

## Decision on the Substantive Change Report by Quality Assurance Agency for Higher Education (QAA)

**Register Committee**  
13 – 14 March 2025

**Ref.** RC46/C129

**Ver.** 1.0

**Date** 2025-03-20

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<b>Decision of:</b>	2025-03-14
<b>Result:</b>	Take note
<b>Report received on:</b>	2024-11-15
<b>Agency registered since:</b>	2013-07-01
<b>Last external review report:</b>	2023-06-28
<b>Registration until:</b>	2028-06-30
<b>Absented themselves from decision-making:</b>	Beate Tremel
<b>Attachments:</b>	<ol style="list-style-type: none"> <li>1. <a href="#">Substantive Change Report 1, 2024-11-15</a></li> <li>2. <a href="#">Substantive Change Report 2, 2024-11-15</a></li> <li>3. <a href="#">Substantive Change Report 3, 2024-11-15</a></li> <li>4. <a href="#">Substantive Change Report 4, 2024-11-15</a></li> </ol>

1. The Register Committee considered the Substantive Change Reports of 2024-11-15.
2. The Register Committee took note that QAA has since its last review (of 2023-06-28) introduced the following changes:
  - A) changes in the agency's organisational structure
  - B) development of new external QA activities
    - Tertiary Quality Enhancement Review (TQER)
    - Educational Oversight Review (EOR)
    - Nursing and Midwifery Council Quality Assurance Review (NMCQAR)
  - C) discontinuation of external QA activities
    - Enhancement-led Institutional Review
    - Annual Monitoring for Educational Oversight
    - Educational Oversight – Exceptional Arrangements
    - Higher Education Review (Alternative Providers)
    - Higher Education Review (Foreign Providers)

- Recognition Scheme for Educational Oversight

## A) Changes in organisational structure

3. The Register Committee took note of QAA organisational re-structure where as the agency has reorganised its work in two distinct directorates, Regulatory Services and Contract Services.
4. The Committee understood that the Regulatory Services directorate is responsible for the work QAA undertakes across the UK in relation to independent quality assurance assessments being provided for the funders and regulators in Scotland, Wales and Northern Ireland. Furthermore, the Committee understood that the Contract Services directorate is responsible for enhancement activities in England and internationally, where QAA will continue to maintain separation between ESG and non-ESG activities.
5. **Based on the information provided in the Substantive Change Report, the Register Committee had no prima facie concerns that the ESG are complied with. Nevertheless, the Register Committee expects that these organisational changes will be analysed in full against ESG 3.1, in particular how the agency ensures a clear separation between ESG and non-ESG activities, as part of QAA's next review for renewal of registration.**

## Register Committee

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## B) Development of new external QA activities

### B1) Tertiary Quality Enhancement Review (TQER)

6. The Committee understood that QAA was commissioned by the Scottish Funding Council to to develop new procedure that covers both higher and tertiary providers in Scotland, following the conclusion of the cycle of the previous activity, Enhancement-led Institutional Review (see point C).
7. The Committee noted that this new activity has been developed on the basis of the Enhancement-led Institutional Review while widening the scope of the review after significant consultation with the sector.
8. **Based on the information provided in the Substantive Change Report, the Register Committee had no prima facie concerns that the ESG are complied with.**

### B2) Educational Oversight Review (EOR)

9. The Register Committee took note that QAA introduced the Educational Oversight Review (EOR) with the goal of consolidating its five existing activities, *Annual Monitoring for Educational Oversight*, *Educational Oversight – Exceptional Arrangements*, *Higher Education Review (Alternative Providers)*, *Higher Education Review (Foreign Providers)* and *Recognition Scheme for Educational Oversight* into one external quality assurance activity.

