
ENQA AGENCY REVIEW: QUALITY ASSURANCE AGENCY FOR HIGHER EDUCATION (QAA)

MILAN POL, AURELIJA VALEIKIENE, ELLEN HAZELKORN, ADRIAN STAN
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EXECUTIVE SUMMARY

The present report gives account of how QAA (the Quality Assurance Agency for Higher Education, United Kingdom) meets expectations of the *Standards and Guidelines for Quality Assurance in the European Higher Education Area* (ESG-2015). In addition to the agency itself and its stakeholders within the UK, the report is meant to provide information for the ENQA Board's decision on QAA's continued membership and to EQAR to support QAA's re-application to the register. This is a third review of the agency. QAA has been a member of ENQA since 2000 and in EQAR since 2013.

QAA is a UK-wide agency covering England, Northern Ireland, Scotland, and Wales, within a higher education system that is devolved, i.e. higher education policy is determined by each nation. QAA implements nine activities that fall under the present review, and six additional activities, outside of the scope of the ENQA review. QAA delivers reviews and is involved in procedures that cover further and higher education; the nature of methods is of two kinds – some are in the spirit of quality enhancement, and others focus on quality assurance, although all have a focus on improvement. The principal aim of the agency is to safeguard standards and improve the quality of UK higher education wherever it is delivered around the world. QAA's vision is for world-leading and independently assured UK higher education.

QAA's external review process followed the *Guidelines for ENQA agency reviews*. The panel was appointed by the ENQA Board and included the following members:

- Dr Milan Pol, Dean and Professor of Education, Masaryk University, Czech Republic, Chair, academic (ENQA nominee),
- Ms Aurelija Valeikienė, Deputy Director, Centre for Quality Assessment in Higher Education (SKVC), Lithuania, Secretary, quality assurance professional (ENQA nominee),
- Professor Ellen Hazelkorn, Emeritus Professor and Director, Higher Education Policy Research Unit (HEPRU), Dublin Institute of Technology, Ireland; education consultant, BH Associates; quality assurance professional (EUA nominee),
- Mr Adrian Stan, PhD student and periodontology resident, University of Medicine and Pharmacy "Victor Babes", Romania, student (ESU nominee).

The panel considered the evidence given in the self-assessment report, additional evidence requested by the panel and provided by the agency on its own initiative, and performed a site visit at QAA's head office, where meetings with a wide range of audiences were held. The panel thoroughly analysed all the evidence and discussed it. The panel concluded that QAA complies with the ESG as follows:

- ESG 3.1 ACTIVITIES, POLICY AND PROCESSES FOR QUALITY ASSURANCE – Fully compliant
- ESG 3.2 OFFICIAL STATUS – Fully compliant
- ESG 3.3 INDEPENDENCE – Fully compliant
- ESG 3.4 THEMATIC ANALYSIS – Fully compliant
- ESG 3.5 RESOURCES – Fully compliant
- ESG 3.6 INTERNAL QUALITY ASSURANCE AND PROFESSIONAL CONDUCT – Fully compliant
- ESG 3.7 CYCLICAL EXTERNAL REVIEW OF AGENCIES – Fully compliant
- ESG 2.1 CONSIDERATION OF INTERNAL QUALITY ASSURANCE – Fully compliant
- ESG 2.2 DESIGNING METHODOLOGIES FIT FOR PURPOSE – Fully compliant
- ESG 2.3 IMPLEMENTING PROCESSES – Fully compliant
- ESG 2.4 PEER-REVIEW EXPERTS – Substantially compliant
- ESG 2.5 CRITERIA FOR OUTCOMES – Fully compliant
- ESG 2.6 REPORTING – Fully compliant
- ESG 2.7 COMPLAINTS AND APPEALS – Fully compliant

Thirteen examples of good practices were found; one recommendation given and eighteen suggestions for improvement are made.

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

INTRODUCTION

This report analyses the compliance of the Quality Assurance Agency for Higher Education (QAA), United Kingdom, with the *Standards and Guidelines for Quality Assurance in the European Higher Education Area* (ESG 2015).

It is based on an external review conducted in the period from October 2017 (when the ENQA Board approved the review panel) until May 2018 (when the external review report [ERR] was finalized). The complete process, from the moment QAA approved the project plan for the development of the agency's self-assessment report (SAR) to the consideration of the present review report by the ENQA Board spans from February 2017 to June 2018.

BACKGROUND OF THE REVIEW AND OUTLINE OF THE REVIEW PROCESS

BACKGROUND OF THE REVIEW

ENQA's regulations require all member agencies to undergo an external cyclical review, at least once every five years, in order to verify that they act in substantial compliance with the ESG as adopted at the Yerevan ministerial conference of the Bologna Process in 2015.

QAA has been a member of ENQA since 2000, and as this is QAA's third review, the panel provides clear evidence of results in all areas covered by the ESG and acknowledges progress from the previous review. At the same time, this is the first QAA review after the revised ESG were adopted in Yerevan (Armenia) in 2015, and the first review following the revised ENQA methodology for agency reviews. The panel has adopted a developmental approach, as the *Guidelines for ENQA Agency Reviews* aim at constant enhancement of agencies.

This review and the findings of the panel are used also towards QAA's application to extend its listing in the European Quality Assurance Register for Higher Education (EQAR), on which the agency has been registered since its last external review in 2013.

For the complete terms of reference (ToR), please see Annex 2. For the glossary of terms used, please see Annex 5.

MAIN FINDINGS OF THE 2013 REVIEW

The 2013 review was performed by aligning QAA's fulfilment of expectations against the first version of the ESG (2005)¹ and following ENQA Statutes, which integrated the ESG as membership criteria along with additional, specific ENQA criteria. The present review takes place against the background of the revised version of ESG (2015)², which represents increased expectations for all – higher education institutions and quality assurance agencies – and for the establishment of quality assurance on the higher education system level³.

In 2013, the ENQA panel's assessment was **Full Compliance** in all criteria, with commendations and recommendations provided as follows:

- **ENQA criterion 1 (overall): Use of external quality assurance procedures for higher education (ESG 3.1):**
 - **ENQA Criterion 1, sub-criterion: Use of internal quality assurance procedures (ESG 2.1)**
Recommendations: None.

¹ Full text available at http://www.enqa.eu/wp-content/uploads/2015/09/ESG_3edition.pdf

² Full text available at http://www.enqa.eu/wp-content/uploads/2015/11/ESG_2015.pdf

³ A comparative analysis of the ESG 2015 and the ESG 2005 is available at http://www.enqa.eu/indirme/papers-and-reports/associated-reports/EQUIP_comparative-analysis-ESG-2015-ESG-2005.pdf (courtesy of the EQUIP project, more at <http://www.equip-project.eu/>).

– **ENQA Criterion 1, sub-criterion: Development of external quality assurance processes (ESG 2.2)**

Recommendations:

- QAA should consider the development of a strategy which takes account more directly of the needs as stakeholders of business and industry at both Board and operational level. Additional input could be sought from this constituency in both review method planning and development and also in its subsequent operation.
- The 'risk-based approach to quality assurance' should be developed further (as already planned by QAA), bearing in mind the need to ensure conceptual clarity and procedural fitness for coherent implementation.

– **ENQA Criterion 1, sub-criterion: Criteria for decisions (ESG 2.3)**

Recommendations:

- The Panel recognises that QAA currently ensures that a balance is maintained between the need formally to articulate detailed indicators of sound practice in the Quality Code, and the need also to allow for some flexibility of judgement in the review process itself, while still safeguarding the overall coherence of judgements. The Panel endorses the continuation of this approach, which can, in the Panel's view, continue to be achieved through QAA's commendable practices of both training reviewers thoroughly and also providing professional guidance throughout the review process. The Panel recommends that a continuing commitment to this balanced approach will be essential for the successful implementation of both the Quality Code and the planned risk-based approach to quality assurance.

– **ENQA Criterion 1, sub-criterion: Processes fit for purpose (ESG 2.4)**

Recommendations:

- The Panel commends QAA's training programme for Reviewers as a feature of good practice
- The Panel commends QAA's model for student engagement as a feature of good practice
- Following agreement in principle by the QAA Board, the Panel urges the early implementation of the inclusion of an international reviewer (from outside the UK) in all its institutional review programmes across the UK as a standard feature. In the Panel's view, this will bring added depth, experience, insight and added value both to QAA's review activities and to institutional quality enhancement capacity, by providing a wholly unbiased system-wide view on operations, unfettered by traditions.
- QAA should continue its efforts to position its operations, where possible and appropriate, with quality criteria and procedures determined by professional, statutory and regulatory bodies (PSRBs) responsible for accreditation.

– **ENQA Criterion 1, sub-criterion: Reporting (ESG 2.5)**

Recommendations:

- The Panel commends, as a feature of good practice, QAA's imaginative use of multimedia/social media as tools for public engagement and supports plans to expand this area of communication.

– **ENQA Criterion 1, sub-criterion: Follow-up procedures (ESG 2.6)**

Recommendations: None.

– **ENQA Criterion 1, sub-criterion: Periodic reviews (ESG 2.7)**

Recommendations:

- QAA should continue to exercise extreme care in the introduction of the new review process of Higher Education Review in England and Northern Ireland.

In particular the criteria for the definition of risk and for differentiating procedural consequences needs to be robust in substance, viable for coherent implementation, and transparent to the institutions concerned and to the general public.

– **ENQA Criterion 1, sub-criterion: System-wide analyses (ESG 2.8)**

Recommendations:

- The Panel strongly commends, as a feature of good practice, QAA's substantial level of activity in system-wide analysis and its dissemination across the sector.

▪ **ENQA Criterion 1, sub-criterion: Activities (ESG 3.3)**

Recommendations: None.

▪ **ENQA criterion 2 (ESG 3.2): Official status**

Recommendations: None.

▪ **ENQA criterion 3 (ESG 3.4): Resources**

Recommendations:

- In its forward budget planning, QAA should take urgent steps to confirm financial provision for the inclusion of international experts in all of its principal institutional review procedures.

▪ **ENQA criterion 4 (ESG 3.5): Mission statement**

Recommendations: None.

▪ **ENQA criterion 5 (ESG 3.6): Independence**

Recommendations:

- Care should be taken to safeguard the element of current HEFCE funding and to protect the operational independence of QAA in any changes following the implementation of revisions to the HEI funding model in England, whereby funding for teaching will in the future reach institutions wholly via student fees (rather than via a combination of tuition fees and grants via HEFCE).

▪ **ENQA criterion 6 (ESG 3.7): External quality assurance criteria and processes used by the agencies**

Recommendations: None.

▪ **ENQA criterion 7 (ESG 3.8): Accountability procedures**

Recommendations:

- QAA's Board may wish to consider whether the appointment of an international Director at Board level might further enrich the mix and depth of skills available to the Board. The QAA Board may wish to consider this issue as part of the further development of a broader overarching internationalisation strategy for the Agency.

▪ **ENQA criterion 8: ENQA specific** (encompassing management and consistency; appeals procedures; involvement with ENQA).

Recommendations: None.

On the basis of the 2013 external review report, QAA's self-evaluation report, and additional clarifications obtained both from the review panel and QAA, the EQAR Register Committee approved QAA's inclusion in EQAR till 31 July 2018⁴. In its decision of 18-19 October 2013, the Register Committee underlined several issues as follows:

- QAA was expected to submit a Substantive Change Report (as per §6.1 of the EQAR Procedures for Applications) once the then new approach – the review of transnational education (TNE) – is finalized and being implemented. (At the moment of EQAR's decision, the new approach was still being developed in consultation with QAA's stakeholders.)

⁴ Full text available at https://www.eqar.eu/fileadmin/agencyreports/2013_04_QAA_ApprovalDecision.pdf

- A full analysis of the new risk-based method for England and Northern Ireland and its implementation needed to be part of the next external review, as a handbook for the new method was published only after the external review of QAA in 2013.
- QAA was expected to take urgent steps with a view to making available the additional resources required for involving international experts in QAA reviews.
- Students should be part of the expert groups in reviews for degree-awarding powers (DAP) and university title (UT), as the nature of these reviews or the advisory capacity of QAA would not render the exclusion of students appropriate.

The panel noted two “flagged” issues from EQAR’s decision letter (dated 3 July 2017), which refer to the present review, as follows:

- **Reporting:** Attention should be given to whether QAA has taken steps to make publicly available the outcomes and full reports of the reviews for DAP and UT.
- **External quality assurance processes and criteria:** In relation to the groups of experts involved in the reviews for DAP and UT, the matter should receive attention as to whether QAA has taken steps to include students as members of the groups.

These issues of concern are discussed thoroughly in the paragraphs under the relevant standards below.

REVIEW PROCESS

The 2018 external review of QAA was conducted in line with the process described in the *Guidelines for ENQA Agency Reviews* and in accordance with the timeline set out in the *Terms of Reference (ToR)*. To assure integrity of the process, the panel followed the *ENQA Code of Conduct for Reviewers*.

The panel took note of the *Use and Interpretation of the ESG for the European Register of Quality Assurance Agencies*, issued by the Register Committee (Ref. RC/12.1, ver. 2.0, dated 21 November 2017), and paid particular attention to matters arising from communication between QAA and EQAR that took place in between the 2013 and 2018 reviews. The ENQA Board appointed the panel for the external review of QAA, which is composed of the following members:

- Dr Milan Pol, Dean and Professor of Education, Masaryk University, Czech Republic, Chair, academic (ENQA nominee),
- Ms Aurelija Valeikienė, Deputy Director, Centre for Quality Assessment in Higher Education (SKVC), Lithuania, Secretary, quality assurance professional (ENQA nominee),
- Professor Ellen Hazelkorn, Emeritus Professor and Director, Higher Education Policy Research Unit (HEPRU), Dublin Institute of Technology, Ireland; education consultant, BH Associates; quality assurance professional (EUA nominee),
- Mr Adrian Stan, PhD student and periodontology resident, University of Medicine and Pharmacy “Victor Babes”, Romania, student (ESU nominee).

Following the revised ENQA methodology for agency reviews, the panel was supported by Ms Lindsey Kerber, ENQA Secretariat member, as coordinator of the review throughout the process from preparation to the site visit to production of the external review report, delivered for the ENQA Board’s consideration. This new arrangement by ENQA proved to be very beneficial for the smoothness and quality of the review.

ENQA created a designated place on a google drive with folders containing: ENQA reference materials, EQAR reference materials, templates, QAA previous review and follow-up materials, SAR, ERR, site visit materials, ToR, and CVs of panel members.

Apart from the SAR team, QAA assigned three persons to support the organization of the review:

- Ms Rowena Pelik, Director of Nations and International and designated senior officer, who was available to the review team during the site visit to explain the context and provide information;
- Ms Fiona Crozier, Head of International and project manager of the review, who also provided information and assisted from a more practical perspective;
- Mr Rafe Smallman, Quality Specialist and project coordinator for the ENQA review, who helped with logistical aspects of the visit.

In addition, technical support staff worked to arrange videoconferences, skype, and phone conversations on site. The panel appreciates contributions by the aforementioned individuals; their input was very important.

The ENQA review coordinator organized a preparatory videoconference briefing on 25 January 2018 on Zoom, attended by all panel members. The meeting allowed the panel to introduce themselves in person and discuss the whole process, including: the purpose of the review; roles and responsibilities of panel members; use and understanding of the ESG 2015 and judgment of compliance; link between evidence and information, analysis, and conclusions in the review report; timeline and management of the site visit; drafting of the report; and submission of the final review report and the decision-making process.

By suggestion of the review Secretary and having obtained agreement from all panel members, the Chair assigned responsibility to members of the group for analysis of how QAA satisfies individual ESG. Notwithstanding this arrangement, the entire panel went through all the materials and formed individual opinions on the work of QAA that were subsequently thoroughly debated. The panel used the ENQA mapping grid to record lines of enquiry as per each ESG. During the site visit, after preparatory discussion, panel members divided responsibilities over assuming lead roles while conducting interviews with various audiences met. Afterwards, team discussions were had in private, led by the Chair, in order to identify outstanding issues and come to final conclusions. All judgments were reached by consensus in the panel, not by voting.

Before the visit, the panel analysed the SAR with internal and external references and acquainted themselves with the QAA website and selected materials there. Following internal discussion among the panel, a number of requests for clarification and additional documentation were issued. The agency promptly responded to all of them, either before or during the site visit. The panel confirms having had access to all individuals and documents it wished to consult. For a list of all documentary evidence, supporting the review, please see Annex 6.

After the site visit, each member of the panel supplied the Secretary with a list of most important issues to be covered in the report. The final review report was drafted by the Secretary in consultation with the entire panel. The draft report was checked by the ENQA Review Coordinator. QAA was given an opportunity to comment on the factual correctness of the draft report. The panel considered all comments received from QAA and then finalised the report.

Self-assessment report

QAA produced a self-assessment report (SAR), consisting of 14 parts (total 79 pages), that included information on the development of the SAR; higher education and quality assurance of higher education in the context of the agency; history, profile, and activities of the agency; higher education quality assurance activities of the agency; processes and their methodologies; agency's internal quality assurance; international activities; compliance with European Standards and Guidelines (Part 3 and Part 2); information and opinions of stakeholders; recommendations and main findings from previous review(s) and agency's resulting follow-up; SWOT analysis; current challenges and areas for future development; glossary (link to QAA website); three annexes.

Information on QAA's compliance towards ESG 3.7 was omitted from the original SAR, but was handed to the panel upon arrival for the site visit. It was explained that QAA's compliance with the standard was thought to be self-evident by virtue of the agency applying for the present ENQA review, which is a third external review, and its follow-up actions taken in the meantime.

The SAR is extensively referenced, with all together 169 references given to various documents, news and other media pieces, links to external websites, etc. Hard color copies of QAA's SAR in A4 format with annexes printed on A3 paper were mailed to all panel members.

In addition, upon signing the Terms of Use, arrangements were made for the panel to access selected evidence (including confidential documents) on the Reviewer Extranet, QAA's designated secure online system. The panel had a chance to see how the extranet system works for managing QAA's own reviews.

QAA's SAR was produced by a group of 11 individuals. Other members of staff and senior management provided input via workshops and in particular through development of an initial SWOT analysis and clarification of key principles and themes in the SAR. In addition, the draft SAR was shared with the QAA Board and externals, including two international readers. The finalization of the document took place with close involvement of the Board and CEO of QAA.

The panel met eight members of the SAR team and had an opportunity to discuss lessons learnt during the process. The SAR gives a good synopsis of the complex system of higher education and quality assurance in the UK, most recent policy developments, activities of QAA, and the agency's own insights for the future. The document is of good reflective quality. All additional evidence and links to external sources proved to be very useful to form a view on QAA's work and the fast-changing environment in which the agency operates.

Site visit

The site visit to the head offices of QAA in Gloucester, United Kingdom, was conducted between 19-22 February 2018. There were two rooms booked for the panel: one which served as the panel's own private base and another, in which meetings with larger groups of individuals were held. All together, there were 16 meetings organized with QAA staff, the Board, and stakeholders (representatives of providers, funders, professional, statutory, or regulatory bodies [PSRBs], reviewers, and students). For complete information see Annex 1.

Interviews with external agency stakeholders spanned between 30 and 60 minutes. Given the length of conversations and travel costs to Gloucester, it was unreasonable to expect that all interviewees would come to meet the panel in person. Therefore, some sessions were arranged by video conferences, skype, or phone. In general, the video conferences worked very well, however, the quality of the skype connections was not uniformly good.

The panel appreciates the input of all the QAA staff and Board: for their contribution to the review exercise – from producing an extensive SAR, to the smooth organization of the site visit, including the warm hospitality and attention to details, and through the final stages of the review. Most importantly, the professionalism of the staff and their dedication to the agency were visible throughout. The panel also wishes to thank all the external stakeholder representatives for availing themselves to support QAA in this review either by directly coming to meet the panel or connecting by distance; their testimonies were very important in building the body of evidence. The panel hopes that some of the questions that were asked will inspire both QAA and its partners to consider future developments and improvement, as despite all achievements one can never rest still.

HIGHER EDUCATION AND QUALITY ASSURANCE SYSTEM OF THE AGENCY

HIGHER EDUCATION SYSTEM

The UK has one of the largest and most diverse higher education systems in Europe. While research policy is implemented UK-wide, higher education policy is a devolved matter in the UK, meaning it is determined individually by each of the four nations:

- In England, through the UK Government,
- In Northern Ireland, usually through the Northern Ireland Executive⁵,
- In Scotland, through the Scottish Government,
- In Wales, through the Welsh Government.

The UK belongs to the group of EHEA countries in which a single national quality assurance agency, registered on EQAR, is responsible for the quality assurance of higher education in all four of the nations that constitute the UK. QAA is part of the co-regulation system across the UK, further details on which are given in coming sections.

According to the UK's Higher Education Statistics Agency (HESA), student (both full time and part time) and staff numbers for the academic year 2016-17 were as follows⁶:

	England	Northern Ireland	Scotland	Wales	UK (total)
Students (undergraduate and postgraduate)	1,891,980	54,570	241,935	129,395	2,317,880
Staff (academic)	173,360	3,040	20,235	10,240	206,870
Staff (non-academic)	174,500	3,345	24,130	10,860	212,835

Compared to data from the previous QAA review⁷, the number of academic and non-academic staff in three nations of the UK has increased, with Northern Ireland being the exception. Student numbers in Scotland and Northern Ireland have increased, however England and Wales both experienced a decrease. There were shifts in the nature of the student body, as the number of younger students, female students, and minority students grew. The number of international students studying in the UK decreased, while the number of international students registered with a UK provider outside the UK increased. Consequently, the overall numbers of undergraduate and postgraduate students decreased by approximately 9%. There are approximately 700,000 TNE students studying for a UK award overseas, this is in addition to the number of total number mentioned above⁸.

Given the diversity of higher education institutions (universities, university colleges, and specialist institutions such as conservatories or those focusing on arts or agriculture) and other organizations that deliver or contribute to all or part of a higher education program, the collective term “provider” is widely used in the UK to denote any type of educational institution. In addition, the terms “higher education sector” or “higher education system” are used to describe the aggregate of institutions that offer Levels 4-8 on the framework for England, Wales and Northern Ireland and Levels 7-12 on that in Scotland.⁹

⁵ At the time of the panel visit to QAA and drafting of the present report, devolved power has been suspended in NI due to the absence of an agreement on power-sharing as per the Northern Ireland Agreement/Belfast Agreement, 1998.

⁶ <https://www.hesa.ac.uk/data-and-analysis/staff> ; <https://www.hesa.ac.uk/news/11-01-2018/sfr247-higher-education-student-statistics/numbers> ; <https://www.hesa.ac.uk/data-and-analysis/students>

⁷ Data provided in QAA review in 2013 were for academic year of 2011-12

⁸ http://www.universitiesuk.ac.uk/policy-and-analysis/reports/Documents/International/International_Facts_and_Figures_2017.pdf

⁹ <http://www.accreditedqualifications.org.uk/qualifications-and-credit-framework-qcf.html> ; <http://www.qaa.ac.uk/en/Publications/Documents/Qualifications-can-Cross-Boundaries.pdf>

Providers fall into categories depending on whether they receive or do not receive public funding and by status (there is some overlap between the first and fourth categories) as follows:

- Universities (out of 168 in the UK, four are private and thus called “alternative providers”),
- Publicly funded higher education providers (colleges, university colleges, specialist institutions),
- Further education colleges (more than 200, seven of which have powers to award their own degrees, while others are associated with degree-awarding bodies, normally universities),
- Alternative providers (four private universities [as mentioned above] and several hundred other private institutions that do not hold degree-awarding powers (DAP) but work with degree-awarding bodies).

The level of direct public funding has decreased in recent years, and therefore, funding levels or the proportion of public funding is no longer a basis for differentiation. To obtain current and reliable statistics by provider type was difficult because of various sources and the absence of a central data depository. For the overview of providers by UK nation, please see Annex 3.

The right to use university title (UT) is protected by law. Following proposals set out in the white paper *Higher Education: Students at the Heart of the System* (BIS, 2011), the requirement for university designation in England was reduced to 1,000 full-time students and consequently, in 2012-13 ten long-established specialist institutions gained UT¹⁰. Institutions that award taught degrees but which do not meet the numerical criteria for UT may apply to use the title “university college”, although not all choose to do so.

Applications to be designated a university are considered by QAA taking into account the specific variations in the different nations of the UK. To be able to award a recognized higher education degree in the UK, an organization must have been authorized by statute, by Royal Charter, by the Privy Council, or by Act of Parliament. The Privy Council¹¹ is responsible for current decisions on the granting of DAP in the UK, and on the right of an institution to be called a “university” or “university college”.

There are three main types of DAP:

- Foundation degree-awarding powers (FDAP) (applicable to further education colleges (FECs) in England and Wales),
- Taught degree-awarding powers (TDAP) (UK-wide, includes the right to award bachelor’s degrees with honors, taught master’s degrees, and other taught higher education qualifications, but not postgraduate research degrees),
- Research degree-awarding powers (RDAP) (UK-wide, applies to higher education providers with TDAP, is the right to award doctoral degrees and master’s degrees, where the research component is larger than the taught component in terms of student workload).

The processes for acquiring DAP in England was changed in 2017 subsequent to the Higher Education and Research Act 2017 (HERA). Among other issues, a new system of probationary DAP (now referred to as new DAP or NDAP) was launched. The criteria and process for this will be introduced in 2018-19, and QAA is advising the UK Government on the development of both. Further modifications may take place, as the impact of these changes is also being considered by the other UK nations.

There is no national accreditation or approval of programs in the UK. Some programs can be accredited by professional, statutory, and regulatory bodies (PSRBs), which are a very diverse group of professional and employer bodies, regulators, and those with statutory authority over a profession or group of professionals. Accreditation can be any process of approval leading to assurance that a program meets the standards required by a particular profession. Some PSRBs act as awarding bodies, while others only accredit the awards of other organizations, including higher education providers.

¹⁰ <https://www.theguardian.com/education/2012/nov/27/ten-new-universities-announced>

¹¹ A formal body of advisers to the Sovereign of the United Kingdom

Another distinctive feature of UK provision is validation and franchising arrangements. Validation, as defined by the Quality Code, is a process by which a degree-awarding body judges a module or program developed and delivered by another organization and approves it as being of an appropriate standard and quality to contribute, or lead, to one of its awards; students would normally have a direct contractual relationship with the delivery organization.

As explained in the SAR, different providers are obliged to undergo external quality assurance (EQA) for the following reasons:

- Publicly funded providers are subject to EQA or assessment because the bodies that allocate public funding are required by law to assess that the delivery of studies they fund is made at the necessary level. Each of the four funding bodies (for England, Northern Ireland, Scotland, and Wales) has different requirements for quality assessment.
- Alternative providers are required to undergo EQA if:
 - they want “educational oversight” from QAA, which they need in order to be licensed by the UK government to recruit students who are not European Economic Area nationals,
 - they want “specific course designation”, which allows eligible students access to student support loans from the Student Loans Company (SLC),
 - they hold DAP, which is subject to periodic renewal¹².

It was proposed to introduce a single register of all providers in England to replace the existing three registers, but the plan to introduce a „registered basic category“ of providers has not been carried through by the OfS, meaning some providers will not be subject to regulation or EQA. It is envisaged that QAA will be the gatekeeper, organizing assessments of providers that wish to be placed on the register in order to deliver higher education. Under the new regulatory framework (see below), the Teaching Excellence Framework (TEF) will be compulsory for all providers who are registered with the OfS and have over 500 students.

On behalf of the sector, QAA maintains and publishes the two qualifications frameworks – *The Framework for Higher Education Qualifications in England, Wales and Northern Ireland (FHEQ)* and *The Framework for Qualifications of Higher Education Institutions in Scotland (FQHEIS)* – as part of the UK Quality Code. The FQHEIS effectively forms part of the larger 12-level Scottish Credit and Qualifications Framework (SCQF). The FHEQ is part of the Credit and Qualifications Framework for Wales (CQFW); this one is not maintained by QAA, but the agency is a member organization of the CQFW partnership. QAA participated in the referencing of UK qualifications frameworks against the Bologna framework for qualifications in the EHEA (FQ-EHEA) and continues to provide guidance on qualifications in relevant materials (via the website and on paper). For more details on frameworks, please see Annex 4.

QUALITY ASSURANCE AND RECENT POLICY DEVELOPMENTS

Changes in regulatory environment

Primary responsibility for the quality of higher education in the UK rests with the four individual nations (England, Scotland, Wales, and Northern Ireland), and with the individual providers, which are autonomous. UK providers are fully responsible for academic output standards, student outcomes, and the quality of the student academic experience, wherever their students are based or however they study, irrespective of if a program is delivered with a partner or not. This situation leads to one in which different organizations share responsibilities for external oversight of quality and contribute with input to the co-regulatory approach.

¹² Publicly funded providers hold DAP for an unlimited period of time, while alternative providers must renew their powers once in every six years.

The Office for Students (OfS) (started operations since 1 April 2018) replaces the Higher Education Funding Council for England (HEFCE) (which ceases to exist as of 1 April 2018), forming the new co-regulation system. These changes primarily affect England, albeit the influence and impact is widely felt across the UK. At the same time, the changes accentuate differences between how the different UK nations regulate higher education; they also reflect different approaches to higher education as a public vs. a marketable good. Previously, higher education was overseen by the funding councils: the Higher Education Funding Council for England (HEFCE), the Scottish Funding Council (SFC), the Higher Education Funding Council for Wales (HEFCW) and the Department for the Economy in Northern Ireland (DfE(NI)). The councils were by law required to assess the quality of provision, a role overseen by QAA. It is these arrangements which have changed in England.

The “new operating model” reflects the more market-oriented approach to higher education provision in England, which relies on student choice and provider competition to improve quality and value for money. In contrast to Scotland, which publicly funds all higher education, England promotes a diverse system of public institutions and alternative providers. Students pay tuition by way of income-contingent student loans (ICL), which are repaid based on earnings after finishing their studies. This differs from most further education courses or apprenticeships, where costs are fully met from general taxation or contributions by employers.

HERA established the OfS, which has brought about significant changes in the regulatory framework relating to the power to award degrees and UT, registration (and de-registration) as a higher education provider, quality, and standards amongst many other points of important detail.

