

2024  
SELF-ASSESSMENT  
REPORT FOR ENQA  
AGENCY REVIEWS

enqa.

European Association for  
Quality Assurance in Higher Education



European Association for Quality Assurance in Higher Education - ENQA ASBL

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2024 Self-Assessment Report for ENQA Agency Reviews

This report can be downloaded from the ENQA website at  
<https://www.enqa.eu/external-review-of-enqa-agency-reviews/>

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## Contents

Executive Summary .....	2
1. Introduction .....	3
2. Development of the Self-Assessment Report .....	4
3. History, Profile and Activities of ENQA .....	5
4. ENQA's Compliance with the ESG Part 3 .....	9
4.1. Activities, policy and processes for quality assurance (ESG 3.1).....	9
4.2. Official status (ESG 3.2) .....	11
4.3. Independence (ESG 3.3).....	12
4.4. Thematic analysis (ESG 3.4) .....	16
4.5. Resources (ESG 3.5).....	18
4.6. Internal quality assurance and professional conduct (ESG 3.6).....	22
4.7. Cyclical external review of agencies (ESG 3.7) .....	26
5. ENQA's Compliance with the ESG Part 2.....	26
5.1. Consideration of internal quality assurance (ESG 2.1) .....	26
5.2. Designing methodologies fit for purpose (ESG 2.2) .....	27
5.3. Implementing processes (ESG 2.3).....	31
5.4. Peer-review experts (ESG 2.4).....	36
5.5. Criteria for outcomes (ESG 2.5) .....	41
5.6. Reporting (ESG 2.6).....	45
5.7. Complaints and appeals (ESG 2.7) .....	47
6. ENQA's Collaboration with EQAR .....	51
7. SWOT Analysis.....	53
8. Key Challenges and Areas for Future Development.....	54
9. Glossary of Terms .....	56
10. Annexes .....	56

## Executive Summary

The European Association for Quality Assurance in Higher Education (ENQA) is a membership organisation of quality assurance (QA) agencies in the European Higher Education Area (EHEA). ENQA supports its members and the wider QA community through representation, expertise, projects, events, working groups and external reviews of agencies.

In 2024, ENQA is undergoing its second voluntary external review of the ENQA Agency Reviews process. This self-assessment report (SAR) describes and analyses how the Agency Reviews comply with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (the ESG) and considers the changes made in the review process since the first review in 2019. The SAR also reflects on the main strengths, weaknesses, opportunities and threats of ENQA Agency Reviews as well as key challenges and areas for future development, and ENQA's collaboration with the European Quality Assurance Register for Higher Education (EQAR).

Some of the most recent developments to be addressed in the review include the revision of the Guidelines for ENQA Agency Reviews for full reviews, the new enhancement-led targeted reviews for mature agencies, the establishment of the ENQA Agency Review Committee, and changes in the judgement scale and in the membership decision-making process. In parallel, ENQA and EQAR have strengthened their collaboration.

Overall, ENQA Agency Reviews offer a well-established, recognised and independent agency review methodology that serves various needs and embodies the principles and standards of the ESG. It is based strictly on peer-review, relying on trained experts from various stakeholder groups, supported by professional review coordinators from the ENQA Secretariat. These aspects are viewed as strengths of the ENQA Agency Reviews.

The existing challenges relate to financial sustainability of the agency reviews and the overall resources; ensuring that agencies' contexts are well understood by the respective panels; adapting to the change of the judgement scale from a four-point to a three-point compliance assessment; and the overall length of the review process. Moreover, there are areas where further dialogue with EQAR is needed, particularly regarding the use of the ESG and ensuring that review reports contain the necessary evidence for both organisations.

Through the upcoming external review of the Agency Reviews, ENQA wishes to reflect on the service that it offers to agencies and explore ways to improve the methodologies' efficiency and fitness-for-purpose.

## I. Introduction

The European Association for Quality Assurance in Higher Education (ENQA) is a membership organisation which serves and represents its members at the European level and internationally. ENQA has 60<sup>1</sup> members, which are quality assurance (QA) organisations from the European Higher Education Area (EHEA) that operate in the field of higher education and in compliance with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (the ESG<sup>2</sup>). ENQA also has 41<sup>3</sup> affiliates<sup>4</sup> across the world.

Compliance with the ESG is assessed through an external peer review of the QA agency. Since 2011, ENQA has coordinated the majority<sup>5</sup> of agency reviews used for application for ENQA membership, as well as registration on the European Quality Assurance Register for Higher Education (EQAR).<sup>6</sup>

As part of its own QA cycle, ENQA is committed to undergo voluntary external reviews of the ENQA Agency Reviews, coordinated by an external organisation.<sup>7</sup> This commitment follows the principle set out in the ESG 3.7, that “agencies should undergo an external review at least once every five years in order to demonstrate their compliance with the ESG”. ENQA should be able to demonstrate it meets the same requirement as set for its member agencies. ENQA underwent its first external review in 2019.<sup>8</sup>

This current external review should analyse all activities of ENQA that are within the scope of the ESG, namely activities related to the ENQA Agency Reviews.<sup>9</sup> This includes full reviews of QA agencies (including its more focused version, named ‘partial reviews’) and targeted reviews. Specifically, the external review should:

- Reflect upon the methodologies and practices of ENQA Agency Reviews and evaluate these against standards of Parts 2 and 3 of the ESG (adapted to the context and work of ENQA). In particular the review should reflect upon the new activities and practices introduced since the last review (e.g., new compliance scale, ENQA Agency Review Committee, targeted review);
- Reflect how the Agency Reviews connect with the Association’s key strategic goals 2021-2025 and its overall aims and objectives;
- Reflect upon ENQA’s collaboration with EQAR.

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<sup>1</sup> As of June 2024.

<sup>2</sup> [https://enqa.eu/wp-content/uploads/2015/11/ESG\\_2015.pdf](https://enqa.eu/wp-content/uploads/2015/11/ESG_2015.pdf)

<sup>3</sup> As of June 2024.

<sup>4</sup> Organisations that do not wish to or for whatever reason are unable to apply to become members of ENQA may request affiliate status within ENQA. Affiliates are bona fide organisations or agencies with a demonstrable interest in the QA of higher education and can be located anywhere in the world.

<sup>5</sup> Out of the 43 reviews used for ENQA membership applications in 2020-2023, only one was not coordinated by ENQA. Out of the 56 reviews used for EQAR registration applications in 2020-2023, seven were not coordinated by ENQA.

<sup>6</sup> The London Communiqué (p.4) outlines the mandate and principles for the establishment of [EQAR](#) (“Applications for inclusion on the register should be evaluated on the basis of substantial compliance with the ESG, evidenced through an independent review process endorsed by national authorities, where this endorsement is required by those authorities.”):

[https://eha.info/Upload/document/ministerial\\_declarations/2007\\_London\\_Communique\\_English\\_588697.pdf](https://eha.info/Upload/document/ministerial_declarations/2007_London_Communique_English_588697.pdf)

<sup>7</sup> <https://www.enqa.eu/external-review-of-enqa-agency-reviews/>

<sup>8</sup> The 2019 external review of ENQA Agency Reviews was coordinated by the Nordic Institute for Studies and Innovation, Research and Education ([NIFU](#)).

<sup>9</sup> The 2024 external review of ENQA Agency Reviews is coordinated by the Knowledge Innovation Centre ([KIC](#)).

It is important to note that most QA agencies use the ENQA-coordinated review as a basis for their application to be listed in EQAR. This means that ENQA’s procedures for these reviews also need to consider EQAR’s requirements. Therefore, any recommendations made by the panel of experts in the scope of the external review of ENQA Agency Reviews should be contextualised and keep in mind the possible impact that the proposed changes may have on the review processes that are used for EQAR purposes.

While the agency reviews are an important part of ENQA’s work, the activities of the Association are much wider and more varied. However, those activities, while briefly described in this self-assessment report, are not subject to review.

## 2. Development of the Self-Assessment Report

The self-assessment report (SAR) has been prepared by a working group, composed of the Head of Agency Reviews and Project and Reviews Officer from the ENQA Secretariat as well as one ENQA Board member and one member of the ENQA Agency Review Committee (ARC). It incorporates input from stakeholders and results of ENQA’s regular internal QA mechanisms. The Secretariat staff finalised the report taking into account feedback from the other members of the self-assessment working group, Secretariat, Board, ARC and ENQA Appeals and Complaints Committee (ACC), as well as member agencies.