10. The Committee understood that the agency took such step of consolidating the existing five activities into one due to the low number of providers that were reviewed under these activities (35 providers in total) while a unified and consolidated review methodology was deemed to be more appropriate.
11. **Based on the information provided in the Substantive Change Report, the Register Committee had no prima facie concerns that the ESG are complied with.**

### **B3) Nursing and Midwifery Council Quality Assurance Review (NMCQAR)**

12. The Register Committee took note that the Nursing and Midwifery Council Quality Assurance Review will focus on reviewing nursing and midwifery courses across the United Kingdom.
13. QAA introduced the Nursing and Midwifery Council Quality Assurance Review in agreement with the Nursing and Midwifery Council. The aim of the reviews will be to provide quality assurance reviews for the Council which will perform programme approval and modification agreements of nursing and midwifery programmes.
14. **Based on the information provided in the Substantive Change Report, the Register Committee had no prima facie concerns that the ESG are complied with.**
15. **The Register Committee took note of the newly introduced activities and expects that the new activities B1, B2 and B3 will be analysed in full against ESG 2.1 – 2.7 as part of QAA’s next review for renewal of registration**

### **C) Discontinuation of external QA activities**

16. The Register Committee understood that the Enhancement-led Institutional Review (Scotland) has reached the end of its cycle and the same has been replaced with the Tertiary Quality Enhancement Review (TQER), see point B1.
17. Furthermore the Committee noted the *Annual Monitoring for Educational Oversight, Educational Oversight – Exceptional Arrangements, Higher Education Review (Alternative Providers), Higher Education Review (Foreign Providers) and Recognition Scheme for Educational Oversight* reviews have been discontinued. The Committee understood that the agency discontinued these activities due to the small number of higher education providers requiring these type of reviews, and their considerable overlap and similarity. These activities have been replaced by the new activity Education Oversight Review (EOR), see point B2.
18. The Register Committee took note of the discontinuation of these four activities. Therefore, these external QA activities shall be archived from QAA’s profile on the register.

## EQAR Substantive Change Report

Agency #1	Quality Assurance Agency for Higher Education
Agency acronym	QAA
Expiry date #1	30/06/2028
Contact #1	Rob Stroud
Phone #1	01452 557001
Email #1	<a href="mailto:r.stroud@qaa.ac.uk">r.stroud@qaa.ac.uk</a>
Other organisations?	No
A. Has the organisational identity of the registered agency changed?	No
B. Has the organisational structure changed?	Yes

### Description

Following a review of our operations after the introduction of our new services (as set out in Change Report of 26 October 2023) and changes that impact our other review methods that are shortly to be implemented (further change reports to follow) QAA has made the decision to implement an organisational restructure.

The previously listed EQAR contact Alastair Delaney, who had made an exceptional contribution to the Agency, particularly in relation to our work related to our EQAR registration, and who we wish the very best for the future, has left the Agency and therefore is no longer our key contact.

Our new key contact will be Rob Stroud, an existing member of staff within the Agency who has taken up the role of Executive Director of Quality Assurance and Enhancement.

We have reorganised our work into two distinct directorates - Regulatory Services, and Contract Services. Regulatory Services will be responsible for the work that we undertake across the UK in relation to independent quality assurance assessments being provider for the funders and regulators in Scotland, Wales, and Northern Ireland (which are all ESG compliant activities). Additionally, our work in relation to the regulation of the Access to Higher Education Diploma (a qualification below HE level) and our work in relation to quality and standards reference points (including the UK Quality Code) will sit within this directorate. Significantly, we have established a new post which will have responsibility for our European engagement and compliance activity (as well as responsibility for another of our review...

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... methods). We are hopeful that this dedicated resource will allow us to increase our collaborative activities with our colleagues across the EHEA community.

Our work in Contract Services includes our membership/sector enhancement activities, our services in England and internationally (where we continue to maintain separation between ESG and non-ESG activities), and our new contract with the Nursing and Midwifery Council to provide quality assurance activities to inform their UK wide regulatory activity.

Further reorganisation in our wider Agency activities will mean we will also be enhancing our sector engagement activities. The net effect of our changes to our staffing structure will be an increase in our total staffing headcount, and we

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consider this will put the Agency in a strong position to support and champion HE quality assurance for many years to come, and be able to adapt and respond in an agile manner as the different nations of the UK look to QAA to support their quality assurance in different ways.

Please note we will be submitting further change reports today in order to update on the changes to review methods that will now be embedded within this new structure (it has not been possible to submit as a single report due to the word limits).

