors' names. They are published on the agency's website and, in this sense, accessible to any interested individuals. From discussions with agency staff, the panel learned that there were no negative decisions to publish, because, according to BACs general inspection procedure, the decision to accredit an institution is postponed until such time as they meet BAC published standards satisfactorily.

### **Analysis**

The review panel acknowledges that progress has been made in terms of improving the consistency and depth of commentary about how providers met the minimum standards, particularly in relation to how an institution's internal quality assurance processes meet BAC expectations. At the same time, it believes that further work is needed, since several areas of BAC reports seen by the panel remain limited in terms of the qualitative analysis included. This means that BAC's work to address a specific recommendation in their last ENQA review on enhancing the use of qualitative analysis in their review reports remains to be attended to more explicitly. The panel believes strongly that making further progress against this recommendation is important because without sufficient detail in BAC reports, key stakeholders including the wider academic community, external partners, and other interested individuals may not fully understand how inspection teams have come to a decision in respect of applications for BAC accreditation. It is therefore the panel's recommendation that BAC further strengthen guidelines to increase the analytical content of inspection reports. This should, in the panels view, ensure BAC inspectors are prompted to include appropriate levels of analytical content in their inspection reports which, in turn, should allow interested individuals to more fully understand how an inspection team has come to a decision.

From the interview with providers, it became clear that the BAC reports are considered helpful and very much appreciated by providers. However, while seeing examples of providers receiving reports, implementing local action plans, enhancing internal QA processes, the review panel could not see any evidence showing how the institution's action points from previous inspections are captured and action against these areas for development is evaluated in subsequent reports. This is a significant gap as it may mean that work by providers to address important recommendations made by inspection teams goes unchecked. In the panel's view, inspection reports should include a reflection on progress made by providers on action points agreed by prior inspectors.

Even though IHE Scheme inspections are against minimum criteria, in other words, there is no requirement to demonstrate enhancement, the current practice the panel heard about during the site visit demonstrates there is an enhancement component of BAC inspections which is highly appreciated by providers. This could be valued even better if BAC consider moving away from the tick-box/commentary box style report that they currently use to a narrative-driven one.

### **Panel commendation**

2. The review panel commends the helpfulness of the agency's inspection reports for providers enhancing internal quality assurance processes.

**Panel recommendations**

2. The review panel recommends that the agency further strengthen guidelines to increase the analytical content of inspection reports in order to allow interested individuals to more fully understand how an inspection team has come to a decision.
3. The review panel recommends that the agency ensure that progress made by providers against action points is fully reflected upon by inspection teams in subsequent reports.

**Panel suggestion for further improvement**

8. The review panel suggests that the agency might consider moving away from the tick-box/commentary box style report that they currently use to a narrative-driven one.

**Panel conclusion: partially compliant**

# ENHANCEMENT AREAS

## ESG 3.5 RESOURCES

As stated in the ToR of the present review, BAC selected ESG standard 3.5 Resources as the standard for the enhancement-oriented element of the review. In a separate document, provided as a complement to the agency's SAR, BAC explained their reasons for selecting this enhancement area, outlining key challenges, as well as aspirations and plans for the future. Since the last ENQA review, BAC has taken strategic steps towards enhancing how they use their resources, and the targeted review was seen by the agency as an opportunity to discuss with the review panel how to maximise the impact of the actions undertaken.

A number of topics and leading discussion questions were included to guide the panel pertaining to BAC's plans to expand internationally, specifically on the ethical dimensions this brings (e.g., how to effectively make decisions on application for the accreditation process when providers are located in countries experiencing conflict); support to providers in developing the participation of students in their governance and activities (e.g., in countries that do not have this in place due to cultural or legal reasons); smoother engagement with governments on system-wide projects of quality assurance (e.g., offering BAC's micro-credential scheme pilot to national contexts with no regulation on lifelong learning).

Acknowledging its somewhat limited expertise in quality assurance activities in the wider international context of such questions, the panel discussed possible ways to organise a session on the selected enhancement area that would be of value to the agency and proposed to host a 90-minute workshop with a number of participants suggested by the agency. The workshop, chaired by the review panel chair and facilitated by the panel members, included as participants the Chair of the Board of Trustees (Council), the Chief Executive, the Deputy Chief Executive, the Chair of the Audit Committee, the Accreditation Manager, and BAC's external Senior Advisor.

### Workshop design

The panel organised the enhancement area session as a SWOT analysis, followed by a discussion on possible future scenarios for the future of the agency. The participants were first asked individually to identify strengths, weaknesses, opportunities and threats, with a particular focus on BAC's identified challenges, aspirations and future plans, and, as applicable, related to the leading discussion questions mentioned above. An engaged discussion followed, reflecting on a number of key aspects highlighted by the participants. The session concluded with a brief discussion of future scenarios, with the participants sharing their reflections on the question 'Where will BAC be in five years?'

### Emerging themes and suggested actions

*BAC has the potential to capitalise further on its quality brand*

During the enhancement session, as indeed in several interviews during the site visit, BAC's commitment to a quality culture in the agency's operations was at the heart of the discussion. The agency prides itself on its well-established brand with a long-standing reputation, and the ambition to grow and expand is carefully balanced by a concern to maintain stability in financial and human resources.