Table I. Overview of the self-assessment process

Activity	Period
Development of the plan for the self-assessment process	Spring 2023
Stakeholder feedback ENQA Reviewers’ seminar (input from experienced experts), 7-8 September 2023 Focus group on targeted reviews (input from members), 27 October 2023 Input from the E4 <sup>10</sup> , 12 December 2023 Input from EQAR, 27 February 2024	Autumn/Winter 2023-2024
SWOT analyses of ENQA Agency Reviews by the Board, ARC and Secretariat	November 2023 to January 2024
Start of drafting the SAR	January 2024
1 <sup>st</sup> meeting of the self-assessment working group	5 February 2024
2 <sup>nd</sup> meeting of the self-assessment working group	13 March 2024
SAR reflection meeting with the ENQA Secretariat staff	9 April 2024
3 <sup>rd</sup> meeting of the self-assessment working group	11 April 2024
Written feedback on SAR from the Board, ARC and ACC	May 2024
Board’s discussion on the SAR	3 June 2024

<sup>10</sup> The E4 Group consists of ENQA, the European University Association (EUA), the European Association of Institutions in Higher Education (EURASHE) and the European Students’ Union (ESU).

Consultation with member and affiliate agencies	June 2024
Board's approval of the SAR	13 September 2024

The drafting of the SAR and associated consultations has been a useful and valuable process. It has allowed ENQA to reflect on its work, identify areas that need further improvement or clarification, and appreciate progress and positive developments achieved since the 2019 review.

### 3. History, Profile and Activities of ENQA

ENQA originated a few years before the signature of the Bologna Declaration, when the outcomes from the European pilot project for evaluating quality in higher education (1994-1995) demonstrated the value of sharing and developing experience in the area of QA. Following this and the Recommendation of the Council (98/561/EC of 24 September 1998)<sup>11</sup> ENQA was established in 2000 as the European Network for Quality Assurance in Higher Education. In order to respond to growing expectations towards ENQA with regards to European policy development, including the mandate from the Ministers of Higher Education for drafting the ESG, it was concluded that ENQA needed to strengthen its organisational profile. For this reason, in 2004 the network was transformed into an association, with clearly articulated membership criteria.

Coordinating external reviews of agencies is one of the key activities of the Association and this has been offered as a professional review service since 2011. Reviews are carried out on the basis of the ESG (currently the 2015 edition), and the external review methodology described in the Guidelines for ENQA Agency Reviews (last revised in 2021).

As a membership association, ENQA also conducts many other activities, including representing the interest of members in European policy-making bodies; coordinating and participating in projects; organising events, trainings and webinars to facilitate networking, peer learning and professional development; providing information and expertise on specific QA topics; publishing reports and studies; and coordinating working groups.<sup>12</sup>

#### Structure of ENQA

ENQA's organisational structure is presented on the website<sup>13</sup> and formalised in the statutes<sup>14</sup> and rules of procedure.<sup>15</sup> The Association has the following bodies:

- the General Assembly (GA)
- the governing body (called the 'Board'), including the Presidency
- the Secretariat
- the Agency Review Committee (ARC)
- the Appeals and Complaints Committee (ACC)

<sup>11</sup> <https://enqa.eu/wp-content/uploads/2013/06/Recommendation-of-the-Council-98.561.EC-of-24-September-1998.pdf>

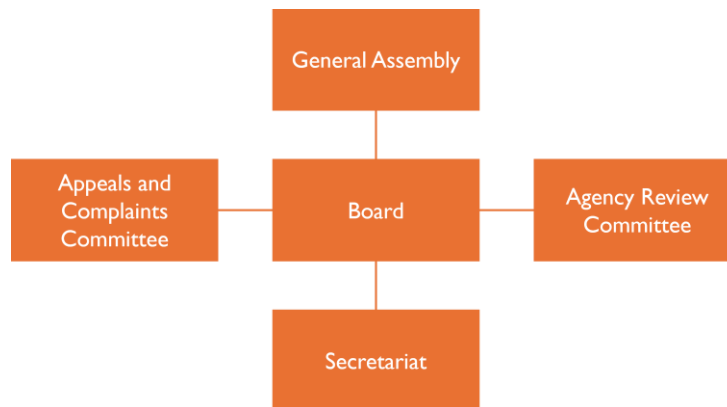
<sup>12</sup> For more information about other ENQA activities, see here: <https://www.enqa.eu/about-enqa/>

<sup>13</sup> <https://www.enqa.eu/structure/>

<sup>14</sup> <https://www.enqa.eu/wp-content/uploads/ENQA-Statutes-2021.pdf>

<sup>15</sup> <https://www.enqa.eu/wp-content/uploads/ENQA-Rules-of-Procedure-2021-1.pdf>

Figure I. Organigram of ENQA



### **General Assembly**

The ENQA General Assembly (GA) is the main policy and decision-making body of the Association, and it is composed of all ENQA members.<sup>16</sup> The GA meets twice a year to discuss and approve matters of strategic importance to the Association, such as the strategic plan, annual work plans and budgets. The GA also elects the Board, ENQA President and ENQA Vice-Presidents. In relation to Agency Reviews, the GA appoints the members of the ACC, endorses the composition of the ARC, as well as endorses the Board's decisions for admission of members and decides upon exclusion of members.

### **Board**

The ENQA Board is the governing and executive body of the Association. It is responsible for the overall management of the Association, including strategic and financial planning, implementing and monitoring ENQA's activities, taking decisions on membership and affiliation applications, and dealing with third-party complaints on ENQA's members. In relation to Agency Reviews, the Board adopts the Guidelines for ENQA Agency Reviews, proposes the members of the ACC for appointment by the GA, and appoints members of the ARC. The Board comprises between nine and eleven members, including the President, two Vice-Presidents and the Treasurer. Board members are elected by the GA following nominations by ENQA members, and serve terms of three years, renewable once.

### **Secretariat**

ENQA's daily management and implementation of activities are conducted by the ENQA Secretariat, led by the Director, who is appointed by the Board. The Secretariat has currently nine staff members, including the Director.<sup>17</sup> Since 2020, the Secretariat has a dedicated 'reviews team' specifically tasked with coordinating Agency Reviews and other review-related activities. The team currently consists of three staff members: the Head of Agency Reviews (who is responsible for overseeing all review-related matters, with general oversight from the Director) and two Project and Reviews Officers.

### **Agency Review Committee**

The ENQA Agency Review Committee (ARC) deals with the internal QA of the ENQA Agency Reviews including the scrutiny and validation of the external review reports and the approval of the review panels composed by the Secretariat's reviews team. The ARC is composed of five to seven experts appointed by

<sup>16</sup> Affiliates have the right to attend the GA, except any closed parts of the meeting, and to speak at the invitation of the Chair. They have no voting rights and their representatives are not eligible for Board membership.

<sup>17</sup> The job positions and responsibilities of the Secretariat members are available here: <https://www.enqa.eu/structure/>



the Board and endorsed by the GA, following a proposal by the Director. Members of the ARC serve terms of two years (renewable once), and at least two members of the Committee should be replaced every two years to ensure rotation and continuity.

### **Appeals and Complaints Committee**

The ENQA Appeals and Complaints Committee (ACC) deals with appeals and complaints made in relation to membership decisions taken by the Board and the conduct of procedures in respect to membership matters and ENQA Agency Reviews. The ACC is made up of four representatives from members of ENQA, nominated by the Board and appointed by the GA for a three-year term (renewable once). At least one of the members is normally a former member of the Board.

### **ENQA Agency Reviews**

ENQA Agency Reviews evaluate whether the agencies' QA activities<sup>18</sup> are in compliance with the ESG. Agencies from the EHEA that achieve compliance are eligible for ENQA membership. Additionally, EQAR's Register Committee uses the reports to make decisions on agencies' registration on EQAR, which has ESG compliance as the registration criteria. ENQA may also coordinate reviews of agencies that do not wish to or cannot apply for ENQA membership, such as QA agencies outside the EHEA.<sup>19</sup> Whatever the purpose, the agency reviews aim to stimulate trust in QA and quality of higher education internationally, and support the legitimacy of the reviewed agency at the national level (where relevant). ENQA coordinates three types of review: full, partial and targeted. While each type of review has their own specificities, the procedures follow the same main steps. The review is an evidence-based process carried out by independent experts, consisting of analysis of the agency's SAR and other documentation, a site visit to the agency, an experts' report resulting from the review and a follow-up. ENQA Agency Reviews also always have a developmental approach and aim at continuous enhancement of the agencies. The whole review process is conducted in English, with agencies expected to translate key documents and provide an interpreter for the site visit if needed.

#### **Full reviews**

To be eligible for a full review, the agency should have been operational for at least two years and should have completed at least five reviews and published their reports. The first full review of an agency against the ESG pays specific attention to the policies, procedures and criteria in place and does not require full evidence of concrete results in all areas at this stage.<sup>20</sup> However, the agency must be able to document (e.g. through action plans with timetables) how it will achieve results across all standards by its next review. The second and subsequent full reviews require clear evidence of results in all areas. In addition, further reviews are expected to reflect on progress since the previous review. All full reviews cover all standards of Parts 2 and 3 of the ESG.<sup>21</sup> The methodology for full reviews is described in the Guidelines for ENQA Agency Reviews.<sup>22</sup>

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<sup>18</sup> E.g. reviews, audits, evaluations or accreditations of higher education institutions or programmes that relate to teaching and learning (and their relevant links to research and innovation), regardless of whether these activities are carried out in the agency's predominant country/region of operation, in other countries of the EHEA, or outside the EHEA and regardless of whether the activities are compulsory or voluntary in nature.

