

Approval of the Application
by Quality Assurance Agency for Higher Education (QAA)
for Renewal of Inclusion on the Register

Register Committee
 12-13 October 2023

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Ver. 1.0
Date 2023-10-17
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Application of:	2022-09-20		
Agency registered since:	2013-07-01		
Type of review:	Full	Site visit:	2023-02-27
External review report of:	2023-06-28	Submitted:	2023-08-25
Review coordinated by:	European Association for Quality Assurance of Higher Education (ENQA)		
Review panel members:	Oliver Vettori (Chair), Nuria Comet (Secretary), Kirsty Williams, Liv Teresa Muth		
Decision of:	2023-10-13		
Registration until:	2028-06-30		
Absented themselves from decision-making:	Beate Tremel		
Attachments:	<ol style="list-style-type: none"> 1. QAA Statement on the Review Report, 2023-08-25 2. External Review Report, 2023-06-28 & Minuted Clarification with Review Panel, 2023-10-03 3. Substantive Change Report of 2023-06-30 4. Eligibility, Minuted Clarification with QAA, 2022-09-27 5. Substantive Change Report of 2023-02-13 6. Substantive Change Report, 2022-10-25 		

1. The application of 2022-09-20 adhered to the requirements of the EQAR Procedures for Applications.
2. The Register Committee confirmed eligibility of the application on 2023-02-13 having considered the clarification received from QAA on 2022-09-27.
3. The Register Committee considered the external review report of 2023-06-28 on the compliance of QAA with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG, 2015 version).
4. The Register Committee further considered the change reports of 2023-06-30, of 2023-02-13 and 2022-10-25.
5. The Register Committee sought and received clarification from the chair of the review panel (see Minuted Clarification with Review Panel of 2023-10-03).

Analysis:

6. In considering QAA's compliance with the ESG, the Register Committee took into account:

- *Enhancement-led Institutional Review (Scotland)*
- *Degree Awarding powers and University Title (Wales/Scotland)*
- *Quality Enhancement Review (Wales).*
- *Gateway Review (Wales)*
- *Higher Education Review (Alternative providers/Foreign providers) (UK wide²) (including the follow-up activity, Annual Monitoring)*
- *Review Scheme for Education Oversight (Educational Oversight) (UK-wide) (including the follow-up activity, Annual Monitoring)*
- *Educational Oversight Exceptional Arrangements (Educational Oversight) (UK-wide) (including the follow-up activity Annual Monitoring)*
- *International Quality Review (IQR) and IQR for African Higher Education Centers of Excellence (ACE) (International)*
- *International Programme Accreditation (IPA)*

7. The Register Committee noted that QAA has initiated two new activities i.e., *Scottish Quality Enhancement Arrangements* (in Scotland) and *Quality Enhancement Review* (in Wales) that are due for implementation. The agency is thus expected to provide further information (within a Substantive Change Report¹) as soon as it has commenced the implementation phase of the above mentioned activities.

8. The following activities carried out by QAA are not covered by EQAR registration. They are however considered as part for the agency's renewal application in what concerns their clear and transparent separation from QAA's external QA activities within the scope of the ESG (see list above)².

- *QE-TNE*
- *Investigatory Schemes*

9. The Register Committee found that the report provides sufficient evidence and analysis on QAA's level of compliance with the ESG.

10. With regard to the specific European Standards, the Register Committee considered the following:

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¹See EQAR's Guide for Agencies on reporting substantive changes

<https://www.eqar.eu/register/guide-for-agencies/reporting-and-renewal/>

²See more under EQAR's Use and Interpretation of the ESG subsection 4.2 and

Annex 2,

https://www.eqar.eu/assets/uploads/2020/09/RC_12_1_UseAndInterpretationOfTheESG_v3_0.pdf

ESG 2.4 – Peer-review experts

11. The Register Committee already noted in its change report decision (of 2022-10-28) that QAA has changed its policy since the last review and addressed the concerns raised as regards to student involvement in review panels.

12. The Committee was reassured by the panel’s analysis that showed that QAA ensures there is always a student included in its panels for all of the activities under review, except for follow-up visits. The Register Committee understands that follow-up visits are part of an external QA activity, and not a separate activity on its own and therefore finds this approach acceptable.

13. The Register Committee therefore finds the earlier issues addressed and concur with the panel’s recommendation that QAA should extend its pool of international reviewers in light of its own increasing rate of international reviews.

ESG 2.5 – Criteria for outcomes

14. The Register Committee understood from the review panel’s analysis that there is no independent commission that reviews and checks all reports and their application across the agency, which may question whether criteria are being applied uniformly.