The OfS has a remit that includes a focus on competition, student choice, and outcomes. The OfS replaces HEFCE, which was oriented towards institutions, whereas the OfS is oriented towards students. It will take a more risk-based approach to monitoring provider performance, and its new regulatory framework is intended to promote increased choice and diversity. Further changes will make it quicker and simpler for new providers to enter the market, with an expectation that greater competition may mean some providers will exit. The OfS will manage and maintain a publicly available list of registered English higher education providers. The two-category register being adopted, instead of the three-category register originally proposed, means that an unknown number of private providers who are not in receipt of public funding will be outside the regulatory reach of the OfS¹³.

Quality instruments

The *UK Quality Code for Higher Education* (Quality Code) is UK-wide and is seen as a unifier of institutional policies and practices. It sets out 19 expectations in parts A, B, and C, which must be met by UK higher education providers that receive any kind of public or student loan funding. The Quality Code replaced the “Academic Infrastructure” in 2012 as the main reference point for checking on the quality of UK higher education, having been developed in close consultation with the UK higher education sector. Owned and maintained by QAA, it sets out “what higher education providers expect of themselves”, and “what students may expect”. The Quality Code covers:

- setting and maintaining standards, as determined by the UK qualifications frameworks and subject benchmark statements (SBS), together with other relevant guidance,
- meeting UK expectations about the quality of the student opportunities and seeking ways to enhance this,
- providing trustworthy and reliable information about higher education.

The Higher Education Code of Governance (Governance Code) was developed in December 2014 after wide consultation with members of the Committee of University Chairs and higher education stakeholders. In three parts it spells out the core values and principles of good governance and gives

¹³ https://www.officeforstudents.org.uk/media/1047/ofs2018_01.pdf, p28

illustrative guidance on how each of the primary elements could be implemented by the governing bodies.

England's Department for Education (DfE) has introduced the Teaching Excellence and Student Outcomes Framework (TEF) to incentivize teaching quality – drawing inspiration from the experience of the Research Excellence Framework (REF); the Knowledge Excellence Framework (KEF) is proposed to assess and measure engagement activity. As noted in the SAR, QAA advised the UK Government during the design phase of the TEF and worked closely with HEFCE in delivering the assessment process for Year 2 of the TEF (2016-17).

TEF is a voluntary scheme, in place from 2016 and on trial till 2019-20, having two functions¹⁴: to reward institutions for excellent teaching on undergraduate level and to correspondingly signal to students about excellent provision and student experience. TEF is in addition to existing national quality requirements for universities, colleges, and other higher education providers. It is based on scrutiny through a combination of metrics, along with a written submission from the universities, and peer review. Participating higher education providers receive a “gold”, “silver” or “bronze” award reflecting the excellence of their teaching, learning environment, and student outcomes. While TEF was developed by the DfE in England, individual providers in Scotland, Wales, and Northern Ireland can decide to participate if they wish. In England, TEF results were initially linked to the ability of providers to raise tuition fees in line with inflation, however this approach was not approved by the House of Lords¹⁵, nor adopted in the other nations.¹⁶ General public and political criticisms of the tuition fee levels, and correspondingly the student loan debate, have led to the UK government establishing a review of post-18 education inclusive funding in England¹⁷.

HEFCE held legal responsibility to assure quality in higher education, which it outsourced through contracts, primarily to QAA. This will now be the responsibility of the OfS. As part of the change, Expressions of Interest (EoI) were invited, for which QAA was the only applicant. This was followed by a public consultation after which the Secretary of State designated QAA as the Designated Quality Body for England¹⁸. This brings the independent (but still sector-owned) body closer to government. There are provisions in HERA 2017 that protect both the independence and expertise of the DQB and QAA should ensure it balances the need to help the OfS fulfil its responsibilities with the need to maintain trust of the sector. Separate arrangements have already been agreed by QAA with Wales and Scotland.

The UK-wide Standing Committee for Quality Assessment (UKSCQA) was established to provide sector-led oversight of those aspects of quality assessment arrangements that continue to be shared across the UK. The Chair of UKSCQA is also a member of the QAA Board and QAA's Chief Executive is a member of the Committee. It is expected that UKSCQA will support a co-regulatory approach by bringing together academic expertise and students with regulatory and other bodies. Currently, UKSCQA is tasked to oversee the set of baseline regulatory requirements, including the following elements:

¹⁴ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/550232/Teaching-excellence-framework-factsheet.pdf; <http://www.researchcghe.org/perch/resources/publications/making-sense-of-the-tef.pdf>

¹⁵ <https://www.timeshighereducation.com/news/house-lords-rejects-plans-link-tef-results-tuition-fees>

¹⁶ <https://www.ucas.com/ucas/undergraduate/getting-started/what-study/teaching-excellence-framework-tef-courses-starting-2017>

¹⁷

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/682348/Post_18_review_-_ToR.pdf

¹⁸

https://www.google.com/url?q=https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/677339/Designation_of_a_body_to_perform_the_assessment_functions_for_higher_education....pdf&sa=D&ust=1523210492679000&usq=AFQjCNG4DtTzfqjOaptXB562yEkuQQJmw

- The framework for higher education qualifications in England, Wales, and Northern Ireland;
- Specific elements of the current Quality Code (except for guidance on subject levels);
- The financial sustainability, management, and governance requirements of the relevant funding body;
- The Higher Education Code of Governance, or other equivalent designated governance code;
- The expectations of consumer law as expressed through the Competition and Markets Authority guidance;
- Student protection measures as expressed through the Office of the Independent Adjudicator's good practice framework and the Northern Ireland Public Service Ombudsman equivalent, and HEFCE's Statement of Good Practice on higher education course changes and closures;
- The provider's mission and strategy for its higher education provision.

UKSCQA is expected to provide information and advice to the four funding bodies in exercising their respective responsibilities for quality assessment; to support the transition to new approaches to quality assessment for England, Wales, and Northern Ireland; and also to support ongoing alignment between UK-wide aspects of quality assessment arrangements and the ESG. In addition, UKSCQA will coordinate and work with the Higher Education Academy (HEA), the Leadership Foundation for Higher Education (LFHE), and QAA. UKSCQA includes representatives from the funding bodies, higher education sector bodies, students, PSRBs, and representatives from a diverse range of providers; in total it comprises 24 persons plus four alternates. The CEO of QAA is a member of UKSCQA.

UK openness to EQAR

Wales is the only UK nation that allows regulated providers to commission a mandatory review from an EQAR-registered agency to demonstrate that they meet baseline regulatory requirements. The obligation is that an interested QA agency must demonstrate knowledge of the local context and provide services in line with requirements and expectations of the Welsh Language Standards. These two clauses are coupled with other national criteria for conducting reviews, such as being able to produce judgments in line with the Quality Code. These criteria limit possibilities that any non-UK-based agency would be able to implement procedures, or for other UK-based QA agencies, registered on EQAR, to compete. Consequently, only QAA was in a position to make a case and deliver Quality Enhancement Reviews in Wales. While there are several European QA agencies listed on EQAR that claim to have implemented procedures in the UK, only QAA is in charge of mandatory QA procedures that providers must undergo either on a cyclical basis (such as reviews) or a non-cyclical basis (e.g. to obtain DAPs).

QAA Mandate

QAA's work is dependent upon the context of four nations, thus change is constant. QAA progressed smoothly to the fourth round of ELIR procedures in Scotland, which are very distinctively oriented towards enhancement and as such are well-appreciated by providers there and met with great interest beyond the borders. QAA has secured the contract to start new quality assurance and enhancement procedures in Wales. The agency's status in England was clarified just at the time of the ENQA panel's visit.

As mentioned above, HEFCE previously held legal responsibility to assure quality in higher education for England and Wales. When HEFCE was disbanded, the OfS was given overall responsibility. The DfE, in October 2017, acting on behalf of the OfS, sought opinions from the higher education sector, including providers and students, on the appropriateness of any particular organization to act as the Designated Quality Body (DQB). In January 2018, the UK Government consultation response "Designation of a body to perform the assessment functions for higher education in England" was published. The views to this consultation received both digitally and in formal writing overwhelmingly

stood for recommendation to designate QAA for the DQB function. Ninety-eight percent of the 158 organizations and individuals supported QAA because of its credibility and suitability.

On 30 January 2018 the OfS addressed the Secretary of State for Education with the nomination of QAA as the body to perform the OfS's assessment functions (to assess the quality of, and the standards applied to, higher education in England), and to provide advice to the OfS (on the granting, variation, or revocation of DAP). The new English regulatory framework was published at the end of February 2018.¹⁹ Historically, funding councils in the UK carried statutory responsibility for quality and enhancement of higher education. For the first time in history, QAA now has a statutory responsibility in the field in England.

QAA

QAA's mission is to safeguard standards and to improve the quality of UK higher education wherever it is delivered. To achieve its mission, QAA works in partnership with the providers and funders of higher education, the staff and students in higher education, employers, and other stakeholders:

- to meet students' needs and be valued by them,
- to safeguard standards in an increasingly diverse UK and international context,
- to drive improvements in UK higher education,
- to improve public understanding of higher education standards and quality.

The values of QAA are expertise, innovation, collaboration, accountability, and integrity.

QAA has carried out work on behalf of HEFCE and the other UK higher education funders to assess the quality and standards of higher education since 1997.

QAA'S ORGANISATION / STRUCTURE

QAA is a company limited by guarantee and not having a share capital (registered on 27 March 1997) and a registered charity (registered on 9 June 1997 in England and in Scotland on 6 February 2007). The company's members are the UK higher education representative bodies: GuildHE Limited, Universities Wales, Universities Scotland, and Universities UK (UUK).

An additional member has been added to the Board of Directors, making a total of 18 members. The directors of the company are also its trustees. The Chief Executive of QAA is not a member of the Board of Directors. Of 18 members of the Board, six are independent of the higher education sector (including the Chair). The Board currently consists of:

- four members appointed jointly by the four UK higher education funding bodies,
- four members appointed jointly by the UK representative bodies,
- six independent members (drawn from industry and the professions),
- one independent member with experience of alternative providers (newly added member),
- one member nominated by the UK Council of Colleges,
- one independent student member,
- one member nominated by the National Union of Students.

The members of the Board hold office for a fixed term of 3 years (except students) and are eligible to be appointed for a maximum of 2 consecutive terms. Students serve for a maximum of 2 consecutive 1-year terms. Retired Board members are not eligible to be appointed to the Board until there has been a gap of at least 3 years since the date of their retirement from the Board. Members of the Board step down in rotation so that there is no single point in time when the entire Board changes at once. There is still no international member on the QAA Board contrary to the recommendation of the last review panel.

The QAA Board has eight committees as follows:

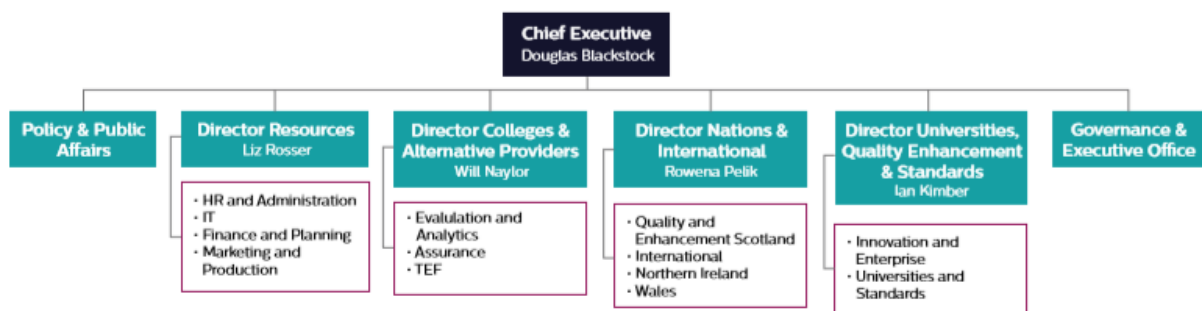
¹⁹ https://www.officeforstudents.org.uk/media/1047/ofs2018_01.pdf

- Access Recognition and Licensing Committee,
- Advisory Committee on Degree-Awarding Powers (ACDAP),
- Student Strategic Advisory Committee (SAC),
- Audit Committee,
- Nominations and Remuneration Committee,
- QAA Wales Strategic Advisory Committee,
- QAA Scotland Strategic Advisory Committee,
- QAA Enterprises (QAAE).

Each committee is chaired by a Board member or independent person approved by the Board. In between the present and the past review, committees were somewhat re-organized, and the total number diminished by two.

Mr Anthony McClaran served as Chief Executive from 2009 to 2015. Following his departure to assume a new role in TEQSA (Australia), Mr Douglas Blackstock, then Director of Resources, was appointed acting interim Chief Executive from October 2015. Mr Blackstock was permanently appointed to lead QAA as Chief Executive in November 2016. The Articles of QAA Association stipulate that the Chief Executive reports to the Board of Directors.

The main structure of the Agency and persons in charge are provided below:



The Executive and the Heads of Functions together are called the Senior Management Team (SMT) in internal documentation of QAA.

QAA has established QAA Enterprises Limited (QAAE) to carry out the following activities, for a fee and as a way to leverage its experiences and diversify funding.

- To provide a range of services, including consultancy, training, research, sponsorship, review, and accreditation, for the sole purpose of generating income to support the objects of QAA,
- To promote the quality and standards of higher education in the UK and overseas.

QAA is the ultimate parent undertaking and has held one 1 £ ordinary share since incorporation of the company. QAAE is chaired by the Chair of the Board of Directors of QAA.

QAA’S FUNCTIONS, ACTIVITIES, PROCEDURES

QAA’s activities by UK nation are as follows:

	England	Northern Ireland	Scotland	Wales
Quality Code	V	V	V	V
Revised operating method for quality assessment	V	V		
Advising on degree-awarding powers (DAP)	V	V	V	V
Review methods for alternative providers	V	V	V	V
Review of Transnational Education (TNE)	V	V	V	V
General Osteopathic Council Review (GOSc)	V	V	V	V

Access Validating Agency licensing, monitoring and relicensing	V			V
Teaching Excellence Framework (TEF)	V	V	V	V
Enhancement-led Institutional Review (ELIR)			V	
Quality Enhancement Review (QER)				V

In addition to the above-listed activities, QAA works with UK governments and other sector bodies to: provide expert advice and support policy development (e.g., guidance on plagiarism and essay mills); deliver training, guidance, and events to help UK higher education providers develop and improve their own quality assurance processes; and to provide a program of engagement with providers, students, and PSRBs to support UK higher education. QAA produces publications to support continuous improvement in the sector, including research, analysis, case studies, and thematic reports.

Building upon previous cooperation, in 2017 QAA entered into a formal relationship with the Higher Education Statistics Agency (HESA) and Jisc²⁰, this new constellation known as the M5 Group²¹. The agencies aim to work more closely together with respect to the use and application of data and analytics in quality assurance and to share resources.

Activities in scope of ESG

In the scope of the ESG, currently QAA implements nine activities:

- Higher education review (alternative providers) (HER AP) and its derivatives,
- Enhancement-led Institutional review (ELIR), Scotland,
- Quality enhancement review (QER), Wales,
- Degree-awarding powers (DAP),
- International quality review (IQR),
- Quality review visit (QRV, Gateway),
- General Osteopathic Council (GOsC) review,
- Unsatisfactory quality scheme (UQI)/concerns schemes,
- Review of transnational education (TNE).

The common elements of all those procedures that are in the scope of the ESG are as follows:

- The UK Quality Code (incorporating qualification frameworks);
- Model of review that contains self-assessment, peer review, site visit, and published report;
- Enhancement as an expected outcome of review methods and QAA's engagement with the higher education sector (including through the Quality Enhancement Network);
- Direct engagement of students in EQA and support for student engagement in internal quality assurance (IQA) (including through the QAA Scotland Strategic Advisory Committee, the QAA Wales Strategic Advisory Committee, the Student Engagement Partnership in England, the Student Partnership in Quality Scotland [sparqs]] and Wise Wales).

In some review methods, there is a particular role for a student, the so-called Lead Student Representative (LSR), which allows students to actively and directly contribute to the review process and communicate with the review panel. The LSR is expected to help ensure the smooth communication between the student body, the provider, and QAA, and usually oversees the production of a student submission. The LSR selects the students whom the review team meets. As a norm, the LSR is appointed by the students themselves, and this person may be a member of the student representative body, but may not hold a senior staff position.

²⁰ the UK higher, further education and skills sectors' not-for-profit organisation for digital services and solutions

²¹ The title bears inspiration from the name of the motorway that connects them.

Outside of the ESG, as deemed by QAA, is authorization in relation to Access to Higher Education courses, and various capacity-building services, such as a five-day International Quality Assurance Programme (IQAP) for non-UK higher education professionals, and a Concepts of Quality online training program, designed as an introduction to UK higher education quality assurance.

Each procedure is described below, drawing information from QAA's SAR, handbooks for relevant methods, and QAA's website²². Information below is accurate as of the site visit to the agency, bearing in mind that HEFCE closed at the end of March 2018.

Higher Education Review of Alternative Providers (HER AP), UK-wide

HER AP is the principal QAA method applicable to private institutions, also referred to as alternative providers, that offer full programs leading to their own awards or awards from a partner provider (who has DAP). These methods are UK-wide, and thus QAA reviews a small number of alternative providers in Scotland and Wales. The provider applies directly to QAA to schedule it for a HER AP. Although the outcomes of the reviews inform regulatory decisions made by some UK nations, the governments have no direct involvement in the review process, and QAA has no contractual relationship with any government to provide these reviews. QAA is the body approved by governments to provide an assessment of quality in order that providers can apply to recruit international students and/or access student funding.

In England, HER AP has two components; one of them is performed by QAA, another is by HEFCE and completely separate. The first component, by QAA, is a review of the provider's arrangements for maintaining the academic standards and quality of the courses it offers (the review of quality assurance arrangements), which aims to inform students and the wider public whether a provider meets the expectations of the higher education sector for: the setting and/or maintenance of academic standards, the provision of learning opportunities, the provision of information, and the enhancement of the quality of students' learning opportunities. The second component, by HEFCE, is a check on financial sustainability, management, and governance (the FSMG check), which has the aim of giving students reasonable confidence that they should not be at risk of being unable to complete their course as a result of financial failure of their education provider. For providers undergoing HER AP for specific course designation for student support purposes, the FSMG check is carried out by HEFCE after the quality assurance review has taken place.

There are four variations on the "basic" HER AP method for other types of alternative providers (those that do not have DAP), which also feature the common principles of a QAA review. They apply to the following:

- *Embedded colleges (total 42) operating networks of colleges that provide preparatory programmes for international students.* Where these providers are recruiting students who are not EEA nationals, they are subject to educational oversight from QAA and are reviewed under the HER (Embedded Colleges) method.
- *Embedded colleges operating as autonomous providers with close links to a single higher education institution (normally a university) (total five providers).* Where these providers are recruiting students who are not EEA nationals, they are subject to educational oversight from QAA and are reviewed under the Educational Oversight Exceptional Arrangements method.
- *Overseas providers operating in the UK (total 20),* of which there are two main types:
 - recognized overseas providers offering full courses in the UK leading to non-UK awards – where these providers are recruiting students who are non-EEA nationals, they are subject to educational oversight from QAA and are reviewed under the HER (Foreign Providers) method;

²² Variation in terminology is deliberate, quoting specific terms used in descriptions of procedures

- “third-party” providers of short-term study abroad programs in the UK, which form part of degree courses offered by overseas providers in their home country (also known as “study abroad providers”) – where these providers are recruiting students who are non-EEA nationals, they are subject to educational oversight from QAA and are reviewed under the Review Scheme for Educational Oversight method.

Enhancement-led Institutional Review (ELIR), Scotland

This is the main QAA review method for universities and other providers in Scotland, running since 2003, and currently in its fourth cycle. Its main focus is the provider’s strategic approach to enhancement, with particular attention to arrangements for improving the student learning experience. It analyses and confirms the provider’s ability to secure the academic standards of its awards.

ELIR 4 places much greater emphasis on contextualizing the review than previous versions of the method. In practice this means that, while the provider still carries out a holistic evaluation of its strategy, policy, and practice in relation to quality assurance and enhancement, the review will focus on those areas where there is likely to be greatest benefit to the provider, as agreed with the provider under review. ELIR is a distinctive approach to institutional review, developed to address the particular context of the Scottish higher education sector.

Quality Enhancement Review (QER), Wales

QAA’s principal review method for Wales is QER and being such it reflects the needs of the Welsh sector. The renewed method, implemented since 2017, is the successor of *Higher Education Review: Wales* and earlier versions of *Institutional Review (Wales)*. The aim of the current procedure is to inform a provider’s governing body, students, and the wider public of whether it meets the requirements of the Quality Assessment Framework (QAF) which is set by HEFCW and to encourage improvement.

QER has a focus on how higher education providers use the information and evidence available to shape their strategic approach to enhancement, and it is particularly interested in the provider’s strategic intentions and its plans in light of its current and planned future student profile (taking account of the full diversity of the student population, location, modes, and levels of study). QER explores the impact of the provider’s strategic approach to quality enhancement, including how any changes in the student population may affect it.

Degree-awarding powers (DAP) scrutiny, UK-wide

QAA’s Advisory Committee on Degree-Awarding Powers (ACDAP) receives and considers applications for DAP from providers anywhere in the UK. If ACDAP decides that an application should proceed, QAA carries out a scrutiny to determine whether the applicant meets the criteria, which differ according to where the applicant is based and for which level of powers it is applying (FDAP, TDAP, RDAP). At the end of the scrutiny process the scrutiny team submits a final report back to ACDAP, in which it formulates a recommendation to the QAA Board. The QAA Board then provides advice to the respective government, for consideration by the Privy Council, which has the ultimate authority to grant DAP.

International Quality Review, for non-UK providers

IQR is a procedure specifically designed for higher education providers outside the UK that wish to undergo a review by QAA. Instead of the UK Quality Code being a reference, the ESG part I serves that purpose. The method is designed to analyse and reflect on providers’ own quality assurance approaches, to challenge and benchmark their existing processes against the ESG, and to support them to drive improvement and excellence in their own quality assurance approach.

Quality Review Visit (QRV; Gateway), England and Northern Ireland

Quality Review Visit is part of the new operating model for the quality assessment of publicly funded providers in England and Northern Ireland from 2016. QAA carried out QRVs on behalf of HEFCE and DfE(NI). It was brought to the attention of the panel, that in 2018, depending upon discussions with HEFCW, this method may be adapted and applied to Wales, too.

This method applies to providers wishing to access the publicly funded higher education sector and to new entrants towards the end of their four-year developmental period, having undergone a period of enhanced monitoring and scrutiny. A QRV may also be needed if there is evidence of a sufficiently serious problem in an established provider (so-called risk-based and context-sensitive review). It also applies to a number of higher education providers in England and Northern Ireland (FECs) that had not been through two QAA reviews before the revised model was introduced.

General Osteopathic Council Review (GOsC Review), UK-wide

QAA carries out reviews of osteopathic courses and course providers under the contract from the General Osteopathic Council (GOsC), which is the statutory regulatory body for osteopaths and osteopathic education providers. According to information in QAA's SAR, the procedure covers institutions in England, Northern Ireland, Scotland, and Wales; at the time of the SAR's production there were 10 providers of recognized osteopathy courses in England and Wales.

The GOsC ensures that courses of osteopathic education meet its requirements for standards and quality, as well as governance and management of the course provider. Those that do are recognized and awarded Recognised Qualification (RQ) status. This allows graduates from those courses to register with the GOsC and practice osteopathy legally in the UK. The Recognised Qualification is subject to approval from the Privy Council. Following reviews of osteopathic courses and course providers, conducted by QAA, decisions concerning the granting, maintenance, and renewal of RQ status are made.

GOsC review has three different forms:

- recognition review, for new courses seeking RQ status
- renewal review, for courses seeking to renew RQ status
- monitoring review, where the GOsC needs assurance about a particular course or provider, perhaps in relation to the fulfilment of conditions from a previous recognition or renewal review, or because of some important development in the course or provider.

There are two key reference points that are considered, namely: the GOsC's Osteopathic Practice Standards and the UK Quality Code for Higher Education, published by QAA.

Unsatisfactory quality investigations (UQI), England and Northern Ireland

UQIs are part of the new operating model for the quality assessment of publicly funded providers in England and Northern Ireland. In order to proceed to an investigation, there has to be evidence of weaknesses that go beyond an isolated occurrence and where the evidence suggests broader failings in the management of quality and standards. These concerns may be reported to the funders or QAA by students, staff, and other stakeholders, or they may arise through the funders' other interactions with the providers they fund. QAA carries out UQIs on behalf of HEFCE and DfE(NI), and, based on discussions with HEFCW, the method may be adapted to and applied in Wales from 2018.

The notion of "concern" in this context encompasses unsatisfactory cases on how higher education providers manage their academic standards, the quality of learning opportunities, and the information they publish, but not individual complaints against providers (although in some cases these can be re-

qualified as concerns). The procedure first includes a screening, which may proceed to the stages of an initial inquiry (operated by HEFCE) and/or a full investigation (by QAA upon referral from HEFCE). If the matter escalates to a full investigation, it is then managed following the ESG model (submission of information by a provider, analysis by a team of peers, a site visit, and a report). Decisions are taken by the relevant funding body in light of the QAA report. Further complaints, that include redress or compensation are dealt with by the Office for the Independent Adjudicator.

QAA Concerns Scheme, UK-wide

QAA's Concerns Scheme is the corollary of the UQI process for alternative providers across the UK. It is similar to the model for UQI, but it differs as follows:

- Under the Concerns Scheme, QAA undertakes the initial analysis of the concern(s) to establish whether a full investigation is required,
- The outcome of a full investigation under the Concerns Scheme is a report published on QAA's website.

QAA Scotland has developed the Scottish Concerns Scheme for publicly funded higher education providers. Similarly as in other cases, concerns about academic standards and quality in Scottish providers can be raised by students, staff, and other parties, and these are differentiated from complaints.

The distinctive feature of the Scottish Concerns Scheme is a so-called "no surprises" approach, which constitutes an informal protocol for sharing information within the Scottish higher education sector. Scottish providers have regularly sought advice from QAA Scotland about approaches they might adopt to avoid potential risks to quality and standards, often in respect of new developments such as collaborative activity. To complement this, providers have informed QAA Scotland of any potentially adverse outcomes in relation to quality and/or academic standards, for example critical outcomes arising from provider-led review processes or from professional body engagements. Early sharing of such information and constructive cooperation throughout the procedure is seen as welcome in the relationship between QAA Scotland and the providers, helping to speed the investigation of the case while taking due care to avoid any conflicts of interest.

In the case of Scotland, the model of investigation has the same features as a general concerns scheme: the institutional submission of information, a desk-based investigation if quality and/or academic standards are at risk currently or are likely to be in the future (the reference point for reaching this view will be the Quality Code), consideration by the so-called "case conference" and/or peer reviewers, a possible site visit, and a report of the findings. The case may, however, not reach the final stages if a provider is able to constructively resolve the issue itself.

Transnational higher education (TNE) review, UK-wide

QAA carries out TNE review under contract from the four UK higher education funding bodies, and TNE activity is reported to UKSCQA. TNE review is aligned with, and complements, the new model for quality assessment in England and Northern Ireland, QAA's Enhancement-led Institutional Review in Scotland, and the Quality Assessment Framework for Wales. TNE review includes provision delivered through partnership arrangements, branch campuses, and distance learning. Specifically, TNE review focuses in more detail on the following aspects:

- Testing the implementation of policies and processes for safeguarding standards and enhancing the quality of TNE provision,
- Gaining a detailed understanding of the TNE student experience,
- Disseminating good practice in TNE provision to the whole UK higher education sector,
- Enhancing cooperation with quality assurance bodies in UK TNE host countries.

TNE review rests on a proportionate and risk-based approach (which is interpreted as recognition of the diversity within the UK sector and in overseas regulation and processes). TNE reviews are country-based. For their implementation, both international partnerships and those with stakeholders within the UK (such as the British Council (BC), UUKi, and HE Global) are very important.

QAA international activities

QAA has an internationalization strategy; some of these activities are related to contracts concluded with funding bodies (like TNE reviews), while others are outside of these arrangements (like IQR and International Quality Assurance Programmes, IQAP). QAA's international activities fall under several strands.

QAA has membership in international networks – ENQA, INQAAHE, APQN (observer status), Council for Higher Education Accreditation (CHEA) and its International Quality Group, the Quality Beyond Boundaries Group (QBBG), and the Cross-Border Quality Assurance Network (CBQAN).

QAA is a dedicated and active member of ENQA and one of its founders. Several members of QAA staff have served on the ENQA Board, led, or otherwise participated in ENQA working groups, co-produced reports published as ENQA occasional papers, and partnered in projects. QAA has organized events, including a training for ENQA reviewers, a seminar for ENQA member agency staff, and the 7th ENQA General Assembly in Gloucester. QAA has contributed to the development of common tools, such as the “ENQA Quality Assurance Professional Competencies Framework”²³ and “Cooperation in Cross-Border Higher Education: A Toolkit for Quality Assurance Agencies”²⁴.

Memoranda of understanding and letters of intent with key partners, mostly in countries of UK TNE provision and some other states in the Asia-Pacific region, have been signed, with the aim to share information, enhance mutual understanding, explore and facilitate cooperation in the quality assurance of cross-border provision, and engage in joint projects.

Last but not least, QAA provides support for the DfE and the UK nations in their work with the Bologna Follow-up Group (BFUG) and participation in the Bologna Process. The panel is informed of QAA's view²⁵, that despite the referendum results on the UK's membership in the European Union, the UK remains one of the first signatories of the Bologna Process and an active member to date, and so QAA remains connected to its partners in Europe through associated structures and on a multilateral basis.

QAA'S FUNDING

There are several sources of funding that QAA receives.