According to the SAR, BAC's strategic approach to growth has two main objectives: to increase the number of accredited providers, and to explore other sources of income. This is supported by BAC's Strategic plan 2021-2026, which states that the agency will invest in its growth by expanding products and services to add value to current accredited providers and to attract a wider range of

new providers. In the context of this 'strategic pillar', several competitive strengths related to BAC's brand and role in the QA landscape were brought out in the SWOT analysis, such as:

- combination of BAC standards and UK recognition ('still (some) appetite for UK HE');
- double focus on compliance and enhancement;
- ability and experience in working with different kinds of provider and learn about a wider contextualisation; experience across many national sectors; common quality (assurance) framework for a wide variety of different further education and higher education providers;
- non-regulatory role means BAC can reach providers outside of the UK seeking international recognition;
- BAC's charitable objectives are global;
- relationships with national governments overseas (e.g., Bahrain, Nepal, South Africa).

Based on such strengths, the SWOT exercise also highlighted opportunities for BAC to expand its developmental work and diversify its offer, by, for example, developing new products, workshops, types of inspections, accreditation of new types of programmes, modular structures, micro-credentials, etc.

However, important weaknesses and threats were also identified, for example:

- competition from other QA agencies, both within the UK and outside;
- changing trends from qualitative to quantitative QA (at least in the UK higher education sector), increasing reliance on metrics;
- countries are developing ('strengthening') their own national frameworks. – How does BAC stay relevant? What does BAC offer compared to a national audit, when academic resources are finite – how can BAC add value?
- need to make BAC better known outside the UK;
- need to be a more active voice in the QA arena, to increase awareness of BAC;
- since BAC does not have a regulatory voice, need for more effort to become recognised.

The identification of such strengths, weaknesses, opportunities and threats confirmed the panel's impression from various interviews during the site visit that, as an independent and non-regulatory agency, BAC is able to direct its resources more flexibly than many other European QA agencies towards the needs of their providers, being accountable only to their stakeholders. However, this autonomy also means that the agency needs to ensure that the strong reputation of their brand is upheld, and that providers continue to seek BAC accreditation and re-accreditation, in particular as BAC's income primarily comes from accreditation and inspection fees. Thus, for BAC, staying relevant in a competitive environment and adapting to changing trends is of utmost importance, as is moving from being reactive to more proactive. The panel applauds the well-balanced efforts made by the agency to grow and diversify strategically, while protecting the good reputation of their business and achievements, and the financial security.

*BAC strives to adapt to changing trends in quality assurance*

The SWOT analysis revealed an awareness of the need for BAC to adapt to changing trends in QA, nationally and overseas. For instance, the agency sees the aforementioned change from qualitative towards quantitative QA and the increasing reliance on metrics (at least in the UK) as a possible threat that has to be carefully observed.

On the other hand, the trend towards a more integrated tertiary education landscape is perceived by BAC as an opportunity, since the agency offers external quality assurance to both higher education and further education providers. In particular, the agency's Common Quality Framework is regarded as an asset, applicable across all six BAC schemes and institutions, representing the

quality commitments that all BAC-accredited providers demonstrate and maintain during the accreditation cycle. According to BAC, the framework provides an infrastructure to actively pursue opportunities to expand their products and services, and in interviews during the site visit the panel heard from BAC staff that there are already further education and training providers who use BAC schemes to access the higher education sector.

BAC also aims to contribute to the lifelong learning agenda in the UK and beyond. Though not being a regulatory body, BAC has the potential to bring valuable perspectives to this area, given its expertise and experience across the wider tertiary sector. The agency's ministry and government level contacts could support this activity.

The panel believes that taking on a more active role in the national and international quality assurance arena in general could also strengthen BAC's brand as an expert body and contribute to the agency's identified goals to achieve greater visibility to prospective providers and to the quality assurance community at large. The panel suggests that, among other actions, BAC should develop its approach to thematic analysis (see also the panel's recommendations for ESG 3.4 above, p. 18), so that thematic analyses of general findings from the agency's accreditations and other thematic activity can also support the agency's participation in various policy and system-level discussions, in the UK and beyond.

*BAC has increased its engagement on national, European and international level*

Engaging with the wider quality assurance community is important to BAC, and in particular through actively engaging with ENQA, as stated in the BAC 2021-2026 strategy. A clear example of this is the ENQA Working Group on the QA of Micro-credentials, proposed to ENQA and chaired by the agency. According to the SAR, the expertise and input from the Council members have contributed towards BAC's increasing international focus and support the agency's efforts to be more active in the European quality assurance family. One participant in the enhancement session expressed that they wished BAC to become a more 'European' agency, actively liaising with both EUA and EURASHE, in addition to ENQA membership and registration on EQAR. Two members of the Accreditation Committee are also currently members of the INQAAHE Board of Directors.

During the enhancement session, further examples were given of the importance BAC sees in engaging in the wider quality assurance landscape, in the UK, but more actively in other parts of Europe and globally. A system-wide accreditation project was completed in Bahrain, and discussions at governmental level have been conducted in Vietnam, Egypt, Nepal and Qatar. Still, BAC admits that they need to explore new ways to engage with governments on system-wide projects of quality assurance, in order to better adjust the accreditation offer to specific national contexts.