15. The Register Committee concurs with the panel’s recommendation that QAA should strongly reflect on its approach to ensuring the consistency of outcomes including the potential need to establish an independent commission that validates reports and makes the final decision.

16. The Register Committee therefore agreed with the panel’s conclusion, that QAA complies only partially with standard 2.5.

ESG 3.1 – Activities, policy and processes for quality assurance

17. The Register Committee noted the following concerns with the way QAA has separated its consultancy and related activities from its external QA activities within the scope of the ESG. In particular the Register Committee remained in doubt whether:

- readers (at least lay readers) are able to distinguish whether the reviews carried out in Albania (with the national QA body) fall within the scope of QAA’s registration on EQAR, as they were not officially certified as in line with the ESG and
- how the agency ensures a clear communication and separation of the QE-TNE activity from QAA’s activities within the scope of the ESG, given that the activity can be easily misconstrued as an ESG activity [see change report of 2023-02-13].

18. The Register Committee noted that these concerns have not been addressed in the self-evaluation and external review report and therefore the Committee sought further clarifications from the panel to clarify how are

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the services rendered by QAA itself (internationally or domestically) separated from QAA’s regular ‘ESG activities’.

19. The panel explained (see minuted call of 2023-10-03) that in its understanding the QE-TNE activity is outside the scope of the ESG and thus outside the scope of the review. While the panel did bring this matter up during its discussion with the agency, the panel was reassured by the agency that this activity is not within the scope of the review. The panel was also unaware of the concerns raised by the Register Committee with regards to the consultancy activity carried out by the agency in Albania.

20. The Register Committee could not establish how the agency ensures a clear separation between ESG-type external quality assurance activities especially in cases where such a risk has been previously noted. The Committee therefore could not follow the panel’s judgment of compliance and found that QAA complies only partially with ESG 3.1.

ESG 3.4 – Thematic analysis

21. The Register Committee noted that QAA carries out systematic thematic analysis within Scotland, sector-wide analysis in Wales, while UK-wide QAA has only carried out “The Quality Assurance of Alternative Providers: A Retrospective View”.

22. The Committee finds that the current activity is sufficient in its understanding and interpretation of the standard and therefore could not follow the panel’s judgment of partial compliance and concluded that QAA complies with ESG 3.4.

23. The Register Committee nevertheless underlines the panel’s recommendation that QAA should develop a clearer plan for thematic analyses for all of its external QA activities in all nations of the UK and publish them on its website.

24. For the remaining standards, the Register Committee was able to concur with the review panel’s analysis and conclusion without further comments.

Conclusion:

25. Based on the external review report and the considerations above, the Register Committee concluded that QAA demonstrated compliance with the ESG (Parts 2 and 3) as follows:

Standard	Previous decision (2019-03-15)	Review panel conclusion	Register Committee conclusion
2.1	Compliance	Compliance	Compliance
2.2	Compliance	Compliance	Compliance
2.3	Compliance	Compliance	Compliance
2.4	Partial compliance	Compliance	Compliance
2.5	Compliance	Partial compliance	Partial compliance

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2.6	Compliance	Compliance	Compliance
2.7	Compliance	Compliance	Compliance
3.1	Partial compliance	Compliance	Partial compliance
3.2	Compliance	Compliance	Compliance
3.3	Compliance	Compliance	Compliance
3.4	Compliance	Partial compliance	Compliance
3.5	Compliance	Compliance	Compliance
3.6	Compliance	Compliance	Compliance
3.7	Compliance	(not expected)	Compliance (by virtue of applying)

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26. The Register Committee considered that QAA only achieved partial compliance with some standards. In its holistic judgement, the Register Committee concluded that these are specific and limited issues, but that QAA continues to comply substantially with the ESG as a whole.

27. The Register Committee therefore approved the application for renewed QAA's inclusion on the Register. QAA's renewed inclusion shall be valid until 2028-06-30³.

28. The Register Committee further underlined that QAA is expected to address the issues mentioned appropriately and to resolve them at the earliest opportunity.

³ Inclusion is valid for five years from the date of the external review report, see §3.25 of the EQAR Procedures for Applications.