<sup>19</sup> Since 2020, two agencies outside the EHEA have requested an ENQA-coordinated review.

<sup>20</sup> E.g., completed reports of thematic analyses.

<sup>21</sup> Part I is covered through the evaluation of agencies' compliance with the ESG 2.1.

<sup>22</sup> <https://www.enqa.eu/wp-content/uploads/ENQA-Guidelines-2021.pdf>

## Partial reviews

Partial reviews are available to those ENQA members that, according to the decision by the Board, do not demonstrate compliance with the ESG after a review for membership renewal and are therefore assigned the status of a 'member under review'. This status allows the member to benefit from its membership rights within ENQA for a period of a maximum of two years, during which the agency should make the necessary adjustments and then undergo a partial review. Partial reviews focus on standards identified as partially or non-compliant by the panel of the last full review and, if the case, any other standard(s) identified as causes of concern by the ENQA Board. Agencies applying for ENQA membership for the first time may not make use of the partial review arrangement as the 'member under review' status is granted only to existing members. The specificities of a partial review are described in the policy for partial reviews.<sup>23</sup> If requested by an agency, an ENQA-coordinated partial review can also be used for the purpose of EQAR's 'focused review', which addresses issues that led to the agency's rejection for registration on EQAR. In practice, ENQA's methodology for this type of review is the same whether it is used for ENQA or EQAR purposes.

## Targeted reviews

In 2020-2021, ENQA together with EQAR developed the methodology for targeted reviews. This came in response to calls from ENQA members to allow a lighter touch approach for well-established agencies that had repeatedly demonstrated their compliance with the ESG. Agencies that are members of ENQA and/or registered on EQAR and that have undergone at least two consecutive successful full reviews against the ESG can opt for a targeted review.<sup>24</sup> This review focuses on areas that need to be evaluated in-depth; i.e., standards that were only partially compliant with the ESG during the last full review<sup>25</sup>, new or changed external QA activities of the agency, and other substantial changes that could impact the agency's ESG compliance (e.g., organisational changes). Importantly, targeted reviews also put more focus on the enhancement aspect. The agency is expected to specifically reflect on its consideration of internal QA (ESG 2.1) and select one or two other standards as enhancement areas for deeper consideration.<sup>26</sup> The methodology is described in the Guidelines for ENQA Targeted Reviews.<sup>27</sup>

## Decision-making process after the 2019 review of ENQA Agency Reviews

The ENQA Agency Review process concludes with the scrutiny and validation of the external review report by the ARC, which was established in 2021 to further enhance the quality and consistency of the agency reviews. After this, the agency can use the report to apply for registration on EQAR and/or membership in ENQA. For agencies applying to both organisations, EQAR registration is considered first and if successful ENQA takes that as de facto confirmation of ESG compliance. If there is no EQAR application, or it is rejected, then the ENQA membership application is assessed by the Board on the basis of the review report and ARC statement (see ESG 2.5).

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<sup>23</sup> <https://www.enqa.eu/wp-content/uploads/ENQA-partial-reviews.pdf>

<sup>24</sup> Agencies are not obliged to engage in a targeted review. It is offered as an alternative to a full review every other time (with a full ESG review in between, five years after a targeted review).

<sup>25</sup> According to the judgement of the review panel, and/or the EQAR Register Committee for reviews serving EQAR registration.

<sup>26</sup> To be chosen from a limited set of standards according to the EQAR Policy on Targeted Reviews: [https://www.eqar.eu/assets/uploads/2021/07/RC\\_16\\_1\\_Policy\\_on\\_TargetedReviews\\_v1\\_0.pdf](https://www.eqar.eu/assets/uploads/2021/07/RC_16_1_Policy_on_TargetedReviews_v1_0.pdf)

<sup>27</sup> [https://www.enqa.eu/wp-content/uploads/Guidelines-for-ENQA-Targeted-Reviews\\_v3.pdf](https://www.enqa.eu/wp-content/uploads/Guidelines-for-ENQA-Targeted-Reviews_v3.pdf)

This process was established in 2021 in order to more clearly separate the membership application from the preceding review process.<sup>28</sup> The change in the procedure was prompted by several considerations: discussions of the Board in conjunction with the drafting of the 2021-2025 Strategic Plan; feedback from the members indicating that the two decisions on agencies' ESG compliance by ENQA and EQAR was confusing (particularly if there were different outcomes between the two); and a wish to transfer responsibility for the scrutiny and validation of the report review reports to a separate body, in parallel giving the Board more time for strategic-level issues. These discussions were backed by the outcomes of the 2019 external review of ENQA Agency Reviews.

## 4. ENQA's Compliance with the ESG Part 3

### 4.1 Activities, policy and processes for quality assurance (ESG 3.1)

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.

**Translation of the standard for the purpose of this review:**

ENQA should engage in agency reviews on a regular basis. Agency review processes should be part of ENQA's activities and expressed in its publicly available mission statement. ENQA should ensure the involvement of stakeholders in its governance and work in relation to agency reviews.

As a core part of its portfolio of activities, ENQA has systematically conducted external reviews of QA agencies since 2011. Agencies need to renew their membership in ENQA (and registration on EQAR) every five years, creating thus a regular cycle of reviews. The number of reviews per year fluctuates (see figure 2), but it does so mostly according to a five-year pattern, thus being largely predictable. Once every five years there is a significantly smaller number of reviews, which is due to the transition phase following the launch of the revised ESG in 2015 and due to the Covid-19 pandemic in 2020 when some processes were postponed. This regular cycle of reviews allows for good advance planning in terms of financial and human resources, as well as appropriate timing of other activities (such as trainings, review of methodologies etc.).

The ENQA Agency Reviews is a well-known service of ENQA and one which has prominence and respect in the broader EHEA eco-system by providing the review reports on which decisions on ESG compliance are made, thus also providing evidence for the Bologna Process key commitment of QA systems being aligned with the ESG. It is clear from the volume of requests that agencies continue to rely on ENQA for agency reviews, despite other coordinators being active.<sup>29</sup> The Agency Reviews thus contribute to ENQA's recognised position as the designated stakeholder organisation for QA in the EHEA<sup>30</sup>, allowing it to legitimately represent the interests of its members.

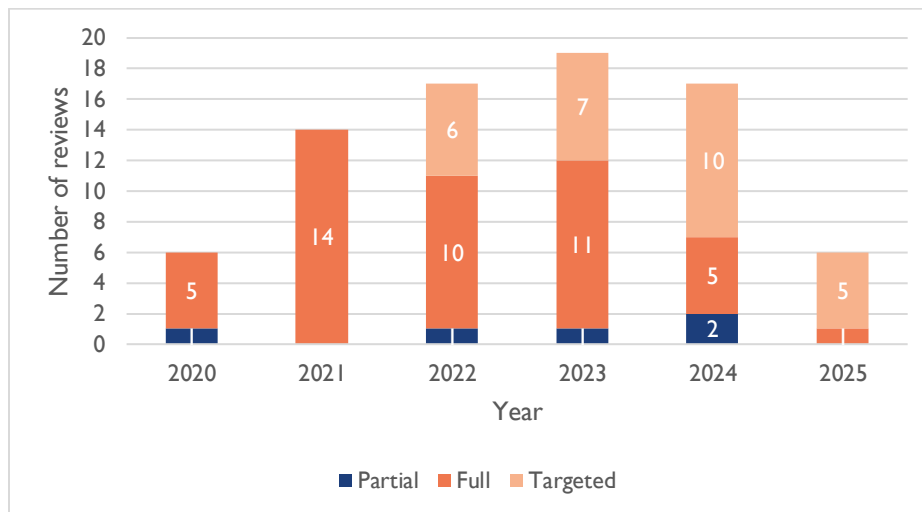
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<sup>28</sup> Before the change in 2021, the ENQA Board carried out the work now conducted by the ARC, and decided on an agency's overall compliance with the ESG on the basis of the external review report. The decision on ENQA membership took place at the same time and preceded the agency's application for EQAR registration.

<sup>29</sup> ENQA coordinates the majority of ESG reviews, however, ENQA and EQAR also accept reports from reviews coordinated by other entities for membership and registration applications, as long as the respective rules on eligibility and methodology are followed.

<sup>30</sup> ENQA is a consultative member of the Bologna Follow-Up Group (BFUG).