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**C. Changes in EQA activities**

4. Not applicable, no new activities/no changes

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**D. Activity outside the scope of the ESG**

No

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**Submit form?**

I am ready to submit the change report form

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## EQAR Substantive Change Report

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Contact #1	Rob Stroud
Phone #1	01452 557001
Email #1	<a href="mailto:r.stroud@qaa.ac.uk">r.stroud@qaa.ac.uk</a>
Other organisations?	No
A. Has the organisational identity of the registered agency changed?	No
B. Has the organisational structure changed?	No
C. Changes in EQA activities	<ul style="list-style-type: none"><li>• 1. One or several new external QA activities were introduced</li><li>• 3. One or several existing activities were discontinued</li></ul>
Description new/changed	<p>In Scotland, we have introduced the Tertiary Quality Enhancement Review (TQER). This is in response to the commission given to QAA by the Scottish Funding Council to develop a new review mechanism that covers both higher and tertiary education providers in Scotland, following the conclusion of the cycle of the previous higher education review activity. This new method was therefore developed on the basis of an existing activity that was subject to the last external review as we have previously reviewed higher education providers in Scotland under the previous method, but is a substantial update and has been subject to significant consultation with the sector.</p>

### 1. New EQA activity:

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**Focus**

study programmes or higher education institutions

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**ESG 2.1**

The Agency has an Internal Quality Assurance (IQA) manual which sets the expectations for method design. As part of the manual there is a method design checklist which includes demonstrating how ESG Part 1 is incorporated. The UK Quality Code is a key external reference point for TQER. QAA maps the UK Quality Code against the ESG Standards 1.1 to 1.10 and ensures its approach reflects the ESG standards. The mapping is included in Annex S of the published TQER review guide. The Quality Code is also embedded throughout TQER as an external reference point, in the section entitled 'Evidencing the effectiveness of the institution against the TQEF principles' and the documentation in the 'Advance Information Set' is also structured against the Quality Code. The Quality Code is embedded throughout TQER enabling ESG Part 1 to form an integral part of the method.

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**ESG 2.2**

The development of TQER has taken account of the Agency's Internal Quality Assurance Manual which sets out the characteristics and expectations of QAA's review methods and method level expectations. This includes a method design checklist that must be adhered to. The development of the review method has been overseen by a method advisory group with members drawn from key stakeholders. The method development process also requires consultation with stakeholders at a formative stage. Sector workshops, meetings with sector bodies and a college engagement programme were undertaken as well as liaison with key

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sector groups, committees and networks. A formal consultation was undertaken prior to finalising the method. The revised method was then signed off by the Agency's Assessment and Reviews Group which has oversight of all the Agency's review activity.

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### ESG 2.3

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<https://www.qaa.ac.uk/docs/qaas/reviewing-he-in-scotland/tqer-guide-for-institutions.pdf>

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### ESG 2.3

N/A: Site visits are used although there is scope for the initial review visit to be either online, hybrid or in person. The main visit would normally be in person but may be hybrid to reflect the nature of the provision under review (for example transnational education or online delivery).

N/A: QAA has overall responsibility for all aspects of TQER. In two areas external parties – Scottish Funding Council (SFC) and Scottish Credit and Qualifications Framework Partnership (SCQFP) provide supporting documentary evidence where fixed timescales and processes have been agreed.

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### ESG 2.4

The agency approach to selection, appointment and training of reviewers remains unchanged from ELIR which is the predecessor method. Applications will be considered for all reviewer types and all members of review teams are selected according to the criteria outlined in the TQER guide. Reviewers are appointed using a job description and person specification published as part of the recruitment process. All reviewers, including those trained in other review methods, are required to undertake mandatory training and specific training for TQER.

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Reviewers will be expected to participate in continuing development and reviewer events as appropriate and targeted training and continuing professional development to specific reviewers as required. All the team members are required to join the Protection of Vulnerable Groups scheme. The minimum size of the review team is four peer reviewers to include one Student Reviewer, and either:

- two reviewers (at least one of these will have teaching experience) and one specialist reviewer

- three reviewers (at least one of these will have teaching experience).

The maximum team size is six reviewers depending on the size and complexity of the institution and the outcomes of the scoping exercise. Information on the types of reviewers is available in the TQER guide.

