

**Substantive Change Report**  
**by Quality Assurance Agency for Higher Education (QAA)**

Register Committee

Ref. RC/C80

Ver. 1.0

Date 2022-11-07

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Decision of: 2022-10-25

Report received on: 2022-08-16

Agency registered since: 2013-07-01

Last external review report: 2017-06-21

Registration until: 2023-06-30

Absented themselves from decision-making: none

Attachments:

1. [Substantive Change Report of 2022-05-16](#)
2. [Substantive Change Report of 2022-05-26](#)
3. [Substantive Change Report of 2022-08-16](#)
4. [Minuted clarification call of 2022-09-15](#)

1. The Register Committee considered the Substantive Change Report of 2022-08-16, of 2022-05-26 and of 2022-08-16.

2. The Committee took note that QAA has since its last review (of June 2017) introduced the following changes in its activities:

*A)* development of a new external QA activity (outside the scope of the ESG): *Quality Evaluation and Enhancement of UK Transnational Higher Education (QE-TNE)*,

*B)* development of a new external QA activity: *International Programme Accreditation (IPA)*,

*C)* discontinued the activity: the *General Osteopathic Council (GOsC) Review*.

**A. Quality Evaluation and Enhancement of UK Transnational Higher Education (QE-TNE)<sup>1</sup>**

3. The Register Committee noted that QAA has replaced the activity *Transnational Education Review (TNE)* with a new thematic, country-specific quality enhancement activity, QE-TNE. While TNE Review was an activity within the scope of the ESG, QAA classified QE-TNE as an activity outside the scope of the ESG.

4. QE-TNE includes UK degree-awarding bodies on a voluntary basis. The QE-TNE programme consists of an agreed schedule of (target) country-specific activity, as opposed to a primarily institutional only focus.

<sup>1</sup><https://www.qaa.ac.uk/international/transnational-education/quality-evaluation-and-enhancement-of-uk-tne#qe-tne-participants>

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5. The Register Committee noted that QE-TNE evaluations result in a published per-country report, as well as a series of institutional visitation reports, case studies and further reports that are not published. Visitation reports for higher education institutions are short (eight to ten pages) and include findings, suggested actions and areas for development to support quality enhancement.
6. Given that QAA does not consider the activity within the scope of the ESG, the Committee asked QAA to clarify the relation of QE-TNE to the Core and Common practices of the UK Quality Code (see p.11 of the QE-TNE Handbook, point 12) and why the handbook makes a reference to EQAR's publication requirement (p. 45 of QE-TNE Handbook), which would not be applicable to an activity outside the scope of the ESG. The Committee further asked how QAA ensured that the results of a QE-TNE review are not misconstrued as an activity within the scope of the ESG.
7. QAA explained that QE-TNE is carried out similarly to other evaluation activities, but that the methodology is adapted to align with the context and needs of the specific host country. The agency emphasised that the activity is conducted around a series of themes providing examples of effective practice and does not evaluate against a set of criteria nor follows any standards or guidelines.
8. QAA stated that QE-TNE does not observe the UK Quality Code for Higher Education, and it does not reference the ESG in its QE-TNE review. The agency also explained that the wording of the report was clearly distinguished from other types of reports.
9. QAA also stated that the conclusions of the QE-TNE reviews do not have any regulatory status and that higher education providers cannot rely on any reports or other outputs from the QE-TNE for any purpose relating to registration with the Office for Students.
10. **The Register Committee underlined that the regulatory status does not bear any consequence on whether an activity is within or outside the scope of the ESG.**
11. The Register Committee considered QE-TNE against the four characteristics<sup>2</sup> of an 'ESG-type activity':
  - (a) it is evident and undisputed that QE-TNE is substantially concerned with teaching and learning in higher education;
  - (b) even though QE-TNE is primarily focusing on the country level, it concerns (also) individual higher education institutions and involves quality assessment at that level;
  - (c) QE-TNE largely follows pre-defined processes, although not a set of pre-defined criteria);

<sup>2</sup>See EQAR Policy of the Use and Interpretation of the ESG (p.4), <https://www.eqar.eu/about/official-documents/#use-and-interpretation-of-the-esg>

(d) QE-TNE uses the typical external quality assurance terminology of 'evaluations'.