Figure 2. Number of reviews in 2020-2024<sup>31</sup> and a projection for 2025



ENQA’s Strategic Plan 2021-2025 (publicly available on the website<sup>32</sup>) defines ENQA’s mission, vision, values and goals. ENQA’s mission is to represent their interests internationally, support them nationally and provide them with comprehensive services and networking opportunities. Under ENQA’s umbrella, the community of agencies drives innovation in QA and refines QA processes. ENQA’s vision is an EHEA where persistently high-quality education contributes to responsible and active European citizens in democratic and sustainable societies, where access is attainable for all, and where graduates acquire a broad knowledge base on which to build regionally and globally rewarding careers while inspiring their personal development. ENQA respects the diversity of higher education systems and QA approaches and operates in keeping with its values, which are integrity, transparency, independence and social responsibility. ENQA’s mission is translated into three main goals:

1. Representing interests of QA agencies;
2. Providing services to members and other stakeholders;
3. Driving the development of external QA.

Under each of the goals, the Strategic Plan lists the key activities that contribute to achieving them. The Agency Reviews are explicitly mentioned in two places. The Agency Reviews primarily fall under the goal of providing services to members. As such, the sub-goal 3 under this goal states that ENQA’s Agency Review Programme is the preferred partner for reviews against the ESG. The goal is translated into the following activities: “ENQA is to organise agency reviews in a professional manner with appropriately trained and experienced reviewers, consistent with the ESG. Through the reviews it organises, ENQA supports the development of independent and trustworthy agencies and provides mature agencies with tailor-made reviews that improve and enhance their processes, activities and procedures beyond threshold standards.”

Additionally, the sub-goal 7 under the third main goal relates to the Agency Reviews, as follows: “ENQA review reports are rich sources of information on quality in higher education. ENQA develops and encourages research projects that make use of these reports in order to detect trends, innovative good practices, and areas

<sup>31</sup> The 2020 partial review was for ENQA purposes, the 2022 and 2023 ones were coordinated for EQAR’s ‘focused review’ purposes, and one of the 2024 partial reviews was for EQAR’s ‘focused review’ whereas the other one served both ENQA and EQAR purposes.

<sup>32</sup> <https://enqa.eu/wp-content/uploads/2020/05/ENQA-Strategic-Plan-2021-2025.pdf>

*that demand attention. ENQA also leads or is a partner in projects and studies that address specific topics related to quality assurance in higher education.”*

Beyond this, the information collated through the Agency Reviews is crucial in providing an evidence base that ENQA uses for its other activities. The information gathered in this way comes both through formal approaches such as thematic analyses and through informal mechanisms such as accrued knowledge and expertise of the ENQA Secretariat and Board of practices and challenges within agencies. This indirectly supports a wide array of ENQA’s other activities, including providing evidence for policy development and representation, providing support for developing agencies, and providing expertise internationally. As such, although the Agency Reviews are only explicitly mentioned in two of the sub-goals, they contribute to the majority of ENQA’s other goals. In the future, ENQA could look into connecting the information gathered through reviews more directly with the other activities of the Association.

ENQA’s mission and goals are translated into annual work plans which are approved by the Board and the GA each year. The achievement of the goals is tracked through annual activity reports, submitted to the GA each autumn. A mid-term check of the strategic plan was carried out at the half-way point in 2023 and further reflections will be done in 2025 as part of the preparations for the next strategic plan.

ENQA involves stakeholders in its governance and work (see section 3). ENQA’s GA is composed of members, and the Board and the ACC are composed of representatives of members. So far, all ARC members have been current employees of a member agency, but as per the criteria defined in ENQA’s rules of procedure (p.10), this is not a requirement. This leaves room for wider stakeholder involvement in the ARC in the future if desired.

ENQA’s review experts include QA professionals, academics and students, nominated by ENQA’s partner organisations (see ESG 2.4). ENQA collaborates closely with EQAR as described in section 6 and throughout this SAR.

### **Aspects that work well**

- A well-established and recognised agency review methodology that serves various needs (full, partial, targeted reviews)
- Strong involvement of stakeholders in the design and implementation of ENQA Agency Reviews, including through the peer-review approach
- Predictability of the number of the reviews and selection of ENQA as the preferred review coordinator

### **Aspects for further attention**

- Connecting the information gathered through reviews more directly with the other activities of the Association

## **4.2 Official status (ESG 3.2)**

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

### **Translation of the standard for the purpose of this review:**

ENQA should have an established legal basis and its status as a body responsible for coordinating agency review processes should be widely recognised by the relevant EHEA stakeholders.

There have been no changes in ENQA's official status since the previous review. ENQA is an international non-profit association under Belgian law ('association internationale sans but lucrative' or 'aisbl'). ENQA Agency Reviews are an activity conducted by ENQA and not by a separate legal entity. This activity is therefore represented by the Association in legal and contractual matters.

The recognition of the Agency Reviews stems from the role of ENQA in the wider European framework, namely ENQA being the designated stakeholder organisation of QA agencies in the EHEA. The Agency Reviews operate at the European level and are not linked to a specific national framework, although in some national or regional contexts ESG compliance, demonstrated by ENQA membership or EQAR registration, is a regulatory requirement for an agency to operate.<sup>33</sup> EQAR, which is the only legal entity established through the Bologna Process, has verified the review process and established a continuous collaboration with ENQA as coordinator of reviews. ENQA-coordinated reviews are thus automatically considered eligible by EQAR.

### Aspects that work well

- A formally recognised activity throughout the EHEA that also serves EQAR registration purposes

## 4.3 Independence (ESG 3.3)

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.

### Translation of the standard for the purpose of this review:

ENQA should be independent and agency review processes need to be carried out autonomously. ENQA should have full responsibility for its agency review processes and their outcomes without third party influence.

### Organisational independence

ENQA is an independent non-profit association registered under the Belgian law as 'aisbl' (see ESG 3.2). ENQA's statutes and rules of procedure, which are adopted by the GA and adhere to national legislation, define the bodies of ENQA and their respective roles. ENQA is free to determine its structures and way of work independently from national governments and other stakeholders. The latest change in ENQA's organisational structure was made in March 2021 when the ARC was created (see section 3).

As a membership organisation, ENQA is logically not organisationally independent from its members. Similarly, the ENQA Board is composed exclusively of elected representatives from ENQA member agencies, which have usually been reviewed through an ENQA Agency Review. Also, so far, all ARC members have been current employees of an ENQA member agency (see ESG 3.1), and the ACC is always composed of representatives of ENQA members. However, ENQA has measures in place to safeguard the independence of the Association including the Agency Reviews against undue influence from any specific member. The organisational structure of ENQA guarantees that an individual cannot serve in more than one of these bodies at the same time.<sup>34</sup> The statutes formalise how Board members are nominated and elected, and the different ways mandates can end (including rules and conditions for dismissal). The appointment, composition and mandate of the ARC and ACC are defined in the rules of procedure.

<sup>33</sup> National legislation in more and more countries requires EQAR registration rather than ENQA membership for their QA agencies.

<sup>34</sup> The rules of procedure establish that members of the ENQA Board and of the ACC may not serve at the same time in the ARC and that no member of the ACC shall at the same time be a member of the Board.



Additionally, there are terms of reference of the ARC<sup>35</sup> that detail the work of the Committee. The Board, the committees, and expert panels represent a structure with which ENQA guarantees that there is a system of checks and balances, and independence is secured.

### **Operational independence**

ENQA has full operational independence and thus defines its procedures independently as formulated in the ENQA statutes, the rules of procedure and the Guidelines for ENQA Agency Reviews, while naturally considering changes based on feedback from its members and other stakeholders. The review process is not legally or structurally separated from other activities of ENQA. In practice, ENQA considers that the other activities are compatible with the review activities, and do not create a conflict of interest. To further ensure this, ENQA refrains from engaging in specific support activities for review preparations for individual agencies. Instead, ENQA organises topic-specific events, webinars or coordinates projects that can help the Association's members and affiliates in this regard (e.g. the SEQA-ESG project<sup>36</sup>).

ENQA has strict procedures for ensuring no conflict of interest, in order to safeguard independence of operations. While ENQA's members and partners are invited to nominate experts for the reviews, it is the Secretariat's reviews team that selects which nominations are accepted (see ESG 2.4). Likewise, the panel compositions for individual reviews are done by the reviews team in line with strict criteria (see Annex I), and the panels are approved by the ARC. The procedure also includes a check from the agency and the EQAR Secretariat (if the agency applies to EQAR) to ensure that there are no conflicts of interest identified by either party. If the ARC, agency or EQAR identifies a conflict of interest, and it is verified, the Secretariat recomposes the panel, which is again checked by the three parties. However, it is quite rare that any party raises a conflict-of-interest concern, which demonstrates that the existing rules that guide panel composition and the work of the reviews team to pre-check any potential concerns work well and are sufficient.