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## ESG 2.5

The same as for all other QAA reviews. The Agency ensures consistency through: 1. a published judgement criteria, 2. training of reviewers, 3. a trained QAA officer attending the full review and discussing the outcomes, judgements and findings with the team, testing the evidence and providing advice and help to the reviewers in decision making, 4. referencing of evidence behind the reviewers' findings which is checked by the officer, 5. moderation of the review findings by an experienced and senior review manager, 6. moderation of review reports and 7. institutions' factual accuracy checks.

Following the recommendation made in the 2023 ENQA review, QAA has reviewed its approach to provide guidance and templates to further support the consistent application of the moderation approach and from 2024-5 will implement cross agency report sampling. Both

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actions will further support our existing practice.

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**ESG 2.6**

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<https://www.qaa.ac.uk/reviewing-higher-education/quality-assurance-reports>

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**ESG 2.7**

The same as for all QAA reviews. Appeals and formal complaints procedures are designed to ensure that there is no conflict of interest throughout, and both are handled by QAA's Governance team to avoid any conflict of interest. No one involved will have had previous involvement with the matter.

An appeal is a challenge by an institution to the outcome of a review or to another decision made by QAA. QAA has a consolidated appeals procedure. This is available on QAA's public website and an updated version to include this new method has recently been considered and approved by QAA's Board. The appeal procedures state when an appeal can be made, the deadline by which an appeal must be made to be valid, what is an appealable judgement and the grounds for appeal. The procedures set out the process, timescales and potential outcomes.

A complaint is an expression of an individual's dissatisfaction with their experience of dealing with QAA.. Complaints may be on behalf of the individual's institution. If a formal complaint is received at the same time as an appeal, the complaint is stayed until the appeal has been concluded. QAA's Complaints Handling is available on QAA's public website.

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**ESG 3.4/ESG 3.6**

The QAA follows a standardised approach that is publicly outlined on our website. Key

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components of that approach include an Internal Quality Assurance Manual (IQA Manual), strategic oversight by the Assessment and Reviews Group and operational oversight by the Assessment and Reviews Operational Group. The manual sets out the overall approach of QAA to the internal quality assurance of its work as an external quality assurance agency reviewing, evaluating and accrediting the quality and standards of higher education. It sets out the expectations for method design and provides guidance on delivery. The manual seeks to help QAA staff to understand the QAA approach to external quality assurance and to support their development as quality professionals. It is designed as a reference document, providing information when staff need it. In QAA's most recent ENQA review report QAA was commended for 'its comprehensive Internal Quality Assurance Manual which serves as a great reservoir of internal knowledge and regulates a vast array of issues and processes'. The IQA manual sets out an approach to thematic reporting outlining the requirement for each review method to produce a reflective overview. Reference to thematic reporting has been included in the TQER guide. In addition, QAA is developing an approach to cross-agency thematic reporting in addition to review method thematics.

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### 3. Discontinued EQA activity

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Enhancement-led Institutional Review (Scotland)

Context

This review had reached its end of cycle. The Scottish Funding Council commissioned QAA to develop a new review method, the TQER.

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D. Activity outside the scope of the ESG

No

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Submit form?

I am ready to submit the change report form

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## EQAR Substantive Change Report

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Agency acronym	QAA
Expiry date #1	30/06/2028
Contact #1	Rob Stroud
Phone #1	01452 557001
Email #1	<a href="mailto:r.stroud@qaa.ac.uk">r.stroud@qaa.ac.uk</a>
Other organisations?	No
A. Has the organisational identity of the registered agency changed?	No
B. Has the organisational structure changed?	No
C. Changes in EQA activities	<ul style="list-style-type: none"><li>• 1. One or several new external QA activities were introduced</li><li>• 3. One or several existing activities were discontinued</li></ul>
Description new/changed	<p>Across the UK we have introduced the Educational Oversight Review (EOR). This review consolidates five existing review methods into one. As there was only a constituency of around 35 providers that continued to be subject to these methods, it was inefficient to continue to run them separately, and a consolidated review mechanism was more appropriate. Almost all of the providers subject to the review require it to demonstrate compliance with the requirements of the UK Home Office to allow them to recruit international students, and therefore it was important that these providers have access to a contemporary and effective review mechanism that meets both their needs, and the statutory requirements to which they are subject. This</p>

therefore is also considered to be an update to existing activities that were subject to the last external review (HER-AP, HER-FP, EOE, RSEO, and AMEO).