The panel acknowledges the potential challenges of conducting external quality assurance in systems with sometimes very different regulations and procedures. A complementary element to BAC's global endeavours could be to establish contacts with relevant regional quality assurance or accreditation networks. BAC might wish to explore ENQA's links with other quality assurance networks aiming to enhance cooperation with other regions of the world and to ensure that ENQA's members benefit from exchange of practice (e.g., African Quality Assurance Network, ASEAN Quality Assurance Network, Asia-Pacific Quality Network, and Arab Network for Quality Assurance in Higher Education).

*BAC aims to strengthen its community of stakeholders*

BAC makes important efforts to inform and engage their stakeholders, a clear example of which are the annual stakeholder events. The agency also has intentions to undertake further activities focused on quality enhancement or best practice support for providers. This includes the development of an online learning platform as well as offering facilitated workshops and webinars.

During the enhancement session, and also heard by the panel in interviews, BAC insisted on the need for the agency ‘to be where their providers are’, and to listen to the often very different needs and expectations of current and prospective providers. It was clear to the panel that, although the present review concerns higher education accreditation solely, BAC prefers to see their community of stakeholders as a whole, brought together under the Common Quality Framework. Providing opportunities for providers of both further and higher education is therefore a BAC priority. As one participant in the enhancement session put it: ‘Providers want to meet with providers, different profiles; if they do not do higher education, they want to know how to prepare to do higher education. And BAC is seen as a platform for that.’ Artificial intelligence was mentioned as an example of a current topic for a BAC event that is high in demand: ‘not just workshops but also provide places where stakeholders can discuss this among each other’.

The panel commends BAC’s strong focus on their stakeholders, and in particular higher education providers. However, students were not explicitly mentioned as stakeholders in the discussions with the agency, and the panel has suggested elsewhere in this report (p. 14) that BAC should consider the value of a more proactive approach to involving student representatives and working with student bodies. The panel is convinced that such a dialogue would benefit both the students and the agency and provide BAC with a valuable channel to policy level discussions on student participation in governance and activities, in the UK, in Europe, and beyond. The panel also encourages BAC, as appropriate, to further extend its range of stakeholders to include various representative bodies in higher education, nationally and internationally, and to consider establishing more permanent reference groups (such as the now more occasional Higher Education Focus Group) that would provide external perspectives on the agency’s activities on a more regular basis. Such actions could contribute to promoting BAC’s intention to be a well-known point of contact and increase the focus on support for enhancement to providers.

#### *BAC is committed to responsible growth*

As already mentioned, BAC has the ambition and capacity to grow, but in a balanced way and without endangering its mission and charitable objectives. Intended plans for growth, despite BAC being a strong organisation, may put additional strain on the core staff team and on finances (SAR, p. 32). This calls for responsible growth, based on careful ethical, human resources, and financial considerations.

The enhancement session SWOT exercise brought out a number of concerns addressed by the agency when planning to expand:

- ethical dimension: How do ethics and quality assurance intersect? How to effectively make decisions on application for the accreditation process when providers are located in countries experiencing conflict? BAC discusses this regularly but has not reached a defined position; decisions are taken on a case-by-case basis;
- need to keep current business and quality culture while expanding;
- risk of moving too fast and overextending a small organisation;
- BAC’s accreditation activity is dependent on the commitment of its inspectors;
- changing national contexts and agendas;
- capitalising heavily on personal contacts (mainly Council members) can make BAC vulnerable;
- travel to far places, e.g., to attract new providers globally can have a negative impact on sustainability, and although BAC increasingly conducts accreditation activities online, reducing the agency’s carbon footprint remains a challenge;
- costs can be a threat, and a challenge remains on the financial side in the need to ensure sufficient funds to achieve BAC’s charitable objectives and fulfil their strategic goals. At the

same time, strategic financing is also an opportunity, as evidenced by the creation of BAC's development fund, drawn from BAC investment income.

The fact that BAC does not engage in higher education accreditation at programme level, only at institutional level, was discussed with the agency as a development area. The panel wondered whether more modular quality assurance activities might be a way for BAC to grow, considering that higher education provision may also be present in some of BAC's other accreditation schemes (e.g., the Online, distance and blended learning scheme, the College scheme, or the International centre scheme). Though this is not currently planned, the recently developed and piloted Micro-credentials scheme was mentioned by the agency as a possible way to contribute to the lifelong learning agenda, nationally or globally, a direction the panel wishes to encourage. Further, BAC's Common Quality Framework, bringing together independent further education, higher education and training providers from around the world, should, in the view of the panel, be able to facilitate the design of new quality assurance methodologies and supporting activities fit for purpose for BAC's diverse portfolio of providers, and support them on their enhancement journey.

In a wider policy and geopolitical perspective, BAC may need to consider the growing security concerns in international collaboration, and current developments and measures taken in various countries and regions to address such issues, as this may have an impact on the agency's plans to expand globally.

Finally, two main directions for BAC to move forward were pointed out in the discussion:

- 'What providers are telling us - not only higher education, but all providers; non-higher education providers challenge the higher education providers.'
- 'Use the expertise of trustees/Council members to identify where higher education is going to.'

It seems to the panel that these two directions are in fact complementary, and that in BAC's specific context, a strong sensitivity to the needs and preferences of providers, and capitalising on the expertise and extensive experience of its trustees, will continue to be important success factors for the agency.