Application by Quality Assurance Agency for Higher Education (QAA) for Renewal of Registration

Register Committee

Minutes of Telephone Conversation

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Date 2022-09-28
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Date of the conversation:	27/09/2022
Representative of QAA:	Laura Porter, Alastair Delaney
Representative of EQAR:	Melinda Szabo

1. QAA has submitted on 2022-09-20 an application for renewal of registration on the European Quality Assurance Register for Higher Education (EQAR).
2. In order to prepare the deliberations of the Register Committee on the eligibility of the application and QAA's activities within the scope of the ESG, EQAR contacted QAA to clarify the matters below.
3. QAA agreed to clarify the matters by means of an online conversation.
4. QAA clarified that *Gateway Quality Review* is an activity carried out at institutional level and not programme level and should therefore be updated as such in the list of QAA activities on the EQAR website.
5. Considering the difference between the activity *Higher Education Review* of Alternative providers vs *Higher Education Review* of Foreign providers, QAA stated that there are minor differences in terms of length of review and members nominated in review teams, but the approach in the external review of the provider is essentially the same. The two activities have different handbooks.
6. Concerning the activity *Higher Education Review* of Alternative providers QAA further clarified that the activity is UK wide, but the higher education review of alternative providers is only available for those institutions who cannot register with the Office for Students (OfS).
7. The two activities *International Quality Review (IQR)* and *IQR for African Higher Education Centers of Excellence (ACE)* while they have separate handbooks they have identical review processes. The only difference between the two activities is the scoping exercise (readiness check) carried out in the case of ACE.
8. The activity *Annual Monitoring for Educational Oversight* is not a free standing' quality assurance activity. The activity is carried out as part of QAA's *Educational Oversight Exceptional Arrangements*.
9. The activity *Investigatory schemes (Scottish Concern Scheme/Concerns Investigation process (Wales)/Concerns Scheme for Alternative Providers reviewed by QAA)* is a form of investigation activity undertaken in response to specific concerns that has been identified. The scope is

generally very specific. In case of wider concerns, a scheduled review of an institution might be brought forward.

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Clarification provided by the Panel

Register Committee

Date of the conversation:	2023-10-03
Panel members:	Oliver Vettori
Representative of EQAR:	Melinda Szabo

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1. QAA has submitted on 2022-09-20 an application for renewal of registration on the European Quality Assurance Register for Higher Education (EQAR). On 2023-08-25, QAA submitted the external review panel's report of 2023-06-28.
2. In order to prepare the deliberations of the Register Committee on QAA' compliance with the ESG, EQAR contacted the Panel to clarify how are the services rendered by QAA itself (internationally) or through its subsidiary QAAE (domestically) are separated from QAA's regular (ESG) activities, in particular considering the concerns raised in QAA's Renewal Decision of 15/03/2019, and QAA's Change Report of 13/02/2023.

ESG 3.1 – Activities, policy and processes for quality assurance

3. It was the panel's understanding that the QE-TNE activity is outside the scope of the ESG and thus outside the scope of the review of QAA. While the panel did bring this matter up during its discussion with the agency, the panel was reassured that this activity is not within the scope of the review and that it does not need to be addressed.
4. The panel was also unaware of the concerns raised by the Register Committee (in its decision of 2019-03-15) with regards to the consultancy activity carried out by QAA in Albania.
5. During its site-visit and discussion with the higher education institutions, the panel however found no indication that there might be a lack of understanding or confusion between the activities within or outside the scope of the ESG.
6. The panel nevertheless understands that since no further evidence was collected on this, it might be raised as an issue in the agency's renewal of registration on EQAR.



**The Quality Assurance Agency
for Higher Education**

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Melinda Szabo
Deputy Director
European Quality Assurance Register for Higher Education

By Email

25/08/2023

Dear Melinda,

QAA Statement

As part of QAA's commitment to quality enhancement, QAA has initiated an action plan process to respond to each of the areas made within the recently published ENQA agency review report. Lead members of staff have been allocated to all areas and the action plan will be approved and monitored by QAA's Assessment and Reviews Group as well as overseen by the QAA Board. A number of these actions are already in progress or completed. Actions completed include:

- In respect of the ESG 3.7 recommendation, the action plan approach was approved by the Senior Leadership Team in June 2023 in advance of publication of the report.
- In respect of the ESG 2.6 recommendation, a searchable report spreadsheet was added to the website pending further web development to increase functionality - <https://www.qaa.ac.uk/reviewing-higher-education/quality-assurance-reports>. This was completed 14th February 2023 following submission of the SAR.
- In respect of the ESG 2.7 recommendation a revised Comments, Compliments and Complaints procedure has been approved by the Board and was published on 18th July 2023 - [QAA procedure for the handling of complaints](#).
- In respect of the ESG 2.6 suggestion for further improvement, QAA has completed the process of uploading to DEQAR reports for England, Scotland and Wales.
- In respect of the ESG 2.7 suggestion for further improvement, the consolidated appeals procedure has been revised in respect of screening and approved by the Assessment and Review Group in August 2023. It is now with the board for approval at the October board meeting.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Alastair Delaney'.

Alastair Delaney
Director of Operations and Deputy CEO