- From providers (for 2016-17 the sum is £ 6,90 million which accounts for 56% of the total income):
 - subscriptions: funding bodies require providers they fund to pay QAA subscription fees, and there are also some providers who voluntarily subscribe. Subscription gives access to enhancement events and workshops, webinars, and publications such as insight pieces on various topics;
 - commissions from providers in Wales for review services;
 - fees and annual maintenance charges paid by providers of higher education seeking educational oversight from QAA;
 - fees and annual maintenance charges paid by providers of higher education seeking specific course designation from QAA;

²³ <http://www.enqa.eu/indirme/papers-and-reports/occasional-papers/ENQA%20Competencies%20Framework.pdf>

²⁴ http://www.enqa.eu/indirme/papers-and-reports/occasional-papers/QACHE%20Toolkit_web.pdf

²⁵ QAA Viewpoint. Post-EU referendum: the UK, European Higher Education Area and the Bologna Process. August 2016. <http://www.qaa.ac.uk/en/Publications/Documents/QAA-Viewpoint-PostEU.PDF>

- fees paid by providers of higher education seeking DAP for the scrutiny process that supports their application.
- From funding councils and regulatory bodies (for 2016-17 it was £ 4,12 million or 34% of the total income), based on:
 - contracts with the four UK funding bodies (the Higher Education Funding Council for England (HEFCE), the Higher Education Funding Council, Wales (HEFCW), the Scottish Funding Council (SFC), and the Department for the Economy in Northern Ireland DfE(NI)) for international activities;
 - an outcome agreement with the Scottish Funding Council and Universities Scotland,
 - contracts with the General Osteopathic Council (GOsC).
- other private contracts, consultancy, and business development work in the UK and overseas (for the year 2016-17 it was £ 1,23 million or 10% of the total income).

QAAE has not generated a large income yet (about £ 20 thousand). Any surpluses of QAAE are gift-aided to QAA.

The financial year runs from 1 August to 31 July, and the annual planning cycle for activities covers the same period.

FINDINGS: COMPLIANCE OF QAA WITH THE STANDARDS AND GUIDELINES FOR QUALITY ASSURANCE IN THE EUROPEAN HIGHER EDUCATION AREA (ESG)

ESG PART 3: QUALITY ASSURANCE AGENCIES

ESG 3.1 ACTIVITIES, POLICY, AND PROCESSES FOR QUALITY ASSURANCE

Standard: Agencies should undertake external quality assurance activities as defined in Part 2 of the ESG on a regular basis. They should have clear and explicit goals and objectives that are part of their publicly available mission statement. These should translate into the daily work of the agency. Agencies should ensure the involvement of stakeholders in their governance and work.

2013 review recommendation

“QAA’s Board may wish to consider whether the appointment of an international Director at Board level might further enrich the mix and depth of skills available to the Board. The QAA Board may wish to consider this issue as part of the further development of a broader overarching internationalisation strategy for the Agency.”

Evidence

QAA is in a unique and exceptional position to serve the UK higher education sector; at the same time it wishes to be an agency of choice, so both aspects are reflected in the vision, mission, and strategy of the agency. The most recent strategic planning period covered 2014-2017 and had three aims:

- Enhance the quality and secure the academic standards of UK higher education, wherever delivered, in order to maintain public confidence,
- Provide leadership, through knowledge and resources, in assuring and enhancing the quality of higher education within the UK and internationally,
- Extend and enhance the value and reach of QAA's services within and beyond UK higher education.

The strategy also includes the ways of work and gives broad indications how the implementation levels would be monitored (monitoring is described in more detail under ESG 3.6). The strategy is set in a dialogue between QAA staff and the Board, representatives of the higher education sector, students, and business stakeholders. While Board minutes are not confidential and are posted on the website, some other documents, e.g. the Register of Risks maintained by the Board and the Internationalisation Strategy are not public. The panel had access to a full range of documents in order to form a comprehensive view of the agency.

The current strategy, approved by the Board on 14 December 2016 and launched in May 2017, extends from 2018 to 2020, and rather than being focused on the agency activities as the previous one did, it has a stronger orientation towards serving the sector. It contains the following three main objectives – that by 2020, QAA will be recognized and valued by student bodies, providers, and governments as:

- the expert independent quality body supporting a diverse system of co-regulation of UK higher education,
- delivering valued services that provide assurance and drive quality enhancement,
- using QAA’s international reputation and partnerships to benefit UK higher education.

On QAA’s website, the current strategy as well as the latest annual reports are available.

The panel got acquainted with two main documents on internationalization, namely the QAA International Strategy (for the period of 2017-2020) and QAA's Proposed Approach to International Strategic Engagement. They both relate explicitly and positively to the mission and vision of QAA: through the international work to promote the interests of UK higher education and to extend the reputation and respect in which it is held. When QAA talks about itself in the international regard as a leading quality expert, it is in service of the interests of UK providers. The strategy has three main aims that all together create a complex set. Specifically, their focus is as follows: (1) engagement in international activities that support UK higher education; (2) delivery of TNE reviews, country reports, and some other international activities; and (3) creation, promotion, and management of products and services for the international market that build and extend the reputation of the UK higher education system and provide a return to QAA. The approach to delivery of these aims has been formulated in general and specified for the period 2016-2018. It mainly focuses on membership in strategic international networks, retaining QAA's place in EQAR, having an active role in the development of the Bologna Process and the EHEA, and also producing country reports related to TNE. Further, this is concretely elaborated with regard to individual ambitions and activities in different countries/regions around the world.

The panel has inquired both with the Board and SMT as to how QAA dealt with the potential threats and opportunities of Brexit. It was explained that the issue was discussed by the Board and presented in the position paper produced under the QAA Viewpoint series, entitled "Post-EU referendum: the UK, European Higher Education Area and the Bologna Process" (August 2016)²⁶. No other actions were taken nor are they currently planned, as it was believed that Brexit will not directly affect QAA, since the exact shape of the agreement between the UK and the EU remains unclear, similar to estimations of its impact. However, QAA is aware that there will likely be changes in the flows of students and provision, in both directions, of transnational education, for instance, in the document on a strategic approach to international engagement, it is projected that, due to Brexit, UK TNE provision in Ireland, which already was the second largest host country for UK provision in Europe, is likely to grow. This leads to the assumption that more work is coming both with providers and partners in Ireland.

Also, it was mentioned during the site visit that higher education institutions lately were showing increased interest towards the ESG given changes in the wider quality assurance landscape, and to that end QAA hosted a seminar.

A summary annual work plan 2017-18 for QAA is laid on one page and was made available to the panel together with other materials before the visit. In order to see how the strategy translates into daily activities, the panel requested the agency to provide the panel with evidence of more concrete planning. The detailed plan for the current year was received during the site visit. It listed 14 priorities, expected outcomes (one to five for each priority), then milestones (four to nine for each priority), timing (applicable terms of the year), responsible persons (overall owners of the priority and those in charge of achieving concrete milestones), and risks (that would prevent reaching the outcomes in part or entirely). The panel also inspected confidential termly reports by the SMT, enumerating key achievements and key performance indicators, with gantt charts on the progress of agency-wide projects.

As a quality assurance agency, QAA applies a number of methods; their goals and objectives are explicitly described (what they are or what they are not, e.g. the Concerns Scheme lists issues that would not be investigated) and published either in handbooks, manuals for a relevant procedure, or other documentation, available either fully through the website or on request by email (e.g., guidance on DAP).

²⁶ Summary content presented earlier, under the chapter "QAA international activities"

For all methods that QAA implements, some activities are cyclical (HER AP, ELIR, QER), some have periodic follow up (such as DAP for alternative providers and FECs), and others are not (QRV, UQSI, QAA Concerns Scheme and QAA Scottish Concerns Scheme, TNE review) because of their nature and purpose. The panel inquired into the numbers of procedures completed per year during the period covered by the present external review of QAA and received detailed statistics per method, per nation, accounted in activity years (as noted above, they are not calendar years). Notably, due to the new operational model, in 2016, QAA discontinued the review of publicly funded providers in England and Northern Ireland. Past activities are summarized below:

<i>year</i>	England	Northern Ireland	Scotland	Wales
HER AP and annual monitoring				
2013-14	237	3	2	1
2014-15	180	3	4	2
2015-16	157	3	4	2
2016-17	153	3	2	2
General Osteopathic Council Review (GOsC)				
2013-14	2			
2014-15	2			1
2015-16	1			
2016-17	4			
Quality Review Visit (QRV) [previously – HER and IRENI]				
2013-14 (IRENI)	2		n/a	n/a
2013-14 (HER)	47		n/a	n/a
2014-15 (HER)	87		n/a	n/a
2015-16 (HER)	87	1	n/a	n/a
2016-17 (QRV)	30		n/a	n/a
Enhancement-led Institutional Review (ELIR)				
2013-14	n/a	n/a	6	n/a
2014-15	n/a	n/a	5	n/a
2015-16	n/a	n/a	5	n/a
2016-17 (annual discussion)	n/a	n/a	18	n/a
Quality Enhancement Review (QER) [previously – HER and IRW]				
2013-14 (IRW)	n/a	n/a	n/a	3
2014-15	n/a	n/a	n/a	2
2015-16	n/a	n/a	n/a	4
QER starts in 2018	n/a	n/a	n/a	
Unsatisfactory Quality Investigations (UQI)				
2015-16	5		n/a	n/a
QAA Concerns²⁷				
2013-14	69 (incl 12 AP)			4
2014-15	61 (incl 24 AP)			6
2015-16	45 (incl 13 AP)			3
2016-17	5 (all AP)			

Activities related to obtaining DAP are summarized below:

	2013	2014	2015	2016	2017	total
England						

²⁷ Number of cases, not providers, as there may have been several cases in any one year regarding an institution

	Applications	7	8	8	4	8	35
	Proceeded	7	7	8	2	6	30
	Completed	2	5	3	8	5	23
Scotland							
	Applications		1				1
	Proceeded		1				1
	Completed				1		1

Under the TNE procedure, reviews were carried out as follows: in 2014-15 procedures in the United Arab Emirates and the Caribbean were completed, in 2015-16 provision in Greece and Cyprus were covered, and in 2016-17 activities of UK higher education in Ireland were reviewed. In addition to review activities, as part of a contractual agreement with HEFCE, HEFCW, DfE(NI), and SFC, QAA regularly produces country reports. They are meant to give providers an understanding of the higher education and regulatory environment in key destinations for UK TNE. Country reports may or may not be associated with TNE review activity. In the latter case, they also include the main lessons learned from reviewing TNE in the subject country, for the benefit of the whole sector. In 2017, four country reports were posted on the QAA website: on the United Arab Emirates (dated May 2017), Pakistan (Aug 2017), China (Oct 2017), and the Republic of Ireland (Dec 2017).

Quality enhancement activities and other services that are offered in exchange for subscription to QAA are kept separate from review activities. Consultancy as an activity is part of QAA's portfolio; income from this, similar to the income from business development work and other private contracts, is part of QAA's general income. QAA offers a number of specially designed services aimed at supporting the development of quality assurance and quality assurance professionals worldwide. This includes capacity-building programs, training, and consultancy for universities, governments, and quality assurance agencies; for example, this can include training reviewers or supporting the establishment of review programs and evaluations (SAR, p. 32). For consultancy, done internationally (e.g. recently in Albania and the United Arab Emirates), QAA charges commercial rates, as this work cannot be funded by UK income (SAR, p. 36).

QAAE is registered as separate from QAA; it has a separate line of domestic consulting activities that are not mixed with the main quality agency work, in order to avoid conflicts of interest. The issue has been considered by the QAA Board, and it was decided that QAAE should be used in three specific cases: 1) it was agreed that trade should only go through the trading company where it is deemed non-primary purpose trading; 2) it is more cost effective for taxation purposes to do so; or 3) to provide a separation of activities and financial protection for QAA. More recently, the relationship and services provided to each other are articulated in the agreement signed by QAAE's Company Secretary and QAA's Director of Resources. For the two organizations, separate financial accounts are maintained, audits performed, and financial reports done and published.

On an individual level, care is taken to avoid conflicts of interest when employees of QAA engage in other than primary job-related tasks. The panel got acquainted with QAA policies spelling out terms of staff engagement in other activities and how this should be managed.

Stakeholders in the broad sense of the word are extensively involved in the work of QAA in various ways: from being present on the Board, to feeding into development and the re-design of procedures, to serving on review teams, contributing to enhancement-oriented events, etc.

QAA works in partnership with representatives of different bodies – governments and governmental bodies, politicians, civil servants and policy makers, higher education funding bodies, other higher education agencies, individual higher education providers, higher education staff, employers, and

student organizations. This engagement is mainly focused around higher education policies, the design of the quality assurance framework itself and standards for quality, and intelligence and development for the future both at home and overseas.

The role of PSRBs is seen primarily in setting the general standards for quality, recorded in the Quality Code and specifically in SBS, and to that end fruitful cooperation takes place. Both the agency staff and its Board, as well as representatives from the higher education sector whom the panel met, expressed the overall view of the present situation as being sufficient to achieve the aims of proper consideration of the needs of business and industry. (More on the role of PSRBs is described under ESG 2.2).

Other new cooperation initiatives, like the M5 Group, represent an ambition to maximize potential by sharing resources, intelligence, and data for greater effectiveness and impact. The panel finds all the above-mentioned activities of large scale and very important for QAA's operation in a complex and highly turbulent context.

Likewise, staff of QAA are present in a number of high-level working groups in the UK, such as the Universities Quality Working Group (UQWG) in Scotland, or the most recently established UKSCQA, or the Regulatory Partnership Group (RPG), which was established in September 2011 by HEFCE and the SLC. Its purpose was to advise the government, HEFCE, and other national agencies on policy and strategic and operational issues arising from the development of the funding and regulatory arrangements for higher education in England. As mentioned in the SAR, work done in the leadership groups includes drafting proposals and suggesting policy in key areas for higher education, encompassing baseline regulatory requirements (incl. the Quality Code), apprenticeships, TNE, enhancement activities, and topics associated with student involvement in higher education and quality assurance.

As mentioned above, even though QAA has done reviews of TNE for already some time, starting from 2016 the agency is formally contracted to continue to undertake in-country reviews of TNE by the higher education funding bodies of all four nations (HEFCE, DfE(NI), SFC, and HEFCW). It is estimated that over 80% of all UK degree-awarding bodies are engaged in some form of TNE, either through distance learning, partnerships, or branch campus arrangements. This provision is delivered to ca 701 thousand students in ca 180 countries worldwide. QAA operates peer reviews, where members of panels come solely from the higher education sector and represent academics, administration, and students. No reviewers from public organizations, private businesses, and the non-governmental sector are included.

The presence of international members in panels is limited to three EQA procedures as follows:

- IQR method, which is a review of non-UK providers: it will always have an international reviewer (three actual cases so far),
- QER Wales, where the handbook sets out an option to include an international reviewer,
- ELIR procedures in Scotland: inclusion of international reviewers was standard in ELIR 2 & 3 cycles; in ELIR 4 it is not mandatory, but optional, as agreed with a provider under review.

As explained by the agency, greater value is seen from contributions of internationals not to quality assurance activities, but rather to enhancement-oriented events for the sector (e.g. by inviting them as speakers to fora) and development work (e.g. in projects, on research, and for publications). The agency gave numerous examples to illustrate its internationalization as below.

QAA has international speakers, delegates, and practices featured at the Enhancement Conference events in Scotland and for annual QAA conferences (e.g. this year they will be from Nigeria and China).

QAA also commissions scans of international policy and practice, e.g. for the “Focus On: postgraduate research student experience” project, colleagues and practices from nine international institutions (Denmark, US (two HEIs), New Zealand, Australia, South Africa, Hong Kong, Chile, and Sweden) were drawn. In the project QAA ran jointly with Universities Scotland on enterprise and entrepreneurship, a webinar series included a contribution from the University of Lund (Sweden). TNE provision is another area – production of “Focus On: collaborative activity” engaged colleagues located in Dubai and Malaysia. It was said that this kind of involvement provided a more rounded picture, which the Scottish providers can use in evaluating their own policies and practices – and ELIR teams, in turn, pick up the ways in which providers conduct that evaluation in their ELIR. QAA officers can also pick this up in the annual discussion that is held as part of the ELIR method.

Analysis

QAA operates under short-term strategies (the previous one spanned over four years, while the present one covers a three-year period). The panel saw that the strategy is published, and it is translated into annual work plans that are monitored on an operational and Board level; both detailed internal and publicly available summary annual reports are made. The Internationalisation Strategy supports fulfilment of the agency’s mission. It is constructed around three main areas: building the reputation of QAA as a leading quality assurance agency; supporting the reputation of UK higher education (and especially TNE); and securing contracts for international work that extend QAA’s reputation, diversify its sources of income, and contribute to its financial sustainability. No measures are planned to expand participation of internationals in reviews, thus, the recommendation of the previous ENQA review was not taken on board.

QAA regularly undertakes EQA activities as defined in Part 2 of the ESG, and there is a series of methods/activities conducted, some of which are cyclical; for others cyclicity does not apply by their nature. All have clear and explicit goals and objectives; processes and criteria are clear. These activities are the core of QAA’s mission and operation. There are nine procedures aligned with the ESG and subject to the present review, and the panel is positive that they are based on and comply with Part 2 of the ESG.

Consultancy and other activities of QAAE are kept separate from QAA activities. While consulting internationally is done via the main QAA, QAAE is for domestic consultancy services, to separate EQA activities from consulting and to avoid conflicts of interest. In addition to what is described in the SAR and what was orally presented, the panel further inquired into a clear distinction of the two organizations and received additional written evidence to that effect. The body of evidence leads the panel to conclude that there is no confusion between the two. QAAE is a small company, though QAA staff mentioned that there was potential for development.

The volume of EQA activities that QAA runs seems to be dependent upon review logic and outcomes (cyclicity) or externally driven demand (such as requests for DAP or investigations of concerns). For non-cyclical activities, TNE reviews deserve special attention.

During the site visit to the agency, members of the SMT expressed a view that internationalization of higher education was likely to increase. At the moment, an analysis of TNE scale, level, and modes is being done; discussions on the issue are held, including with the British Council. When talking to senior leadership of providers, the panel learned that in some cases, the student population registered with a particular overseas institution through its branches or partners is even greater than the UK-based student body, which poses certain managerial challenges. To complement this, incidences in the past and some results of EQA indicate that managing collaborative provision is one of the areas in which difficulties are observed. Given the size and scope of TNE, validation and franchising arrangements, and considering the current volume of EQA activities, there seems to be a greater need for TNE reviews

than one or two countries per year and continuous and strengthened attention to managing higher education provision with others. When this question was explored with the agency, QAA seemed to be open to the idea of intensifying TNE reviews, however, pointed to stringent resources to implement these. The panel recommends the agency undertake further work, including external consultations with institutions and funding bodies, in order to bridge the gap in resources enabling a sizable expansion of TNE reviews and more attention towards validation and franchising in particular, in order to safeguard student interests in receiving quality higher education wherever UK providers deliver it.

Stakeholders are involved in the work of QAA to a large extent. Conversely, staff of QAA are contributing to several high-level leadership groups. Yet, unlike the practices in a many of EHEA countries, stakeholder groups outside academia are not directly contributing to review teams²⁸ (see also ESG 2.4).

During both the 2008 and 2013 reviews undertaken by ENQA, the involvement of internationals in governance and work of QAA has been a subject of separate discussion, and in the 2018 review the panel followed upon the developments.

QAA has produced an Internationalisation Strategy, and thereby addressed the recommendation of the 2013 ENQA review satisfactorily. It covers international cooperation, bilateral relations, and other aspects in the documents, but no explicit intention to engage international experts in QAA's reviewing activities in the UK can be found. QAA may also wish to explicitly articulate relationships with partners within the United States and Canada, as countries successful in the internationalization of higher education.

As for another recommendation from the 2013 review, namely, to include an international member on the QAA Board, the issue was discussed, but the decision was made to increase the representation of alternative providers instead. It was seen that the current composition of the Board gave sufficient exposure to international experiences from which the agency has benefited. Also, other international involvement by QAA, as described above, was seen as sufficiently informing the present activities and developmental work. Involvement of an international both on the Board and in review panels was also seen as costly and not exactly providing the same value as compared to locals, well versed in the local educational and regulatory context. In the panel's point of view, some arguments on the value and role of international reviewers are missed.

In the panels' view, participation of an international member on the Board would make a significant contribution to the work of QAA, and bring it in line with international best practice. It would provide a direct and regular opportunity, at a high level, to hear and take account of an external perspective and dimension with respect to, inter alia, strategic planning and the breadth of its activities. No doubt, current members of the Board, drawing on their own international experience, make a valuable contribution according to their expertise and fields of responsibility. However, this should not be confused with having an international perspective. Indeed, it is notable that participation of international members on QA agency boards and on panels are among the indicators monitored in the Bologna Process.

In this context, QAA should expand its membership with respect to two further dimensions.

First, the panel believes that having representatives of other educational and national systems, as well as of diverse cultural and ethnic backgrounds, would further enrich the work of QAA and better reflect the increasingly diverse higher education sector and student population (domestically and in the

²⁸ Also see: https://eacea.ec.europa.eu/national-policies/eurydice/content/european-higher-education-area-2018-bologna-process-implementation-report_en p. 135

context of expanding TNE provision). It would also strengthen the agency's ethical leadership and assure its integrity and independence, amongst the UK and international higher education community. Such actions would further ensure independence from local "group think" and contribute positively to self-reflection and innovative attitudes.

Second, the panel believes that representatives of employer groups/employment sectors and civil society should be part of the process of reviews. Internationally, and especially in the UK, there is broadening public debate about the role of universities and their engagement with the communities and regions in which they are based and on whom they rely, and on new forms of accountability. Drawing on the positive experience of including students in the review process, steps should be taken to actively involve stakeholder groups (going beyond the higher education community) in QAA's processes.

Given globalization trends and increasing internationalization of higher education, alongside concerns about growing tensions and decline in public trust in public institutions, including universities, it is disappointing that these observations need to be made. The panel would like to re-emphasize the importance of taking these suggestions seriously, and wishes QAA to urgently act to rectify this anomaly in its processes.

The panel acknowledges that its judgment of full compliance is based on the ESG standard itself, and that the suggestions below are made with consideration of progress (of which QAA is usually at the forefront) and in the spirit that the panel believes is intended by the standard as well as the guideline.

Panel commendation

QAA is commended for its wide involvement of stakeholders (primarily academics, students, administrators, business, and education sector representatives) in the governance of the agency, development of quality assurance policies and procedures, and enhancement work.

Panel suggestions for further improvement regarding implementation of the guidelines

- Working with international partners to seek improvements in the regulatory framework for UK TNE provision is included in the current strategy of QAA. The panel urges QAA to intensify its activity with respect to TNE reviews overseas and to strengthen its oversight of collaborative provision arrangements, in order to better protect students' interests to receive quality higher education and at the same time to safeguard the reputation of UK provision overseas. For that purpose, additional resources should be allocated.
- The panel urges QAA, as a matter of priority, to review its structures and procedures and include, at a minimum, an international member on its Board and to expand the membership of international representatives on review panels. It is with an understanding that internationals will bring an external dimension to the work of QAA and to review processes, which is not necessarily the same as of locals who have had or continue to have international exposure or internationals who contribute on an ad hoc basis.
- Further consideration should be given to including representatives from non-higher education stakeholder groups, including those of employers and civil society, on its review panels to ensure that UK higher education reflects the widening diversity of public interest in higher education.

Panel conclusion: fully compliant

ESG 3.2 OFFICIAL STATUS

Standard: Agencies should have an established legal basis and should be formally recognised as quality assurance agencies by competent public authorities.

2013 review recommendation - none

Evidence

QAA is an independent organization, a company limited by guarantee and not having a share capital (registration number: 03344784), and a charity (registration numbers: 1062746 and SC037786). The agency has a license for operations (Companies House Certificate of Incorporation). The panel had access to a wide range of historic and current documents of the agency.

The organization of QAA is described in the Articles of Association. The panel had an opportunity to acquaint themselves with the most recent version of it (adopted by written resolution on 10 April 2017). There, objectives of QAA remain the same and are set as follows:

- the promotion and maintenance of quality and standards in higher education in the UK and elsewhere,
- the enhancement of teaching and learning, and the identification and promotion of innovation and good practice in teaching and learning,
- the provision of information and the publication of reports on quality and standards in higher education in the UK and elsewhere,
- the provision of advice to governments, as requested, on access course recognition and in relation to all or any of the above objects.

The SAR details which outcomes of QAA's work are used for specific regulatory purposes. The biggest part of work done by the agency is contracted by HEFCE, DfE(NI), SFC, HEFCW, and GOsC and have clear deliverables as well as assigned funding. For other work it is not the agency that approaches institutions, but rather institutions, observing governmental and funders' requirements for student recruitment purposes, renewal of DAP, and access to student loans, come to QAA. Still more services, including enhancement events and publications, are covered by institutional subscriptions, the majority of which are mandatory for providers.

QAA's role is significant in maintaining national qualifications frameworks and the UK Quality Code, which is the main reference for defining standards and quality both by institutions themselves and students, and in external quality assessments.

QAA is recognized internationally as a member of ENQA, INQAAHE, and CHEA's International Quality Group; as an observer in APQN; and also participates in the Quality Beyond Boundaries Group (QBBG), and the Cross-Border Quality Assurance Network (CBQAN). QAA satisfied ENQA's membership criteria, as demonstrated by the 2008 and 2013 reviews, the latter stating full compliance for every standard of the ESG 2005. In 2014, INQAAHE found QAA to be comprehensively aligned with the INQAAHE Guidelines of Good Practice. In 2015, QAA was recognized by APQN for its efforts in achieving international cooperation in assuring the quality of cross-border education. Active engagement with international stakeholders, including ministries, quality assurance bodies, and higher education providers is assigned strategic importance by the agency. It is done with multiple purposes: for improving their understanding of the UK higher education and quality assurance system; providing input that may actively shape international and national policies; and building capacity and consultancy opportunities.

As stated in strategic documents and in the ToR of the present external review, coordinated by ENQA, QAA is interested in retaining a place on EQAR, which it has held since 2013.

Analysis

QAA has a clearly established legal basis; it is formally recognized across the UK. In 2017, QAA marked its 20th anniversary of operations as a quality assurance agency. QAA is well embedded into the institutional framework for quality assurance of higher education in the UK, contributing towards a co-regulatory approach and enhancement of higher education provision.

As described in the documentation for each procedure and elsewhere, by carrying out reviews and investigations into concerns on quality, QAA helps the four funding councils discharge their statutory responsibilities for quality assessment and, where designated, enhancement. QAA's work informs government decisions, e.g. on providers regarding specific course designations, and other bodies, such as the Privy Council, which grants DAP, and GOsC, for professional recognition and registration of providers.

In the fast-changing institutional environment and present period of development, QAA's standing was strengthened when it recently won the tender and became the DQB for England. In the meeting with the Board, the panel learned that although more system-level changes are expected, the mission, values, and principles of QAA's work would remain the same.

Although a small number of non-UK agencies registered on EQAR perform evaluations in the UK, these are mainly focused on the program level, whereas QAA is focused on the institutional level. It is fair to say that QAA does not have competition carrying out assessments across the four nations, but it has some competition where enhancement-oriented activities are concerned, such as from professional bodies or consulting companies.

QAA not only holds formal powers, but is valued for its enhancement work and for being a trusted partner by the higher education sector, which, as described above, overwhelmingly supported the agency in its bid for designation in England.

Panel commendation

QAA makes valuable contributions to protecting student interests and towards higher education quality advancements internationally; it is a recognized and respected agency in the professional circles.

Panel conclusion: fully compliant

ESG 3.3 INDEPENDENCE

<p>Standard: Agencies should be independent and act autonomously. They should have full responsibility for their operations and the outcomes of those operations without third party influence.</p>
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2013 review recommendation

“That care should be taken to safeguard the element of current HEFCE funding and to protect the operational independence of QAA in any changes following the implementation of revisions to the HEI funding model in England, whereby funding for teaching will in future reach institutions wholly via student fees (rather than via a combination of tuition fees and grant via HEFCE).”

Evidence

QAA was established as an independent body; it is registered both as a company and a charity.

What it means to be a company for QAA is described in the QAA Code of Best Practice (approved by the QAA Board in December 2017). The Companies Act 2006 places a duty on company directors to "promote the success of the company for members' benefit". In practical terms QAA interprets that since its members are the four representative bodies of HEIs (GuildHE, Universities Wales, Universities Scotland, and Universities UK), promoting members' benefits is working for the entire higher education sector or higher education providers, not just the providers' four representative bodies. It works thus in the public's interest, not as a private benefit.

QAA's charitable status requires that it shows how the agency provides benefits to the public, on which it is required to report, and not for the purpose of implementing the policies of a governmental authority.

Work that is done by QAA for governments and contracted on behalf of funding bodies is clearly described in terms of responsibilities, deliverables, cooperation modes, funding, and other circumstances in the contracts that were made available to the panel.

All founding members of QAA are represented at the level of the Board of Directors (Board), however, the entire Board of QAA sets its strategy. The founders do not have any more power on the Board than other members. Each member has one vote. This was confirmed during the panel's meeting with the QAA Board.

A special clause relates to liability of Board members (described in the Articles of Association): in the unlikely event of the need to pay debts and in case of a need to re-adjust the rights of the contributories among themselves, the liability of the members is limited to a sum not exceeding £1.

All members of the Board act in their individual capacity; declaration of interests, membership in committees, and their terms of reference are publicly available on the QAA website and are reflected in the annual company reporting. It is explicitly established in the QAA Code of Best practice that a Trustee is not a delegate of the body that appoints him or her. Appointments to the Board are by public recruitment (for independent members, and there is competition for the posts as this service is highly regarded) or by nomination. In the latter case, members of the Nomination and Remuneration Committee (NRC), on behalf of the Board, engage in dialogue with appointors or nominators. The Chairman is appointed by the QAA Board. Service is on a part-time basis. There are strict rules on acceptance of gifts, hospitality, and awards to avoid any conflict (by action or abstention) or any suspicion of it. Members of the QAA Board and QAA Board committees are bound by seven principles of public life. These are: selflessness, integrity, objectivity, accountability, openness, honesty, and leadership. QAA has developed a Trustee Code of Conduct, which also applies to Members of QAA Board committees. As mentioned above, these and other details on the modus operandi for the Board members, including corporate, financial, and other responsibilities and work in committees, are set in the Code of Best Practice.

Involvement of stakeholders takes place within predetermined venues, not compromising the independence of QAA, as the agency retains ownership of its results, whether they are final or fed into further procedures and decision making. For example, it is specifically mentioned in the contract with HEFCE that the panel read that QAA's responsibilities for the QRV method include a duty to "consult stakeholders on the proposed approach, through publication of a draft review handbook for providers, and use feedback from this process to work with the funding bodies to refine the approach." Handling nominations, appointments, and training of experts are the responsibility of QAA; there is nothing in the contracts that would interfere with these processes.