*BAC aims to enhance communication and promotion*

During the enhancement session, BAC reiterated its ambition described in the SAR and in interviews to improve its communication and promotion activities and channels. The SWOT analysis reflected on, for instance, the following goals and related issues:

- to be a recognised voice on quality matters and to be more active in the quality assurance arena,
- to increase awareness of BAC and to make BAC well known outside the UK.

However:

- lack of communication strategy a weakness,
- insufficient resources for proactive marketing.

BAC has identified the need to improve its social media presence and the website to be more visible to prospective providers. At the same time, participants expressed some caution as to what social media to use, as well as possible ethical challenges.

Further, other ways were discussed of promoting BAC and demonstrating the benefits that BAC accreditation can give to accredited providers. For instance, it was mentioned that discussions have

started with some providers in different parts of the world that could be BAC vectors in the region or with others to promote the agency. The panel sees this as a fruitful way forward and reiterates its suggestion for BAC to explore relationships with relevant regional quality assurance or accreditation networks in other regions of the world.

### **Panel reflections**

The discussion took place in an open, friendly and constructive atmosphere, and it was clear to the panel that those present were deeply committed to both safeguarding and developing the quality brand of BAC, with a clear focus on the needs and preferences of existing and future providers.

In addition to the reflections and suggestions made in this section, the panel wishes to highlight the potential of linking BAC's selected enhancement area ESG 3.5 Resources with

1 - the further development of the agency's thematic analysis activity (ESG 3.4), including the publication of reports on general findings and themes from BAC inspections; and

2 - the further development of the analytical content of BAC's inspection reports (ESG 2.6), so that reports may better support the production and publication of thematic analyses.

In the panel's view, such measures would support several of the goals set by BAC for the enhancement area, for example, added value for the agency's stakeholders, increased visibility of BAC's expertise and activities, and intensified participation in policy and system-level discussions, all of which may in turn contribute to BAC's overarching goal to sustain its quality brand and to expand and attract new providers.

Finally, the panel wishes to thank BAC management and staff for engaging in the proposed exercise and hopes that the above reflections and suggestions will be useful to the agency on its continuous enhancement journey.

# CONCLUSION

## SUMMARY OF COMMENDATIONS

ESG 2.1 CONSIDERATION OF INTERNAL QUALITY ASSURANCE	1. The review panel commends the agency for maintaining the IHE Scheme fit for purpose, thus ensuring its continued relevance for providers.
ESG 2.6 REPORTING	2. The review panel commends the helpfulness of the agency's inspection reports for providers enhancing internal quality assurance processes.

## OVERVIEW OF JUDGEMENTS AND RECOMMENDATIONS

ESG 3.4 THEMATIC ANALYSIS	1. The panel recommends that the agency urgently develop concrete plans for conducting thematic analysis, which should be clearly reflected in the action plan of the agency, and start conducting it based on the pre-set timeline.
ESG 2.6 REPORTING	2. The review panel recommends that the agency further strengthen guidelines to increase the analytical content of inspection reports. 3. The review panel recommends that the agency ensure that progress made by providers against action points is fully reflected upon by inspection teams in subsequent reports.

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

## SUGGESTIONS FOR FURTHER IMPROVEMENT

ESG 3.1 ACTIVITIES, POLICY, AND PROCESSES FOR QUALITY ASSURANCE	1. The panel suggests that the agency use open calls more actively when recruiting students for its governing bodies. 2. The panel suggests that the agency consider the value of adopting a more proactive approach to involving student representatives and working with student bodies,
ESG 3.4 THEMATIC ANALYSIS	3. The panel suggests that the agency consider commissioning thematic analysis externally. 4. The panel suggests that the agency review how its thematic analysis activity can be further supported by the agency's inspection reports.
ESG 2.2 DESIGNING METHODOLOGIES FIT FOR PURPOSE	5. The panel suggests that the agency continue to offer, at an increased level, support for providers to better understand the expectations regarding fulfilling the IHE Scheme standards. 6. The panel suggests that the agency continue to offer, at an

	increased level, support for providers to better understand the expectations regarding fulfilling the standards.
ESG 2.5 CRITERIA FOR OUTCOMES	7. The panel suggests that the agency tighten the monitoring and oversight of non-Lead inspectors, which could improve both the inspection process and the inspectors' performance.
ESG 2.6 REPORTING	8. The review panel suggests that the agency might consider moving away from the tick-box/commentary box style report that they currently use to a narrative-driven one.

# ANNEXES

## ANNEX I: PROGRAMME OF THE SITE VISIT

SESSION NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW
10 September 2024 - Online meeting with the agency's resource person			
1 Tue 10/09	11.30-13.30 (120 min)	Review panel's kick-off meeting and preparations for site visit	
2 Tue 10/09	14.00-15.30 (90 min)	An online clarification meeting with the agency's resource person to clarify the agency's changes since the last full review against the ESG and to understand the background and motive of the agency's choice of the self-selected ESG standard for enhancement (next to the overall HE and QA context of the agency)	BAC representatives:  Higher Education Manager and Agency Resource person Chief Executive
Sunday 22 September 2024 – Day 0 (pre-visit)			
3 Sun 22/09	18.00-19.00 (60 min)	Review panel's pre-visit meeting and preparations for day 1	
4 Sun 22/09	As necessary	A pre-visit meeting with the agency's resource person to clarify any remaining questions after the online clarifications meeting	BAC resource person
Monday 23 September 2024 – Day 1			
	9.00 – 9.30 (30 min)	Review panel's private meeting	
5	9.30 – 10.15	Meeting with the Chief Executive and the	Chief Executive