12. The Committee concluded that QE-TNE largely has the characteristics of an 'ESG-type' activity. The Committee further considered that the award of the kite mark to QE-TNE participants might create the impression that the activity is of an assessment nature and certifies a certain achievement, rather than to be of purely developmental nature.
13. Based on the above, the Register Committee found that the proposed classification of the QE-TNE activity as an activity outside the scope of the ESG is not self-evident. The Committee could only accept such a classification if the close resemblance of an ESG activity (as described above) is balanced by an extremely high degree of transparency and clarity in the way the activity is presented. The Committee, however, found that QAA's description of QE-TNE as "aligned with the spirit and essential purpose of the ESG" (see Change Report) and reference to "EQAR's publication requirement" (see QE TNE Handbook, p. 45) suggest that QE-TNE was an ESG activity and may thus mislead the public about the status of the activity.
14. **The Register Committee therefore requests that QAA responds to these concerns by either:**
  - a) removing all (implicit or explicit) references to EQAR and ESG (or misconstruing the use of UK Quality Code) in its presentation of the QE-TNE, and ensuring a clear communication in the QE-TNE Handbook, its website and all related documentation by means of an explicit and clear disclaimer that QE-TNE is an activity outside the scope of the ESG, thus not covered by QAA's EQAR registration and that no claim of having been reviewed against the ESG may be made on its basis; or
  - b) clarifying QE-TNE as an activity within the scope of the ESG.
15. The agency is expected to provide a further report by 5 December, either – in case a) – demonstrating how QAA has addressed the concerns or – in case b) – providing information on ESG compliance in its QE-TNE reviews using the standard form for ESG activities.

## **B. International Programme Accreditation (IPA)<sup>3</sup>**

16. The Register Committee noted that QAA initiated the International Programme Accreditation (IPA) in July 2022.
17. The IPA activity assesses the standards and quality of individual programmes of study against Part 1 of the ESG. (ESG 2.1)
18. In the development of the IPA procedure, QAA consulted an internal working group and an external advisory group. External stakeholders were also invited to comment on the methodology. Based on the

<sup>3</sup><https://www.qaa.ac.uk/international/accreditation/international-programme-accreditation>

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feedback received at each of the consultation stages amendments were introduced in the proposal (ESG 2.2).

19. The activity includes the normal peer review cycle, including a mid-cycle review, two to three years after a successful programme review. The institution's programme team is asked to provide evidence that any recommendation and other findings from the IPA review is being addressed (ESG 2.3).
20. The review team comprises of one UK peer reviewer, one international peer reviewer and one student reviewer (at least one is a subject specialist) (ESG 2.4).
21. The accreditation period is five years, subject to a satisfactory mid-cycle review. To ensure consistency in its reporting and decision making an independent panel of QAA, composed of officers who were not involved in the accreditation of the programme will review the report (ESG 2.5).
22. QAA publishes the review report on its website. The report sets out the review team's confirmed findings (overall judgements, recommendations) and analysis as confirmed by the Accreditation Panel (ESG 2.6).
23. Procedures for the IPA are subject to the general appeals and complaints protocols of QAA (ESG 2.7).
24. **Based on the information provided in the Substantive Change Report, the Register Committee had no concerns that the ESG are complied with in this new activity.**

### **C. General Osteopathic Council (GOsC) Review**

25. The Committee understood that QAA ceased to carry out reviews for the General Osteopathic Council (GOsC) following the end of its contract (on 31 July 2020).
26. **The Register Committee considered the reported changes and noted that the separation of QE-TNE from QAA's activities within the scope of the ESG as well as the implementation of the IPA should be addressed in the next external review of QAA.**

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## EQAR Substantive Change Report

Reference #	22447649
Status	Complete
Login Username	r.pelik.2@qaa.ac.uk
Login Email	r.pelik.2@qaa.ac.uk
Agency #1	Quality Assurance Agency for Higher Education
Agency acronym	QAA
Expiry date #1	30/06/2023
Contact #1	Piers Wall
Phone #1	+44 7789 938385
Email #1	<a href="mailto:p.wall@qaa.ac.uk">p.wall@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	4. Not applicable, no new activities/no changes
D. Activity outside the scope of the ESG	Yes
Context	<p>QE-TNE is a thematic, enhancement-based method. It is an innovative high-value scheme with clear benefits for its members, it meets the interests of host countries and the differing requirements of the UK's home nations. <b>It is fit for its purpose and aligned with the spirit and essential purpose of the ESG although, due to its nature, it does not fully meet all standards.</b></p> <p>QE-TNE focuses on quality enhancement and thematic reporting thus it is external quality</p>

activity not external quality assurance.

- The focus is UK TNE in a selected host country (it is neither institutional nor programme review)
- It is voluntary and fees-based
- TNE arrangements are selected for evaluation visits (with findings not judgements) alongside institution-led case studies
- There is a range of published outputs including the Overview Report
- It is flexible and responsive to the context of the host nation
- It complements UK quality assurance and does not duplicate it
- Thematic analysis is built into the whole approach
- The benefits go beyond the country or arrangement being selected – **and beyond the UK.**

QE-TNE has five stages (handbook attached)

Stage 1: Creating a schedule of country-based activity involves analysing data and looking at policy priorities to assess potential host nations against the criteria set out in the method handbook.