To follow upon the recommendation of the previous review, HEFCE funding is now secured for three procedures – QRV (gateway procedure), UQSI, and TNE reviews. The three contracts were all concluded on the same date (22 July 2016), all commenced on 1 August 2016, and all extended till 31 July 2021. In each contract, funding is earmarked per year within the given period.

As a general rule, sector-wide consultations for the renewal of current and/or the launching of new methods are held, but then it is the responsibility of the Board to approve the methods and of the agency staff to produce and publish the relevant handbooks. As an example, most recently, during the 2016-17 activity year, three such updated handbooks were published for DAP in England, Scotland, and Wales.

The pool of experts, in service for QAA, is composed of individuals promoted by various institutions, primarily higher education providers, and by way of self-nominations. Student reviewers can also be nominated by student unions. All applications are screened. The panel examined a reviewer contract template, which includes a clause on the necessity to “behave as a representative of QAA, adopting organisational values, particularly during the review visit”.

Handbooks for relevant methods clearly set the division of responsibilities between QAA, providers, and reviewers. For example, the HER handbook has this: “The review's findings (judgements, recommendations, features of good practice and affirmations) will be decided by the review team as peer reviewers. The QAA Review Manager will ensure that the findings are backed by adequate and identifiable evidence, and that the review report provides information in a succinct and readily accessible form. To this end, QAA will retain editorial responsibility for the final report and will moderate reports to promote consistency.” (p. 23). The above-quoted manual is a typical description on drafting of reports. It was also confirmed so by the staff whom the panel met.

Conduct of reviewers is thoroughly discussed in the QAA training events and written guidelines. For example, in the HER reviewer training material it is explicitly required that “The services under this contract shall be performed... to the highest professional standard”; principles and clear examples of conduct follow. To give another example, in the IQR procedure, members of a review team “share responsibility for collective decisions and an overall conclusion”. The roles of reviewers, QAA staff members accompanying the team, students (both as team members and as LSRs from institutions), facilitators from institutions under review, other partners (in case institutions under review cooperate with different awarding bodies, etc.) are clearly described in the various manuals that the panel examined. The publishing of a report is QAA’s responsibility, except in several procedures, such as the GOsC review, where it is done by GOsC, and the UQI, where it is done by the funding body.

EQA processes and judgments are driven by criteria and methodologies, and there are no constitutional links with government, nor with individual higher education providers.

Analysis

QAA operates as an independent body in all three aspects – as an organization, operationally, and in terms of judgments.

QAA has official status and from its registration both as a charity and through the interpretation of its activities as a company, it is clear that QAA works for the public benefit in higher education. Acting on behalf of governments and funders has clearly prescribed ways and outcomes.

The Articles of Association and the QAA Code of Best Practice are the main documents clearly spelling out the rights and responsibilities of the Board and the CEO of QAA. In December 2017, the Code of Best Practice was updated, and the new version was published on the website in March 2018. The

Board of QAA is responsible for the overall strategy and finances of the agency. It is independent in its judgments, working in an open and transparent way. The CEO of QAA is responsible for everyday operations of the agency and working together with the Board according to the strategy and work plans. It is very important that the Chair of the QAA Board is one of the independent trustees and not from among the company members. It is also made clear in the Code of Best Practice that QAA staff are responsible to their line managers and the CEO, not to trustees or members of committees.

In contracts with HEFCE, QAA is specifically tasked with the design of an overarching approach for operating, including such elements as institutional submissions (self-evaluation reports or similar), teams, and reports to be produced and published. In observance of contractual obligations, final approval of the approach, worked out by QAA, is by the funding council. In the panel's view, this is a normal procedure which in no way limits the operational independence of the agency. The contracts with HEFCE extend for five years, allowing medium-term certainty for the agency's operations.

The panel is positive there is no interference with judgments offered by review teams. Terms of behaviour of actors involved in the review process, including of reviewers themselves, are described in relevant handbooks/manuals/approaches. In the documentation it is clearly described how dissatisfaction can be raised with the agency, establishing clarity both regarding positive and negatives outcomes.

Panel commendations

The modus operandi for the QAA Board, the rest of the agency, and reviewers is well established in the QAA Code of Best Practice and documentation for review methods.

Panel suggestions for further improvement

Care should be taken to safeguard independence of the agency when redefining the new regulatory framework in England in consultations with the OfS and other relevant bodies.

Panel conclusion: fully compliant

ESG 3.4 THEMATIC ANALYSIS

Standard: Agencies should regularly publish reports that describe and analyse the general findings of their external quality assurance activities.

2013 review recommendation - none

Evidence

QAA generates a relatively large number of documents related to thematic analysis. There are four main formats of analysis that QAA produces: 1) summary-type annual reports on activities and their outcomes, 2) main findings from reviews, 3) thematic reports on selected subjects of interest and patterns identified during reviews, and 4) case studies of good practice in higher education. In addition, films are created, and news is disseminated via Twitter, Facebook, Flickr, QAA News, RSS, and YouTube. The QAA Viewpoint series tackles selected important topics in higher education and offers the agency's opinion on them.

The majority of publications are in electronic format, with some in paper versions. QAA owns and maintains three websites, found at the following addresses:

- <http://www.qaa.ac.uk> – the main website for QAA as the agency
- <http://www.enhancementthemes.ac.uk/> – supported by QAA Scotland
- <http://www.accesstohe.ac.uk/Pages/Default.aspx> – devoted to Access to Higher Education courses in England and Wales.

The panel was informed that a new design of the main website is underway and should be launched sometime in spring 2018.

Summary annual reports present the overall policy environment and QAA strategic aims and achievements, in some 20 pages with eye-catching statistical visuals. As a rule, there is an overview of work (including volume and outcomes) across the four nations of the UK, and financial accounts are given. There are also separate reports on the work of QAA Scotland, giving more details on the national policy context, the review procedures and their results with key trends, and enhancement related work, which is enthusiastically supported by institutions. Since 2014-15, when the Focus On project was launched, accounts are given on it. The characteristic Scottish approach is emphasized throughout, which rests on the principle that “quality in a mature, effective higher education system should not focus solely or primarily on threshold issues of quality assurance, but on the sector’s determination to continue to enhance the quality and excellence of its provision above the threshold.” Last but not least, the reports provide some information about the wider work of QAA across the UK and on the international level.

Reports are made on different procedures and are also addressed to specific funding bodies. For example, on the basis of HER (conducted in England, Wales, and Northern Ireland), seven publications were developed and made available to the public in recent years.

In some cases, reports on reviews, such as for TNE, are also accompanied by other analytical work done collaboratively with other organizations. As mentioned in the SAR, QAA has recently begun work with Jisc and HESA on the Business Intelligence Analytics Lab Project aimed at usage of higher education data and with the purpose to improve the student experience through development of data dashboards. The panel heard of common work from the Jisc and British Council representatives during the site visit as well.

Thematic reports examine patterns or themes emerging from QAA review and are intended to offer useful and timely guidance for the higher education sector. In the last several years there were more than 15 such reports published, mainly related to ELIR. As for case studies, since 2014, 63 publications were issued based on institutional submissions of good practice. It was mentioned in the SAR, and also said during the interviews with the panel, that there was wide interest in enhancement-related analysis from colleagues and partners abroad. Interest is so high that such events are often overlooked both by local and foreign participants.

Analyses, reports, and publications are often accompanied with other forms of professional dialogue within the higher education community – policy briefs (such as the most recently published overview on the future shape of the UK Quality Code, currently under review), conferences, seminars, etc. Also, QAA uses the Knowledgebase system to keep records of all its findings (recommendations, affirmations, and features of good practice) and offers opportunities for advanced search in various aspects.

Some publications are open to all interested parties, while others are exclusively for QAA subscribers, e.g. on transition experiences of entrants to higher education from increasingly diverse prior educational experiences, the role of student satisfaction data in quality assurance and enhancement, quality assurance of apprenticeships, enterprise and entrepreneurship education, and programme approval and validation. Analysis and research are partly conducted by QAA staff, partly in collaboration with other organizations (such as the BC, HEA, Association of Colleges, Association of Graduate Recruiters, Chartered Association of Business Schools, Chartered Management Institute, the

National Union of Students, and providers), and partly commissioned externally with distinguished individuals. Specific software (NVivo) is used to store and more efficiently analyse review reports.

Analysis

QAA regularly publishes reports that describe and analyse annual activities, general findings of EQA activities, areas of good practice and also areas where institutions face challenges. These findings contribute to the reflection and the improvement of quality assurance policies and processes in institutional, national, and international contexts and are met with great interest.

Publicly available reports are accessible through QAA's websites and are conveniently searchable. Some reports are specifically produced for accountability purposes, and some analytical reports have restricted circulation (are solely for QAA subscribers).

Representatives of institutions with whom the panel met in particular praised QAA for producing publications contributing towards higher education enhancement. Of these, several topics were particularly noted – analytical work around entrepreneurship, student assessment, management of collaborative provision, and essay mills.

Panel commendations

Analytical work by QAA and institutional submissions to the agency are of high quality and provide value to the higher education sector.

Panel suggestions for further improvement

- QAA takes a strategic approach on analysis in a number of areas of their operations (e.g. linked to ELIR), but this is not comprehensively so across all work by QAA. Thus the agency is intends itself and is encouraged by the review panel to develop a more strategic focus to analysis. This would involve systematically undertaking more thematic studies across a set of reviews, or trends over time, etc. The panel fully supports these improvement-oriented plans by the agency for the benefit of a wide range of stakeholders both at home and abroad.
- QAA is encouraged to expand work around the theme of academic integrity in higher education in order to promote ethical practices, enhance student learning experiences, and also to address issues of bogus provision.

Panel conclusion: fully compliant

ESG 3.5 RESOURCES

Standard: Agencies should have adequate and appropriate resources, both human and financial, to carry out their work.
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2013 review recommendation

"That in its forward budget planning, QAA should take urgent steps to confirm financial provision for the inclusion of international experts in all of its principal institutional review procedures."

Evidence

The visit to the agency started with a tour around the QAA premises in Gloucester. In the secure building, co-shared with other organizations, QAA occupies the entire third floor. The panel confirms QAA has a very modern and technologically well-equipped open-space head office. QAA Scotland has a dedicated office in Glasgow. Smaller bases of QAA are shared with other organizations in Wales (in Cardiff, with NUS Wales) and in London (with Jisc). During the visit, the panel talked to colleagues in the Glasgow and London offices.

While some resources (like helpdesk and CRM) are shared with other organizations in the M5 Group, information technology systems, such as QMIS (an agency-wide operational database for managing reviews) and review extranet (used by QAA staff, reviewers, and providers), are independent and secure. It is mentioned in the SAR and announced on the website that QAA was certified to the ISO 27001 international standard for information security across the entire organization in January 2016.

The chart in the SAR demonstrates decreasing trends for QAA's income from UK funding councils from 2013-14 to 2017-18, with an especially big drop from 2015-16 to 2016-17. Notably, in 2016 reviews of publicly funded providers in England and Northern Ireland were discontinued, while negotiations over the next period and associated EQA work are ongoing, with the QER method being very recently finalized just before the site visit to the agency. QAA has been successful in concluding three five-year contracts to conduct part of the activities on behalf of four funding councils. Texts of contracts with HEFCE were made available for the panel's scrutiny. They provide the following:

- for QRV (gateway procedure) – total value of the contract in portions as follows: £ 941,948 for year 1; £ 653,440 for year 2; £ 222,249 for year 3, and the same amount for year 4 and 5;
- for UQI procedure – £ 101,443 for year 1; £ 96,438 for year 2 and the same amount for years 3, 4, and 5;
- for TNE reviews – total value of £ 952,280 in equal portions of £ 190,456 for each year.

The same income chart in the SAR shows a slight decrease of subscription fees from providers (from 2015-16 to 2016-17), with stability projected thereafter. It remains to be seen how the overall debate over public and private financing to higher education will affect, if at all, QAA's income from higher education providers.

As for income from other contract work in the last five years, 2013-14 seems to have been the highest point, with a sharp decrease in 2014-15, then a slight rectification of the flow in 2015-16, then a marginal increase, and plateau. From financial statements the panel learned that QAAE so far generates small amounts of income: in 2015 it was £ 1,398; in 2016 it grew to £ 15,531; the profit for the last financial year (2017) was £ 4,910. During the site visit, when talking to agency staff in charge of international projects and consulting, an optimistic message over the market need and potential earnings was conveyed.

In the interviews with the ENQA panel, the Board and staff members of QAA mentioned increasing pressure to deliver more with less resources. The annual activity reports of QAA and QAA Scotland, the SAR, and other internal materials describe a "lean review", with a mention of the internal restructuring that took place in 2016 and satisfaction over its results.

As written in the SAR, QAA has 147 staff members (119.9 full-time equivalent) with experiences in higher education and other sectors and from a range of national and international contexts; genders are almost equally distributed. The agency practices flexible work arrangements, such as job-sharing, working from home, or calling on recently retired or semi-retired staff to cover for more and less intensive periods. There are regular resourcing meetings, and a full review six months after the restructure in 2016 was done. From oral testimonies the panel is aware that some downsizing took place in response to QAA budget fluctuations and the need to economize. New hiring and appointments also happened. During the interviews, the panel learned that in response to turbulent developments both outside the organization and within, additional measures were taken, including frequent communication and staff micro-climate surveys.

QAA draws from a pool of ca 450 reviewers, mostly from within the UK and some international. On an occasional or contract basis other experts from the higher education sector are attracted.

QAA's analytical work is numerous and impressive, including communication to the public via its own websites and social media. The agency did not mention shortage of either capacity or resources to that end.

Analysis

QAA has offices in four cities across the UK; material basis, including IT infrastructure, is adequate to support its activities.

The panel formed an opinion that a "lean review", although not easy, provided useful results and helped improve the efficiency and effectiveness of QAA. The agency expressed certainty that its new structure is well aligned to meet the needs of the present and face the future.

QAA is one of the largest QA agencies in Europe in terms of employee numbers. The panel is assured that even though there were ups and downs, the SMT and the Board closely monitor developments in human resources and take appropriate measures. The agency is encouraged to apply the ENQA framework for QA staff competence development, as intended.

The panel urges QAA to re-visit arrangements on TNE reviews to allow a greater volume of work to be carried out as mentioned before. The panel is aware that the current structure of income QAA receives from regular sources does not provide this flexibility, thus a need for it to be re-negotiated and re-defined. Likewise, allocation of additional funding for other cyclical procedures is needed to enable participation of international members in panels.

The 2013 review recommendation has not been addressed satisfactorily. It was said to the panel in various meetings that one of the reasons for not having internationals in regular reviews was the much higher cost compared to local experts. The panel explored this subject further to better understand how these disproportionately greater costs would accrue, given that flights booked in advance, and within Europe, are reasonable. The panel is positive there could be ways found to overcome the costs problem, as long as there is an appreciation of the valuable input of internationals towards reviews.

At the present moment, the agency has enough resources to improve, to reflect on their practice, and to inform the public about their activities.

Panel commendations

QAA is commended for managing well through uncertain times and for adopting a smart approach to resource management.

Panel suggestions for further improvement

The panel is reminded of the UK's principal and continuous commitment to participate in the EHEA, and thus encourages QAA and its main funders to think how this commitment could be translated into appropriate funding and review arrangements to enable participation of international reviewers.

Panel conclusion: fully compliant

ESG 3.6 INTERNAL QUALITY ASSURANCE AND PROFESSIONAL CONDUCT

<p>Standard: Agencies should have in place processes for internal quality assurance related to defining, assuring and enhancing the quality and integrity of their activities.</p>

2013 review recommendation

"QAA's Board may wish to consider whether the appointment of an international Director at Board level might further enrich the mix and depth of skills available to the Board. The QAA

Board may wish to consider this issue as part of the further development of a broader overarching internationalisation strategy for the Agency.”

Evidence

QAA publishes its various reports, inter alia: *Building on World-Class Quality*, annual reports and consolidated financial statements, and Enterprises Directors' Report and financial statements on its website, as well as corporate policies regarding standards of service, data management, IT, language usage, etc. Information on organizational structure, funding, partnerships at home and internationally, are also published on the website. In contrast, internal documents, such as financial regulations and others regulating day-to-day activities of the agency, are kept confidential.

The SAR describes the six levels of performance management to make sure that the current strategy and annual operating plans and delivery programs are implemented. It connects such processes as setting objectives and targets; planning, budgeting, and resource deployment; evaluation, monitoring, and performance indicators; and performance review and reporting. Special attention is paid to management of risks, with clear allocation of responsibilities by levels (starting with staff and contractors through to the QAA Board), and auditing processes (regular plus those that are additionally commissioned). Internally, reports are submitted to the QAA Executive, Honorary Treasurer, and the Board (separately to the Audit Committee and the full Board). Externally, reports are made to funding bodies, subscribers, and authorities in observance of requirements related to QAA's company and charitable status.

Internally, all corporate policies and procedures are published on the intranet. QAA has a comprehensive human resources management scheme, spanning from notifications of vacancies to recruitment and selection of new staff, to induction of new employees, and to performance review. Policy is enacted to guarantee training and development is effective, for the benefit of the individuals and the agency as a whole, and to the achievement of QAA objectives. Staff whom the panel met appreciated professional development opportunities on the job.

There is mandatory induction of all Board members. A relevant program was reviewed and updated during 2015-2016. Members of the Board whom the panel met confirmed these arrangements were working well. Aside the SMT, there are designated staff members (e.g. the Company Secretary and Clerk to the Board) available to support Board members in the discharging of their statutory duties.

The panel noted that the SAR included an approach to risk management. The Strategic Risk Register names risks in relation to QAA aims; there are triggering factors described; each risk is assigned an owner or several; current and proposed controls are listed; likelihood and impact identified; target likelihood, impact and target risk given. It was explained to the panel that QAA only brought major risks onto the strategic risk register when there is action, are controls or mitigations that the agency can take, but that QAA monitors and discusses the wider more speculative risks as well. Operational risks are managed below the Board level. All risks are kept under regular review, the panel was given documentary evidence of the changes.

The panel was informed by the SAR, and in meetings during the visit, that the executive team monitors the annual activity plan continuously. Formal monitoring takes place at the end of each term, at which time the outcomes are discussed and challenged by the SMT. This monitoring leads to a summary of the overall position against the annual work priorities and strategic objectives, highlighting key achievements (including impact) and exceptions (including corrective action). The panel was given examples of follow-up actions taken.

Evidence was given to the panel of the Board meeting (dated 11 October 2017), providing a summary evaluation of how the yearly plan for 2016-17 was implemented together with the overall summary of achievements, outcomes, and impact per 29 priorities in the four-year strategic planning period. Notably, QAA has demonstrated flexibility and rigor, and delivered its 2014-17 strategy despite a 24% reduction in income and associated reductions in pay and non-pay costs.

External feedback is gathered during the course of implementation of review activities and in relation to other services (such as events); it is recorded in the customer relationship management system. A special survey was commissioned by QAA in May 2017 with the purpose of preparing for future activities. Another survey was done in June 2017 gathering feedback on the value of QAA services and in general provided very good results. The SAR informs that from now on such a survey will be an annual activity.

There is an ethical conduct and anti-bribery policy to which QAA adheres; it is also extended to all with whom the agency works. It stipulates the position on preventing and prohibiting bribery, in accordance with the Bribery Act 2010. Employees and all associated persons are informed that any breach of this policy is likely to constitute a serious disciplinary, contractual, or criminal matter for the individual concerned and may cause serious damage to the reputation and standing of QAA.

QAA's commitment to encouraging diversity and eliminating discrimination amongst its employees is described in the Equality Policy Document (July 2014), provided to the panel. It defines the basic principles and the law, describes unlawful discrimination, and defines responsibilities of the Board, SMT, heads of functions, all employees, and human resources department/organizational development department.

Communication with authorities in selected countries, covered by TNE and IQR, are covered in the internationalization strategy, as well as in appropriate descriptions of procedures.

It is among the eligibility criteria that a foreign provider, applying to IQR, needs to demonstrate through the submission of evidence that it is registered, or otherwise appropriately recognized, as a higher education provider by the national quality assurance authority or other relevant agency or ministry of the country or countries in which they are located. Other clauses also apply. These are checked by QAA staff during the eligibility determination stage, and only a positive outcome of it opens a way to proceed to the scoping stage and other steps in the procedure.

Analysis

The panel had access to a number of policies and other internal documents that provided detailed descriptions of how the agency works and complies with relevant legal requirements. QAA's IQA processes follow the Plan-Do-Check-Act (PDCA) cycle. Responsibilities of the Board, its committees, CEO, and SMT are clearly described. There are regular checks of performance (in-year, termly, and end of year) done; additional audits were also commissioned. The Board whom the panel met confirmed that planning, implementation, internal monitoring, and corrective actions (if necessary) are effective. Both by information in the SAR and other documents made available, the panel is assured QAA takes measures to follow upon its findings.

Internal policies, including on ethical behaviour, non-discrimination, and whistleblowing, are applicable to all staff, the Board and its committee members, temporary workers, consultants, contractors, agents, and subsidiaries acting for, or on behalf of, QAA both within the UK and overseas. Competence and professionalism of staff, the Board, and all other parties are assured by appropriate selection for the job, training, ongoing support, and oversight of on-the-job performance or performance under contracts and agreements.

Detailed guidance and binding clauses apply regarding all business, legal, and communication aspects of relations between QAA and a foreign provider to be reviewed. In the panel's view they reach the goals. IQR seems to be a highly selective method, not a simple business opportunity for the agency.

The panel explored the topic of risk management at length, with a premise that risk is part of everyday life, and organisations should identify and address all of them; and that risks may present challenges as well as opportunities. This is especially relevant in the changing policy landscape, such as in the UK, with introduction of new initiatives and considering wider national agenda. In discussion with QAA, it emerged that major risks to the UK higher education sector and accordingly to the work of QAA are identified as "strategic" risks, small in number. More generic risks, such as international reputation, mutual recognition of professional qualifications, financial sustainability of the sector/institutions, UK universities seeking to establish campuses elsewhere in Europe, etc., posed by Brexit are monitored and only brought on to the strategic risk register when there are direct actions or mitigations that QAA can take to manage the risk. In general, risks appear to be well identified and handled by QAA.

Panel commendations

- QAA is commended for having a robust governance and well-developed internal quality assurance system which is applied rigorously.
- International Quality Review (IQR), offered by QAA to overseas providers, is established as a well-documented and demanding process, fully in line with the ESG.

Panel suggestions for further improvement

- QAA is encouraged, as planned, to apply the ENQA Quality Assurance Professional Competencies Framework, of which QAA contributed to the development, and use opportunities offered in the ENQA Leadership Programme.
- The panel further encourages QAA to discuss the wider risks, even if they appear to be out of the control of the agency; yet if they do happen, the agency has a contingency plan to address their consequences. The wide range of approaches could be used (such as promoted by the UK Government²⁹, the Australian Government³⁰, and the Canadian Government³¹) and some specific tools (e.g. Logframer³²) could be helpful in the coming review of presently existing risk management arrangements.

Panel conclusion: fully compliant

ESG 3.7 CYCLICAL EXTERNAL REVIEW OF AGENCIES

Standard: Agencies should undergo an external review at least once every five years in order to demonstrate their compliance with the ESG.

2013 review recommendation - none

Evidence

This is the third external review of QAA; the previous ones took place in 2008 and 2013. After receiving and considering the 2013 ERR, the Board of QAA approved an action plan put forward by the agency.

²⁹ <https://www.gov.uk/government/publications/management-of-risk-in-government-framework>

³⁰

http://www.egovernment.tas.gov.au/project_management/supporting_resources/templates/medium_to_large_projects/Project_risk_register_template_and_guide.docx

³¹ <https://www.canada.ca/en/treasury-board-secretariat/corporate/risk-management.html>

³² <https://www.logframer.eu/content/exporting-risk-register-new-ms-excel-workbook>

As requested by the ENQA Board, QAA submitted a progress report in October 2015. The following issues were addressed:

- The panel's recommendations on then ESG 2.2 (regarding the risk-based approach), ESG 2.7 (on reviews against the newly completed Quality Code), ESG 3.6 (on safeguarding independence by appropriate funding),
- The QAA Board's request regarding then ESG 2.4 (on processes fit for purposes).

In response to its obligations to EQAR, QAA submitted two substantial reports. One was filed on 22 August 2016 regarding the introduction of IQR. This was in response to EQAR's request to present the full IQR handbook. The second was sent on 31 July 2017 regarding QAA's internal organizational changes, discontinued reviews of publicly funded providers in England and Northern Ireland, the introduction of QRV and the investigation of unsatisfactory quality, and updates to TNE review.

Analysis

QAA fulfills its formal obligations towards continuous membership in ENQA and EQAR. The previous ENQA review provided an opportunity for QAA to reflect on its policies and activities. The agency emphasized it was a genuine process of self-evaluation, involving staff and external stakeholders, beyond the matters of formal compliance. From documental evidence and testimonies gathered during the site visit, the panel believes it was so.

At the time of submission of the progress report to the ENQA Board in 2015, not all panel recommendations had been addressed, but only part - those that were highlighted by the ENQA Board and quoted in the ENQA President's letter to QAA. Findings of the present review reveal that all 2013 recommendations were considered, but not necessarily followed through; actions were taken as deemed fit by the agency.

Panel suggestions for further improvement

QAA is advised to carefully consider all recommendations put forward by the ENQA review panel, not only those highlighted in the letter to the agency issued by the ENQA Board.

Panel conclusion: fully compliant

ESG PART 2: EXTERNAL QUALITY ASSURANCE

ESG 2.1 CONSIDERATION OF INTERNAL QUALITY ASSURANCE

<p>Standard: External quality assurance should address the effectiveness of the internal quality assurance processes described in Part 1 of the ESG.</p>

2013 review recommendation - none

Evidence

UK higher education degree awarding providers are autonomous and as such are ultimately responsible for the quality of their provision. Both requirements and expectations for higher education provision are set in the Governance Codes and the Quality Code, which are shared across the four nations of the UK. The latter states that "Higher education providers reviewed by the Quality Assurance Agency for Higher Education (QAA) are required to meet all the Expectations" (Quality Code, part A, p. 1). The only difference is made between providers holding DAP and those without, that are working with them under validation arrangements. In this case, delivery organizations do not carry the same responsibilities for academic standards, but they also are expected to understand how academic standards are set and maintained. Overall responsibility for quality and academic standards is with providers awarding degrees; managing provision with others is covered by the Quality Code Chapter B10.

While preparing for the ENQA review, QAA engaged in a mapping exercise that provided evidence on how various parts of the Quality Code, Governance Code, and GOsC Osteopathic Practice Standards in general align to ESG Part 1 and in which chapters they are specifically referenced (given in Annex 3 of the SAR, please see Annex 8 of the present report).

When looking further into the details, how the new expectations on fair recognition and interinstitutional cooperation of the ESG 2015 under standard 1.4 were embedded in the Quality Code, the panel found that Chapter B2: Recruitment, Selection and Admission to Higher Education refers to the principles of fair admissions or so called „Schwarz principles“³³ and Chapter B6 is dedicated to the Assessment of Students and the Recognition of Prior Learning. The panel was informed by the agency that reviews undertaken by Supporting Professionalism in Admissions (SPA) in 2008 and 2011 have affirmed the continuing validity of the Schwartz principles, and provide evidence that they have been successfully adopted by the higher education providers.

Handbooks for reviews provide clear mentions as to what reference points are covered by them. For example, the ELIR handbook states: “While institutions have flexibility to identify the full suite of reference points that are relevant to their strategic vision, context and student population, there are a number of specific references that Scottish higher education institutions are expected to address. These include the Quality Code, incorporating Subject Benchmark Statements, and the higher education qualifications framework that, in Scotland, is established within the SCQF. Institutions will also have regard to Part 1 of the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG) (see Appendix 4) and to the UK Professional Standards Framework for Teaching and Supporting Learning.” (ELIR, p. 2). Similar statements are found in other cases. All review methods have correspondence to all expectations under ESG Part 1, except GOsC which is a specific program-level review and, as such, in line with GOsC’s requirements and aligns primarily with ESG 1.2, 1.3, 1.4, and 1.10.

All reviews follow a similar process, beginning with institutional self-evaluations. In situations where external concerns are raised with providers, the latter are expected to submit relevant documentation for external scrutiny. In some cases, like HER review, the evidence base was substantial, including a combination of information collected by QAA, information given by the provider (including the self-evaluation document), and information provided by students (HER Handbook 2015, p. 46).

The Quality Code has been used in QAA reviews since 2014. Reflections on the Quality Code began with a public consultation in October 2017 and is due to be completed in November 2018. QAA on behalf of UKSCQA is coordinating the process. The panel understands that during the revision process the emphasis remains on higher education providers having responsibility for setting and maintaining the standards of their awards (both at and above the threshold), and for managing the quality of their provision. The primary objective of the revision process is to introduce a new, streamlined top layer to the Code, consisting of a smaller number of overarching expectations. In addition, it is said, that expectations should give more prominence to providers’ responsibilities to operate fair admissions in the context of managing quality and promoting social mobility³⁴. The panel concurs with this view.

³³ The principles on fair admission were first set in *Fair Admissions to Higher Education: Recommendations for Good Practice* (2004) drafted by The Admissions to Higher Education Steering Group, which was chaired by Steven Schwartz, Vice-Chancellor, Brunel University.

³⁴ https://ukscqa.org.uk/wp-content/uploads/2017/09/UKSCQA_Consultation_on_the_Review_of_the_UK_Quality_Code_for_HE.pdf, p. 4

Analysis

The fundamental principle is that providers, with degree-awarding authority, have responsibility for their higher education provision. This principle is endorsed in regulations, and consequently, in all review methods. The link between internal and external quality assurance is there, as EQA directly depends on providers' capacities and performance. During the visit, the panel explored various aspects under ESG Part 1; it confirms that procedures implemented by QAA do address the effectiveness of the IQA processes within provider institutions.

In relation to new expectations under ESG 1.4, it could be said that while in the Quality Code fair admission, recognition of prior learning (RPL) and credit transfer appear to be well covered, deepened attention could be given to fair recognition of qualifications from abroad, in line with the Lisbon Recognition Convention. Currently, neither of the above mentioned chapters of the Quality Code nor the Schwarz principles bear reference to the Lisbon Recognition Convention and its subsidiary texts, that establish internationally agreed best practice regarding recognition of qualifications concerning higher education. Notably, the recently published Bologna Process Implementation Report (2018)³⁵ clearly demonstrates that there is room for improvement in implementation of the Lisbon Recognition Convention in the UK.

