



With the support of the Lifelong Learning Programme of the European Union

Information note

ENQA Board decisions on external reviews of quality assurance agencies

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1. Background

In 2000, ENQA was established as a network of quality assurance agencies to promote European co-operation in the field of quality assurance in higher education. In 2004, ENQA became a registered association of quality assurance agencies. Involvement in ENQA can be obtained through Membership or Associate/Affiliate status. In accordance with the ENQA Regulations, it is a condition of membership that all Full Members of ENQA undergo an external review at least once every five years. The reviews are conducted against the ENQA membership criteria¹ which consist of Part III of the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG), as adopted by the European Ministers in charge of higher education in Bergen in 2005, plus some additional requirements.

According to the ENQA regulations, applications for Full Membership are considered only if accompanied by an independent external review report on the Agency's conformity with the membership criteria. In order to avoid duplication of reviews undertaken rigorously against the same criteria, full membership of

¹ Annex 1 to the ENQA Regulations (compared to the ESG the ENQA membership criteria include some additional requirements).





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ENQA will normally constitute *prima facie* evidence for inclusion in the European Quality Assurance Register for Higher Education (EQAR)².

In line with the principle of subsidiarity which underpins the ESG, external reviews of agencies are normally initiated and coordinated by national authorities, as part of their routine quality assurance arrangements. Where it is not appropriate or not possible for the review to be organised at a national level (for example where there is no suitable or willing national body to coordinate the review), or where an agency so requests, the review may be organised by ENQA or by another international body. The approximate cost of the ENQA-coordinated reviews, including the fees and expenses of a five-member international review team, is 30,000 EUR.

There are two types of reviews in place. Type A review evaluates the agency's compliance with ENQA membership criteria and with the ESG while a Type B review evaluates other aspects in addition to the ENQA membership criteria and the ESG, such as specific demands of national legislation, particular statutory functions or follow-up on previous review.

2. Levels of conformity with ENQA membership criteria/ESG

To evaluate whether or not an agency meets the ENQA membership criteria/ESG, the level of conformity with the criteria/ESG expected by the ENQA Board is not rigid adherence, but '**substantial compliance**', which means that each and every standard has to be met in substance in order to fulfil the criteria/ESG.

The four descriptors used by the review panels in their report on how to judge the compliance of an agency with each ENQA membership criterion/ESG standard are as follows:

- **fully compliant:** the agency is entirely in accordance with the criterion/ESG standard, which is implemented in an effective manner;
- **substantially compliant:** the agency is to a large extent in accordance with the criterion/ESG standard, the principle/spirit of which is followed in practice;
- **partially compliant:** some aspects or parts of the criterion/ESG standard are met while others are not. The interpretation of the criterion/ESG standard is correct, but the manner of implementation is not effective enough;

² cf. Report of the E4 Group to the Bologna Follow-Up Group on a European Register of Quality Assurance Agencies, Berlin, 17-18 April 2007. EQAR lists quality assurance agencies that have proven their credibility and reliability in a review against basically the same standards as for ENQA membership, the Standards and Guidelines for Quality Assurance in the EHEA.





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- **non-compliant:** the agency fails to comply with the criterion/ESG standard.

3. ENQA Board decision making procedures

External reviews coordinated at national or international level result in a report compiled by the Review Panel. This report is submitted to ENQA. The Review Committee (a sub-committee of the ENQA Board) conducts the initial scrutiny of the final report and makes a recommendation to the ENQA Board based on its findings. In their scrutinies, the Review Committee members seek to answer two fundamental questions:

"Does the information provided in the final report of the agency's review satisfy the Board that the review was conducted to the required level of independence, integrity and robustness?"

"Does the final report of the agency's review provide sufficient, verified evidence that the agency meets the ENQA membership criteria and thereby the European Standards and Guidelines for Quality Assurance in Higher Education (ESG)?"

The Review Committee members then combine their analyses to form a conclusion and so to decide what recommendation to make to the ENQA Board. The Board is not bound by the recommendation of the Review Committee; it may draw a conclusion of a different type, provided it has firm ground to arrive at a different conclusion.

The conclusion and recommendation from the Review Committee falls into one of the following five categories:

- A) The Review Committee finds that the review was conducted to the required level of independence, integrity and robustness, and the final report provides sufficient, verified evidence that the agency meets the ENQA membership criteria and thereby the ESG.

Consequences: The Review Committee is likely to recommend that the Board grants or reconfirms the agency's ENQA Full Membership. Normally, the Board follows the recommendation.

- B) The Review Committee finds that the review was conducted to the required level of independence, integrity and robustness but that the final report did not provide sufficient, verified evidence in specific areas to be able to conclude that the agency meets the ENQA membership criteria and thereby the ESG.





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Consequences: The Review Committee is likely to recommend that the Board request further information and/or documentation to address the specific areas raised by the Committee. The Board requests further information from the agency or may wish to get further clarifications from the panel. The application is considered again after clarification.

- C) The Review Committee finds that the final report does not provide sufficient evidence that the review was conducted to the required level of independence, integrity and robustness and so does not feel able to draw a conclusion as to the agency's compliance with ENQA membership criteria and thereby the ESG.

Consequences: The Review Committee is likely to recommend that the Board request further information and/or documentation to address the concerns raised by the Committee. The Board requests further information from the agency or may wish to get further clarifications from the panel. The application is considered again after clarification.

- D) The Review Committee finds that the report provides sufficient evidence to conclude that the agency does not adequately comply with ENQA membership criteria.