Stage 2: Relationship building and liaison with the host country **to:**

- Build trust and relationships, share...

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... intelligence and insights

- Explore any challenges for TNE
- Prepare for in-country activity: the provider and sample selection (including shared activity); meetings with a wider group of UK TNE students; potential meetings with UK TNE graduates, employers or professional bodies linked to UK TNE provision

QE-TNE is a collaborative process throughout and looks to mutual benefits between the UK and host nation and for UK TNE providers in the scheme overall.

Stage 3: Preparation and planning in the UK  
UK providers are surveyed; case studies selected; the visit sample enables the review team to explore TNE delivery and understand what the nature of the student experience is like in practice, to look at how providers work with their partners and seek to enhance provision.

Stage 4: Evaluation activity

The sample of TNE arrangements, like any other method, involves an evidenced self-evaluation, expert peers (including a student), a site visit and reporting. The review team identify common matters across providers to feed into wider thematic reporting, identifying: what are the distinctive features of UK TNE in this country? **what is working well? where are there areas for development? what are the collective challenges?**

Stage 5: Production of reports, publications and wider outcomes

The country-related outputs are: the Overview Report (the publicly available report of UK TNE activity within the selected country); a short report on each TNE arrangement; ...

...institution-led case studies; student experience report; Country Guide; and a range of dissemination events, such as webinars. This range of outputs across three countries each year enables all the material to be interrogated to produce a flow of thematic reports and

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resources.

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<b>File #1</b>	<a href="#">qe-tne-handbook-21_1.pdf (7.80 MB)</a>
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## EQAR Substantive Change Report

Reference #	22531649
Status	Complete
Agency #1	Quality Assurance Agency for Higher Education
Agency acronym	QAA
Expiry date #1	30/06/2023
Contact #1	Alastair Delaney
Phone #1	+44 (0)1452 557091
Email #1	<a href="mailto:a.delaney@qaa.ac.uk">a.delaney@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	3. One or several existing activities were discontinued
3. Discontinued EQA activity	
1	General Osteopathic Council (GOsC) Review
Context	Contract for this work has ended. QAA no longer does reviews on behalf of the GOsC.
D. Activity outside the scope of the ESG	No
Submit form?	I am ready to submit the change report form
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**Device**

Desktop

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**Referrer**

<https://www.eqar.eu/>

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## EQAR Substantive Change Report

Reference #	23235387
Status	Complete
Agency #1	The Quality Assurance Agency for Higher Education
Agency acronym	QAA
Expiry date #1	30/06/2023
Contact #1	Dr Alison Felce
Phone #1	+447706306060
Email #1	<a href="mailto:a.felce@qaa.ac.uk">a.felce@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>International Programme Accreditation (IPA) offers institutions outside the UK the opportunity to have an independent peer review of its curriculum development and quality assurance process. The review includes the systematic monitoring and evaluation of learning and teaching, and the processes that support them, to ensure that the standards of academic awards meet the required level and the quality of the student learning experience is being safeguarded and continually improved. This is combined with a specific review of individual programmes of study and may lead to International Programme Accreditation by the QAA.</p>

IPA assesses the standards and quality of individual programmes of study against the Part 1 of the ESG. QAA also takes into account the local context; national and regional regulatory requirements; and standards.

IPA benefits higher education institutions by enabling them to analyse and improve the quality assurance systems that safeguard their programme, which supports development of curriculum and helps student achievement.

IPA has four stages

Stage 1: Application - An international higher education institution completes an application form and provides evidence demonstrating that their programme meets the eligibility criteria. A Screening Panel determines whether the programme can proceed to the review stage.

Stage 2: Review – The institution demonstrates how the programme meets IPA standards (ESG Part 1) through a self-evaluation document (SED), supported by relevant evidence. The review team of three - comprising one UK peer reviewer, one...

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... international peer reviewer and one student reviewer (at least one is a subject specialist) – carries out an initial analysis and then visits the institution to meet programme staff, students and other stakeholders. The review team drafts a report setting out their findings on whether or not each of the standards is met along with recommendations, aspects of good practice and conditions (if required).

Stage 3: Accreditation – The review report and the recommendation regarding accreditation is

presented to the QAA Accreditation Panel. The Accreditation Panel considers the report and recommendation, and determines whether the programme should be awarded QAA International Programme Accreditation. Where accreditation is awarded, QAA shares the International Programme Accreditation badge with the institution for use in relation to the programme. The accreditation period is five years, subject to a satisfactory mid-cycle review. QAA publishes the review report on the QAA website together with a link to the institution's action plan which is developed by the institution in response to the conclusions of the review report. The institution publishes the action plan on its own website.