In addition, the panel encourages QAA to explore how it could contribute to the cooperation within the triangle of higher education institutions, UK NARIC, and other organizations addressing fair recognition and admission as in ESG 1.4.

QAA activities are constructed so that they meet a set of expectations: i) domestically to assure standards and quality, while protecting the interests of students, satisfying requirements of governments and funders, as well as safeguarding the overall reputation of providers following the provisions of the UK Quality Code and the Higher Education Code of Governance, and 2) internationally to monitor and assure standards of ESG part 1. It is through compliance of the UK Quality Code that UK providers align themselves to the expectations of the ESG, rather than directly to the ESG. The exception is the IQR, as the method to evaluate foreign providers - it considers an institution's quality assurance processes directly against the 10 standards of ESG Part 1, and the QER method in Wales which also makes a judgement on whether the institution meets the standards in part one of the ESG.

The need to have more direct links between the standards and guidelines under the ESG and the Quality Code, used in all review methods across the UK, is appreciated in ongoing consultations and discussions concerning revisions of the Quality Code. The panel welcomes efforts in that regard.

Panel suggestions for further improvement

The panel suggests that the attention to fair recognition during the Quality Code revision process is deepened. This is especially pertinent in the context of ESG 1.4 and the expectation that fair recognition should include higher education qualifications, periods of study, and recognition of prior learning (RPL/APL) (including recognition of non-formal and informal learning). This is necessary in order to assure institutional recognition processes are fully covered by the internal quality assurance system and institutional practices remain in line with the principles of the Lisbon Recognition Convention, the international treaty, to which the UK is a party, and its subsidiary texts adopted by the intergovernmental Lisbon Recognition Convention Committee.

Panel conclusion: fully compliant

³⁵ https://eacea.ec.europa.eu/national-policies/eurydice/content/european-higher-education-area-2018-bologna-process-implementation-report_en, p.142-152

ESG 2.2 DESIGNING METHODOLOGIES FIT FOR PURPOSE

Standard: External quality assurance should be defined and designed specifically to ensure its fitness to achieve the aims and objectives set for it, while taking into account relevant regulations. Stakeholders should be involved in its design and continuous improvement.

2013 review recommendations

1. *“QAA should consider the development of a strategy which takes account more directly of the needs as stakeholders of business and industry at both Board and operational level. Additional input could be sought from this constituency in both review method planning and development and also in its subsequent operation.”*
2. *“The ‘risk-based approach to quality assurance’ should be developed further (as already planned by QAA), bearing in mind the need to ensure conceptual clarity and procedural fitness for coherent implementation.”*
3. *“QAA should continue its efforts to position its operations, where possible and appropriate, with quality criteria and procedures determined by professional, statutory and regulatory bodies (PSRBs) responsible for accreditation.”*
4. *“That QAA should continue to exercise extreme care in the introduction of the new review process of Higher Education Review in England and Northern Ireland. In particular the criteria for the definition of risk and for differentiating procedural consequences would need to be robust in substance, viable for coherent implementation, and transparent to the institutions concerned and to the general public.”*

Evidence

QAA underscores in the SAR, and it was also emphasized during the site visit, that working with a wide range of stakeholders is a key feature of the agency’s approach. Stakeholder representatives whom the panel met confirmed this. More specifically, engagement with the PSRB community was extensive in the development of new review methods, in a way of public consultations. Another venue is the PSRB Forum, which has gatherings two or three times a year and are held to discuss current higher education issues. There also are possibilities to raise concerns regarding provision that QAA would follow upon in the Concerns Scheme.

Involvement of different stakeholders was substantive in the drafting of such UK-wide instruments as the Governance Code and the Quality Code. At the end of each chapter of the three parts of the Quality Code, the members of the advisory group for the relevant part of the text are listed. There, persons from the academic community, independent professionals, students, representatives of other organizations in the sector, and QAA’s own staff are found. Wide contribution of stakeholders was also important while drafting SBS, which are reference points setting out agreed UK expectations for threshold academic standards in specific subject areas and disciplines at bachelor's and master's degree level.

To illustrate further the development of new procedures, the case of QER could be taken. QER has a twofold aim: to provide quality assurance and support quality enhancement. As noted in the handbook for the procedure, QER was developed by QAA in consultation with providers in Wales, Universities Wales, and ColegauCymru. Early proposals were the subject of face-to-face discussion with representatives of providers; QAA then finalized the handbook following formal consultation, and it was published in October 2017 both in English and Welsh.

As to the first recommendation of the previous review – to consider the needs of business and industry at the Board level – this is done through involvement of Board members with relevant experience. No changes seem to have taken place regarding intensifying cooperation directly with business and industry representatives. Work carried out so far and planned for the remaining part of the 2017-18

activity year was focused around obtaining stakeholder support for the designation of QAA as the DQB for England; no other activities were found in the plans made available to the panel. The same applies to the operational level, as reviews currently are solely carried out by peers - academics and members of administration within providers.

Regarding the third recommendation of the previous ENQA review, in terms of assessments, some QAA methods have no direct interface with PSRB requirements, while others do. GOsC reviews effectively are the ones to satisfy the regulator's requirements and obtain access to the profession. For other procedures, HER in Wales could serve as a further example: "Where providers have PSRB accreditation for their programmes, review teams will explore how accreditation requirements are taken into account in the setting and maintaining of standards and the quality assurance of programmes." (Handbook for HER, 2015, p. 18). While PSRBs alongside other stakeholders were involved in the development and update of the Quality Code, it should be remembered that the Quality Code as such is concerned with academic standards, academic quality, and academic awards; professional aspects are not given such prominence. It is the providers' choice to accredit their programs with the relevant PSRBs or not, and the providers' responsibility to observe applicable laws and regulations. Thus, PSRB representatives are most actively involved by providers themselves doing internal program reviews. Otherwise, it was said during the visit to the agency that PSRBs take note of QAA review results. Representatives of providers whom the panel met also confirmed they saw the primary engagement foci of PSRBs on the level of study programs.

All reviews and other activities (such as the UQI/Concerns Scheme) have clearly described aims and a context. For example, the QRV is designed with a specific aim to function as a gateway process, assuring that UK baseline requirements are met and new providers can enter the publicly funded higher education system; at the same time the method is explicitly stated as being designed with a view to comply with the ESG.

In Scotland, enhancement is the overarching theme of work; it rests upon the practice of working collaboratively, the use of national quality Enhancement Themes, learning from international experience, and engaging students as partners. ELIR 4 was developed by QAA Scotland with the support of an External Institutional Review Advisory Group comprising members from the sector, including students. A written consultation with all providers was held, and further discussions took place in sector groups such as the Universities Quality Working Group, the Scottish Higher Education Enhancement Committee, and the Teaching Quality Forum. The enhancement culture in Scotland places emphasis on moving beyond the threshold and aspiring to excellence.

There is a standard QAA approach to keeping review methods fit for purpose: they are developed through a consultative process, implemented, with feedback gathered from providers and reviewers, which is reflected upon, and then corrections enacted. Handbooks on procedures may be supplemented with additional guidance for providers and briefings (e.g. regarding GOsC, ELIR). Relevance to the context of four nations is observed, while having in the background expectations of the same UK-wide Quality Code.

There is a differentiation in terms of volume of various activities; elements of risk are also considered in the monitoring. Cycles are determined as follows (starting with the shortest):

- 3- to 5-year cycle with interim monitoring (interval determined by GOsC) is applicable to GOsC-recognized qualification renewal review;
- 4-year cycle with interim annual monitoring is typical to HER (for Alternative Providers, Foreign Providers, Embedded Colleges); Educational Oversight for Exceptional Arrangements (EOEA); Recognition Scheme for Educational Oversight (RSEO) [however, in all three cases reviews can be brought forward if monitoring failed];

- 5-year cycle, incorporating an annual discussion, is typical to ELIR in Scotland;
- 6-year cycle is characteristic to QER in Wales (yet the review may be brought forward at provider or HEFCW request);
- every 6 years alternative providers and FECs are currently required by the Privy Council to renew DAPs (adherence is typically demonstrated by undergoing the relevant QAA review method such as HER, rather than a new scrutiny).

For the methods that are not organized in cycles, clear triggers for initiation of the procedure are set as well. Since QRV is a “gateway” method, providers may stay longer in the developmental period or successfully complete it and then become subject to periodic assurance reviews, or may withdraw during its course, so the outcome and cyclicity vary. UQI depend upon the incoming number of eligible concerns; it is designed to be a rapid, tailored intervention when things go wrong. The QAA Concerns Scheme and QAA Scottish Concerns Scheme also are influenced by the incoming number of eligible cases, and the outcome may influence the next monitoring (for alternative providers) or whether the review visit is carried out earlier.

Demands that are put on providers by EQA are weighted in all procedures. For example, the contract with HEFCE on QRV states that QAA must: “Minimise the burden to providers wherever possible and be proportionate to the size and nature of the provider being assessed.” Similar clauses are in other contracts with HEFCE. These principles are observed while implementing other reviews as well. The HER AP Handbook specifies that the review visit program and duration vary according to the outcome of the desk-based analysis: a demonstrated strong track record in managing quality and standards and of responsibilities effectively will lead to a relatively short visit; whereas in the opposite case the review visit will be longer in order to carefully investigate the concerns.

Regarding the second recommendation of the 2013 review on the risk-based approach to quality assurance, work has been continuous since before the last external review of the agency. Advancement on the introduction of risk-based elements was first related to the HER AP method; then QRV could be added to the list as a procedure, elements of which include consideration of providers’ past and present performance in both provision of higher education studies, and also in terms of finances and general management. Also, elements of risk are considered under TNE.

In its progress report to the ENQA Board in 2015, QAA mentioned co-funding of a PhD student from King’s College London undertaking research on risk-based quality assurance in education. His analysis, co-authored with another staff member of QAA was presented at EQAF in 2015³⁶. In February 2018, a specially commissioned report³⁷ was published on the QAA website, drawing parallels from experience of regulatory bodies in other sectors (such as in health, food safety, and finances), and echoing concerns over the usage of metrics towards quality assurance.

As said, risks, identified through frequent monitoring or complaints received, affect the intervals between reviews that providers in England and Northern Ireland undergo and by their intensity (measured by the duration of the visits). Also, the length of the visit and the size of the panel will depend upon specifications of providers (for smaller institutions durations will be shorter and the panel smaller as well). QRV also embodies the principles of proportionality and risk assessment in the light of providers maturity and reliability. Criteria for decisions on both aspects of reviews (intervals and intensity) are described in the HER handbook, which, to remain fit for purpose, was reviewed

³⁶ Griffiths, A., Halford, E. Zen and the art of risk assessment: what are the implications of a system of risk- based quality assurance for higher education in England? November 2015. http://www.eua.be/Libraries/eqaf-2015/paper-13_griffiths_halford.pdf?sfvrsn=0

³⁷ King, R., Brennan, J. Data-driven risk-based quality regulation. December 2017. <http://www.qaa.ac.uk/en/Publications/Documents/Data-driven-quality-assessment-final.pdf>

every year from 2015 till 2017. In Wales, risk is assessed according to the provider's track record as indicated by the outcome of the previous review, which determines the intervals between reviews; provisions are described in the HER (Wales) handbook.

In Scotland, the review method is based on the concept of continuous enhancement, not the risk. All institutions are reviewed on the same cycle at the same interval, but the themes of the review and the nature of the follow-up take shape depending on the institutional context. This approach continues for the fourth cycle of ELIR and is valid for the period till 2022.

Analysis

Consultations are a significant element in implementing the co-regulatory approach in higher education in the UK. Each method fits the specific needs and context; this is the reason why there has been a frequent change of review methods in England and relative stability in Scotland. Given the changing political priorities, diversity of UK higher education providers, and the modes of delivery, this seems to be a requirement.

As is required by the standard, QAA consults stakeholders in the development of review methods and other quality instruments in order to assure their effectiveness and fitness for purpose; handbooks for procedures are regularly reviewed (often on a yearly basis). On the highest level, the QAA strategy 2017-20 has a strong focus on serving the higher education sector and in safeguarding student interests. On the operational level, when planning review methods, public consultations are held, with a possibility for all interested parties to express their interests and proposals.

Stakeholders from business and industry are widely consulted and directly involved in the development of standards for quality (Quality Code) and in particular on the subject level (SBS), and by providers themselves when designing, approving, and further improving their study programs. The level and volume of engagement with this group of stakeholders was said to be mostly appropriate given institutional autonomy and the sector's primary responsibility for quality higher education provision. No specific input is proactively sought from business, industry, and civic society representative organizations, but the panel sees potential for developments there. Recent initiatives, such as the UPP Foundation Civic University Commission, inquiring into how institutions can serve their communities better and also play a global role, suggest there are challenges yet to address.

There is careful consideration of the volume and workload for institutions under review, and in particular of cost that review methods place on institutions directly or through the funding councils. It is noteworthy that research on risk-based quality assurance in higher education, done in-house at QAA and in cooperation with external academics, suggests that care should be taken, as data-derived instruments are found only to have the potential when applied in tandem with peer review approaches. Moreover, as research shows, effectiveness of such instruments depend upon organizational maturity and internal culture.

Panel commendations

- QAA is commended for engaging in research on the potential as well as drawbacks of the risk-based approach and for greater usage of metrics in quality assurance of higher education.
- Enhancement-led approaches, where threshold quality is guaranteed and standards are assured, seem to provide stimuli for high-achieving institutions – especially concerning long-term organizational development and ownership of quality processes.

Panel suggestions for further improvement

- QAA would be advised to consider issues of engagement with the broader higher education community, and beyond, as part of its methodologies. Such an approach would be in line with

the recently introduced KEF – the new Knowledge Exchange Framework. Accordingly, QAA as the main organization for QA in the UK should continue to maintain a broadly designed consultation process across the sector, and with a broadly defined group of external stakeholders, as a way to enhance higher education quality. This way, in terms of quality assurance, consensus can be reached and demonstrated further to address present challenges for higher education in particular and society in general.

- The panel endorses continued insights into the concept of risk and analysis of the results of the risk-based approach being applied so far, and calibration of QAA review methods informed by them. In the quest for efficiency and impact, there is an appetite for risk-based approaches among wide audiences, and sometimes overly high expectations are present. Therefore, dissemination to audiences nationally and overseas is important, as findings may have broad impact both in terms of setting higher education policies and practices.

Panel conclusion: fully compliant

ESG 2.3 IMPLEMENTING PROCESSES

Standard: External quality assurance processes should be reliable, useful, pre-defined, implemented consistently and published. They include:

- a self-assessment or equivalent
- an external assessment normally including a site visit
- a report resulting from the external assessment
- a consistent follow-up.

2013 review recommendation - none

Evidence

How exactly the ESG model applies to all QAA methods is provided separately for each of them below. QAA also produced an overview table on how its methods align with key principles of the ESG, given in Annex 2 to the SAR, and quoted in Annex 7 of the present report.

Higher Education Review of Alternative Providers (HER AP), UK-wide

Till 2017, the Higher Education Review consisted of two parts: the so-called “core element” (focus on academic standards, quality of learning opportunities, information, and enhancement) and a second, changing periodically, thematic element, determined as particularly worthy of further analysis or enhancement by a decision of a special commission, including members of HEFCE and provider representative bodies (the latter part was discontinued in 2017).

The QAA component of the HER AP reviews follows the ESG model: a team of peers, a self-evaluation report by a provider, a separate submission by students, a site visit (the duration of which is between one and five days), and reporting with judgments and other findings. The provider is required to produce a follow-up action plan in consultation with students, to be updated annually until completion; these plans are then monitored through the annual monitoring process. Annual monitoring represents a short check on the provider’s continuing management of academic standards, the management and enhancement of the quality of learning opportunities, and the information it publishes about its academic provision. LSR is a particular feature of this method.

Degree-awarding powers (DAP) scrutiny

There are separate handbooks produced for different UK nations and published on the QAA website, except Northern Ireland (for which enquiries should be addressed by email to QAA). In three nations, the method follows a general model, where minor differences exist in the steps of the procedure and the criteria applied (although they are also largely compatible). The handbook for England specifies

that applications should be sent to HEFCE, which refers them to QAA. In the case of Scotland, a relevant handbook commands that applicants address the Privy Council, who seek advice from the Scottish government, and the Scottish government formally requests advice from QAA. In the case of Wales, the Privy Council receives the application and seeks advice from the Welsh government, and the Welsh government then formally requests advice from QAA. Common features are as follows: applicants produce a critical self-analysis (CSA), there is a visit by a panel of experts, and the report is considered by ACDAP who then makes a recommendation to the entire QAA Board. From the Board confidential advice is given to HEFCE or to the Scottish or Welsh governments, and in all cases advice is given to the Privy Council, which makes the final decisions. The latter are published.

The scrutiny process is carried out by a team of specially trained peer reviewers, including a student reviewer. The process takes place over 12-18 months and typically involves a series of visits (one to two days), in order to allow the scrutineers to observe a range of meetings and other events through a complete academic cycle. ACDAP may recommend that an application be placed in abeyance, giving time for the applicant to take such developmental action as will enable the scrutiny to be resumed at a later date. Follow-up depends upon the outcome of the process. Successful applicants, who are granted UK DAP are expected to subscribe to QAA.

General Osteopathic Council Review (GOsC Review), UK-wide

Guidance on GOsC reviews is provided on the GOsC website to which QAA refers. There, various documents for use by providers and reviewers are placed.

Stages of the process include: production of the self-evaluation and application to GOsC, preliminary meeting, a panel, a site visit (usually is two-and-a-half days, during it teaching may be observed), and a report. In case the final report contains a positive judgment with conditions, the provider has to produce an action plan demonstrating how conditions will be fulfilled; for that, documents usually are enough, but occasionally, a full monitoring review to check on the fulfilment of conditions may be done. Providers have an obligation to submit to QAA an annual monitoring report.

TNE Review (Transnational Education Review)

As mentioned above, TNE reviews are closely linked to other reviews done across four nations. As there is no cyclicity, the plan for reviews is drafted in consultation with QAA, the funding bodies, and UKSCQA.

The handbook for the method specifically quotes as being developed following the ESG. The model includes an extensive desk-based background analysis, a representative sample of TNE arrangements to be visited (in view of perceived academic risks and for facilitation of sharing of good practice), a visit by peers (visits could be of two types - review visits and case study visits), and publication of three types of reports (on providers, on good practice, and a country overview). The visit could be organized either in the UK or at the delivery site overseas. There will be on average 8 review visits and 4 case study visits per TNE review round. Each review visit lasts one whole day, and each case study visit lasts half a day. The review team might also decide that it would be possible to follow up the desk-based analysis with only a video-conference.

Recommendations made following a TNE review will be followed upon in other institution-level processes: HEFCE's Annual Provider Review for England and Northern Ireland, and QAA's ELIR in Scotland, the QAF and QER in Wales, and HER AP. In case serious concerns about academic standards and quality are identified, they could be subject to further investigations, done either by the respective funding body or QAA. After publishing the reports, a workshop is arranged for reviewed providers and others to discuss and share the lessons.

Quality Review Visit (QRV; Gateway), England and Northern Ireland

QRVs are carried out by teams of trained peer and student reviewers following the ESG model: they include a provider briefing by QAA (face to face or virtual), provider's submission to the review team, analysis of submission and supporting evidence by the review team, site visit, and reporting. Site visits will normally be two days, although this could vary depending on the findings of the initial provider assessment. The program will also vary for each provider, but this will be based on preliminary findings of the review team before the site visit.

The outcomes of the QRV are considered by the relevant funding body in reaching its broader judgment about the provider's readiness to enter the higher education sector, to remain in, or to exit the developmental period. LSR is a particular feature of this method.

Enhancement-led Institutional Review (ELIR), Scotland

The main theme of reviews in Scotland is enhancement, understood as taking deliberate steps to bring about improvement in the effectiveness of the learning experiences of students. The institutions' strategic approach to enhancement is emphasized, along with implementation at multiple levels within the institution. Institutions can choose to proceed in a way of continuous improvement and/or more significant step-changes in policy and practice.

A range of reference points are used: Scottish (SFC) guidance to institutions on quality and the SCQF, UK (Quality Code), and European (ESG Part 1). ELIR 4 reviews are contextualized, which means there is variation between review focused on an institution, and how this is addressed by the institution and the review panel.

The method follows the ESG model: submission of a so-called Reflective Analysis, a team of peers, a visit (a single day planning visit and the full review visit, resulting in the full review visit lasting between 3-5 days), and reporting (an outcome report and a more detailed technical report). During the ELIR 3 cycle, each institution was expected to engage in a specific ELIR follow-up event, whereas for the new cycle of ELIR 4, the institutions are expected to engage in follow-up activity delivered through the Focus On projects, with the intention of facilitating cross-institutional learning. ELIR contains both cyclical review and an annual discussion with each provider.

Quality Enhancement Review (QER), Wales

QER provides an assessment of higher education providers against the ESG and agreed baseline requirements (QAF). It is structured around the strategic priorities of the provider and the nature of its student body - and how the two interrelate to define the provider's priorities for enhancing the student learning experience. It is designed to be a holistic approach to a higher education provider, and give learning opportunities for the entire sector.

The method follows the ESG model: submission of so-called Self-Evaluative Analysis, a team of peers, a visit (the main review visit will last between three and five days), and reporting (an outcome report and a technical report). An institutional action plan in consultation with students is expected shortly after the review, to be updated annually; this is followed by the HEFCW triennial assurance review (or a sooner intervention if needed) and a regular review (in 6 years). Providers with unsatisfactory judgments are monitored more closely than those with positive outcomes. LSR is a particular feature of this method.

Unsatisfactory quality investigations (UQI), England and Northern Ireland

The procedure first includes a screening, which may proceed to the stages of an initial inquiry (operated by HEFCE) and/or a full investigation (by QAA upon referral from HEFCE). If the matter escalates to a full investigation, it is then managed following the ESG model: submission of information

by a provider, analysis by a case officer/team, a site visit (typically lasting 1-2 days), and a report. Decisions are taken by the relevant funding body in light of the QAA report. Further complaints that include redress or compensation are dealt with by the Office for the Independent Adjudicator.

QAA Concerns Scheme, UK-wide

Concerns received can be investigated within a coming review (in this case the information and accompanying evidence will be passed to the reviewers) or if the next review visit is more than nine months away, QAA normally investigates it separately in two stages. These stages include an initial inquiry and a full investigation. A serious concern, if well evidenced, can directly instigate a full investigation without an initial inquiry. A full investigation follows the ESG model.

As already mentioned above, in the case of Scotland, the model of investigation has the same features as the general concerns scheme, and the ESG model applies.

Complaints about institutions (including concerns about standards and quality) in Wales are considered by HEFCW, but provision of alternative providers in Wales is covered by the QAA Concerns Scheme.

International Quality Review, for non-UK providers

IQR comprises three stages: an application, a scoping visit, and a review, the last of which includes a self-evaluation by the provider, a review team, a site visit (lasting two, three, or four days), and a report. Progressing from one stage to another depends on whether the provider has satisfactorily met the requirements of each one, as a provider has to be deemed ready to undergo a rigorous review by QAA. In case of success, upon completion of the review, providers are expected to publish their action plan in response to the QAA report and can use the QAA IQR Graphic.

Analysis

All reviews subject to the present scrutiny by the ENQA review panel follow the ESG model. The abundance of review methods suggests there are variations in what particular criteria, usually called reference points, are considered, and the ESG model is implemented, depending on the nature of the concrete procedure. Normally self-evaluation reports are produced, but in other cases the equivalent forms are required (e.g. not full self-evaluations, but institutional submissions of information in case of concerns). Groups of reviewers are assembled, except for concerns cases, where work can be done by a QAA officer and not proceed to a full-scale review. This arrangement seems to be proportionate and fully justifiable. All procedures end up with the production of reports, forms for which may vary depending upon the method. Again, this is logical considering the various purposes of reviews.

There is a system where regular reviews are complemented by annual reporting, in order to have a close look at developments within institutions. Follow up, as a rule, contains an expectation for a provider to produce an action plan, which will be the subject of QAA scrutiny; while in more enhancement-oriented approaches it is complemented by various forms of collective discussions and learning.

Guidance materials, not limited to procedural descriptions, are published, thus giving full transparency of arrangements, under which QAA, its review panels, and providers work to achieve consistency and professionalism. The panel is confident that under this standard the ESG expectations are fully met by QAA.

Panel commendations

- The contribution of students to review processes is commendable. They produce separate contributions from the provider's written or audio submission of information in order to

complement the providers' self-evaluation report. Also, identification of lead student representatives (LSRs) enables an authentic student's voice to be heard and given prominence.

- Institutional action plans for follow up, complemented by other forms of dialogue and mutual learning instances between QAA and providers and among providers themselves, is a commendable practice, ensuring managerial effectiveness and also wider impact of reviews beyond immediate actions.

Panel conclusion: fully compliant

ESG 2.4 PEER-REVIEW EXPERTS

<p>Standard: External quality assurance should be carried out by groups of external experts that include (a) student member(s).</p>
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2013 review recommendation

“Following agreement in principle by the QAA Board, the Panel would urge the early implementation of the inclusion of an international reviewer (from outside the UK) in all its institutional review programmes across the UK as a standard feature. In the Panel’s view, this will bring added depth, experience, insight and added value both to QAA’s review activities and to institutional quality enhancement capacity, by providing a wholly unbiased system-wide view on operations, unfettered by traditions.”

Evidence

As mentioned under ESG 3.3, experts (usually called reviewers or visitors), in service for QAA, can be nominated by higher education providers and other institutions, or apply by themselves. Student reviewers can also be nominated by a student union or a representative organization. Announcements on recruitment of reviewers take place via a number of channels (e.g. on the website and through newsletters). All applications are screened by the agency.

Irrespective of the nominations, it is the responsibility of QAA to appoint experts, to offer training, and to assign review teams. The exception is the GOsC review, for which QAA nominates visitors to the review, followed by a check for any conflicts of interest, and approval by GOsC (General Osteopathic Council review of osteopathic courses and course providers, Handbook for course providers, 2011, p. 4). In all cases, providers are asked if they have any objections regarding the proposed experts. Adjustments may follow if potential conflicts of interest are found.

Handbooks on review methods contain descriptions of roles of all those contributing to the process, including QAA staff in their coordinating capacity, and also profiles of reviewers. Under the category of “peers” two types of reviewers are found:

- Current or former staff from higher education institutions with senior-level expertise in administration, management, and/or teaching; in case of former staff members, they can be consultants with up-to-date expertise in provision of higher education;
- Current undergraduate or postgraduate students, those on sabbatical, or recent graduates (up to two years) with experience in representing students' interests.

For some procedures, criteria for experts are rated differently. For example, a handbook on HER containing selection criteria both for staff reviewers and student reviewers, specifies for the category of staff “essential” criteria (relating to the current standing, personal, social, and IT skills) and “desirable” criteria (relating to past experiences).

The ELIR 4 handbook lists qualities required in all reviewers, then additional ones for UK reviewers, international reviewers, and student reviewers. “In addition to the qualities required in all reviewers, international reviewers are expected to demonstrate a number of the following attributes: current or recent (within three years) wide experience of academic management at the institutional level outside the UK, preferably relating to quality assurance and enhancement of the student learning experience; current or recent (within three years) experience of external review of higher education institutions outside the UK, either as a panel member or through senior involvement with a quality assurance or enhancement organization; peer-acknowledged expertise in the development of good practice in learning and teaching, and the wider student experience (it will be highly desirable to have such recognition at an international level); knowledge and experience of practice in a minimum of one country in addition to the UK (it will be highly desirable to have wide-ranging international comparative knowledge and experience); an awareness of the distinctive features of the Scottish higher education system in general, and the enhancement-led approach in particular (ELIR training will emphasise this but some initial awareness is expected).”

There are a number of documents pertaining to training and development of reviewers, including a relevant policy for review team members and guidance documents on reviewer roles for separate procedures. The panel had access to the HER AP reviewer training 3-day program and materials and found them to be well prepared, providing detailed and very useful practical information on expectations for behaviour prior to, during, and after the visit. For ELIR, all reviewers are given training by QAA Scotland to familiarize themselves with the method and also the wider enhancement-led approach. All reviewers are trained and must participate in re-training, as review methods change. Experts whom the panel met, including students, confirmed so and praised the value of training.

Training for reviewers in the QAA pool, once selected, is free of charge, but obligatory and extensive; after successfully undergoing training, reviewers are expected to be available for several visits during a year. There is also an evaluative phase after the review ends, where feedback is gathered from QAA staff, providers, and reviewers themselves in order to identify underperformance (in this case, developmental support is provided) or excellent performance (in this case, reviewers are invited to share their practice with others). There are also annual reviewers’ conferences organized with the aim of continuous professional development.

All reviewers declare their interests, so that there are no conflicts, ethical conduct is covered by the contracts, clear guidance on behaviour during the review process is given, and performance is subsequently evaluated.

The number of reviewers is different for different procedures:

- For HER AP, the size of the team is between two and six reviewers depending on the scale of the provision on offer, including one student. Regarding the latter category, variation may occur, as the reviewers briefing guidance says: “One student reviewer on teams of three or more” (Higher Education Review (Alternative Providers) Briefing. 19 May 2017. p. 12).
- For UK-wide concerns, the screening and initial inquiry is done by the case officer; the full investigation will be led by a QAA member of staff or representative, and may also involve others, depending on the nature of the concern and its complexity (Raising concerns about standards and quality in higher education: guide and submission form, February 2014, revised October 2015).
- For the concerns scheme in Scotland, the initial inquiry is done by a QAA Scotland senior staff member (the so-called case officer), then analysis is dealt with by so-called “case conference”, involving a minimum of two senior QAA officers. In case of a full investigation, it will be led by a senior member of QAA Scotland staff or a representative and, depending on the nature of

the concern and its complexity, is likely to involve others such as peer reviewers (Scottish Concerns Scheme, October 2016, p. 2-4).