Members of the ARC and ACC can serve as reviewers in ENQA Agency Reviews, however current members of the Board cannot. This rule was historically in place due to the Board's involvement in the membership decision-making process (and formerly in the scrutiny and approval of review reports). However, it could be reconsidered due to the changed responsibilities of the Board since 2021 and the long-standing requirement that any Board member recuse themselves for decision-making on any matter related to an agency where they have an existing interest. Now that the Board no longer scrutinises review reports, their involvement in reviews as experts could enhance the connection of the Board to this important activity of ENQA. The ACC and the two sub-committees within the ARC make use of an alternative member in case any regular member has a conflict of interest. Members of the ARC and ACC cannot be involved in reviews in which they have an actual, potential or perceived conflict of interest; e.g., a member of ARC or ACC is never asked to review a report or appeal/complaint of their own agency, or a review in which they have acted as a reviewer. ENQA also keeps a register of the current Board members' and ARC members' interests to avoid any conflicts. It could be useful to have a register for the ACC members as well even if the number of complaints/appeals is low and the members are expected to declare any real or apparent conflict of interest prior to reviewing a complaint/appeal. For the no-conflict-of-interest mechanism for experts, see ESG 2.4.

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<sup>35</sup> Internal document, available to the review panel upon request.

<sup>36</sup> Supporting European QA Agencies in meeting the ESG (SEQA-ESG) 2: <https://www.enqa.eu/projects/supporting-european-qa-agencies-in-meeting-the-esg-seqa-esg-ii/>

The respective roles and responsibilities of ENQA, the review panel and the agency are explained in detail in the Guidelines for ENQA Agency Reviews and are also laid out in the contracts signed between ENQA and the agency and between ENQA and the experts. The ENQA review coordinator (a member of the Secretariat) supports the panel throughout the process and reviews the report to ensure consistency, provision of evidence, clarity and completeness. However, the findings and recommendations are the sole responsibility of the review panel. The chair of the panel signs off on the final report and has the final say should there be any disagreement within the team or regarding suggestions from the review coordinator. The final draft of the report is sent to the agency for a factual check before it is finalised. However, this process is limited to identifying factual errors and the agency may not suggest changes to the panel's findings.

Reviews that are coordinated for EQAR purposes need to take into account EQAR's requirements (e.g. regarding timelines, defining the terms of reference, and reporting), which occasionally may be different from those of ENQA. Continuous dialogue between ENQA and EQAR at various levels aims to ensure that the requirements and needs of both organisations are addressed.

### **Independence of formal outcomes**

The ARC is responsible for assessing the integrity of the review process and checking the quality and consistency of the reports. The scrutinies of reports are done individually by three members of the respective sub-committee to ensure full independence of assessment. The ARC then discusses these scrutinies and produces a statement validating that the report has been produced in accordance with the Guidelines for ENQA Agency Reviews and, if applicable, noting any areas where it disagrees with the findings of the review panel. If necessary, the ARC can request further clarification from the panel or changes to the report, but only in cases where the ARC believes that the link between evidence, analysis and conclusion is not clear (see ESG 2.5). The ARC does not take a decision on overall compliance of the agency with the ESG. The statement is published on the ENQA website together with the review report.

The decisions on granting an agency membership of ENQA are the responsibility of the Board. The ENQA statutes and the Board conflict of interest policy<sup>37</sup> contain provisions for Board members' abstention from decision-making for membership purposes in case of real or perceived conflict of interest.

### **Recommendations from the 2019 review and ENQA's respective follow-up action:**

#### **Panel recommendation**

As ENQA will never be able to reach total independence due to its nature as a membership organisation, it is more important to enhance the actions and policies that ensure the independence of decision-making and integrity of processes. Specifically, the independence of ENQA within reviews should be enhanced by (re-)defining the complaint and appeal procedures and promulgating them to all relevant stakeholders. Furthermore, greater externality should be facilitated by involving stakeholders outside the membership organisations.

#### **ENQA action to recommendation**

Partially addressed:

In 2021, ENQA made changes in the review methodology by unbundling the review process from the membership decision-making (see section 3). This change has made the responsibilities and steps in the

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<sup>37</sup> Internal document, available to the review panel upon request.



process clearer while not solving all the issues the change was set to resolve (see ESG 2.3 and further in section 6).

In the Strategic Plan 2021-2025, ENQA underlined its profile as a membership association. With this direction it is appropriate that the governing body of ENQA is composed solely of members. In the meantime, the ARC has been established which provides the possibility for members from bodies other than ENQA member agencies. However, in the first years of operation of the ARC, during which the Committee's procedures and working methods were first established and refined, the Secretariat and Board decided that it was best if the ARC included only ENQA member representatives in order to ensure the thorough understanding of the review process and the context in which the ARC operates.

The recommendation on the complaint and appeal procedures is considered under ESG 2.7.

#### **Panel recommendation**

The panel observed that the relationship between ENQA and EQAR may raise questions about the independence of agency review processes. The panel recommends that ENQA critically evaluate the impact of meeting EQAR requirements on its review processes and take the opportunity presented by its strategic planning exercise to consider the nature of its relationship with EQAR.

#### **ENQA action to recommendation**

Addressed:

This recommendation was considered during the drafting of the 2021-2025 Strategic Plan and the revision of the membership decision-making process in 2021 according to which the pathways to apply for ENQA membership with an ENQA-coordinated review now depend on the agency's registration status in EQAR. This change sought to make the decision-making process clearer by addressing two issues. Firstly, to create a clearer separation between the review process and the subsequent use of the review report for ENQA and EQAR application processes. And secondly, to reduce discrepancies between the outcomes of the ENQA and EQAR decision-making processes, which according to feedback from members was confusing. The change has not entirely managed to solve the issue, however, as there are still occasions when the EQAR Register Committee deviates from the conclusion of the ENQA panels and/or the ARC (see section 6).

#### **Panel recommendation**

In this context, the appropriateness of the current governance arrangements and decision-making process should be further discussed in relation to the strategic decision about the role of agency reviews. If the purpose of ENQA Agency Reviews is solely to determine whether agencies can become ENQA members, then including only members on the Board makes sense. However, some stakeholders (e.g. some national-level ministries) perceive ENQA reviews as having a role beyond membership: to promote recognition of qualifications. In the latter case, the composition of the board should be reconsidered. ENQA should clearly state the purpose of the reviews and make this explicit to different stakeholders to avoid misinterpretations.

#### **ENQA action to recommendation**

Addressed:

During the discussion of ENQA's 2021-2025 strategy it became very clear that members want to keep ESG compliance as the decisive membership criteria. In the strategy, ENQA also focused its position as a membership organisation. For these reasons, it is appropriate that the ENQA Agency Reviews

continue serving the dual purpose (i.e. checking the ESG compliance and supporting agencies' enhancement) and that the Board is composed of representatives of member agencies.

### Aspects that work well

- Freedom to determine ENQA Agency Reviews' structures and way of work independently from national governments and other stakeholders
- Strict procedures in place for ensuring no conflict of interest, in order to safeguard independence of ENQA Agency Reviews' operations
- Prominence of the peer-review approach: the findings and recommendations are the sole responsibility of the review panel

### Aspects for further attention

- Impact of EQAR's requirements on ENQA Agency Reviews' processes

## 4.4 Thematic analysis (ESG 3.4)

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

**Translation of the standard for the purpose of this review:**

ENQA should regularly publish reports that communicate general findings of the agency review processes.

ENQA is in a unique position to provide analysis of developments, trends, areas of good practice and persistent difficulties of external QA in the EHEA drawing from the findings of the ENQA Agency Reviews. The interest of members and other stakeholders in thematic analysis and the usefulness of such information for informed policy-making has been taken into account in the 2021-2025 Strategic Plan (see ESG 3.1).

Since 2021, ENQA has formalised its approach to thematic analyses in its Policy on Internal Quality Assurance of ENQA Agency Reviews (see ESG 3.6). ENQA is committed to producing at least one thematic analysis every two years. The decisions on the topics are made by the ENQA Board based on proposals by the ARC or the Secretariat. The thematic analysis is then produced by the ENQA Secretariat.<sup>38</sup>

Since the previous review, ENQA has published the following thematic analyses:

1. *ESG 2015-2018 ENQA Agency Reports: Thematic Analysis (2020)*.<sup>39</sup> This analysis looked at main agency practices, best practices and existing limitations in relation to standards 3.4, 3.6 and 2.1 of the ESG. The three standards were chosen for their known complexity and for the difficulty that agencies face in achieving full compliance with each. The report was commissioned to an external researcher.

<sup>38</sup> There is also the possibility of outsourcing thematic analyses based on the available resources of the Secretariat and/or the nature of the analysis.

<sup>39</sup> <https://www.enqa.eu/wp-content/uploads/ESG-2015-ENQA-Thematic-Analysis-final.pdf>

2. *What comes after the agency reports are published? An analysis of approaches to follow-up (ESG 2.3) and complaints and appeals (ESG 2.7) (2023).*<sup>40</sup> The analysis concentrates on QA agencies' approaches to follow-up (as required by ESG 2.3) and to complaints and appeals procedures (ESG 2.7) as part of their external QA activities based on the findings of agency reviews between 2020 and 2022. It provides an insight into the variety of approaches across the EHEA as well as reflection on how panels identified these approaches in terms of showcasing the examples of good practice or persistent difficulty. The report was prepared by the ENQA Secretariat.