SESSION NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW
Mon 23/09	(45 min)	Chair of the Council (Board of Trustees)	Chair of Council <i>All online</i>
	10.15 – 10.30 (15 min)	Review panel's private discussion	
6 Mon 23/09	10.30 – 11.15 (45 min)	Meeting with the Deputy Chief Executive, Chief Inspector, Higher Education Manager, Accreditation Manager	Deputy Chief Executive Chief Inspector Higher Education Manager Accreditation Manager <i>All face to face</i>
	11.15 – 11.30 (15 min)	Review panel's private discussion	
7 Mon 23/09	11.30 – 12.15 (45 min)	Meeting with the chairs of the Accreditation, Standing and Audit committees	Chair of Audit Committee Chair of Accreditation Committee <i>All online</i>
	12.15 – 13.15 (45 min)	Lunch (panel only)	
8 Mon 23/09	13.15 – 14.00 (45 min)	Meeting with members of the Accreditation Committee dealing with HE accreditation (from UK and international)	Member of the Accreditation Committee Member of the Accreditation Committee Student Member of the Accreditation Committee <i>All online</i>
	14.00 – 14.15 (15 min)	Review panel's private discussion	
9 Mon 23/09	14.15 – 15.00 (45 min)	Meeting with the agency staff in charge with the day-to-day managing in relation to HE accreditation (from UK and international)	Higher Education Manager Chief Inspector Accreditation Coordinator Inspections Coordinator <i>All face to face</i>
	15.00 – 15.15 (15 min)	Review panel's private discussion	
10	15.15 – 16.00	Meeting with 5-6 members of the expert pool	Senior Inspector and Report Editor

SESSION NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW
Mon 23/09	(45 min)	involved in the Independent Higher Education Accreditation (in UK and international)	Inspector and Report Editor Inspector Inspector and Report Editor Inspector and Report Editor Inspector and Report Editor <i>All online</i>
11 Mon 23/09	16.00 – 17.00 (60 min)	Wrap-up meeting among panel members and preparations for day 2	
		Dinner (panel only)	
Tuesday 24 September 2024 – Day 2			
	9.00 – 9.30 (30 min)	Review panel's private meeting	
12 Tue 24/09	9.30 – 10.15 (45 min)	Meeting with 5-6 heads of some reviewed HEIs (from UK and international)	Representatives of: University of New York in Prague (Czech Republic) The British College (Nepal) International Burch University (Bosnia and Herzegovina) Markfield Institute of Higher Education (UK) <i>All online</i>
	10.15-10.30 (15 min)	Review panel's private discussion	
13 Tue 24/09	10.30 – 11.15 (45 min)	Meeting with 5-6 quality assurance officers of some reviewed HEIs (from UK and international)	Quality assurance responsible at: South African College of Applied Psychology (South Africa) Nobel International Business School (Ghana) United International Business School (Switzerland) International Burch University (Bosnia and Herzegovina) Xenophon College London (UK) <i>All online</i>
	11.15 – 11.30 (15 min)	Review panel's private discussion	

SESSION NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW
14 Tue 24/09	11.30 – 12.15 (45 min)	Meeting with 5-6 members of student expert pool involved in the Independent Higher Education Accreditation (in UK and international)	Student Inspector Student Inspector <i>All online</i>
	12.15 – 13.15 (60 min)	Lunch (panel only)	
15 Tue 24/09	13.15 – 14.00 (45 min)	Meeting with stakeholders, such as employers, students, local community	Employer and Member of Council Student Member of Council University Representative and Member of Council <i>All online</i>
	14.00 – 14.45 (45 min)	Review panel's private discussion	
16 Tue 24/09	14.45 – 16.15 (90 min)	Session to discuss chosen enhancement area ESG 3.5 (participants to be selected by the agency, e.g., BAC council members, staff, stakeholders)	Chair of Council Chief Executive Deputy Chief Executive Chair of Audit Committee Accreditation Manager Senior Advisor (External) <i>All face to face</i>
18 Tue 24/09	16.15 – 18.00 (105 min)	Wrap-up meeting among panel members: preparation for day 3 and provisional conclusions	
		Dinner (panel only)	
Wednesday 25 September 2024 – Day 3			
19 Wed 25/09	9.00 – 10.00 (60 min)	Meeting among panel members to agree on final issues to clarify	
20 Wed 25/09	10.00 – 11.00 (60 min)	Meeting with the Chief Executive and Chair of the Council (Board of Trustees) to clarify any pending issues	Chief Executive Chair of Council <i>All face to face</i>

SESSION NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW
21 Wed 25/09	11.00 – 12.30 (90 min)	Private meeting between panel members to agree on the main findings	
	12.30 – 13.00 (30 min)	Lunch (panel only)	
22 Wed 25/09	13.00 – 13.30 (30 min)	Final de-briefing meeting with staff, Council and committee members of the agency to inform about preliminary findings	Chair of Council (online) Honorary Treasurer and Chair of Audit Committee (online) Chief Executive (face to face) Deputy Chief Executive (face to face) Higher Education Manager (face to face) Chief Inspector (online) Accreditation Manager (online)

## ANNEX 2: TERMS OF REFERENCE OF THE REVIEW

# Targeted review of British Accreditation Council for Further and Higher Education (BAC) against the ESG

## Annex I: TERMS OF REFERENCE

The present Terms of Reference were agreed between BAC (applicant), ENQA (coordinator) and EQAR.