- In GOsC reviews, there are normally three visitors.
- According to the handbook, TNE review will be conducted by a review team comprising three peer reviewers. The review team may include a student reviewer with relevant competence (Transnational Education Review Handbook, revised September 2017, p. 8). Case study visits will be undertaken either by peer reviewers or QAA officers.
- In QRV, the team will normally consist of three reviewers, although in some circumstances a team of two reviewers may be allocated. Regardless of the team size, there is a student reviewer, unless “exceptional circumstances arise”. For review of TNE provision, the QRV team will include a reviewer with TNE expertise.
- Usually there are: five team members for FDAP, five team members for TDAP, and four team members for RDAP, with one member of the team acting as Scrutiny Secretary in each case. One reviewer is a student.
- IQR teams are composed of at least one UK peer reviewer, one international peer reviewer (from outside the UK), and a student reviewer.
- For QER, most often there are four reviewers, except where the provision is small, in which case there are three reviewers. Where the provider has a significant number of collaborative arrangements for its education provision, the size of the team may be increased to five members, including a student member.
- ELIR teams seem to be the largest, as each panel will have between four and six external reviewers including senior academics, a student reviewer, and a coordinating reviewer.

On some occasions, QAA officers play other roles in a sense, acting not as review coordinators, but in assuming investigatory and analytical responsibilities (e.g. in the scrutiny of concerns and contributing towards case study analysis of TNE).

QAA relies on a general pool of some 400 reviewers, a distinct ELIR reviewer pool with some +120 reviewers (of these 17 are internationals), and a pool of +50 students. Basic information on reviewers, in searchable format, is available through the website. The agency also collects information on reviewers’ educational background, institutional affiliation, and other data in order to match competences of reviewers and the task (particular method and complexity of the review, nature and size of the institution to be evaluated, etc.). QAA has published an analysis of reviewer profiles across all review methods and also in relation to HER in 2015³⁸.

The question on inclusion of internationals in QAA review teams comes up in the QAA external review for the third time. In 2008 the review panel made the following observation: “The Panel notes that the inclusion of international experts in review activity is fully within the spirit of the European Standards and Guidelines and would urge QAA to move towards implementation as soon as practicable”. At the moment of the ENQA review in 2013, international reviewers had been invited to ELIR procedures in Scotland (2008-2012). While in December 2012, the QAA Board reviewed the evaluation of the pilot ELIR procedures in Scotland and endorsed the inclusion of international reviewers in other QAA methods in the future; inviting internationals for the HER method and others did not happen.

Similar recommendations on widening the presence of internationals was made in 2013 (quoted at the beginning of this chapter). Following upon it, QAA held consultations with the Board and the higher education sector regarding wider inclusion of internationals in reviews. The panel was informed during the present site visit that consultations did not support the idea proposed by the ENQA panel due to issues of cost and added value/value for money – e.g. involvement of internationals in reviews

³⁸ <http://www.qaa.ac.uk/en/AboutUs/Documents/QAA-reviewers-15.pdf>

as opposed to contribution to other activities by the agency, such as enhancement and development work.

It is regarded that many QAA reviewers have direct experience working internationally or with being involved with collaborative provision overseas, therefore, it is sufficient. Some reviewers whom the panel met confirmed they had experience serving on evaluation teams abroad and found this experience to be positive. As already stated, the panel believes that reflecting upon one's ways of doing things is not exactly the same as seeing those ways from a more distant cultural and educational perspective; these two perspectives are complementary but not interchangeable. This is exactly the reason many other QA agencies would compose mixed teams, from local and foreign experts.

At the moment, QAA uniformly includes internationals in IQR reviews, and they may be included in ELIR 4 reviews. In the past, every ELIR team in the ELIR 2 & 3 cycles included an international reviewer. It is stated in the current ELIR 4 handbook that, following discussion with QAA Scotland, institutions can opt to include an international reviewer, an additional student reviewer, and/or additional UK-based academic reviewers. ELIR 4 is now in the first year of implementation. The panel learned that as of the date of the ENQA site visit to QAA in February 2018, four ELIR teams have been allocated, of which one included an international reviewer (from Europe). Of the four ELIR reviews scheduled for spring/summer 2019, two institutions have explicitly requested international reviewers, and the remaining two have not finalized their view.

The panel is aware that in a consultation document on QER procedure, there was a question posed regarding inclusion of international reviewers, noting that they "can bring an added external perspective to a review team's consideration of the provider's approach to quality assurance and the enhancement of the student academic experience. Their selection to a review team is informed by their expertise and experience, with the aim of achieving a suitable match to the strategic approach and enhancement priorities of the provider". It was also made explicit that "appointing an international reviewer to the review team may incur additional costs to the provider." To the best of the panel's knowledge, the consultation results were negative; internationals would not be included in review teams as a standard feature, but remain an option.

Analysis

To ensure consistency, reviewers are carefully selected, extensively trained on the application of methods, and review teams are accompanied by a QAA review coordinator. The agency ensures impartiality of experts by implementing a mechanism preventing conflicts of interest.

QAA is committed to respecting diversity, equality, and non-discrimination, thus, the panel inquired into how these principles are reflected in expert recruitment. According to statistics provided by the agency, the proportion of male and female reviewers are very good, almost equal. As to the ethnic background, White British would seem to dominate; however, the ethnic background of more than one-third of experts is not known. The agency might wish to undertake further work to better analyse their reviewers' profiles and ensure greater diversity and representation on the teams, reflecting the diverse student/staff profile. The panel suggests QAA should broaden its review panel membership to ensure greater representativeness of the national, cultural, and ethnic diversity of UK higher education.

The 2013 recommendation by EQAR regarding inclusion of students in DAP procedures is addressed satisfactorily.

Students whom the panel met confirmed, that as panel members they were treated as equals throughout the review process.

The panel does not judge that the ESG 2.4 standard is fully met, as there is still not (a) student member in all reviews: there are no students in investigation of concerns, in the GOsC reviews, and in the TNE reviews they may or may not be included.

When implementing various EQA activities, QAA relies exclusively on a peer-review approach, working only with members of academic staff, administration, and students. There is no specific category of reviewers from business and industry, even though some academics might have direct experience working in business and/or industry. The panel does not think the guidelines under ESG 2.4 are fully implemented, as there are no experts in the category of employers/professional practitioners, unlike in many other European countries. The panel is reminded, that as there were times when evaluations were solely done by academics and administrators, and then practices gradually shifted to include students as equal members of teams and accepted as a norm, so can current opinions change on how employers/professional practitioners could contribute to reviews. They are not meant to replace the academic perspective, but rather to complement and enrich it.

The panel is convinced that more direct involvement of employers, representatives of business, as well as representatives of the civil sector, would help in carrying out reviews, and help to better secure standards and quality in bridging current skills gaps and meeting other future needs in an increasingly diverse higher education system both at home and overseas. This would be a welcome development to ensure a broader and better calibrated role for QAA, and through its methods and activities, to increase the relevance of higher education to the labour market and society. It is worth noting that, TEF judgments (the awards of “gold”, “silver”, and “bronze”) – albeit not part of this review – are decided by a high-level, independent panel of 27 experts including academics, students, and employer representatives³⁹.

When enquiring into the reasons why persons from the world of work and internationals could not be included on teams, reservations regarding their ability to apply the Quality Code and other reference points was expressed. The panel is positive that this lack of appropriate contextual knowledge of UK higher education and skills to use specific quality instruments can and should be addressed by providing proper training on the UK higher education context, on the procedure itself, and in briefing before the visit. Surely, a requirement to attend a two or three-day residential training may be a barrier, but this method is not the only way to train reviewers; other ways could be found, e.g. using online technologies, re-distributing the volume of training offered before undertaking any reviews, and during the briefing session once assigned to a reviewers’ team, etc. The panel hopes some other reservations regarding the ability to apply reference points may fade away once changes to the Quality Code, currently under revision, are introduced as well.

Panel commendations

Training and further professional development of reviewers remains an outstanding feature of QAA work, well appreciated by providers and reviewers themselves.

Panel recommendations

Students should be included in all review methods aligned with the ESG as a standard feature, without reservations and special clauses.

Panel suggestions for further improvement

- The panel would like to encourage QAA to build upon the positive experiences of ELIR and IQR teams and to extract from them ingredients that could make regular participation of internationals in reviews across many more review methods a future success story. Sharing

³⁹ <http://www.hefce.ac.uk/lt/tef/whatistef/governance/>

with and learning from other QA agencies can also help identify the value of different perspectives and suggest practical ways to overcome perceived barriers.

- QAA is encouraged to expand its local reviewers pool to better represent diversity of UK providers and students, also incorporating perspectives from business/industry or professional practitioners and civic society. The panel also urges the agency to expand its international reviewers pool and find ways of enabling their participation to meet review requirements and expectations.

Panel conclusion: substantially compliant

ESG 2.5 CRITERIA FOR OUTCOMES

<p>Standard: Any outcomes or judgements made as the result of external quality assurance should be based on explicit and published criteria that are applied consistently, irrespective of whether the process leads to a formal decision.</p>

2013 review recommendation

“The Panel recognises that QAA currently ensures that a balance is maintained between the need formally to articulate detailed indicators of sound practice in the Quality Code, and the need also to allow for some flexibility of judgement in the review process itself, while still safeguarding the overall coherence of judgements. The Panel endorses the continuation of this approach, which can, in the Panel's view, continue to be achieved through QAA's commendable practices of both training reviewers thoroughly and also providing professional guidance throughout the review process. The Panel recommends that a continuing commitment to this balanced approach will be essential for the successful implementation of both the Quality Code and the planned risk-based approach to quality assurance.”

Evidence

When the review processes involve different institutions, clear guidance on their roles, process, timeline, and other important aspects are given. For example, the handbook on obtaining DAP in England specifies that applications should be submitted to HEFCE, which then would refer an application to QAA. The Advisory Committee on Degree Awarding Powers (ACDAP), an expert committee of the QAA Board, would consider an application. If deemed qualifying, it would then be forwarded to QAA's appointed panel; in the opposite case, the applicant is informed of the unsuccessful submission. ACDAP makes a recommendation to the QAA Board, which then confidentially advises the Privy Council (via the relevant government body). Final decisions are made by the Privy Council.

Criteria, the absolute majority of which are qualitative, are clearly defined per procedure, available in handbooks, usually in annexes. For procedures of a similar nature, some criteria are common, some are additional. For example, for applications to obtain TDAP, RDAP, and UT in Scotland, nine criteria are common (in areas of Governance and Management, Quality Assurance, and Administrative Systems); for TDAP there are further three criteria under Academic Staffing (in total it makes 12 criteria), and for RDAP and for UT - an additional five under the Environment Supporting the Award of Higher Degrees, Academic Staffing (in total it makes 17 criteria).

Some judgments are yes/no type (e.g. the concern will be upheld (in whole or in part) or not upheld under concerns schemes); in other reviews judgments may be presented indicating the level of achievement (e.g. GOsC). To give a concrete example of such formulations, in HER AP reviews the judgment on the setting and/or maintenance of academic standards will be expressed as one of the following: meets UK expectations, requires improvement to meet UK expectations, or does not meet UK expectations (by reference to the Expectations in the Quality Code). Review judgments may be

differentiated, indicating to whom they apply: to provision delivered wholly by the provider and that offered through collaborative arrangements; to undergraduate and postgraduate levels; or to the provision associated with different degree-awarding bodies or other awarding organizations.

In two procedures formal judgments are not passed: TNE and IQR. TNE reviews use as criteria the expectations from Chapter B10 “Managing Higher Education Provision with Others” of the Quality Code. More specifically it includes 19 indicators of sound practice, grouped under the following headings: strategy and governance; developing, agreeing, and managing an arrangement to deliver learning opportunities with others; responsibility for, and equivalence of, academic standards; quality assurance; information for students and delivery organizations, support providers, or partners; and certificates and records of study. TNE reports would contain summative conclusions (sometimes omitted), positive features, and recommendations. In IQR reports, at the end of the analysis on how providers comply to each of the standards of ESG Part 1, a judgment is made indicating if the standard is met.

As to the recommendation of the previous review, efforts are made to exercise a balanced approach. As safeguarding measures, features of the process could be listed, such as the wide involvement of stakeholders in consultative processes in the design of the review methods, intensive training of reviewers and support to them given by the agency, and internal moderation process in order to assure quality of reviewers’ reports (in procedures, that result is in judgments). As the Quality Code is currently under revision, it remains to be seen what level of detail it will contain.

Analysis

Information on the review process and decision making as well as criteria is given in handbooks on procedures, some presented not only in text format, but also in flowcharts. It is clear.

The panel is convinced that criteria are applied consistently due to the construction of the processes and professionalism of both QAA staff and reviewers. Low numbers of complaints and appeals also speak towards support of that argument.

The panel looked into the issue of balance between detailed indicators of sound practice in the Quality Code, and the need to allow for some flexibility of judgment in the review process. The panel is positive that due care is taken. The Quality Code itself is not carved in stone. The panel is aware that from the time it was completed in October 2013, regular reviews and consultations regarding elements of it were further held, in particular regarding SBS, which resulted in over 60 SBS being reviewed and revised between 2013 and 2016. In addition, in October 2017, UKSCQA issued a proposal to adopt a holistic approach to reshaping and restructuring the Quality Code, rather than a chapter-by-chapter review. This aims to secure the Code’s core principles, while allowing for greater flexibility to meet the needs of a diversifying sector, and the different contexts of the nations within the UK. It is expected that the proposed approach will result in a Quality Code that will look and feel different from the present one. The consultation was closed in mid-December 2017. At the moment of the present ENQA site visit, QAA was coordinating responses to the consultation on behalf of UKSCQA.

Panel conclusion: fully compliant

ESG 2.6 REPORTING

<p>Standard: Full reports by the experts should be published, clear and accessible to the academic community, external partners and other interested individuals. If the agency takes any formal decision based on the reports, the decision should be published together with the report.</p>

2013 review recommendation - none

Evidence

All review procedures result in published reports, but as navigation on the QAA webpage leading to reports is by title of provider and date, and it is not necessarily easy to find reports by procedure. The panel specifically asked the agency to provide links to samples for all procedures, and they were given. All are published by QAA except for the GOsC procedure (they are published by GOsC, links on the QAA site go there) and UQI (reports are published by the relevant funding body). In case of UQIs, as already mentioned, the scrutiny of a concern may be dealt with by a QAA staff member or may be passed onto the panel if the regular review is within nine months; in this case, consideration of the concern will be merged with another procedure and no separate report is produced, but rather issues are addressed within the main outcome report.

Following a recommendation made by EQAR in flagging QAA's compliance on the standard regarding reporting on DAP in 2013, the agency now publishes the final scrutiny reports for applications to obtain DAPs on its website. In 2015, QAA issued a new policy on disclosure of information in relation to DAPs and applications to obtain a UT containing the following provisions: "All records are closed until the Privy Council's decision has been made public. Once BIS has notified us of the outcome, QAA will publish the final scrutiny team report on its website. The report will have been sent to the applicant organisation at the end of the detailed scrutiny of its application. The published report may still be subject to commercial interest amendments."

In the reports, information on the review and the institution is given, the expert team is clearly identified, judgments and evidence with analysis leading to them are elaborated, good practice examples are underscored (e.g. by writing in bold within the text and by separate paragraphs at the end of reports), and recommendations are given. Summaries at the beginning of the reports are produced. Reports bear QAA logos as applicable per procedure and outcome, e.g. general QAA, QAA Scotland, QAA Global, etc. Welsh language requirements are observed.

Different methods may have several types of reports done. For example, at the end of the review, the ELIR team produces an outcome report (setting out the threshold judgment, the differentiated commendations and recommendations and providing outline information about the nature of the institution) and a more detailed technical report. As already mentioned before, TNE reviews end with three types of report: 1) quality assurance reports on the TNE arrangements of the concrete reviewed providers, containing recommendations and areas of good practice, 2) case studies aimed at providing a better understanding of specific aspects of TNE provision and facilitating the sharing of good practice, and 3) a country overview report, outlining the scale and scope of UK TNE in the selected country of review, the local operating environment, and the key thematic findings from the review and case study visits. TNE reports are published on QAA's website and provided to the funding bodies. Reports may be drafted by review panels or by QAA officers, using materials produced by the panel members. Institutions are given an opportunity to check for factual errors. In addition, LSRs are invited to provide comments on the factual accuracy of the draft reports (e.g. in HER AP). Reports are proofread and prepared for publishing by QAA's Marketing and Production Team.

There is extensive communication via social media channels. Continuous work is being done to build relationships with other organizations and to establish links with other high-traffic websites for the reach of wide audiences.

Analysis

QAA reports are written in a good style; to that end from the last ENQA review additional efforts were put. The panel had access to the agency guidance materials for reviewers on academic writing and found this advice very relevant.

Reports are clear and concise, fully in line with expectations under the guidelines to ESG 2.6. When listing review panel members, student reviewers are specifically identified. A particular feature of the reports is numbered paragraphs, which allow easy cross-referencing. All reports bear the visual identity of QAA and contain the agency's contact data.

Large archives on publications, not only review reports, but handbooks and guidance materials on review methods, pieces of research, and others are conveniently searchable on the website. While the reviewer database is searchable by name and by method, the QAA reports on providers, as mentioned above, are searchable by the title of an institution and the review month and year. It is suggested to consider expanding search possibilities, e.g. by procedure run, and give a one page per provider summary of procedures undergone for increased transparency.

Panel commendations

Extensive use of social media and broad public engagement is a feature of good practice.

Panel suggestions for further improvement

- The panel has heard from QAA staff that the SAR drafting process enabled collation and analysis of a lot of information resulting in a comprehensive report, but communicating clearly UK quality assurance and enhancement arrangements for internal and external audiences was a challenge. Building upon this experience, the ENQA review panel would like to encourage QAA to place on its website overview information on required and optional quality arrangements that different providers are subject to in order to increase transparency and better appreciation of both what the EQA system per each UK nation is, and what the quality of a given provider is. This is in particular important to prospective students (especially international, the number of whom is constantly increasing) and professionals in charge of recognition of qualifications.
- Currently, reports published on the QAA website are searchable by the title of provider, year, and month. The panel suggest the agency could add more options for search.

Panel conclusion: fully compliant

ESG 2.7 COMPLAINTS AND APPEALS

Standard: Complaints and appeals processes should be clearly defined as part of the design of external quality assurance processes and communicated to the institutions.

2013 review recommendation - none

Evidence

QAA has a set of procedures for how to handle complaints and appeals, and these procedures (including timeline) are specified for each method used. The procedures are made publicly available on QAA's website. It is not possible to appeal on grounds of academic judgment; courts do not accept such claims either.

The procedures are continuously being improved. Since the last ENQA review in 2013, a new Consolidated Appeal Procedure was developed by QAA – it includes appeal panels supported by the external advisor. Some other measures to improve QAA's complaints and appeals operation can be mentioned. All QAA reviewers undergo training prior to their engagement in reviews; the training opportunities are provided regularly and thoroughly in relation to changing methodologies. Also, QAA devotes a lot of attention to training reviewers on how to avoid conflicts of interest, complaints, and appeals and uses updated learning material for this. QAA sets up appeal panels to deal with cases, the

members of which have special training conducted partly by QAA staff, partly by external experts. The practice of including a “reading panel” involving an experienced QAA reviewer who reads the draft of the report before it is published can also be seen as a good practice.

The appeal process has the form of a newly (again, repeatedly) conducted review done by a different panel than the original review. When possibilities to solve the appeal “internally” are exhausted, the issue goes to the court.

The QAA Board always receives information about legal issues that appear and the analysis of these issues. Also, QAA itself analyses the complaints and seems to be learning from them, as shown to the panel with the example of two cases (instances provided in the summary of juridical review activity for ENQA panel, not dated).

The ENQA review panel was introduced to two cases that were rejected by the court in the initial hearing. Besides these, the panel was informed about the appeal case of a higher education provider. The reason for the appeal was the judgment of the higher education review; the appeal was based on the report that the provider did not accept, owing to numerous factual mistakes in the report and the irregularity of the process. QAA acknowledged the appeal, and the original review was cancelled. The appeal was conducted in anonymity. According to the provider who was complaining, the QAA procedures were robust, but the problem was seen in the poor performance of the panel.

In general, the number of appeals is relatively small and this number has a decreasing tendency: while in 2014-15 it was 9 cases and in 2015-16 – 13 cases, in the last two reported years the number decreased (in 2016-17 it was 6 cases and in 2017-18 it is 5 cases so far). Furthermore, most of the complaints were rejected. QAA analyses complaints – where they come from and what they relate to. Typical complaints relate to new material (for instance guidelines and rules) that were not delivered to the provider before the review started, and yet the panel followed the new rules; other complaints dealt with a panel not adequately using the criteria or findings being disproportionate.

Analysis

The complaints and appeals procedures have been dealt with well in QAA for a long time, as shown in previous QAA review reports as well as by examining current QAA practice. Appeals are distinct from complaints; this is clearly described. Communication to providers on both procedures is sufficient.

Based on the above-mentioned evidence, the panel agrees that complaints and appeals procedures are developed and used effectively by QAA, and there is an obvious tendency to improve them by adopting specific measures. These measures reflect the complexity of the work with complaints and appeals, and they seem to be effective. Monitoring and reflection take place at QAA at different levels, which also is a positive feature.

The policies and practice for how QAA deals with complaints and appeals is in line with the ESG.

Panel conclusion: fully compliant

ADDITIONAL OBSERVATIONS

Over the last few years, covered by the present ENQA review, QAA has been operating in a changing policy environment, across the UK, and individually in each of the four nations. The move took place appreciating that a "one-size-fits-all" approach does not satisfy expectations neither of policy makers, nor providers. Many public consultations were carried out, and as a result several review methods were revised and additional quality instruments (such as TEF and KEF) were launched, and new structures, such as UKSCQA and OfS, were created. The shift is clearly towards the adoption of a more nuanced approach regarding categories of providers, considering risks associated with provision both at home and overseas, and with greater appetite for efficiency, usage of metrics, and outcome measurement.

QAA was and remains the primary EQA agency for the United Kingdom. This position is strengthened by the designation of QAA as the body to perform the assessment functions for higher education in England. The review panel wishes QAA to find an appropriate balance between the agency's historically close relationship with the higher education sector, supporting its development and enhancement of quality of higher education provision, and successfully adopting the new regulatory roles.

Internationally, QAA is among the leading quality assurance agencies. Such a status recognizes QAA's consistently high organizational performance and valuable contribution towards shaping and implementation of common agendas in quality assurance of higher education. At the same time, this status also entails an obligation to fulfil more than "standard" expectations (for the purposes of the present review – such as under the ESG standards), but also to strive to implement the best international practices (such as those formulated under the guidelines to the ESG). The panel is confident that QAA with all its dedicated staff and the Board, in close collaboration with multiple external stakeholders, is capable to achieve so.

CONCLUSION

SUMMARY OF COMMENDATIONS

The panel found many features of good practice and made the following commendations:

ESG 3.1: QAA is commended for its wide involvement of stakeholders (primarily academics, students, administrators, business, and education sector representatives) in the governance of the agency, development of quality assurance policies and procedures, and enhancement work.

ESG 3.2: QAA makes valuable contributions to protecting student interests and towards higher education quality advancements internationally; it is a recognized and respected agency in the professional circles.

ESG 3.3: The modus operandi for the QAA Board, the rest of the agency, and reviewers is well established in the QAA Code of Best Practice and documentation for review methods.

ESG 3.4: Analytical work by QAA and institutional submissions to the agency are of high quality and provide value to the higher education sector.

ESG 3.5: QAA is commended for managing well through uncertain times and for adopting a smart approach to resource management.

ESG 3.6:

- QAA is commended for having a robust governance and well-developed internal quality assurance system which is applied rigorously.
- International Quality Review (IQR), offered by QAA to overseas providers, is established as a well-documented and demanding process, fully in line with the ESG.

ESG 2.2:

- QAA is commended for engaging in research on the potential as well as drawbacks of the risk-based approach and for greater usage of metrics in quality assurance of higher education.
- Enhancement-led approaches, where threshold quality is guaranteed and standards are assured, seem to provide stimuli for high-achieving institutions - especially concerning long-term organizational development and ownership of quality processes.

ESG 2.3:

- The contribution of students to review processes is commendable. They produce separate contributions from the provider's written or audio submission of information in order to complement the providers' self-evaluation report. Also, identification of the lead student representative (LSR) enables an authentic student's voice to be heard and given prominence.
- Institutional action plans for follow up, complemented by other forms of dialogue and mutual learning instances between QAA and providers and among providers themselves, is a commendable practice, ensuring managerial effectiveness and also wider impact of reviews beyond immediate actions.

ESG 2.4: Training and further professional development of reviewers remains an outstanding feature of QAA work, well appreciated by providers and reviewers themselves.

ESG 2.6: Extensive use of social media and broad public engagement is a feature of good practice.

OVERVIEW OF JUDGEMENTS AND RECOMMENDATIONS

The panel concluded that QAA complies with the ESG as follows:

ESG 3.1 ACTIVITIES, POLICY AND PROCESSES FOR QUALITY ASSURANCE – Fully compliant

ESG 3.2 OFFICIAL STATUS – Fully compliant

ESG 3.3 INDEPENDENCE – Fully compliant

ESG 3.4 THEMATIC ANALYSIS – Fully compliant

ESG 3.5 RESOURCES – Fully compliant

ESG 3.6 INTERNAL QUALITY ASSURANCE AND PROFESSIONAL CONDUCT – Fully compliant
ESG 3.7 CYCLICAL EXTERNAL REVIEW OF AGENCIES – Fully compliant
ESG 2.1 CONSIDERATION OF INTERNAL QUALITY ASSURANCE – Fully compliant
ESG 2.2 DESIGNING METHODOLOGIES FIT FOR PURPOSE – Fully compliant
ESG 2.3 IMPLEMENTING PROCESSES – Fully compliant
ESG 2.4 PEER-REVIEW EXPERTS – Substantially compliant
ESG 2.5 CRITERIA FOR OUTCOMES – Fully compliant
ESG 2.6 REPORTING – Fully compliant
ESG 2.7 COMPLAINTS AND APPEALS – Fully compliant

The panel puts forward one recommendation as follows:

ESG 2.4: Students should be included in all review methods aligned with the ESG as a standard feature, without reservations and special clauses.

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

SUGGESTIONS FOR FURTHER DEVELOPMENT

ESG 3.1:

- **ESG 3.1:** Working with international partners to seek improvements in the regulatory framework for UK TNE provision is included in the current strategy of QAA. The panel urges QAA to intensify its activity with respect to TNE reviews overseas and to strengthen its oversight of collaborative provision arrangements, in order to better protect students' interests to receive quality higher education and at the same time to safeguard the reputation of UK provision overseas. For that purpose, additional resources should be allocated.
- The panel urges QAA, as a matter of urgency, to review its structures and procedures and include, at a minimum, an international member on its Board and to expand the membership of international representatives on review panels. It is with an understanding that internationals will bring an external dimension to the work of QAA and to review processes, which is not necessarily the same as of locals who have had or continue to have international exposure or internationals who contribute on an ad hoc basis.
- Further consideration should be given to including representatives from non-higher education stakeholder groups, including those of employers and civil society, on its review panels to ensure that UK higher education reflects the widening diversity of public interest in higher education.

ESG 3.3: Care should be taken to safeguard independence of the agency when redefining the new regulatory framework in consultations with the OfS and other relevant bodies.

ESG 3.4:

- QAA takes a strategic approach on analysis in a number of areas of their operations (e.g. linked to ELIR), but this is not comprehensively so across all work by QAA. Thus the agency is intends itself and is encouraged by the review panel to develop a more strategic focus to analysis. This would involve systematically undertaking more thematic studies across a set of reviews, or trends over time, etc. The panel fully supports these improvement oriented plans by the agency for the benefit of a wide range of stakeholders both at home and abroad.
- QAA is encouraged to expand work around the theme of academic integrity in higher education in order to promote ethical practices, enhance student learning experiences, and also to address issues of bogus provision.

ESG 3.5: The panel is reminded of the UK's principal and continuous commitment to participate in the EHEA, and thus encourages QAA and its main funders to think how this commitment could be translated into appropriate funding and review arrangements to enable participation of international reviewers.

ESG 3.6:

- QAA is encouraged, as planned, to apply the ENQA Quality Assurance Professional Competencies Framework, of which QAA contributed to the development, and use opportunities offered in the ENQA Leadership Programme.
- The panel further encourages QAA to discuss the wider risks, even if they appear to be out of the control of the agency; yet if they do happen, the agency has a contingency plan to address their consequences. The wide range of approaches could be used (such as promoted by the UK Government , the Australian Government , and the Canadian Government) and some specific tools (e.g. Logframer) could be helpful in the coming review of presently existing risk management arrangements.

ESG 3.7: QAA is advised to carefully consider all recommendations put forward by the ENQA review panel, not only those highlighted in the letter to the agency issued by the ENQA Board.

ESG 2.1: The panel suggests that the attention should to fair recognition during the Quality Code revision process is deepened. This is especially pertinent in the context of ESG 1.4 and the expectation that fair recognition should include higher education qualifications, periods of study, and recognition of prior learning (RPL/APL) (including recognition of non-formal and informal learning). This is necessary in order to assure institutional recognition processes are fully covered by the internal quality assurance system and institutional practices remain in line with the principles of the Lisbon Recognition Convention, the international treaty, to which the UK is a party, and its subsidiary texts adopted by the intergovernmental Lisbon Recognition Convention Committee.

ESG 2.2:

- QAA would be advised to consider issues of engagement with the broader higher education community, and beyond, as part of its methodologies. Such an approach would be in line with the recently introduced KEF – the new Knowledge Exchange Framework. Accordingly, QAA as the main organization for QA in the UK should continue to maintain a broadly designed consultation process across the sector, and with a broadly defined group of external stakeholders, as a way to enhance higher education quality. This way, in terms of quality assurance, consensus can be reached and demonstrated further to address present challenges for higher education in particular and society in general.
- The panel endorses continued insights into the concept of risk and analysis of the results of the risk-based approach being applied so far, and calibration of QAA review methods informed by them. In the quest for efficiency and impact, there is an appetite for risk-based approaches among wide audiences, and sometimes overly high expectations are present. Therefore, dissemination to audiences nationally and overseas is important, as findings may have broad impact both in terms of setting higher education policies and practices.