Consequences: The Review Committee is likely to recommend that the Board does not reconfirm the agency's Full Membership and gives two years to the member to conform to the criteria, during which time the agency will be designated as a Candidate Member of ENQA. However, if the agency believes that it will not be in a position to meet the criteria within two years, it might apply for Associate status directly. If the review in question is a review of a Candidate Member (or a member which has been re-designated from Full Membership to Candidate membership), the Board does not reconfirm the agency's Full Membership and its Candidate Membership should be terminated. If the review in question is a review of an applicant agency, the Board does not grant the agency a membership and encourages it to apply for associate status within ENQA; or grants the agency a Candidate membership (if the agency is likely to meet the criteria within two years of the Candidate membership being granted) and encourages it to undergo a nationally coordinated review within two years.

- E) The Review Committee finds that the final report and/or the review itself does not provide enough evidence to draw conclusions on the agency's compliance with the majority of ENQA membership criteria and thereby the ESG.





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Consequences: The Review Committee is likely to recommend that the Board does not (re-)confirm the agency's Full membership and that the review is declared unacceptable. Normally, the Board follows the recommendation.

If an agency is dissatisfied with the decision of the Board that it is not meeting the ENQA membership criteria and thereby the ESG, it may appeal in writing to the Board. The ENQA Appeals and Complaints Committee will hear the appeal. The Board's decision on the appeal shall be taken in the light of the Committee's report and is final.

4. ENQA Board decisions

The ENQA Board makes a yes/no decision on membership based on the review panels' reports. However, the board reserves the right to deviate from the opinion of the Panel if the review process was not carried out properly and independently as well as if the evidence in the report does not support the judgements.

The ENQA Board aims at balancing the two functions of the ESG and finding a way between testing compliance and striving for improvement. In addition to judging the compliance with the ENQA membership criteria/ESG, the ENQA Board has emphasised and followed an **enhancement-led approach** to reviews when considering review reports. In other words, the aim of the reviews is not only to assess the agency's compliance with the ENQA membership criteria/ESG, but also to assist quality assurance agencies in developing their operations. Where the Board identifies areas for development, it makes recommendations that are expected to be followed up and taken into consideration in a progress report. Such report has to be submitted by the agency usually within two years of the Board's decision. The specific areas of development are also considered in the next external review of the agency in question. Therefore, the recommendations given by the ENQA Board are also to be seen as suggestions for improvement and development.

Another important aspect to which the ENQA Board pays attention when making the decisions on reviews is the national context of the agency. The legal and cultural aspects of the national higher education system of each agency cannot be ignored when considering the integral situation of an agency and its attempts to follow the ENQA membership criteria/ESG. There is little point in adopting a "hard line" position in respect of compliance with the ESG if, by doing so, trustworthy and credible agencies are prevented from gaining Full membership of ENQA through no fault of their own. Against the backdrop that the ESG are designed to be applicable to all quality assurance agencies in Europe, irrespective





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of their structure, function and size, and the national system in which they operate and based on the basic attitude of the ESG that they prefer the generic principle to the specific requirement, as regards the practical handling of the ESG, the ENQA Board operates on the basis of a principle-based rather than a rules-based approach. While adopting this approach, the ENQA Board would like to emphasise that national authorities are encouraged to make every endeavour towards meeting the ESG.

Since 2006, the ENQA Board has considered 32 review reports altogether (as of 16 November 2009). All of the considered reports have resulted in granting/reconfirming of ENQA Full membership. In one case the evidence in the report did not support the judgements and consequently the agency decided to withdraw its application and to undergo a second review after a process of reconstructing the agency. The decision on one review report was pending until the next Board meeting, because a follow-up visit to the agency by the Chair of the panel was needed before a decision could be taken. In addition, in five of the cases, more information was requested from the Chair of the Review Panel before the ENQA Board was able to make a decision. In these cases, the information that was requested concerned the following issues:

- independence;
- conflict of interest mechanisms;
- resources;
- external QA criteria and processes (i.e. publication of reports, student involvement);
- activities;
- accountability procedures;
- selection and appointment process of accreditation expert panels.

Out of the 32 agencies that were granted or reconfirmed Full membership, 23 were requested to submit a progress report in two years time. Two action plans and four progress reports have been submitted and considered so far (as of 16 November 2009). The Board has expressed its satisfaction with all of them.

Reports received by ENQA	32
Reports considered by the Board	32
Reports withdrawn by agency	1
Additional actions before decision:	6
• follow-up visit by panel chair	1
• more information/clarification requested	5
Decisions on granting/reconfirming full memb.	32
Decisions with enhancement elements:	
• decisions with recommendations and progress report requested	23
• decisions with recommendations (no progress	3





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report requested)	
Follow-up by agencies	
• action plans sent to ENQA	2
• progress reports sent to ENQA	4

5. ENQA coordinated reviews

ENQA started coordinating reviews in 2007. ENQA coordinated reviews follow the same procedures as nationally or otherwise internationally coordinated reviews. The review panels consist of national and international experts. The ENQA Board and Secretariat function as the coordinating body of the reviews. Until 16 November 2009, eight ENQA coordinated reviews have been completed. During 2009-2010, another six reviews have been planned to be coordinated by ENQA. At national level, approximately five reviews are planned during 2009-2010.

More information on conducting external reviews of agencies is available in the document *Guidelines for external reviews of quality assurance agencies in the European Higher Education Area* (Helsinki: ENQA, 2009).³

³ Accessible at http://www.enqa.eu/reviews_principles.lasso