Beyond the strict interpretation of this standard (i.e. analysis of panel reports), out of topical interest, ENQA looked into the agencies SARs in the paper *'Diversification of external quality assurance in the EHEA – Reflection following the analysis of ENQA Agency Reviews conducted in 2020-2021'* (2021).<sup>41</sup> This analysis, prepared by the Secretariat, studied to what extent there is a discussion ongoing in the sampled agencies regarding the diversification of external QA activities, and what are the motives for, and characteristics of, such diversification.

Separately from the above-mentioned publications, ENQA collaborates in several projects that may result in thematic analyses that draw on the outcomes of ENQA Agency Reviews. The projects are not of a regular nature and depend on funding opportunities. Since the 2019 review, ENQA was involved in the ESQA project<sup>42</sup> through which ENQA co-authored a report entitled *'Study on Stakeholder Involvement in External Quality Assurance'* (2020).<sup>43</sup> The publication includes an analysis of reports of ENQA Agency Reviews with a focus on standards that consider stakeholder involvement.

In 2025, the ENQA Secretariat will prepare another thematic analysis. The plan for this work, including topic and timeline, will be prepared in late 2024.

ENQA is committed to disseminating the results of the thematic analyses to members and affiliates, and other stakeholders. All the thematic analyses are available on a specific page on ENQA's website.<sup>44</sup> ENQA's target groups have been made aware of the publications also through ENQA's newsletters and social media posts. The latest thematic analysis on approaches to follow-up and complaints and appeals was presented and discussed at the ENQA Reviewers' Seminar in September 2023 and at the ENQA Members' Forum in April 2024. The feedback received demonstrates that the analysis is considered useful to members and affiliates in terms of evidence and inspiration about how these issues are addressed. The invitations to present ENQA's paper on diversification of external QA in the EHEA at various external events<sup>45</sup> is also a signal that it is considered an interesting resource. However, more work could be done to disseminate the results more broadly and to ensure that they feed more prominently into ENQA's other activities.

Producing thematic analyses requires resources. Due to limited time available for the Secretariat staff, ENQA outsourced the 2020 thematic analysis. However, in the future ENQA aims to conduct the analyses in-house as staff members who have coordinated reviews have valuable knowledge to do this. In turn, the action of conducting the analysis enhances the knowledge of those involved in authoring it. Having this

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<sup>40</sup> [https://www.enqa.eu/wp-content/uploads/ENQA\\_2023\\_Thematic-analysis.pdf](https://www.enqa.eu/wp-content/uploads/ENQA_2023_Thematic-analysis.pdf)

<sup>41</sup> [https://www.enqa.eu/wp-content/uploads/Diversification-of-EQA\\_final.pdf](https://www.enqa.eu/wp-content/uploads/Diversification-of-EQA_final.pdf)

<sup>42</sup> Effective involvement of stakeholders in external quality assurance activities (ESQA): <https://www.enqa.eu/projects/effective-involvement-of-stakeholders-in-external-quality-assurance-activities-esqa/>

<sup>43</sup> [https://www.enqa.eu/wp-content/uploads/Study-on-stakeholder-involvement-in-EQA\\_web\\_n.pdf](https://www.enqa.eu/wp-content/uploads/Study-on-stakeholder-involvement-in-EQA_web_n.pdf)

<sup>44</sup> <https://www.enqa.eu/thematic-analyses/>

<sup>45</sup> e.g., ASHE 2021 seminar, NCEQE's Annual International conference 2022, and QQI 10th Anniversary event in 2022.

knowledge in-house feeds into the development of the review procedures and ENQA's broader activities in a more impactful manner. Moreover, the staff working on review matters consider conducting thematic analyses an interesting opportunity for staff development and a means to bring variety to their work portfolio.

### **Recommendation from the 2019 review and ENQA's respective follow-up action:**

#### **Panel recommendation**

The panel recommends that ENQA should take a more proactive, strategic and systematic approach to handling the knowledge and information about internal and external QA in Europe that ENQA has acquired over the years.

#### **ENQA action to recommendation**

Addressed:

ENQA's approach to carry out thematic analyses is now more defined, structured and strategic. Carrying out one analysis every two years gives a predictable cycle, easing planning of the reviews team's work. Collecting ideas for topics from the ARC based on issues that it comes across in its work contributes to the consistency of reviews and helps the work of the Committee, while also presenting valuable information to the whole membership. In parallel, the further development of ENQA's 'book of precedents' (used to support the consistency of the reviews, see ESG 3.6) should in future allow for easier use of the information collated from all reviews. This may give scope for further exploitation of the wealth of information that ENQA holds. However, there is always a challenge to balance such potential and ambitions with the realistic human resources available to conduct such work. It should also be noted that beyond analysing the general findings of the agency review processes, ENQA produces other publications that provide important and useful information on external QA (e.g. through projects and working groups).

### **Aspects that work well**

- Regular publishing of valuable thematic analyses
- ENQA's work on analyses and projects beyond the strict interpretation of the standard
- Engagement of internal stakeholders (the Secretariat, ARC, Board) in defining the topics for thematic analyses

### **Aspects for further attention**

- Results of the thematic analysis could be more broadly disseminated and more prominently feed into ENQA's other activities
- Limited human resources for the task

## **4.5 Resources (ESG 3.5)**

Agencies should have adequate and appropriate resources, both human and financial, to carry out their work.

#### **Translation of the standard for the purpose of this review:**

ENQA should have adequate and appropriate human and financial resources to carry out the review processes.

## Human resources

Since the previous review, the ENQA Secretariat has grown from six full time staff members to seven full time and two part-time staff members. The growing volume of the agency reviews has also seen an increase of staff working specifically for them, going from one to three. The Secretariat's reviews team currently consists of the Head of Agency Reviews and two Project and Reviews Officers. The reviews team coordinates the majority of the reviews and implements other review-related activities (e.g. training sessions, seminars for agencies, thematic analyses), while also carrying out other tasks not directly connected to the Agency Reviews. Additionally, the Head of Agency Reviews is responsible for overseeing and planning of review-related matters. The reviews team holds weekly meetings to share updates on the review coordination, to discuss any challenges and to plan future activities. These meetings are greatly appreciated by the staff involved and serve to enhance collaboration and problem solving, as well as providing learning opportunities for newer staff. It is a strategic decision that the staff working on reviews do not do so in isolation. Other tasks (e.g. project work) aim to ensure the connections between ENQA's various activities and avoid silos in terms of the knowledge and experience. However, this needs continued attention when planning future responsibilities of the staff and internal communication mechanisms, particularly during periods of high workload for the reviews.

The number of reviews per year fluctuates along a five-year cycle, which means that in some years there is a higher number of reviews than others (see ESG 3.1). During the peak years, one or two other staff members have helped with the coordination of one or two reviews. While it is an asset that the other colleagues beyond the core reviews team are trained and skilled to coordinate reviews, having a specific reviews team helps to improve the consistency of the reviews and to manage the responsibilities and communication effectively. The off-peak years can be used for analysis and developmental activities of review activities.<sup>46</sup> While the current volume of reviews can be handled by the current staff, still only limited internal resources can be dedicated to analysis and developmental activities related to reviews during the busier years. During the peak years, it is also important that the Head of Agency Reviews has sufficient time for overseeing the strategic activities and long-term planning.

Beyond the core reviews team, agency review activities are also supported by ENQA's other staff. The Director oversees the strategic direction of the review activities, its connection with ENQA's wider work, and supports the team in handling difficult cases if needed. Financial issues related to reviews are dealt with by the Administrative Officer, Project Officer and Senior Resource Manager. The Administrative Officer also provides other support when needed, in particular for the publication of reports. Other ENQA staff are also consulted when it comes to major activities or developments for the Agency Reviews, e.g., contributing to this SAR, brainstorming on new or changed methodologies, or streamlining administrative or financial processes. The review activities benefit from being embedded into ENQA's overall structure through the shared resources (financial, staff, and infrastructure).

Furthermore, ENQA engages experts on an ad hoc basis on a service contract if necessary. For the 2020 thematic analysis, a researcher was commissioned to carry it out (see ESG 3.4). In 2023-2024, ENQA also engaged a temporary review coordinator for five reviews while one member of the reviews team was on maternity/parental leave. This person was an experienced reviewer from the ENQA pool of experts, and therefore had the necessary knowledge and training to take on the role,<sup>47</sup> but to avoid any conflicts of

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<sup>46</sup> It is planned that in 2025 when there are fewer reviews, the reviews team will e.g. look into revision of templates, conducting a thematic analysis and following up on the outcomes of the external review of ENQA Agency Reviews.

<sup>47</sup> Additional training regarding the coordination aspects of the review process was provided by the Head of Agency Reviews prior to the coordination work.

interest, the coordinator was not involved in reviews as an expert while coordinating agency reviews. The use of a temporary coordinator was a one-off solution, but it worked well and could be considered again in the future for a short-term solution if needed.