ESG 2.4:

- The panel would like to encourage QAA to build upon the positive experiences of ELIR and IQR teams and to extract from them ingredients that could make regular participation of internationals in reviews across many more review methods a future success story. Sharing with and learning from other QA agencies can also help identify the value of different perspectives and suggest practical ways to overcome perceived barriers.
- QAA is encouraged to expand its local reviewers pool to better represent diversity of UK providers and students, also incorporating perspectives from business/industry or professional practitioners and civic society. The panel also urges the agency to expand its

international reviewers pool and find ways of enabling their participation to meet review requirements and expectations.

ESG 2.6:

- The panel has heard from QAA staff that the SAR drafting process enabled collation and analysis of a lot of information resulting in a comprehensive report, but communicating clearly UK quality assurance and enhancement arrangements for internal and external audiences was a challenge. Building upon this experience, the ENQA review panel would like to encourage QAA to place on its website overview information on required and optional quality arrangements that different providers are subject to in order to increase transparency and better appreciation of both what the EQA system per each UK nation is, and what the quality of a given provider is. This is in particular important to prospective students (especially international, the number of whom is constantly increasing) and professionals in charge of recognition of qualifications.
- Currently, reports published on the QAA website are searchable by the title of provider, year, and month. The panel suggest the agency could add more options for search, e.g. by procedure run, and give a one page per provider summary of procedures undergone as this might be helpful for increased transparency.

ANNEXES

ANNEX 1: PROGRAMME OF THE SITE VISIT

DAY 1 – MONDAY 19 FEBRUARY 2018			
TIMING / PLACE	TOPIC	PERSONS FOR INTERVIEW	ISSUES TO BE DISCUSSED
15.00 – 15:30 (30')	A short tour of the premises	QAA representative: Ms Rowena Pelik	ESG 3.5
15.30 – 16.30 (60')	Meeting with the Agency Resource Person	Ms Rowena Pelik, Director of Nations and International	To clarify elements related to the overall system of HE in UK and the context, any substantial updates from the period after QAA's self-evaluation report was submitted.
16.30 – 19.00 (90') QAA offices	Review panel's kick-off meeting	Review Panel: <ul style="list-style-type: none"> • Dr Milan Pol, Dean and Professor of Education, Masaryk University, Czech Republic, Chair, academic (ENQA nominee) • Ms Aurelija Valeikienė, Deputy Director, Centre for Quality Assessment in Higher Education (SKVC), Lithuania, Secretary, quality assurance professional (ENQA nominee) • Dr Ellen Hazelkorn, Emeritus Professor and Director, Higher Education Policy Research Unit (HEPRU), Dublin Institute of Technology, Ireland; education consultant, BH Associates; quality assurance professional (EUA nominee) • Mr Adrian Stan, PhD student and periodontology resident, University of Medicine and Pharmacy "Victor Babes", Timisoara, Romania, Student (ESU nominee) ENQA review coordinator – Ms Lindsey Kerber	Preparations for day 2
19.00	Dinner (panel only)		
DAY 2 – TUESDAY 20 FEBRUARY 2018			
TIMING	TOPIC	PERSONS FOR INTERVIEW	ISSUES TO BE DISCUSSED
8.00 – 8.30 (30')	Review panel's private meeting		
8.30 – 9.30 (60')	Meeting with the Head of Agency	Mr Douglas Blackstock, Chief Executive Officer of QAA	Context of QAA operations; all aspects of compliance towards ESG Part 2 and Part 3
9.30 – 9.40 (10')	Review panel's private meeting		
9.40 – 10.30 (50')	Meeting with members of the Board of QAA	Mr Chris Banks Mr Robert Cashman Mr Stephen Criddle Ms Linda Duncan Professor John Grattan Professor Denise McAlister Mr Philip Wilson	To discuss the institutional, legal, academic and other contexts pertaining to operations of QAA; analysis of QAA's compliance to ESG 3.1, ESG 3.2, ESG 3.3, ESG 3.5, ESG 3.6, ESG 3.7, ESG 2.2
10.30 – 10.45 (15')	Review panel's private discussion		
10.45 – 11.45 (60')	Meeting with members of the team responsible for	Ms Fiona Crozier, Head of International and project chair for ENQA review Mr Matthew Cott, Quality Assurance Manager with a focus on DAP Dr Julian Ellis, Head of Assurance	ESG Part 2 and Part 3, mapping of QAA activities against ESG Part 1

	preparation of the self-assessment report	Mr David Gale, Quality Assurance Manager Ms Gemma Long, Quality Specialist with a focus on Wales Mr Will Naylor, Director of Colleges and Alternative Providers Ms Pamela Sinclair, Quality Enhancement Manager, QAA Scotland (VC Glasgow) Mr Rafe Smallman, Quality Specialist and project coordinator for the ENQA review	
11.45 – 12.00 (15')	Review panel's private discussion		
12.00 – 12.50 (50')	Meeting with representatives from the Senior Management Team	Ms Caroline Blackburn, Head of Finance and Planning Ms Elise Cook, Head of HR Mr Gareth Crossman, Head of Policy & Public Affairs Ms Rachael Gee, Head of Assurance Mr Graham Hardy, Head of Information Systems Mr Ian Kimber, Director of Universities and Standards Ms Maureen McLaughlin, Head of Universities and Standards Dr Gai Murphy, Head of Quality Design Ms Liz Rosser, Director of Resources	Meeting staff members, responsible for daily management, development for the future, finances, human resources, public relations to clarify compliance regarding expectations of ESG 3.1, ESG 3.3, ESG 3.4, ESG 3.5, ESG 3.6, ESG 3.7
12.50 – 13.35 (45')	Lunch on site (panel only)		
13.35 – 14.20 (45')	Meeting with key staff of the agency / staff in charge of different procedures	Mr Matthew Cott, Quality Assurance Manager, DAP and University Title Dr Ailsa Crum, Head of Quality and Enhancement Scotland (VC Glasgow) Mr David Gale, Quality Assurance Manager, GOsC and HER AP Ms Margit Gill, Programme Coordinator, QRV Ms Rozina Hashmi, Quality Assurance Manager, Concerns/UQI Ms Gemma Long, Quality Specialist, Wales and QER Dr Andy Smith, Standards and Frameworks Manager	Meeting expectations of ESG Part 2, Part 1 and Part 3
14.20 – 14.35 (15')	Review panel's private discussion		
14.35 – 15.25 (50')	Meeting with key staff of the agency responsible for international activities, projects, consulting	Ms Fiona Crozier, Head of International Ms Lauren Duncan, Innovation and Enterprise Manager Mr Dan Murch, Innovation and Enterprise Consultant (Skype) Mr Rafe Smallman, Quality Specialist Dr Fabrizio Trifiro', International Manager	International connectedness; Organization and involvement in consulting; ESG Part 2 and Part 3; ESG Part 1
15.25 – 15.40 (15')	Review panel's private discussion		
15.40 – 16.30 (50')	Meeting with key staff of the agency in charge of information provision, systemic analysis, and handling of complaints & appeals / court cases	Ms Lavinia Blackett, Head of Governance Ms Helen Cullis, Data Analyst Ms Lindsay Heaven, Governance Officer Paralegal Ms Debra Macfarlane, Quality Enhancement Manager (VC Glasgow) Ms Sally-Anne Saull, Quality and Engagement Manager Ms Stephanie Stephenson, Head of Marketing and Production Mr Steve Walker, Production and Website Manager	ESG Part 2, ESG 3.1, ESG 3.4, ESG 3.6
16.30 – 17.00 (30')	Connecting with a selected regarding complaints / appeals	Professor Paul Brunt, Director of Academic Partnerships, University of Plymouth (Skype)	ESG 2.7
17.00 – 19.00 (120')	Review panel's private discussion		Wrap-up meeting among panel members and preparations for Day 3
19.30	Dinner (panel only)		
DAY 3 – WEDNESDAY 21 FEBRUARY 2018			
TIMING	TOPIC	PERSONS FOR INTERVIEW	ISSUES TO BE DISCUSSED

8.30 – 9.00 (30')	Review panel private meeting		
9.00 – 9.50 (50')	Meeting with key external stakeholders (e.g. funders, professional, statutory and regulatory bodies)	Ms Fiona Browne, Head of Professional Standards, GoSC (VC London) Ms Alison Cook, Assistant Director Learning Quality, SFC (VC Glasgow) Dr Scott Court, Head of Quality Team, HEFCE (Gloucester) Mr Jon Prichard, CEO, Institution of Chemical Engineers (VC London) Ms Hannah Streatfeild, Deputy Director, Department for Education England (VC London)	Context, in which QAA operates; use of QAA work results; compliance to ESG Part 2 and ESG Part 3
9.50 – 10.00 (10')	Review panel's private discussion		
10.00 – 10.45 (45')	Meeting with other key external stakeholders	Dr Jack Aitken, Chair of QSN and Director, University of Glasgow (VC Glasgow) Mr Ben Elger, Chief Operating Officer, OIA (VC London) Mr Will Hammonds, Programme Manager, UUK (Gloucester) Mr Jonathan Waller, Director of Information & Analysis, HESA (Gloucester) Miss Kate Wicklow, Policy Manager, GuildHE (Gloucester)	Inter-institutional cooperation; Use of QAA work results; ESG Part 2 and ESG Part 3
10.45 – 11.00 (15')	Review panel's private discussion		
11.00 – 11.50 (50')	Meeting with head/Vice-Chancellors (VC) of some reviewed universities, publicly funded higher education providers, further education colleges, alternative providers	Professor Liz Barnes, VC, Staffordshire University (Gloucester) Dr Ben Calvert, PVC, University of South Wales (Gloucester) Professor David Eastwood, VC, University of Birmingham (Phone) Professor Helen Marshall, VC, University of Salford (Skype) Professor Lorna Milne, Proctor, University of St Andrews (Gloucester) Professor John Sawkins, PVC, Herriot-Watt University (Skype) Ms Roxanne Stockwell, Principal, Pearson College London (VC London) Mr John Widdowson, Principal, New College Durham (VC London)	ESG Part 2 and ESG Part 3
11.50 – 12.00 (10')	Review panel's private discussion		
12.00 – 13.00 (60')	Meeting with quality assurance officers of HEIs	Dr Demelza Curnow, Bath Spa University (Gloucester) Dr Frank Haddleton, University of Hertfordshire (VC from Hatfield) Dr Mark Irwin, BIMM (VC London) Mrs Alison Jones, University of Salford (Gloucester) Mrs Lorraine Lavery, Belfast Metropolitan College (Skype) Ms Katrina Swanton, Edinburgh Napier University (VC Glasgow)	ESG Part 2 and ESG Part 3
13.00 – 13.45 (45')	Lunch (panel only)		
13.45 – 14.45 (60')	Meeting with representatives from the QAA reviewers' pool, including academic and labour market representatives	Professor Hilary Grainger, London College of Fashion (Gloucester) Dr Douglas Halliday, University of Durham (Gloucester) Dr Sylvia Hargreaves (VC London) Dr Alan Howard, University of Reading (Gloucester) Ms Francine Norris, West Dean College (VC London) Professor Ian Robinson (Gloucester) Miss Elizabeth Shackels, South West College (Skype)	ESG Part 2 and ESG Part 3
14.45 – 15.00 (15')	Review panel's private discussion		
15.00 – 15.45 (45')	Meeting / connecting with international reviewers / stakeholders	Ms Liz Dempsey, Higher Education Manager, British Council (VC London) Dr Roy Ferguson, University College Dublin and international reviewer (Skype) Mr Richard French, TNE business development manager, Jisc (Gloucester) Ms Raegan Hiles, Head of Outbound Mobilities Programmes, UUKi (VC London) Mr Brandon Lee, CEO, CPE Singapore (Skype) Dr Pdraig Walsh, CEO, QQI Ireland (Skype)	Context, in which QAA operates; ESG Part 2 and ESG Part 3
15.45 – 16.15 (30')	Review panel's private discussion		

16.15 – 17.00 (45')	Meeting with students (members of student representative bodies, QAA advisory committees, review teams)	Miss Sarah Bennett, PhD student at University of West of England (Gloucester) Mr Stuart Cannell, MA student at Manchester Metropolitan University (Gloucester) Mr Craig Best, University of Salford (Gloucester) Ms Ellie Russell, the Student Engagement Partnership (VC London) Ms Eve Lewis, Student partnerships in quality Scotland (Skype) Mr Tom Lowe, University of Winchester (Gloucester) Mr Harry Williams, PhD student at Keele University (Gloucester)	Context, in which QAA operates; ESG Part 2 and ESG Part 3
17.00 – 19.00 (120')	Wrap-up meeting among panel members		Preparation for Day 4 and provisional conclusions
19.30	Dinner (panel only)		
DAY 4 – THURSDAY 22 FEBRUARY 2018			
TIMING	TOPIC	PERSONS FOR INTERVIEW	ISSUES TO BE DISCUSSED
8.15 – 10.00 (45')	Meeting among panel members to agree on final issues to clarify		
10.00 – 11.00 (60')	Meeting with CEO of QAA and Agency Resource Person	Mr Douglas Blackstock, Chief Executive Officer of QAA Ms Rowena Pelik, Director of Nations and International	To clarify any pending issues
11.00 – 12.00 (75')	Private meeting among panel members to agree on the main findings		
12.15 – 12.35 (20')	Final de-briefing with the agency	Mr Chris Banks, Chair of the Board (Phone) Mr Douglas Blackstock, Chief Executive Officer of QAA Ms Lavinia Blackett, Head of Governance Mr Matthew Cott, Quality Assurance Manager with a focus on DAP Ms Fiona Crozier, Head of International and project chair for ENQA review Dr Julian Ellis, Head of Assurance Mr Ian Kimber, Director of Universities and Standards Ms Gemma Long, Quality Specialist with a focus on Wales Mr Will Naylor, Director of Colleges and Alternative Providers Ms Rowena Pelik, Director of Nations and International Ms Liz Rosser, Director of Resources Ms Pamela Sinclair, Quality Enhancement Manager, QAA Scotland (VC Glasgow) Mr Rafe Smallman, Quality Specialist and project coordinator for the ENQA review	Meeting with Members of Executive and other QAA representatives to inform about preliminary findings
12.35 – 13.15 (40')	Lunch (panel only)		

ANNEX 2: TERMS OF REFERENCE OF THE REVIEW

External review of the Quality Assurance Agency for Higher Education (QAA) by the European Association for Quality Assurance in Higher Education (ENQA)

TERMS OF REFERENCE

March 2017

1. Background and Context

The Quality Assurance Agency for Higher Education (QAA) was established in 1997. It is an independent body, a registered charity and is a company limited by guarantee. It is governed by its Board.

QAA is a UK-wide agency covering England, Northern Ireland, Scotland and Wales, within a higher education system that is devolved, i.e. higher education policy is determined by each nation. QAA itself operates as a single entity across the whole of the UK with offices in Gloucester (head office), Cardiff, Glasgow and London.

QAA works with a diverse range of higher education providers (HEPs), both public and private. All HEPs in the UK are autonomous and independent; they are not owned by the state. There are around 600 higher education providers, of which 164 are degree awarding bodies in the UK (excluding those further education colleges that offer HE) and c. 3 million HE students. QAA assures and enhances quality through a number of review methods and is also responsible for the stewardship of the Quality Code, which sets out the expectations for all UK HE.

Since its last review, the landscape for quality assurance in HE in the UK has undergone several reviews and has changed significantly. This has impacted on how QAA works with the devolved nations and on the activities that it undertakes.

A Quality Assessment Review, conducted by the Higher Education Funding Council for England (HEFCE), in partnership with the Higher Education Funding Council, Wales (HEFCW), and the Department for Employment and Learning, Northern Ireland (DELNI) led to a re-conceptualisation of QA in HE in England and Northern Ireland. QAA now operates parts of the system for QA in those two nations. A similar evaluation took place in Scotland. QAA has a UK remit for international work, including review of transnational education and for enhancement, in particular through its stewardship of the Quality Code and through ELIR, the enhancement-led institutional review method applied in Scotland. It continues with its work on Access to Higher Education and provides advice to government on Degree Awarding Powers.

In relation to the key recommendations in QAA's last ENQA review, which were related to the development of a risk-based approach to quality assurance, this matter is high on the agency's agenda at the moment, as the new regulatory framework for England and Northern Ireland seeks to develop that notion further and to successfully operationalise it, thus impacting on the current and future work of the agency.

A further change to QAA's portfolio of work is that it is working with HEFCE, which has been contracted by the government (Department of Education) to support the latter's work on the Teaching Excellence Framework (TEF), particularly around the development and implementation of the assessment framework and process, and the development and training of TEF Officers and Assessors.

A bill reforming Higher Education and Research regulation in England passed through Parliament in 2017 and is expected to come into force in spring 2018, not long after the ENQA review panel visits QAA in February 2018. The Higher Education and Research Act 2017 creates a new Office for Students (OfS), responsible for maintaining a register of higher education providers in England. The OfS can designate an independent body to have responsibility for quality assessment as part of a co-regulatory system. QAA intends to become the designated quality body.

Due to the changes referred to above (which will be discussed in full in the self-assessment report for the review), QAA has needed to move to a different operating model that is appropriate for the new operating environment. The agency has adjusted its resourcing accordingly.

All the matters raised above will be considered in detail in the self-assessment report produced for the review.

QAA has been a member of ENQA since 2000 and is applying for renewal of membership.

QAA has been registered on EQAR since 2013 and is applying for renewal of registration.

2. Purpose and Scope of the Evaluation

This review, will evaluate the way in which and to what extent QAA fulfils the *Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG)*. Consequently, the review will provide information to the ENQA Board to aid its consideration of whether membership of QAA should be reconfirmed/granted and to EQAR to support QAA application to the register.

The review panel is not expected, however, to make any judgements as regards granting membership.

2.1 Activities of QAA within the scope of the ESG

In order for QAA to apply for ENQA membership and for registration in EQAR, this review will analyse all activities of QAA that are within the scope of the ESG, i.e. reviews, audits, evaluations or accreditation of higher education institutions or programmes that relate to teaching and learning (and their relevant links to research and innovation). This is regardless of whether these activities are carried out within or outside the EHEA, and whether they are obligatory or voluntary.

QAA carries out a diverse portfolio of activities across the four devolved nations and across a diverse sector of higher education providers. Its activities may be described as falling into the following categories:

- Review activities (national and international)
- Enhancement and engagement activities
- Support for the government (advice on degree awarding powers and TEF as described above)
- Commercial activities.

The first two categories contain activities that fall within the scope of the ESG and are listed below. The third and fourth categories (government and commercial activities) do not. They will be discussed in the self-assessment report as part of the agency's portfolio of work as a whole.

The following activities of QAA have to be addressed in the external review:

- Higher education review (alternative providers) and its derivatives
- Enhancement-led Institutional review (Scotland)
- Higher education review (Wales)
- Degree-awarding powers (DAP)
- International quality review
- Quality review visit (Gateway)
- General Osteopathic Council review
- Unsatisfactory quality scheme/concerns
- Review of transnational education (TNE)

3. The Review Process

The process is designed in the light of the *Guidelines for ENQA Agency Reviews* and in line with the requirements of the *EQAR Procedures for Applications*.

The evaluation procedure consists of the following steps:

- Formulation of the Terms of Reference and protocol for the review;
- Nomination and appointment of the review panel;
- Self-assessment by QAA including the preparation of a self-assessment report;
- A site visit by the review panel to QAA;
- Preparation and completion of the final evaluation report by the review panel;
- Scrutiny of the final evaluation report by the ENQA Review Committee;
- Analysis of the scrutiny by the ENQA Board and their decision regarding ENQA membership;
- Follow-up of the panel's and/or ENQA Board's recommendations by the agency, including a voluntary follow-up visit.

3.1 Nomination and appointment of the review team members

The review panel consists of four members: one or two quality assurance experts, an academic employed by a higher education institution, student member, and eventually a labour market representative (if requested). One of the members will serve as the chair of the review panel, and another member as a review secretary. For ENQA Agency Reviews at least one of the reviewers is an ENQA nominee (most often the QA professional[s]). At least one of the reviewers is appointed from the nominees of either the European University Association (EUA) or the European Association of Institutions in Higher Education (EURASHE), and the student member is always selected from among the ESU-nominated reviewers. If requested, the labour market representative may come from the Business Europe nominees or from ENQA. An additional panel member may be included in the panel at the request of the agency under review. In this case an additional fee to cover the reviewer's fee and travel expenses is applied.

The panel will be supported by the ENQA Secretariat review coordinator who will monitor the integrity of the process and ensure that ENQA expectations are met throughout the process. The ENQA staff member will not be the Secretary of the review and will not participate in the discussions during the site visit interviews.

Current members of the ENQA Board are not eligible to serve as reviewers.

ENQA will provide QAA with the list of suggested experts with their respective curriculum vitae to establish that there are no known conflicts of interest. The experts will have to sign a non-conflict of interest statement as regards the QAA review.

3.2 Self-assessment by QAA, including the preparation of a self-assessment report

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

- Self-assessment is organised as a project with a clearly defined schedule and includes all relevant internal and external stakeholders;
- The self-assessment report is broken down by the topics of the evaluation and is expected to contain, among others: a brief description of the national HE and QA system; background description of the current situation of the Agency; an analysis and appraisal of the current situation; proposals for improvement and measures already planned; a SWOT analysis; each criterion (ESG part II and III) addressed individually. All agency's QA activities (whether within their national jurisdiction or outside of it, and whether obligatory or voluntary) will be described and their compliance with the ESG analysed.
- The report is well-structured, concise and comprehensively prepared. It clearly demonstrates the extent to which QAA fulfils its tasks of external quality assurance and meets the ESG and thus the requirements of ENQA membership.
- The self-assessment report is submitted to the ENQA Secretariat who has 4 weeks to pre-scrutinise it before forwarding the report to the panel of experts. The purpose of the pre-scrutiny is to ensure that the self-assessment report is satisfactory for the consideration of the panel. The Secretariat will not judge the content of information itself but whether the necessary information, as stated in the ENQA Guidelines for External Review of Quality Assurance Agencies, is present. For the second and subsequent reviews, the agency is expected to enlist the recommendations provided in the previous review and to outline actions taken to meet these recommendations. In case the self-assessment report does not contain the necessary information and fails to respect the requested form and content, the ENQA Secretariat reserves the right to reject the report and ask for a revised version within 4 weeks. In such cases, an additional fee of 1000 € will be charged to the agency.
- The report is submitted to the review panel a minimum of six weeks prior to the site visit.

3.3 A Site Visit by the Review Panel

QAA will draw up a draft proposal of the schedule for the site visit to be submitted to the review panel at least two months before the planned dates of the visit. The schedule includes an indicative timetable of the meetings and other exercises to be undertaken by the review panel during the site visit, the duration of which is 2,5 days. The approved schedule shall be given to QAA at least one month before the site visit, in order to properly organise the requested interviews.

The review panel will be assisted by QAA in arriving in Gloucester, United Kingdom.

The site visit will close with an oral presentation and discussion of the major issues of the evaluation between the review panel and QAA.

3.4 Preparation and completion of the final evaluation report

On the basis of the review panel's findings, the review secretary will draft the report in consultation with the review panel. The report will take into account the purpose and scope of the evaluation as defined under articles 2 and 2.1. It will also provide a clear rationale for its findings with regards to each ESG. A draft will be first submitted to the ENQA review coordinator who will check the report for consistency, clarity and language and it will be then submitted to QAA within 11 weeks of the site visit

for comment on factual accuracy. If QAA chooses to provide a statement in reference to the draft report it will be submitted to the chair of the review panel within two weeks after the receipt of the draft report. Thereafter the review panel will take into account the statement by QAA, finalise the document and submit it to ENQA.

The report is to be finalised within three months of the site visit and will not exceed 40 pages in length.

When preparing the report, the review panel should also bear in mind the *EQAR Policy on the Use and Interpretation of the ESG*, so as to ensure that the report will contain sufficient information for the Register Committee for application to EQAR.

QAA is also requested to provide a letter addressed to the ENQA Board outlining its motivation applying for membership and the ways in which QAA expects to contribute to the work and objectives of ENQA during its membership. This letter will be discussed along with the final evaluation report.

4. Follow-up Process and Publication of the Report

QAA will consider the expert panel's report and will publish it on its website once the ENQA Board has made its decision. The report will also be published on the ENQA website, regardless of the review outcome and decision by the ENQA Board. QAA commits to preparing a follow-up plan in which it addresses the recommendations of the review panel and to submitting a follow-up report to the ENQA Board. The follow-up report will be published on the ENQA website, in addition to the full review report and the Board's decision.

The follow-up report will be complemented by a small-scale visit to the agency performed by two members of the original panel (whenever possible). This visit will be used to discuss issues, based on the ESG, considered as of particular importance or challenge by QAA. Its purpose is entirely developmental and has no impact on the judgement of membership and/or compliance of the agency with the ESG. Should the agency not wish to take advantage of this opportunity, it may opt out by informing the ENQA Review Coordinator about this.

5. Use of the report

ENQA shall retain ownership of the report. The intellectual property of all works created by the expert panel in connection with the review contract, including specifically any written reports, shall be vested in ENQA.

The review report is used by the Board of ENQA for the purpose of reaching a conclusion on whether QAA has met the ESG and can be thus admitted/reconfirmed as a member of ENQA. The report will also be used for registration on EQAR, and is designed so as to serve these two purposes. However, the review report is to be considered final only after being approved by the ENQA Board. Once submitted to QAA and ENQA and until it is approved by the Board the report may not be used or relied upon by QAA, the panel and any third party and may not be disclosed without the prior written consent of ENQA. QAA may use the report at its discretion only after the Board has approved of the report. The approval of the report is independent of the decision on membership.

The Chair of the panel shall remain available to respond to questions of clarification or further information from the EQAR Register Committee provided that the ENQA Secretariat is copied in all such requests.

6. Budget

QAA shall pay the following review related fees:

Fee of the Chair	4,500 EUR
Fee of the Secretary	4,500 EUR
Fee of the 2 other panel members	4,000 EUR (2,000 EUR each)
Fee of 2 panel members for follow-up visit	1,000 EUR (500 EUR each)
Administrative overhead for ENQA Secretariat	7,000 EUR
Experts Training fund	1,400 EUR
Approximate travel and subsistence expenses	6,000 EUR
Travel and subsistence expenses follow-up visit	1,600 EUR

This gives a total indicative cost of 30,000.00 EUR VAT excl. for a review team of 4 members. In the case that the allowance for travel and subsistence expenses is exceeded, QAA will cover any additional costs after the completion of the review. However, the ENQA Secretariat will endeavour to keep the travel and subsistence expenses in the limits of the planned budget, and will refund the difference to QAA if the travel and subsistence expenses go under budget.

The fee of the follow-up visit is included in the overall cost of the review and will not be reimbursed in case the agency does not wish to benefit from it.

In the event of a second site visit required by the Board and aiming at completing the assessment of compliance, and should the agency accept a second visit, an additional fee of 500 EUR per expert, as well as travel and subsistence costs are recoverable from the agency.

7. Indicative Schedule of the Review

Agreement on terms of reference	By June 2017
Appointment of review panel members	November/December 2017
Self-assessment completed	Early December 2017
Pre-screening of SAR by ENQA coordinator	December 2017
Preparation of site visit schedule and indicative timetable	January 2018
Briefing of review panel members	January 2018
Review panel site visit	Mid-February 2018
Draft of evaluation report and submitting it to ENQA coordinator for pre-screening	By April 2018
Draft of evaluation report to QAA	April 2018
Statement of QAA to review panel if necessary	Early May 2018
Submission of final report to ENQA	By Mid-May 2018
Consideration of the report by ENQA Board and response of QAA	June 2018
Publication of report	June/July 2018

ANNEX 3: OVERVIEW OF UK PROVIDERS

UK: Alternative Providers

There are 723⁴⁰ alternative providers without degree awarding powers, and a further nine with such powers: five Universities, three University Colleges, and one college (The Ashridge - Business School). There is at least one private University College without degree awarding powers: the University College of Football Business (UCFB).

England, public institutions (i.e. directly funded by HEFCE)

There are 132 degree awarding institutions; of which 103 are universities or university colleges; seven are FE colleges. The remainder are either colleges of the University of London (18 in total, but only 14 with degree awarding powers, including UCL, Birkbeck, Goldsmiths, Kings), and eight independent institutions but publically funded:

- Guildhall School of Music & Drama
- Liverpool School of Tropical Medicine
- Ravensbourne
- Rose Bruford College of Theatre and Performance
- The Royal College of Art
- Royal College of Music
- Royal Northern College of Music
- Trinity Laban Conservatoire of Music and Dance

There are a further nine alternative providers with degree awarding powers, and the Archbishop of Canterbury. The total of degree awarding institutions in England stands at 142.

There are a further 180 FE or sixth form colleges that deliver HE and are funded by HEFCE directly; HEFCE list⁴¹ a further 32 that include those that deliver on behalf of HEFCE funded providers.

However, the Association of Colleges list a total of 257 FE colleges; presumably the difference is accounted for by the fact that the additional colleges do not deliver HE⁴².

Scotland, public institutions (i.e. directly funded by Scottish Funding Council)

There are 19 Universities, or University level institutions, but 18 with the Open University excluded⁴³.

There are 27 colleges listed in Scotland⁴⁴, but 9 listed have now become part of the University of Highlands and Islands, and SRUC is counted as a university above, thus it makes 17 in total.

Northern Ireland, public providers (i.e. directly funded by the Department for the Economy in Northern Ireland)

There are two Universities⁴⁵ in Northern Ireland. Then there is College of Agriculture, Food and Rural Enterprise and six colleges of further education⁴⁶, so seven colleges in total.

⁴⁰ Shury, J., Adams, L., Barnes, M., Huntley Hewitt, J., & Oozeerally, T. (2016). Understanding the Market of Alternative Higher Education Providers and their Students in 2014. London: BIS. Retrieved from <https://www.gov.uk/government/publications/alternative-providers-of-higher-education-the-market-and-students-in-2014>

⁴¹ The source for these data is the HEFCE register of HE providers: <http://www.hefce.ac.uk/reg/register/search/Home/ByProperty>

⁴² https://www.aoc.co.uk/about-colleges/map?field_college_type_tid=1

⁴³ <http://www.studyinScotland.org/find-a-university/>

⁴⁴ <https://collegesscotland.ac.uk/briefings-and-publications/publications/1144-colleges-in-scotland-leaflet-221117/file>

⁴⁵ <http://www.hefce.ac.uk/workprovide/unicoll/>

⁴⁶ <http://www.anic.ac.uk/>

Wales, public providers (i.e. directly funded by the Higher Education Funding Council for Wales)
 There are ten universities listed⁴⁷, but this includes the Open University, so nine in total.