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## 1. New EQA activity:

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Educational Oversight Review

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**Focus**

study programmes or higher education institutions

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**ESG 2.1**

The Agency has an Internal Quality Assurance (IQA) manual which sets the expectations for method design. As part of the manual there is a method design checklist which includes demonstrating how ESG Part 1 is incorporated. The UK Quality Code is the external reference point for EOR and the basis on which judgements are made. QAA maps the UK Quality Code against the ESG Standards 1.1 to 1.10 and ensures its approach reflects the ESG standards.

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**ESG 2.2**

The development of EOR has taken account of the Agency's Internal Quality Assurance Manual which sets out the characteristics and expectations of QAA's review methods and method level expectations. This includes a method design checklist that must be adhered to. A formal consultation was undertaken prior to finalising the method that was open to both providers currently subject to the review mechanisms this would replace, but also open more widely for other sector stakeholders to review and engage with. The consultation analysis was produced and published for transparency at <https://www.qaa.ac.uk/docs/qaa/guidance/educational-oversight-review-analysis-of-consultation-responses-and-decisions.pdf>. The method was then signed off by the Agency's Assessment and Reviews Group which has

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oversight of all the Agency's review activity.

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**ESG 2.3**

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<https://www.qaa.ac.uk/docs/qaa/guidance/educational-oversight-review-guidance-for-providers.pdf>

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**ESG 2.3**

N/A site visits are used, and no other agency has responsibility for any element of the process beyond a Financial Sustainability, Management and Governance check. For this check, QAA directly contracts a professional firm to undertake this check, according to the specifications that QAA sets out.

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**ESG 2.4**

The review is carried out by teams of peer reviewers, who are staff with senior-level expertise in the provision, management and delivery of higher education; or students with experience in representing students' interests. We appoint reviewers from the higher education sector using a job description and person specification published as part of the recruitment process. We train all reviewers, which consists of generic induction and training, and method-specific training prior to engagement in a review.

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**ESG 2.5**

The same as for all other QAA reviews. The Agency ensures consistency through: 1. a published judgement criteria, 2. training of reviewers, 3. a trained QAA officer attending the full review and discussing the outcomes, judgements and findings with the team, testing the evidence and providing advice and help to the reviewers in decision making, 4. referencing of evidence behind the reviewers' findings which is checked by the officer, 5. moderation of the review findings by an experienced and senior review manager, 6. moderation of review reports

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and 7. institutions' factual accuracy checks. Following the recommendation made in the 2023 ENQA review, QAA has reviewed its approach to provide guidance and templates to further support the consistent application of the moderation approach and from 2024-5 will implement cross agency report sampling. Both actions will further support our existing practice.

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## ESG 2.6

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<https://www.qaa.ac.uk/reviewing-higher-education/quality-assurance-reports>

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## ESG 2.7

The same as for all QAA reviews. Appeals and formal complaints procedures are designed to ensure that there is no conflict of interest throughout, and both are handled by QAA's Governance team to avoid any conflict of interest. No one involved will have had previous involvement with the matter.

An appeal is a challenge by an institution to the outcome of a review or to another decision made by QAA. QAA has a consolidated appeals procedure, which has recently been updated to include reference to this new method and have been approved by the QAA Board. The appeal procedures state when an appeal can be made, the deadline by which an appeal must be made to be valid, what is an appealable judgement and the grounds for appeal. The procedures set out the process, timescales and potential outcomes.

A complaint is an expression of an individual's dissatisfaction with their experience of dealing with QAA.. Complaints may be on behalf of the individual's institution. If a formal complaint is received at the same time as an appeal, the

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complaint is stayed until the appeal has been concluded. QAA's Complaints Handling is available on QAA's public website.