March 2024 (amended in July 2024)

### 1. Background

British Accreditation Council for Further and Higher Education-BAC has been registered on the European Quality Assurance Register for Higher Education (EQAR) since 2015 and is applying for renewal of EQAR registration based on a targeted external review against *the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG)* coordinated by The European Association for Quality Assurance in Higher Education (ENQA).

British Accreditation Council for Further and Higher Education-BAC has been a member of the European Association for Quality Assurance in Higher Education (ENQA) since 2015 and is applying for renewal of ENQA membership.

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

- Accreditation of higher education institutions

This activity will be included on the agency's profile on the EQAR website and linked to DEQAR database. NB: The agency may not upload reports from other activities to DEQAR.

The following activities of the applicant are outside the scope of the ESG:

- Accreditation and inspection of non-higher education institutions
- Non-accreditation activities

While these activities are not relevant to the application for renewal on EQAR, it is BAC's choice – in agreement with the review coordinator – whether those activities should be commented upon by the review panel.

### 2. Purpose and scope of the targeted review

This review will evaluate the extent to which BAC continues to fulfil the requirements of the ESG. The targeted review aims to place more focus on those parts that

require attention and provide sufficient information to support BAC's application to EQAR.

The review will be further used as part of the agency's renewal of membership in ENQA.

## 2.1 Focus areas

C) Standards with a partial compliance conclusion in the Register Committee's last renewal decision:

- a. ESG 2.6 – Reporting
  - Consider how the agency ensures that the external review reports consistently include evidence, analysis, and findings so as to demonstrate how the conclusions are reached.
  - Consider how the agency ensures that the external review reports include enough qualitative insights so the Accreditation Committee of the agency can examine institutions' internal quality assurance processes based on the reports.
- b. ESG 3.4 – Thematic Analysis
  - Consider how the agency ensures the thematic review reports to be analytical and how they have addressed this issue since the last external review.

D) Standards 2.1 to 2.7 for the following activities:

N/A

E) Standards affected by other types of substantive changes<sup>5</sup>:

- a. ESG 2.1 Consideration of Internal Quality Assurance
  - Analyse whether the revised standards of Accreditation of Higher Education Institutions cover all aspects of ESG in practise.
- b. ESG 2.2 Designing Methodologies Fit for Purpose
  - Address whether the updated standards of Accreditation of Higher Education Institutions are fit for purpose to achieve the aims and objectives set for it.
- c. ESG 2.5 Criteria for Outcomes
  - Consider whether the revised standards of Accreditation of Higher Education Institutions are consistently implemented.
- d. ESG 3.1 Activities, Policy and Processes for Quality Assurance

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<sup>5</sup> See the EQAR Register Committee decision on the [Substantive change report of 2024-07-02](#)

- Analyse whether the updates in the Terms of References of BAC's Board of Trustees, Standing Committee and Audit Committee changed stakeholders' involvement in the agency's governance and work compared to the last review.
- e. ESG 3.3 Independence
  - Analyse whether the updates in the Terms of References of BAC's Board of Trustees, Standing Committee and Audit Committee affected agency's independence and autonomy compared to the last review.
- F) ESG 2.1 Consideration of internal quality assurance;
- G) Selected enhancement area: ESG 3.5 Resources
- H) Other matters regarding ESG compliance that come up during the targeted review and that may affect the agency's compliance with the ESG (if any).

These issues should be investigated by the review panel as far as possible, providing an analysis and conclusion on the ESG standard(s) concerned.

Should any substantive changes occur in BAC between now and the review (e.g., organisational changes, the introduction or changes of activities within or outside of the scope of the ESG), the agency should inform EQAR at its earliest convenience.

### **3. The review process**

The review will be conducted in line with the requirements of *the EQAR Procedures for Applications* and *the Policy on Targeted Reviews*, and following the methodology described in the *Guidelines for ENQA Targeted Reviews*.

The evaluation procedure consists of the following steps:

- Agreement on the Terms of Reference between EQAR, BAC and The European Association for Quality Assurance in Higher Education (ENQA);
- Nomination and appointment of the review panel by The European Association for Quality Assurance in Higher Education (ENQA);
- Self-assessment by BAC including the preparation and publication of a self-assessment report;
- A site visit by the review panel to BAC;
- Preparation and completion of the final review report by the review panel;
- Scrutiny of the final review report by ENQA's Agency Review Committee;
- Analysis of the final review report and decision-making by the EQAR Register Committee;
- Decision on ENQA membership by the ENQA Board;
- Attendance to the online follow-up seminar.

### **3.1 Independence of the review coordinator**

The coordinator has not provided remunerated (e.g. consultancy) or unremunerated services to BAC during the past 5 years, and conversely BAC has not provided any remunerated or unremunerated services to the coordinator.

### **3.2 Nomination and appointment of the review team members**

The review panel consists of four members including an academic employed by a higher education institution, a student member and one other expert. At least two members are from another country.