There are 13 colleges of further education listed by ColegauCymru / CollegesWales⁴⁸.

ANNEX 4: OVERVIEW OF UK DEGREES AND THE POWERS TO AWARD THEM

Type of degree	Level in UK frameworks for higher education qualifications		Level in European qualifications framework	Powers necessary
	England, Wales and Northern Ireland	Scotland		
Doctoral degree (or doctorate)	Level 8	Level 12	End of third cycle	Research degree awarding powers (RDAP)
Research master's degree	Level 7	Level 11	End of second cycle	
Taught master's degree				
Bachelor's degree with honours	Level 6	Level 10	End of first cycle	Taught degree awarding powers (TDAP)
Ordinary bachelor's degree		Level 9		
Foundation degree	Level 5		Short cycle	Foundation degree awarding powers (FDAP)

Source: QAA, Handbook on DAP for England, 2015

<http://www.qaa.ac.uk/en/Publications/Documents/Degree-Awarding-Powers-Handbook-England-15.pdf>

⁴⁷ http://www.hefcw.ac.uk/about_he_in_wales/higher_education_institutions/he_institutions.aspx

⁴⁸ <http://www.collegeswales.ac.uk/>

ANNEX 5: GLOSSARY

ACDAP	Advisory Committee on Degree-Awarding Powers
APL	Accreditation of prior learning
BC	British Council
BIS	Department for Business, Innovation and Skills (UK Government Department)
CHEA	Council for Higher Education Accreditation, non governmental higher education organization in the United States
CQFW	Credit and Qualifications Framework for Wales
DAP	Degree awarding powers
DfE	England's Department for Education
DBQ	Designated Quality Body
DfE(NI)	The Department for the Economy in the Northern Ireland
EHEA	European Higher Education Area
ELIR	Enhancement-led Institutional Review (Scotland)
ENQA	European Association for Quality Assurance in Higher Education
EQAR	European Quality Assurance Register for Higher Education
ESG	Standards and Guidelines for Quality Assurance in the European Higher Education Area, adopted by Ministers of Education in 2015 in Yerevan (Armenia)
ESU	European Students' Union
EU	European Union
EUA	European University Association
FCE	Further Education College
FDAP	Foundation Degree awarding powers
FE	Further Education
FHEQ	The Framework for Higher Education Qualifications in England, Wales and Northern Ireland
FQHEIS	The Framework for Qualifications of Higher Education Institutions in Scotland
FSMG check	A check on financial sustainability, management, and governance
GuildHE	Guild Higher Education
GOsC	General Osteopathic Council
Governance Code	Higher Education Code of Governance
HEA	Higher Education Academy
HEFCE	Higher Education Funding Council for England
HEFCW	Higher Education Funding Council for Wales
HE	higher education
HEI	higher education institution
HERA	Higher Education and Research Act, 2017
HER AP	Higher Education Review (Alternative Providers)
HESA	Higher Education Statistics Agency (UK)
HEW	Higher Education Wales
INQAAHE	International Network for Quality Assurance Agencies in Higher Education
IRENI	Institutional Review in England & Northern Ireland (for HEIs)
IQA	Internal quality assurance
IQR	International Quality Review
OfS	Office for Students

PSRB	Professional, statutory or regulatory body – an organisation that oversees the activities of a particular profession and represents the interests of its members and which may set the benchmark standards for, and regulate, the standards of entry into a particular profession
QA	quality assurance
QAA	Quality Assurance Agency Quality for Higher Education, UK
QEF	Quality Enhancement Framework (Scotland)
QER	Quality Enhancement Review (Wales)
FQ-EHEA	The Framework for Qualifications of the European Higher Education Area
Quality Code	UK Quality Code for Higher Education, the definitive reference point for all UK HE providers
QRV (Gateway)	Quality Review Visit
RDAP	Research degree-awarding powers
RQ	Recognised Qualification, status awarded to GOsC
SAR	self-assessment report
SBS	Subject Benchmark Statement, a component of the Quality Code
SCQF	Scottish Credit and Qualifications Framework
SFC	Scottish Funding Council
SLC	Student Loan Company
SMT	Senior Management Team
'Statutory Body'	An organisation set up through the Act of Parliament that has a legal requirement to oversee a particular profession
TDAP	Taught degree-awarding powers
TEF	Teaching Excellence and Student Outcomes Framework
TNE	Transnational Higher Education
ToR	Terms of reference
University College	An institution recognised by the UK authorities as an independent, self-governing body that can award its own taught degrees.
UT, University Title	The entitlement of an institution to call itself a university.
UScotland	Universities Scotland
UKC UK	Council of Colleges
UKSCQA	UK-wide Standing Committee for Quality Assessment
UQI	Unsatisfactory Quality Investigation (England and Northern Ireland)
UUK	Universities UK
UUKi	Universities UK International
Uwales	Universities Wales

QAA maintains an extensive glossary of terms, frequently used in the agency's work and publications, available at <http://www.qaa.ac.uk/about-us/glossary>

ANNEX 6. DOCUMENTS TO SUPPORT THE REVIEW

DOCUMENTS PROVIDED BY QAA

No.	Title	Webpage (NB: blank indicates that the document was available to the review team within the evidence folder on secure Reviewers' extranet)
1.	ENQA review project plan	
2.	DAP and UT arrangements	www.qaa.ac.uk/assuring-standards-and-quality/daput
3.	UK Quality Code for Higher Education	www.qaa.ac.uk/assuring-standards-and-quality/the-quality-code
4.	<i>The Frameworks for Higher Education Qualifications of UK Degree-Awarding Bodies</i>	www.qaa.ac.uk/publications/information-and-guidance/publication?PubID=2843
5.	Verification of the Compatibility of the FHEQ with the FQ-EHEA	Verification of the Compatibility of the FHEQ with the FQ-EHEA (PDF 507 KB)
6.	Verification of the FQHEIS as part of FQ-EHEA	www.qaa.ac.uk/en/Publications/Documents/Verification-of-compatibility-Scottish-FQHE.pdf
7.	<i>Qualifications can cross boundaries</i>	www.qaa.ac.uk/en/Publications/Documents/qualifications-can-cross-boundaries.pdf
8.	HEFCE contract quality review visit	
9.	HEFCE contract unsatisfactory quality	
10.	HEFCE contract transnational education	
11.	QAA 2017-20 strategy	www.qaa.ac.uk/publications/information-and-guidance/publication?PubID=3158
12.	Quality Enhancement Framework	www.qaa.ac.uk/en/AboutUs/Pages/Development-and-enhancement.aspx
13.	ELIR handbook	www.qaa.ac.uk/publications/information-and-guidance/publication?PubID=3157
14.	Quality Enhancement Review Handbook	www.qaa.ac.uk/publications/information-and-guidance/publication?PubID=3199
15.	Letter regarding quality assurance in higher education, 13 March 1997	
16.	QAA review report by ENQA 2013	
17.	Articles of Association	www.qaa.ac.uk/en/AboutUs/Documents/Articles-of-Association.PDF
18.	QAA certificate of incorporation (1997)	
19.	Code of Best Practice	www.qaa.ac.uk/en/Publications/Documents/Code-best-practice-QAA-Board.pdf
20.	QAA board members	www.qaa.ac.uk/about-us/corporate-governance/our-board
21.	QAA board committees	www.qaa.ac.uk/about-us/corporate-governance/our-board/committee-membership
22.	QAA leadership team	www.qaa.ac.uk/about-us/corporate-governance/leadership-team
23.	QAA Annual Report 2016	www.qaa.ac.uk/en/AboutUs/Documents/Annual-Report-2016.pdf
24.	Subject Benchmark Statement review 2013-16	www.qaa.ac.uk/assuring-standards-and-quality/the-quality-code/subject-benchmark-statements/subject-benchmark-review-2013-15

25.	Characteristics Statement on qualifications involving more than one degree-awarding body	www.qaa.ac.uk/en/Publications/Documents/Joint-Degree-Characteristics-15.pdf
26.	QAA Knowledgebase	www.qaa.ac.uk/research/knowledgebase-search
27.	Good practice case studies	www.qaa.ac.uk/about-us/subscriber-services/good-practice-case-studies
28.	Call for case studies	www.qaa.ac.uk/newsroom/launch-of-new-good-practice-case-study-programme
29.	QEN events	www.qaa.ac.uk/research/quality-enhancement-network
30.	PSRB activity	www.qaa.ac.uk/partners/professional-bodies
31.	Student Advisory Committee	www.qaa.ac.uk/partners/student-engagement/advisory-board
32.	Alternative Providers Enhancement Conference programme	
33.	International Enhancement in Higher Education Conference	www.enhancementthemes.ac.uk/conference
34.	ELIR thematic reports	www.qaa.ac.uk/en/ReviewsAndReports/Pages/Enhancement-led-Institutional-Review.aspx
35.	Current Enhancement Theme	www.enhancementthemes.ac.uk/enhancement-themes/current-enhancement-theme
36.	QAA Viewpoint	www.qaa.ac.uk/newsroom/viewpoint
37.	Student engagement overview	www.qaa.ac.uk/partners/student-engagement
38.	Survival Guide for Lead Student Representatives	www.qaa.ac.uk/publications/information-and-guidance/publication?PubID=3135
39.	QAA's MoUs (see under International Partners tab)	www.qaa.ac.uk/about-us/corporate-governance
40.	HER AP review method	www.qaa.ac.uk/publications/information-and-guidance/publication?PubID=3174
41.	Information on FSMG check	www.qaa.ac.uk/en/ReviewsAndReports/Documents/FSMG-guidance-document-2017.docx
42.	Other HER AP review methods	www.qaa.ac.uk/en/ReviewsAndReports/Pages/Educational-Oversight-.aspx
43.	Advisory Committee on Degree Awarding Powers	www.qaa.ac.uk/assuring-standards-and-quality/daput/ac-dap
44.	Degree awarding powers guidance	www.qaa.ac.uk/assuring-standards-and-quality/daput/guidance-and-criteria
45.	Reviews and reports	www.qaa.ac.uk/reviews-and-reports
46.	International Quality Review	www.qaa.ac.uk/about-us/commercial-and-international-services/international-quality-review
47.	IQR handbook	
48.	QRV handbook	www.qaa.ac.uk/en/ReviewsAndReports/Pages/Quality-Review-Visit.aspx
49.	GOsC review	www.qaa.ac.uk/reviews-and-reports/how-we-review-higher-education/general-osteopathic-council-review

50.	Concerns	www.qaa.ac.uk/concerns/concerns-about-providers
51.	Scottish Concerns Scheme	www.qaa.ac.uk/publications/information-and-guidance/publication?PubID=3113
52.	TNE review	www.qaa.ac.uk/reviews-and-reports/how-we-review-higher-education/review-of-overseas-provision
53.	Access to HE	www.accesstohe.ac.uk/Pages/Default.aspx
54.	Albania MoU	www.qaa.ac.uk/en/AboutUs/Documents/MoU-QAA-Albanian-Ministry-of-Education-and-Sport.pdf
55.	QAA Proposed Approach to International Strategic Engagement	
56.	QAA International Strategy	
57.	QQI_QAA bilateral 16-12-16 (example meeting)	
58.	QAA support to DfE on BFUG	
59.	Country report: Pakistan	www.qaa.ac.uk/en/Publications/Documents/Country-Report-Pakistan-2017.pdf
60.	Overview report 2015-16 to SFC	
61.	Analysis reports	www.qaa.ac.uk/research/analysis/review-findings
62.	'Focus on' project	www.enhancementthemes.ac.uk/focus-on
63.	Analytics labs	www.qaa.ac.uk/newsroom/qaa-develops-quality-assurance-data-dashboards-in-partnership-with-jisc-and-hesa
64.	Template reviewer contract	
65.	Appointment of reviewers	www.qaa.ac.uk/about-us/vacancies/appointment-of-reviewers
66.	Training and development policy	
67.	Performance review process note	
68.	Financial regulations	
69.	Lean review update January 2017	
70.	Privacy Impact Assessment	
71.	ISO 27001	www.qaa.ac.uk/en/Newsroom/Pages/QAA-awarded-ISO-27001.aspx
72.	Information security policy	
73.	2017-18 Summary annual plan	
74.	KPI operational report to SMT 2017	
75.	Monitoring and performance report term 3 2016-17	
76.	Annual reporting statement 2016-17 Aims 1 and 2	
77.	QAAs Approach to Risk Management	
78.	Latest risk register	
79.	Audit and Risk Committee ToR	
80.	Lessons Learned Log Office 365	
81.	Equality policy	
82.	Web accessibility	www.qaa.ac.uk/accessibility

83.	QAA policies (corporate policies and review policies)	www.qaa.ac.uk/about-us/corporate-governance/policies
84.	Ethical conduct and anti-bribery policy	
85.	Whistleblowing policy	
86.	Declaration of interests on Board agendas	Example Board minutes (Item 2) www.qaa.ac.uk/en/AboutUs/Documents/Board-meeting-minutes-March-2017.pdf
87.	Outside QAA work process	
88.	Staff briefing agenda Mar 17	
89.	SMT away day agenda Nov 17	
90.	ESG workshop aims and programme	
91.	QAA Annual Conference 2017	www.qaa.ac.uk/newsroom/events/event-resources/qaa-annual-conference-2017
92.	Template feedback from events	Can be demonstrated on request
93.	QRV handbook consultation	
94.	QER method consultation	
95.	Enhancement Themes database	www.enhancementthemes.ac.uk/resources
96.	QRV reviewer role specification	
97.	HER reviewer training (programme and materials)	
98.	QAA review methods	www.qaa.ac.uk/reviews-and-reports/how-we-review-higher-education
99.	QRV provider briefing	https://youtube/E3O86Phhw3c
100.	QAA House Style Guide	www.qaa.ac.uk/en/AboutUs/Documents/QAA-House-Style.pdf
101.	QRV report writing guidance	
102.	Glossary	www.qaa.ac.uk/about-us/glossary
103.	SAB minutes Feb 14	
104.	QAA films	www.youtube.com/user/QAAtube
105.	Complaints and appeals	www.qaa.ac.uk/about-us/complaints-about-qaa-and-appeals-against-decisions
106.	QRV appeal panel training agenda	
107.	Shaping the future role of QAA summary	
108.	Provider survey 2017 report	
109.	Quality Matters programme Oct 2017	
110.	QAA follow up report 2015	
111.	2017-18 Annual Plan	

OTHER SOURCES USED BY THE REVIEW PANEL

1. Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG-2015) http://www.enqa.eu/wp-content/uploads/2015/11/ESG_2015.pdf
2. Guidelines for ENQA agency reviews <http://www.enqa.eu/indirme/papers-and-reports/occasional-papers/Guidelines%20for%20ENQA%20Agency%20Reviews.pdf>
3. The Use and Interpretation of the ESG for the European Register of Quality Assurance Agencies
https://www.eqar.eu/fileadmin/documents/eqar/official/RC_12_1_UseAndInterpretationOfTheESG_v2_0.pdf

4. Terms of reference and composition of the UK wide Standing Committee. UKSC 16/1, Agenda Item 2, 3 November 2016. <https://ukscqa.org.uk/wp-content/uploads/2017/09/3rd-Nov-16-Initial-terms-of-reference-and-composition-of-the-UKSCQA.pdf>
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7. Designation of a body to perform the assessment functions for higher education in England. Government consultation response. January 2018. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/677339/Designation_of_a_body_to_perform_the_assessment_functions_for_higher_education.pdf.
8. Griffiths, A., Halford, E. Zen and the art of risk assessment: what are the implications of a system of risk-based quality assurance for higher education in England? November 2015. http://www.eua.be/Libraries/eqaf-2015/paper-13_griffiths_halford.pdf?sfvrsn=0
9. King, R., Brennan, J. Data-driven risk-based quality regulation. December 2017. <http://www.qaa.ac.uk/en/Publications/Documents/Data-driven-quality-assessment-final.pdf>
10. Universities UK International. International Facts and Figures. Higher Education May 2017. http://www.universitiesuk.ac.uk/policy-and-analysis/reports/Documents/International/International_Facts_and_Figures_2017.pdf
11. Consultation on the review of the UK Quality Code for Higher Education (the Quality Code). UKSCQA/01, October 2017. https://ukscqa.org.uk/wp-content/uploads/2017/09/UKSCQA_Consultation_on_the_Review_of_the_UK_Quality_Code_for_HE.pdf
12. European Commission/EACEA/Eurydice, 2018. The European Higher Education Area in 2018: Bologna Process Implementation Report. Luxembourg: Publications Office of the European Union. [Text completed in April 2018] https://eacea.ec.europa.eu/national-policies/eurydice/content/european-higher-education-area-2018-bologna-process-implementation-report_en

ANNEX 7. ALIGNMENT OF KEY ESG PRINCIPLES WITH THE QAA METHODS IN SCOPE FOR THE REVIEW

Review method	Method includes the following principles...								Comments
	Self-assessment	Site visit	Published report	Consistent follow-up	Peer reviewers	Student reviewers	Published outcome criteria	Complaints and appeals	
HER (AP)	✓	✓	✓	✓	✓	✓	✓	✓	
ELIR	✓	✓	✓	✓	✓	✓	✓	✓	
QER	✓	✓	✓	✓	✓	✓	✓	✓	Review method was recently finalised
DAP	✓	✓	✓	- QAA undertakes the scrutiny process on behalf of the relevant government higher education ministry	✓	✓	✓	✓	
IQR	✓	✓	✓	✓	✓	✓	✓	✓	
QRV	✓	✓	✓	✓ Not all follow-up activity is undertaken by QAA, as specified by the revised operating model	✓	✓	✓	✓	
GOsC	✓	✓	- Reports are published by GOsC	✓ Follow-up by GOsC with QAA involvement when requested	✓	- Appointment of reviewers is the responsibility of GOsC; it does not currently include the appointment of student reviewers	✓	✓ Both QAA and GOsC have complaints schemes. Outcomes are not appealable, reflecting GOsC's	GOsC's statutory responsibilities for professional education are set out in the <i>Osteopaths Act 1993</i>

						although GOsC has said that it will consider this next year.		status as a statutory regulator.	
UQSI	✓	✓	- Reports are published by the funding body	✓ Follow-up by QAA on the request of the funding body	✓	✓	- The process guidance is produced and published by the funding body	✓ QAA has its own complaints process. Outcomes cannot be appealed. Appeals on the grounds of procedural irregularity are made to the funding body.	
Concerns	✓	✓	✓	✓	✓	✓ Includes student reviews if appropriate to the scope of the investigation	✓	✓ There is a complaints process but outcomes cannot be appealed	
TNE	✓	✓ In-country sample of delivery sites	✓	✓ Enhancement event for reviewed providers and wider sector to discuss and share lessons learned	✓	✓ Student reviewers are recruited and deployed according to their expertise	✓	✓ Providers can complain. There is no appeals sample as there are no judgements attached to reviews.	

ANNEX 8. ALIGNMENT OF ESG PART 1 WITH QAA METHODS IN SCOPE FOR THE REVIEW

The table below is from SAR and details how QAA, through the various review methods it operates on behalf of sector bodies or independently, considers the effectiveness of internal quality assurance arrangements as described in Part 1 of the ESG, highlighting the various reference documents that are used as part of the review process.

ESG Standard	Reference documents used in the review process ⁴⁹	Methods that use the specific reference documents
1.1 Policy for Quality Assurance Institutions should have a policy for quality assurance that is made public and forms part of their strategic management. Internal stakeholders should develop and implement this policy through appropriate structures and processes, while involving external stakeholders.	Quality Code , specifically Expectations <ul style="list-style-type: none"> ● A2.1 Degree-Awarding Bodies' Reference Points for Academic Standards ● B10 Managing Higher Education Provision with Others 	<ul style="list-style-type: none"> ● Higher Education Review (Alternative Providers) ● Enhancement-led Institutional Review ● Quality Enhancement Review ● Degree Awarding Powers ● Review of Transnational Education
	Quality Code (applicable Expectations as above) The relevant HE Code of Governance	<ul style="list-style-type: none"> ● Quality Review Visit (Gateway) ● Unsatisfactory Quality Scheme/Concerns ● Quality Enhancement Review
	ESG 1.1	<ul style="list-style-type: none"> ● International Quality Review
1.2 Design and approval of programmes Institutions should have processes for the design and approval of their programmes. The programmes should be designed so that they meet the objectives set for them, including the intended learning outcomes. The qualification resulting from a programme should be clearly specified and communicated, and refer to the correct level of the national qualifications framework for higher education and, consequently, to the Framework for Qualifications of the European Higher Education Area.	Quality Code , specifically Expectations <ul style="list-style-type: none"> ● A1 UK and European Reference Points for Academic Standards ● A3 (A3.1, A3.2, A3.3, A3.4) Securing Academic Standards and an Outcomes-Based Approach to Academic Awards ● B1 Programme Design, Development and Approval The relevant HE Code of Governance	<ul style="list-style-type: none"> ● Higher Education Review (Alternative Providers) ● Enhancement-led Institutional Review ● Quality Enhancement Review ● Degree Awarding Powers ● Review of Transnational Education ● Concerns
	Quality Code (applicable Expectations as above) The relevant HE Code of Governance	<ul style="list-style-type: none"> ● Quality Review Visit (Gateway) ● Unsatisfactory Quality Scheme
	Quality Code B1 GOsC Osteopathic Practice Standards	<ul style="list-style-type: none"> ● General Osteopathic Council Review
	ESG 1.2	<ul style="list-style-type: none"> ● International Quality Review
1.3 Student-centred learning, teaching and assessment	Quality Code , specifically Expectations <ul style="list-style-type: none"> ● A3 (A3.4) Securing Academic Standards and an Outcomes-Based Approach to Academic Awards 	<ul style="list-style-type: none"> ● Higher Education Review (Alternative Providers) ● Enhancement-led Institutional Review ● Quality Enhancement Review

⁴⁹ Baseline regulatory requirements has link to all relevant documents: www.hefce.ac.uk/media/HEFCE,2014/Content/Regulation/UKSC%20text%20for%20web%2024%204%2017.pdf

<p>Institutions should ensure that the programmes are delivered in a way that encourages students to take on an active role in creating the learning process, and that the assessment of students reflects this.</p>	<ul style="list-style-type: none"> ● B3 Learning and Teaching ● B4 Enabling Student Development and Achievement ● B5 Student Engagement ● B6 Assessment of Students and the Recognition of Prior Learning ● B7 External Examining ● B9 Academic Appeals and Student Complaints <p>The Scottish higher education model complaints handling procedure</p>	<ul style="list-style-type: none"> ● Degree Awarding Powers ● Review of Transnational Education ● Concerns
	<p>Quality Code (applicable Expectations as above) OIA Good Practice Framework for handling complaints and academic appeals Principles of good complaint handling - Parliamentary and Health Service Ombudsmen Northern Ireland</p>	<ul style="list-style-type: none"> ● Quality Review Visit (Gateway) ● Unsatisfactory Quality Scheme ● Quality Enhancement Review
	<p>Quality Code, specifically Expectations</p> <ul style="list-style-type: none"> ● B6 Assessment of Students and the Recognition of Prior Learning ● B7 External Examining 	<ul style="list-style-type: none"> ● General Osteopathic Council Review
	<p>ESG 1.3</p>	<ul style="list-style-type: none"> ● International Quality Review
<p>1.4. Student admission, progression, recognition and certification</p> <p>Institutions should consistently apply pre-defined and published regulations covering all phases of the student 'life cycle', e.g. student admission, progression, recognition and certification.</p>	<p>Quality Code, specifically Expectations</p> <ul style="list-style-type: none"> ● A2.2 Definitive records of individual programmes and qualifications ● B2 Recruitment, Selection and Admission to Higher Education ● B6 Assessment of Students and the Recognition of Prior Learning ● C Information about Higher Education Provision 	<ul style="list-style-type: none"> ● Higher Education Review (Alternative Providers) ● Enhancement-led Institutional Review ● Quality Enhancement Review ● Degree Awarding Powers ● Review of Transnational Education ● Concerns
	<p>Quality Code (applicable Expectations as above) Competitions and Market Authority (CMA) - Higher Education: consumer law advice for providers CMA's review of consumer law compliance</p>	<ul style="list-style-type: none"> ● Quality Review Visit (Gateway) ● Unsatisfactory Quality Scheme ● Quality Enhancement Review
	<p>Quality Code, specifically Expectation</p> <ul style="list-style-type: none"> ● B3 Learning and Teaching 	<ul style="list-style-type: none"> ● General Osteopathic Council Review
	<p>ESG 1.4</p>	<ul style="list-style-type: none"> ● International Quality Review

<p>1.5. Teaching Staff</p> <p>Institutions should assure themselves of the competence of their teachers. They should apply fair and transparent processes for the recruitment and development of the staff.</p>	<p>Quality Code, specifically Expectation</p> <ul style="list-style-type: none"> ● B3 Learning and Teaching 	<ul style="list-style-type: none"> ● Higher Education Review (Alternative Providers) ● Enhancement-led Institutional Review ● Quality Enhancement Review ● Degree Awarding Powers ● Review of Transnational Education ● Quality Review Visit (Gateway) ● Unsatisfactory Quality Scheme/Concerns
<p>1.6. Learning resources and student support</p> <p>Institutions should have appropriate funding for learning and teaching activities and ensure that adequate and readily accessible learning resources and student support are provided.</p>	<p>ESG 1.5</p> <p>Quality Code, specifically Expectation</p> <ul style="list-style-type: none"> ● B3 Learning and Teaching ● B4 Enabling Student Development and Achievement 	<ul style="list-style-type: none"> ● International Quality Review ● Higher Education Review (Alternative Providers) ● Enhancement-led Institutional Review ● Quality Enhancement Review ● Degree Awarding Powers ● Review of Transnational Education ● Quality Review Visit (Gateway) ● Unsatisfactory Quality Scheme/Concerns
<p>1.7. Information Management</p> <p>Institutions should ensure that they collect, analyse and use relevant information for the effective management of their programmes and other activities.</p>	<p>ESG 1.6</p> <p>Quality Code, specifically Expectations</p> <ul style="list-style-type: none"> ● A3 (A3.3) Securing Academic Standards and an Outcomes-Based Approach to Academic Awards ● B8 Programme Monitoring and Review <p>Enhancement. General Introduction to Quality Code</p> <p>Quality Code (applicable Expectations as above)</p>	<ul style="list-style-type: none"> ● International Quality Review ● Higher Education Review (Alternative Providers) ● Enhancement-led Institutional Review ● Quality Enhancement Review ● Degree Awarding Powers ● Review of Transnational Education ● Quality Review Visit (Gateway) ● Unsatisfactory Quality Scheme/Concerns
<p>1.8. Public Information</p> <p>Institutions should publish information about their activities, including programmes, which is clear, accurate, objective, up to date and readily accessible.</p>	<p>ESG 1.7</p> <p>Quality Code, specifically Expectation</p> <ul style="list-style-type: none"> ● B3 Learning and Teaching ● B4 Enabling Student Development and Achievement <p>Quality Code (applicable Expectation as above)</p> <p>Competitions and Market Authority (CMA) - Higher Education: consumer law advice for providers CMA's review of consumer law compliance</p>	<ul style="list-style-type: none"> ● International Quality Review ● Higher Education Review (Alternative Providers) ● Enhancement-led Institutional Review ● Quality Enhancement Review ● Degree Awarding Powers ● Review of Transnational Education ● Concerns ● Quality Review Visit (Gateway) ● Unsatisfactory Quality Scheme ● Quality Enhancement Review

<p>1.9. On-going monitoring and periodic review of programmes</p> <p>Institutions should monitor and periodically review their programmes to ensure that they achieve the objectives set for them and respond to the needs of students and society. These reviews should lead to the continuous improvement of the programme. Any action planned should be communicated to all those concerned.</p>	<p>Quality Code, specifically Expectations</p> <ul style="list-style-type: none"> ● A3 (A3.3) Securing Academic Standards and an Outcomes-Based Approach to Academic Awards ● B8 Programme Monitoring and Review 	<ul style="list-style-type: none"> ● Higher Education Review (Alternative Providers) ● Enhancement-led Institutional Review ● Quality Enhancement Review ● Degree Awarding Powers ● Review of Transnational Education ● Quality Review Visit (Gateway) ● Unsatisfactory Quality Scheme/Concerns
	<p>ESG 1.8</p>	<ul style="list-style-type: none"> ● International Quality Review
<p>1.10. Cyclical external quality assurance</p> <p>Institutions should undergo external quality assurance in line with the ESG on a cyclical basis.</p>	<p>Cyclical, every four years + annual monitoring</p>	<ul style="list-style-type: none"> ● Higher Education Review (Alternative Providers)
	<p>Reviews conducted on a 4+1 cycle where institutions are reviewed in years 1-4 followed by a year of reflection and development ELIR incorporates an annual discussion as part of the approach</p>	<ul style="list-style-type: none"> ● Enhancement-led Institutional Review (ELIR)
	<p>Maximum six years between reviews (can be scheduled earlier following a change in direction or status, e.g. a merger, or if risks emerge)</p>	<ul style="list-style-type: none"> ● Quality Enhancement Review
	<p>N/A</p>	<ul style="list-style-type: none"> ● Degree Awarding Powers
	<p>See detail in sections above for nature of the review method</p>	<ul style="list-style-type: none"> ● Review of Transnational Education
	<p>QRV is a requirement for the Gateway process. Provider in development will be reviewed again after four years. 'Established providers' who have completed the developmental stage are required to provide yearly updates on their data monitoring, intelligence gathering and scrutiny, and to undergo review every five years according to the baseline requirements for established providers. This is carried out by HEFCE.</p>	<ul style="list-style-type: none"> ● Quality Review Visit (Gateway)
	<p>N/A</p>	<ul style="list-style-type: none"> ● Unsatisfactory Quality Scheme/Concerns
	<p>Cyclical, normally every five years (three years for a new programme) plus annual monitoring</p>	<ul style="list-style-type: none"> ● General Osteopathic Council Review
	<p>ESG 1.10; Option to be reviewed every four years</p>	<ul style="list-style-type: none"> ● International Quality Review



THIS REPORT presents findings of the ENQA Agency Review of the Quality Assurance Agency for Higher Education (QAA), undertaken in 2018.



2018 ENQA AGENCY REVIEW