ENQA's budget foresees an allocation for staff training. The funds can be used both individually, according to the training needs of each staff member, or allocated to the whole team when joint training is needed. The staff involved in review coordination are always trained prior to coordinating one independently. This includes sessions with the Head of Agency Reviews to discuss the Guidelines and process as well observing a review, including attending at a site visit, coordinated by an experienced review coordinator. In 2021, the Secretariat also held internal training sessions for the whole staff led by the Head of Agency Reviews focusing on different topics related to reviews such as changes in the review methodology, the understanding of the ESG, and the project management tool 'Smartsheet' used for reviews. The Secretariat aims at holding additional training sessions on reviews for the whole staff following the availability of resources. Ensuring time and resources for regular internal trainings is an important aspect to support the quality and consistency of reviews, embeddedness of reviews within ENQA, as well as staff development.

ENQA as a whole organisation has formal policies for all HR matters, including working regulations, pay and progression, well-being, as well as rules to deal with workplace complaints. All the staff have an annual appraisal with the Director. Although a formal hierarchy exists within the ENQA staff structure, within the whole organisation, and within the reviews team, there is an open and consensus-driven working atmosphere where staff have ownership of their work and new ideas and teamwork are highly valued.

ENQA Secretariat's review activities are supported by the ARC and the Board which both contribute to the internal QA of Agency Reviews, thematic analyses, and review-related events. The Board members are not remunerated for their work while the ARC members are remunerated for the scrutiny of the reports and attendance at the ARC meetings.

### **Financial resources**

The reviews-related income and expenditure is quite predictable as the number of reviews per year follows a five-year pattern. This does result in some fluctuation from year to year, although a significant portion of the expenditure is directly covered by the income.

Depending on the type of review, the financial aspects differ. The total fee paid by the agency for a full review is currently 30,600 EUR excluding VAT. The amount is distributed as described in table 2 below. Each full review brings in a net income of 9,100 EUR to the Secretariat, which is used to cover the staff costs related to the review process, expenses related to the ARC, and contributes to costs of other review-related events (e.g. the reviewers' seminar or the seminar for agencies preparing for a review). In addition, each review contributes 1,400 EUR to the training of experts, thus ensuring the long-term sustainability of ENQA's pool of trained reviewers. Travel and subsistence costs are charged at real rates, with agencies receiving a refund or an additional invoice, if the costs are below or above the budgeted amounts.

Table 2. Full review fee structure

Expert fees	13,000 EUR
Travel and subsistence	4,500 EUR
ENQA coordination	9,100 EUR
ENQA training of experts	1,400 EUR
Expert fees progress visit	1,000 EUR
Travel and subsistence progress visit	1,600 EUR
Total	30,600 EUR

The total fee paid by the agency for a targeted review is currently 20,400 EUR or 23,600 EUR excluding VAT, with the higher fee applied if new or significantly modified activities have to be evaluated. The amount is distributed as described in table 3 below. To lower the cost of ENQA Targeted Reviews for agencies, ENQA lowered the experts' fees as well as the contribution to administrative, coordination and training costs.

Table 3. Targeted review fee structure

		With new/modified activity/activities
Expert fees	9,000 EUR	12,200 EUR
Travel and subsistence	4,000 EUR	4,000 EUR
ENQA coordination	6,200 EUR	6,200 EUR
ENQA training of experts	1,200 EUR	1,200 EUR
Total	20,400 EUR	23,600 EUR

The cost of partial reviews varies taking into consideration the number of reviewers and the costs of a site visit (see ESG 2.3 and 2.4).

According to the feedback gathered after each review process, the majority of the agencies (regardless of the type of the review the agency underwent) deemed the cost of the review to be reasonable while some agencies considered the review fees expensive. Similarly, most of the experts considered that the review fee compensated for their work in the panel. However, some panel members have pointed out that the expert fees might not be adequate against the recent high inflation rates or if the review becomes challenging and consequently requires more work. In particular, some experts that participated in targeted reviews have commented that the lower expert fee in a targeted review does not compensate for the work required, especially due to the initial smaller review panel size (three members instead of four), which meant that the workload was in fact not less than for a full review. This latter matter was addressed



by adding one more member in the panel (see ESG 2.2 and 2.4), however, the expert fees for targeted review may need further consideration, since even with the additional panel member, the experts' involvement is not significantly lower than for full reviews.

The review fee structure was adjusted after the last review of the ENQA Agency Reviews in order to cover more substantially the work of the Secretariat in its role of coordinator, while reducing other parts in order to keep the overall increase manageable for agencies. However, at the time of this restructuring, the ARC was not yet in existence, and so a portion of the income for ENQA coordination is now allocated to ARC expenses. Furthermore, inflation has heavily impacted the Secretariat's salaries (due to compulsory indexation in Belgium) as well as travel and subsistence costs. These changes have led to a noticeable increase in the costs for ENQA of implementing a review. Thus, ENQA is again in the position that the review fees are barely covering all related direct and indirect costs. While the Agency Review activities benefit from being part of ENQA's broader activity portfolio and therefore some cross-subsidisation is possible, the aim remains for the reviews to be primarily funded by the income from fees. ENQA therefore recognises that it will be necessary to review the structure and amount of the review fees in order to ensure future sustainability, while maintaining affordability for agencies. This issue will be taken up next year in the preparation of a new financial strategy.

### Aspects that work well

- Professional and dedicated group of review coordinators
- Predictable reviews-related income and expenditure

### Aspects for further attention

- Risk of creating of silos within the ENQA Secretariat as one part of the team dedicates itself largely to the Agency Reviews
- Lack of time for reflections and training on the current methodology and processes, and developments of any potential new activity
- Financial sustainability, balancing the need to cover the implementation costs while keeping the review affordable for agencies

## 4.6 Internal quality assurance and professional conduct (ESG 3.6)

Agencies should have in place processes for internal quality assurance related to defining, assuring and enhancing the quality and integrity of their activities.

### Translation of the standard for the purpose of this review:

ENQA should have in place processes for internal quality assurance related to defining, assuring and enhancing the quality and integrity of its agency reviews.

Following the previous review's recommendations, in 2021 ENQA developed and published the 'Policy on the Internal Quality Assurance of ENQA Agency Reviews'.<sup>48</sup> The policy aims to ensure that all activities coordinated under the umbrella of ENQA Agency Reviews are fit for purpose and run optimally. It describes the processes, tools and responsibilities for planning, implementation, assessment, and improvement of ENQA's reviews.

<sup>48</sup> <https://www.enqa.eu/wp-content/uploads/Policy-on-the-IQA-of-ENQA-Agency-Reviews.pdf>



The ENQA Secretariat, Board and ARC are involved in the internal QA of ENQA Agency Reviews to ensure consistency of the review processes without interfering with the natural differences brought about by the peer review methodology. Review coordinators from the Secretariat manage the daily operations of their assigned agency reviews. The Head of Agency Reviews oversees all ongoing reviews and proposes any action for improvement to the Director, the ARC and the Board. The ARC approves panels and scrutinises and validates the review reports prior to their further use by EQAR or the ENQA Board (see ESG 2.4, 2.5 and 2.6). The ARC's work supports the consistency and comparability of the reports across different review panels. The ENQA Board oversees the internal QA measures, including the adoption of changes proposed by the Secretariat.

ENQA has seen the importance of ensuring a good communication between the ARC and the Board in order to ensure that trends and recurring challenges for agencies, identified through the review process, feed into ENQA's other work, including its policy positions and peer-learning activities for members. This has required specific attention now that the Board no longer scrutinises the individual review reports. In order to support the cooperation, an annual meeting takes place between the Board and the ARC. Furthermore, even when the Board takes a membership decision based solely on the agency's EQAR registration, they still reflect on issues raised during the review to ensure that they maintain a good picture of issues affecting agencies and to highlight areas for particular attention in the follow-up (see ESG 2.3).

Additionally, ENQA has a variety of tools that contribute to the internal QA of ENQA Agency Reviews. One of them is a project management tool 'Smartsheet' which the reviews team uses for the overall reviews management as well as to manage individual reviews. A centralised project management tool assures and enhances the quality and effectiveness of the reviews team's work, allowing oversight and continuity in case of staff changes or absence. It has proven to be a major improvement since the last external review.

Smartsheet also includes the 'book of precedents', which contains records of judgements by the panel, the ARC, the EQAR Register Committee and the ENQA Board (where applicable) for all the standards of each review as well as notes on specific standards discussed by the ARC and EQAR Register Committee (and previously by the ENQA Board). The book is used by the review coordinators during the review processes to support the consistency between reviews and the resulting reports and by the ARC when validating the reports (see ESG 2.5). In late 2023, the book was moved to Smartsheet and notes on the ARC and EQAR Register Committee decisions and discussions were added. The revisions aim to make the book more useful and easier to use compared to the previous format (excel), but its use in practice is still being tested.