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### ESG 3.4/ESG 3.6

The QAA approach to internal quality assurance is outlined on our website. Key components of that approach include an Internal Quality Assurance Manual (IQA Manual), strategic oversight by the Assessment and Reviews Group and operational oversight by the Assessment and Reviews Operational Group. The manual sets out the overall approach of QAA to the internal quality assurance of its work as an external quality assurance agency reviewing, evaluating and accrediting the quality and standards of higher education. It sets out the expectations for method design and provides guidance on delivery. The manual seeks to help QAA staff to understand the QAA approach to external quality assurance and to support their development as quality professionals. It is designed as a reference document, providing information when staff need it. In the most recent ENQA review report QAA was commended for 'its comprehensive Internal Quality Assurance Manual which serves as a great reservoir of internal knowledge and regulates a vast array of issues and processes'. The IQA manual sets out an approach to thematic reporting outlining the requirement for each review method to produce a reflective overview. Reference to thematic reporting has been included in the TQER guide. In addition, QAA is developing an approach to cross-agency thematic reporting in addition to review method thematics.

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### 3. Discontinued EQA activity

2	Educational Oversight - Exceptional Arrangements
3	Higher Education Review (Alternative Providers)
4	Higher Education Review (Foreign Providers)
5	Recognition Scheme for Educational Oversight
<b>Context</b>	Due to the relatively small number of higher education providers requiring these methods, and their considerable overlap and similarity, these methods have all been replaced by the new single Educational Oversight Review.
<b>D. Activity outside the scope of the ESG</b>	No
<b>Submit form?</b>	I am ready to submit the change report form

## EQAR Substantive Change Report

Agency #1	Quality Assurance Agency for Higher Education
Agency acronym	QAA
Expiry date #1	30/06/2028
Contact #1	Rob Stroud
Phone #1	01452 557001
Email #1	<a href="mailto:r.stroud@qaa.ac.uk">r.stroud@qaa.ac.uk</a>
Other organisations?	No
A. Has the organisational identity of the registered agency changed?	No
B. Has the organisational structure changed?	No
C. Changes in EQA activities	1. One or several new external QA activities were introduced
Description new/changed	<p>We have introduced the Nursing and Midwifery Council Quality Assurance Review (NMCQAR). This is a new activity not subject to the last external review, and has been introduced as on the 1 September 2024 QAA entered into a contract with the regulator of all UK nursing and midwifery courses (the Nursing and Midwifery Council) to provide quality assurance activities for them. This is an initial review method and we anticipate introducing further methods under this contract in the future that will cover additional types of quality assurance activities - this method is designed to cover programme approval and modification arrangements.</p>
1. New EQA activity:	
1	NMC Quality Assurance Review
Focus	study programmes or higher education

**ESG 2.1**

The Agency has an Internal Quality Assurance (IQA) manual which sets the expectations for method design. As part of the manual there is a method design checklist which includes demonstrating how ESG Part 1 is incorporated. For this method, noting we are assessing against the regulatory standards set by an independent regulator, we conducted a further detailed mapping exercise in collaboration with the NMC that explains how the ESG part 1 is met. This has been uploaded as per the instructions, and for transparency we have also published this information on our website.

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**ESG 2.2**

The development of this method has taken account of the Agency's Internal Quality Assurance Manual which sets out the characteristics and expectations of QAA's review methods and method level expectations. This includes a method design checklist that must be adhered to. We held two consultation events with sector representatives to take them through the proposed method, and made changes to the final handbook as a result of their feedback. The revised method was then signed off by the Agency's Assessment and Reviews Group which has oversight of all the Agency's review activity.

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**ESG 2.3**

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<https://www.qaa.ac.uk/docs/nmclibraries/guidance/nmc-quality-assurance-reviews-guidance.pdf>

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**ESG 2.3**

Site visits are used in many cases for this review. Where a site visit is not used, and the process includes either online or desk based elements, the assessment process will include the opportunity for reviewers (referred to as "visitors")

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for the purposes of this method) to be able to engage with the institution virtually to test the evidence that has been presented for desk based review. In all cases there will be engagement between the visitors and the institution. If visitors are not satisfied with the evidence, they have the ability to set conditions on the approval that an institution must meet before the programmes being considered can be recommended for approval, and the visitors will re-test that evidence once it has been submitted. The visitors include both lay visitors with wider understanding of quality assurance, but also specialist visitors who must be either a nurse or midwife and therefore have specialist experience relevant to the programmes and therefore are able to provide a comprehensive and thorough degree of scrutiny.