At least one panel member should be a quality assurance professional that is currently employed by a QA agency and has been engaged in quality assurance within the past five years. When requested by the agency under review or when considered particularly pertinent, other stakeholders (for example, a representative of the labour market) may be included. In this case, an additional fee is charged to cover the reviewer's fee and travel expenses.

One of the members serves as the chair of the review panel, and one as the review secretary. 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. At least two panel members come from outside the national system of the agency under review (if relevant).

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.

ENQA will provide the agency with the proposed panel composition and the curricula vitae 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.

Once appointed, the coordinator will inform EQAR about the appointed panel members.

### **3.3 Self-assessment by BAC, including the preparation of a self-assessment report**

BAC is responsible for the execution and organisation of its own self-assessment process and shall take into account the following guidance:

- Self-assessment includes all relevant internal and external stakeholders;

The self-assessment report is expected to contain:

- a description of the self-assessment process and the production of the SAR;
- a description of changes occurred within the agency since the last full review, including any eventual changes in the higher education system and quality assurance system in which the agency predominantly operates, the agency's structure, funding, its list of external quality assurance activities within the scope of the ESG, as well as the changes in the agency's quality assurance activities abroad (where relevant);
- a section that addresses the focus areas of the review, including standards that were considered to be partially compliant with the ESG in the last full review as well as ESG 2.1 and one self-selected ESG standard for enhancement (see **2.1 Focus areas**);
- a SWOT analysis of the agency as a whole;
- for each of the individual standards enlisted above (see section 2) a consideration of how the agency has addressed the recommendations as noted in the previous EQAR Register Committee decision of inclusion/renewal (if applicable).

The report is well-structured, concise and comprehensively prepared. It clearly demonstrates the extent to which BAC fulfils its tasks of external quality assurance and continues to meet the ESG and thus the requirements for EQAR registration.

The self-assessment report is submitted to the review coordinator, 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 coordinator will not judge the content of information itself but rather whether or not the necessary information, as outlined in the *Guidelines for ENQA Targeted 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.

### **3.4 A site visit by the review panel**

The review panel will draft a proposal of the site visit schedule considering the aspects included under the focus area (as defined under point 2.1 of the Terms of Reference).

The schedule will include an indicative timetable of the meetings and other exercises to be undertaken by the review panel during the site visit. The approved schedule shall be given to BAC at least one month before the site visit, in order to properly organise the requested interviews.

The site visit should enable the review panel to explore how the agency has addressed the standards where it has been found to be partially compliant (if the case), aspects of substantive change, consideration of internal quality assurance (ESG 2.1) and the self-selected ESG standard(s) for enhancement. The panel will include extra time during the site-visit to address any other arising issues (if the case) that might have an impact on the agency's compliance with the ESG.

The site visit will close with a final de-briefing meeting outlining the panel's overall impressions but not its judgement on the ESG compliance of the agency.

Prior to the physical site visit, the panel attends a joint briefing call between the panel, ENQA and EQAR to clarify the review expectations and address any possible arising matters.

In advance of the site visit (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.

### **3.5 Preparation and completion of the final review report**

The review report will be drafted in consultation with all review panel members and correspond to the purpose and scope of the review as defined under articles 2 and 2.1. In particular, it will provide a clear rationale for its findings concerning each ESG. When preparing the report, the review panel should bear in mind the *EQAR Policy on the Use and Interpretation of the ESG* to ensure that the report will contain sufficient information for the Register Committee for application to EQAR<sup>6</sup>.

The external report will present the facts and analysis reflecting the reality at the time of review. This will form the main basis for the Register Committee's decision making.

A draft will first be submitted to the ENQA Review Coordinator who will check the report for consistency, clarity, and language. After panel has considered coordinator's feedback, the report will go to the agency for comment on factual accuracy. If BAC chooses to provide a position statement in reference to the draft report, it will be submitted to the chair of the review panel within two weeks after the receipt of the draft report.

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<sup>6</sup> See here: [https://www.eqar.eu/assets/uploads/2020/09/RC\\_12\\_1\\_UseAndInterpretationOfTheESG\\_v3\\_0.pdf](https://www.eqar.eu/assets/uploads/2020/09/RC_12_1_UseAndInterpretationOfTheESG_v3_0.pdf)

Thereafter, the review panel will take into account the statement by BAC and submit the document for scrutiny to ENQA's Agency Review Committee and then to EQAR along with the remaining application documents (self-evaluation report, Declaration of Honour, statement to review report-if applicable). The report is to be finalised normally within 2-4 months of the site visit and will normally not exceed 30 pages in length. All panel members will sign off on the final version of the external review report. The coordinator will provide to BAC the [Declaration of Honour](#) together with the final report.

#### **4. Publication and use of the report**

BAC will receive the expert panel's report and publish it on its website once the ENQA Agency Review Committee has validated the report. Prior to the final validation of the report, the ENQA Agency Review Committee may 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. The report will also be published on the EQAR website together with the decision on registration, regardless of the outcome.

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. 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.

#### **5. Decision-making on EQAR registration and ENQA membership**

The agency will submit the review report via email to EQAR before expiry of the agency's registration on EQAR. The agency will also include its self-assessment report (in a PDF format), the Declaration of Honour and any other relevant documents to the application to EQAR (i.e. annexes, statement to the review report).