Stage 4: Mid-Cycle review - This takes place two to three years after a successful programme review. It is usually a desk-based study and the institution's programme team is asked to provide evidence that any recommendations and other findings from the IPA review are being addressed. The programme team is also asked to outline any changes in the programme that might impact on the extent to which the...

... standards are being met.

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**1. New EQA activity:**

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<b>1</b>	International Programme Accreditation
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<b>Focus</b>	study programmes or higher education institutions
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<b>ESG 2.1</b>	IPA assesses higher education programmes against ESG part 1
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<b>ESG 2.2</b>	There were three points of consultations: 1. an internal working group
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2. an external advisory group
  3. external stakeholders were invited to comment on the methodology.
- Appropriate amendments were made at each stage, based on feedback received.

<b>ESG 2.3</b>	
1	<a href="https://www.qaa.ac.uk/international/international-programme-accreditation">https://www.qaa.ac.uk/international/international-programme-accreditation</a>
<b>ESG 2.3</b>	Not applicable
<b>ESG 2.4</b>	Same as in QAA activities
<b>ESG 2.5</b>	Same as in QAA activities
<b>ESG 2.6</b>	
1	<a href="https://www.qaa.ac.uk/international/international-programme-accreditation">https://www.qaa.ac.uk/international/international-programme-accreditation</a>
<b>ESG 2.7</b>	Same as in QAA activities
<b>ESG 3.4/ESG 3.6</b>	Same as in QAA activities
<b>D. Activity outside the scope of the ESG</b>	No
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# Substantive Change Report by Quality Assurance Agency for Higher Education (QAA)

## Minutes of Telephone Conversation

Register Committee

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Date 2022-09-27  
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<b>Date of the conversation:</b>	15-09-2022
<b>Representative of QAA:</b>	Piers Wall, Alison Felce
<b>Representative of EQAR:</b>	Melinda Szabó

1. QAA has made a Substantive Change Report on 2022-05-16, on 2022-05-26 and 2022-08-16 concerning the development of a new external QA activity (outside the scope of the ESG): *Quality Evaluation and Enhancement of UK Transnational Higher Education (QE-TNE)*, the development of a new external QA activity: *International Programme Accreditation (IPA)*, and the discontinuation of the activity: *the General Osteopathic Council (GOsC) Review*.
2. In order to prepare the deliberations of the Register Committee on the three reports, EQAR contacted QAA via telephone to clarify the matters below.
3. QAA agreed to clarify the matters by means of an online call conversation.
4. QAA explained that it carried out *General Osteopathic Council (GOsC) reviews* between 2005-2020 and that it ceased all such reviews following the end of its contract on 31 July 2020.
5. QAA has launched the *International Programme Accreditation (IPA)* on 28 July 2022. No activity has been carried out as of yet. The IPA is programme specific and includes four stages i.e. application, review, accreditation and mid-cycle review. The activity is designed for non-UK providers similar to QAA's institutional focused *International Quality Review (IQR)*, and although anticipated that IPA and IQR will not be carried out together, such a possibility is not excluded.
6. *Quality Evaluation and Enhancement of UK Transnational Higher Education (QE-TNE)* is a new thematic, country-specific quality enhancement activity replacing QAA's Transnational Education Review. The new activity, QE-TNE, does not observe nor follow QAA's Quality Code but it is designed around a series of themes set together with the provider/national authority. The activity is voluntary, complementing UK's quality assurance system.
7. In its QE-TNE reporting, the expert team prepares analysis with findings but makes no judgments, providing examples of effective practice and not evaluations against a standard.

8. In its QE-TNE handbook QAA notes that "partner organisations might be subject to review or scrutiny by local agencies as part of the QE-TNE if QAA and the local agency engage in a joint review activity". QAA explained that this reference refers to situations where it may be possible to conduct joint reviews with a local agency. The activity involves joint meetings with providers, with both teams carrying out the requirements of their functions. It does not result in joint accreditation or a joint report. The benefits are to reduce the burden on providers and to gain an understanding of the approaches taken by both teams.
9. QAA was further asked to explain the reference to EQAR in the QE-TNE handbook - in regards fulfilment of the publication requirements. QAA clarified that the reference to EQAR and ESG serves as inspiration but there is no mapping against the ESG standards or reference to the ESG in the activities of QE-TNE.
10. Considering the separation of QE-TNE from other activities that carry the ESG label, QAA explained that the aims of the evaluation are clearly communicated to institutions, the wording of the report and templates ensure a clear distinction from other procedures and the staff involved in QE-TNE does not overlap/are different to the staff working on QAA's external QA procedures.
11. The institutional reports resulting from the QE-TNE activity are only made available to QE-TNE scheme members only, they are not made available to the public.

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