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#### ESG 2.4

The review is carried out by teams of peer visitors, who are NMC registrants with experience in the relevant field of practice or profession; professionals with senior-level expertise in the provision, management and delivery of higher education in educational and/or practice settings; patients, people who use services and/or carers; and students with experience in representing students' interests. Registrant visitors include those who are currently or in the last three years have been practicing in nursing, midwifery, as nursing associates and/or in education and will be assigned to undertake activities for parts of the register in which they hold registration and have a recorded qualification. We appoint visitors using a job description and person specification published as part of the recruitment process. We train all visitors, which consists of generic induction and training, and training

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on the specifics of the review method prior to engagement in a review. Size of review teams is determined according to the nature of the review (i.e. whether a full approval or a modification). Additionally, some elements are conjoint with the institution, who will also utilise external expertise and student representation. Although these participants do not form part of the team that makes judgements, it means there is comprehensive representation from stakeholders that inform the reviewers in their work as they progress.

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## ESG 2.5

The same as for all other QAA reviews. The Agency ensures consistency through: 1. a published judgement criteria, 2. training of reviewers, 3. a trained QAA officer attending the full review and discussing the outcomes, judgements and findings with the team, testing the evidence and providing advice and help to the reviewers in decision making, 4. referencing of evidence behind the reviewers' findings which is checked by the officer, 5. moderation of the review findings by an experienced and senior review manager, 6. moderation of review reports and 7. institutions' factual accuracy checks. Following the recommendation made in the 2023 ENQA review, QAA has reviewed its approach to provide guidance and templates to further support the consistent application of the moderation approach and from 2024-5 will implement cross agency report sampling. Both actions will further support our existing practice. In addition, for this contract we are in the process of recruiting two specialist managers with relevant clinical expertise who shall be responsible for assessing the effectiveness of the review method being utilised.

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## ESG 2.6

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<https://www.qaa.ac.uk/reviewing-higher-education/quality-assurance-reports>

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## ESG 2.7

We will be approaching appeals and complaints in a similar, but not identical method to other QAA reviews. Appeals and formal complaints procedures are designed to ensure that there is no conflict of interest throughout, and both are handled by QAA's Governance team to avoid any conflict of interest. No one involved will have had previous involvement with the matter.

An appeal is a challenge by an institution to the outcome of a review or to another decision made by QAA. Due to the statutory nature of these reviews, and the need to comply with UK legislation related to these courses (the Nursing and Midwifery Order 2001) we have implemented an appeals procedure for these reviews that is separate to QAA's normal consolidated appeals procedure. The appeal procedure states when an appeal can be made, the deadline by which an appeal must be made to be valid, what is an appealable judgement and the grounds for appeal. The procedures set out the process, timescales and potential outcomes. In this case, appeals are considered within a statutory period for "observations" (a term specified in the legislation) and these arrangements are set out in Annexe 8 of the handbook.

A complaint is an expression of an individual's dissatisfaction with their experience of dealing with QAA.. Complaints may be on behalf of the individual's institution. If a formal complaint is received at the same time as an appeal, the complaint is stayed until the appeal has been

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concluded.

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**ESG 3.4/ESG 3.6**

The QAA approach to internal quality assurance is outlined on our website. Key components of that approach include an Internal Quality Assurance Manual (IQA Manual), strategic oversight by the Assessment and Reviews Group and operational oversight by the Assessment and Reviews Operational Group. The manual sets out the overall approach of QAA to the internal quality assurance of its work as an external quality assurance agency reviewing, evaluating and accrediting the quality and standards of higher education. It sets out the expectations for method design and provides guidance on delivery. The manual seeks to help QAA staff to understand the QAA approach to external quality assurance and to support their development as quality professionals. It is designed as a reference document, providing information when staff need it. In the recent ENQA review report QAA was commended for 'its comprehensive Internal Quality Assurance Manual which serves as a great reservoir of internal knowledge and regulates a vast array of issues and processes'. The IQA manual sets out an approach to thematic reporting outlining the requirement for each review method to produce a reflective overview. Reference to thematic reporting has been included in the TQER guide. In addition, QAA is developing an approach to cross-agency thematic reporting in addition to review method thematics, and as set out above, for this contract will be recruiting specific staff to conduct analyses of the outcomes to inform both method development and wider sector practice.

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**D. Activity outside the scope of the ESG**

No

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**File #1**

[mapping-of-the-esg-standards-part-1\\_1.pdf \(231 KB\)](#)

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