EQAR is expected to consider the review report and the agency's application at its Register Committee meeting in (Spring, 2025). The Register Committee's final judgement on the agency's compliance with the ESG as a whole can either be substantially compliant (approval of the application) or not substantially compliant (rejection of the application). In case of a positive decision (substantially compliant with the ESG), the registration is renewed for a further five years (from the date of the review report).

The decision on ENQA membership by the ENQA Board will take place after EQAR Register Committee decision.

To apply for ENQA membership, the agency is 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.

## 6. Indicative schedule of the review

Agreement on Terms of Reference	March 2024
Appointment of review panel members	April 2024
Self-assessment report (SAR) completed by BAC	7 June 2024
Screening of SAR by ENQA Review Coordinator	June 2024
Preparation of site visit schedule and indicative timetable	July 2024
Briefing of review panel members	July 2024
Review panel site visit	September 2024
Submission of the draft review report to ENQA Review Coordinator	October 2024
Factual check of the review report by the BAC	November 2024
Statement of BAC to review panel (if applicable)	December 2024
Submission of review report to ENQA	December 2024
Validation of the review report by the Agency Review Committee	February 2025
EQAR Register Committee meeting and decision on the application by BAC	Spring 2025
Decision on ENQA membership by the ENQA Board	Spring/Summer 2025

### ANNEX 3: GLOSSARY

BAC	British Accreditation Council
DEQAR	Database of External Quality Assurance Results
EHEA	European Higher Education Area
ENQA	European Association for Quality Assurance in Higher Education
EQAR	European Quality Assurance Register for Higher Education
ESG	<i>Standards and Guidelines for Quality Assurance in the European Higher Education Area, 2015</i>
HE	higher education
HEI	higher education institution
IHE	Independent Higher Education (Scheme)
INQAAHE	International Network of Quality Assurance Agencies in Higher Education
QA	quality assurance
SAR	self-assessment report
SWOT	Strengths, Weaknesses, Opportunities, and Threats
ToR	Terms of Reference

## ANNEX 4. DOCUMENTS TO SUPPORT THE REVIEW

### I. DOCUMENTS PROVIDED BY BAC

- I.1 IHE Scheme updated standards
- I.2 BAC annual report 2021-22
- I.3 BAC 40th anniversary video & Milestones
- I.4 Common-Quality-Framework-2022
- I.5 ToR Committees & Council
- I.6 Trustees' terms of tenure
- I.7 Stakeholder event programme and write up
- I.8 Strategic Plan
- I.9 Guidelines for inspectors on running online and hybrid inspections v11
- I.10 The link to the online training re online and hybrid inspections
- I.11 Inspection Type Assessment – Template
- I.12 Example of Chief Inspectors monitoring form
- I.13 Records of Evidence used by inspectors to capture their findings during the inspection
- I.14 Current Inspector Handbook
- I.15 Example of BAC report with evaluative comments and inspector names
- I.16 IHE report template with guidance on Internal Quality Assurance
- I.17 Current Inspectors Report Writing Guidelines
- I.18 Inspectors' event agenda
- I.19 Accreditation Committee Summary Guide
- I.20 Accreditation Committee Member Handbook 2024
- I.21 BAC staff contract template 2022
- I.22 Proposed budget for monitoring inspections
- I.23 Inspector contract and GDPR template
- I.24 Well-being Solutions employee assistance programme
- I.25 Staff CPD Records
- I.26 Audit Committee Minutes 1 June 2023
- I.27 Annual Report Summary 2022-23
- I.28 BAC-Fees-Brochure-2024-25
- I.29 Ethical investment management

I.30 31 Example of development fund planning table

I.31 32 BAC One Page Overview

I.32 33 BAC Risk Register - May 2024

## II. ADDITIONAL DOCUMENTS PROVIDED BY BAC, BEFORE AND DURING THE VISIT, ON REQUEST OF THE REVIEW PANEL

- II.1 Some evidence of the focus group discussions and other stakeholder events run by the agency, and how the outcomes of those activities have fed into developments in policy and process
- II.2 Accreditation Committee minutes covering discussion of recent reports
- II.3 Update of 'Inspector Handbook'
- II.4 Draft Report Writing Guidelines – updated version compared to the one of 2020/2021
- II.5 Guidance and training documentation from the last reviewer/inspector training event
- II.6 A recent report pack: the draft report from the team, comments by Chief Inspector, final report submitted to Accreditation committee, and their deliberations
- II.7 Example of guidance provided to inspectors on the dos and don'ts of editing
- II.8 The 'Articles of association' (governing document)
- II.9 The 'Operational manual for committees'
- II.10 The 'Accreditation Committee terms of reference'
- II.11 Recent examples of: Council meeting agenda and minutes; Accreditation Committee attendance tracker (cf. 2019 External Review Report), meeting agenda and minutes, Audit Committee meeting agenda and minutes, Standing Committee meeting agenda and minutes
- II.12 Example of Decision Sheet
- II.13 Student recruitment: example of advertisement and application form

## III. OTHER SOURCES USED BY THE REVIEW PANEL

BAC's website: <https://www.the-bac.org/>

## ENQA TARGETED REVIEW 2025

THIS REPORT presents findings of the ENQA Targeted Review of the British Accreditation Council (BAC), undertaken in 2024.

**enqa.**

European Association for  
Quality Assurance in Higher Education