ENQA Agency Reviews make use of a variety of channels to collect feedback. Input from agencies and reviewers is gathered systematically and in a structured manner through standard surveys following each review, progress visit and review event. In addition to the formal channels, the presence of an ENQA coordinator on site for each review, and the good relations between ENQA and the experts and agencies with which it works means that feedback is also gathered informally on an ongoing basis.

ENQA also collects feedback from the E4 and separately (annually) from the European Students' Union (ESU) on the performance of their appointed experts and generally on their cooperation with ENQA. ENQA and EQAR meet regularly to discuss challenges and opportunities for improvement of the agency reviews. ENQA's Head of Agency Reviews meets with relevant staff from the EQAR Secretariat on a monthly basis to share updates on ongoing reviews and discuss the practical implementation of reviews. In addition, the leadership of the two organisations meet annually and ENQA's ARC meets with EQAR's

Register Committee occasionally (for the first time in September 2023). These discussions are proving useful in ensuring that the review process meets the needs of all involved parties and in understanding the different ways in which the two organisations use the review reports.

The outcomes of all feedback mechanisms, in particular the collated survey results, are considered by the reviews team after each review or event as well as more comprehensively in the annual analysis of ENQA Agency Reviews (see Annex 2). The resulting report also includes suggestions for improvement by the ARC and analysis of appeals/complaints (if any) of the respective year. Drawing from this material, the reviews team proposes actions to further develop the Agency Reviews and related activities. The analysis also includes the follow-up on previous year's planned actions. The Board discusses and approves the internal report and its public summary<sup>49</sup>, including a set of specific and feasible steps to be taken in the coming year. The Secretariat staff can make small adjustments to the review process immediately without approval from the Board, whereas bigger changes require amendments to the Guidelines or other documents and follow from the Board's discussion on the outcomes of surveys and other reflection (see also ESG 2.2).

Several elements ensure professional implementation of ENQA's review coordination. The recruitment of the Secretariat staff, a task of the Director, includes a careful examination of the applicant's professional profile against requirements on professional and ethical work.<sup>50</sup> As mentioned in the previous section (ESG 3.5), all ENQA review coordinators are trained and the reviews team holds regular meetings to discuss reviews (status, challenges, other issues arising from the reviews). The feedback collected after reviews shows that agencies and experts appreciate the professional and smooth coordination of reviews and support provided throughout the process. The sheer number of reviews coordinated also means that ENQA has a very well tested and refined process and a lot of experience to draw on.

To safeguard the integrity of its processes ENQA has processes to ensure the non-conflict of interest by all involved parties, including the experts, the ARC, the Board, the ACC, and the coordinators (see ESG 3.3 and 2.4).

### **Recommendations from the 2019 review and ENQA's respective follow-up action:**

#### **Panel recommendation**

Regarding ENQA's internal QA system, the expert panel sees room for further improvement. ENQA conducts feedback surveys among its members that underwent evaluations processes. Yet, it is not clear through which channel the feedback is analysed and used to inform actions. This is also true for informal and other formal feedback. The expert panel recommends that ENQA implement standardised procedures to catch all feedback received through different channels and analyse it in a comprehensive way.

#### **ENQA action to recommendation**

Addressed:

<sup>49</sup> Available here: <https://www.enqa.eu/about/>

<sup>50</sup> See ENQA Staff Regulations (available to the review panel upon request). Additionally, the annual appraisal interviews enable the leadership of ENQA to identify the needs for further professional training of ENQA staff, in which case the Secretariat staff is encouraged and supported to attend workshops and conferences (e.g. the European Quality Assurance Forum).

Since 2021, the reviews team has implemented a regular and standardised procedure for analysing the feedback gathered from review activities through the annual analyses of Agency Reviews as described above. The analyses are done now more thoroughly and systematically, and the outcomes are presented to the ARC and Board regularly. However, the resulting analyses are very long and somewhat repetitive, partially due to the structure of the feedback surveys. The reviews team is looking into restructuring the feedback survey forms and annual analyses to make them more concise and to-the-point. The suggestions for actions in the annual analyses could also be divided into short and long-term follow-up points. Overall, there is still room for a leaner, more qualitative-based approach to internal QA, drawing also on evidence from other key partners in agency reviews, such as EQAR. ENQA could also explore the use of artificial intelligence (AI), although caution is needed to ensure this is done in a way that brings genuinely useful information, and maintains integrity and data privacy.

### **Panel recommendation**

While the different elements of an internal QA system (e.g. a book of precedents, collection of feedback, training of reviewers) are present, it may be helpful to have a document that describes the whole system in order to present a more formalised and interlinked internal QA system.

### **ENQA action to recommendation**

Addressed:

In 2021, ENQA developed and published the Policy on the Internal Quality Assurance of ENQA Agency Reviews which describes ENQA's plan-do-check-act (PDCA) cycle. However, the reviews team is planning a revision of the document, e.g., by more clearly defining the document's target audience and separating more clearly the policy part from the processes for internal QA of review-related activities in order to improve the document's use (e.g., when training new staff or reviewers). Despite the need to further develop the document, its drafting in 2021 contributed to clarifying the role and responsibilities of the ARC and ENQA to establish a more structured approach to annual analyses (see above) and thematic analyses (see ESG 3.4). Moreover, bringing everything into one policy has helped to streamline the approaches to feedback and ensure that there are no gaps in the PDCA cycle.

### **Aspects that work well**

- Establishment of the ARC to ensure the consistency and quality of reviews
- The introduction of the project management tool 'Smartsheet' that includes an improved book of precedents

### **Aspects for further attention**

- Lengthy surveys for agencies and experts, and not all the collected feedback is helpful or actionable
- Potential for a leaner, more qualitative-based approach to internal QA, and supported with evidence from other key partners in agency reviews. The use of AI could also be explored

## 4.7 Cyclical external review of agencies (ESG 3.7)

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

**Translation of the standard for the purpose of this review:**

ENQA agency review processes should be evaluated on a regular basis in order to demonstrate their compliance with the ESG, taking into account ENQA's role as a reviewer of agencies rather than higher education institutions.

This is the second external review of ENQA Agency Reviews against the ESG. The first review was carried out in 2019 and coordinated by the Nordic Institute for Studies and Innovation, Research and Education (NIFU).<sup>51</sup> The recommendations received from the previous review were addressed, as described throughout this self-assessment report.

### Aspects that work well

- Work undertaken to discuss and address the recommendations from the previous external review

## 5. ENQA's Compliance with the ESG Part 2

### 5.1 Consideration of internal quality assurance (ESG 2.1)

External quality assurance should address the effectiveness of the internal quality assurance processes described in Part 1 of the ESG.

**Translation of the standard for the purpose of this review:**

ENQA agency reviews should verify whether agencies comply with Part 2 of the ESG and whether they effectively address the standards of ESG Part 1 in their external QA activities.

ENQA Agency Reviews differ from the reviews carried out by QA agencies insofar as the subject of the review is not a programme or an institution, but QA agencies themselves. This means that the Part 1 of the ESG, and the internal QA systems of individual higher education institutions (HEIs) is not addressed directly by the ENQA review. However, in assessing the agencies' compliance with the ESG 2.1, ENQA requests that, in their SAR, agencies provide a mapping of their own standards against the ESG Part 1 and indicate how the agency considers the effectiveness of the institution's internal QA processes. This is used to verify that the agencies' criteria cover the standards of ESG Part 1 and thus meet the requirements of the ESG 2.1. In the external review reports, the panels are requested to reflect upon these mappings. This standard is included in all targeted reviews as an enhancement area but in practice, it is treated more from a compliance perspective. ENQA needs to reflect further on how to address this matter in future targeted reviews (see ESG 2.2).

ENQA Agency Reviews use the standards of Parts 2 and 3 of the ESG (without modifications or additions) as evaluation criteria. All 14 standards are addressed individually in the reviews, and the reports produced by the external review panels have a separate section for each of those standards.

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<sup>51</sup> <https://www.enqa.eu/external-review-of-enqa-agency-reviews/>

### Aspects that work well

- ENQA Agency Reviews request the agencies under review to provide a mapping of their own standards against the ESG Part I and to indicate how the agency considers the effectiveness of the institution's internal QA processes

### Aspects for further attention

- ESG 2.1 is listed as an enhancement area for targeted reviews but in practice it is covered more in terms of accountability and compliance, in the same manner as for a full review

## 5.2 Designing methodologies fit for purpose (ESG 2.2)

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.

### **Translation of the standard for the purpose of this review:**

ENQA agency reviews should be defined and designed in a manner that are fit for purpose. Stakeholders should be involved in the design and continuous improvement of these methodologies.

Fitness for purpose is at the heart of the ENQA Agency Reviews. The methodologies aim at addressing the two key purposes of an external review: accountability and enhancement. As a basic requirement, the review process needs to provide the evidence for ENQA (and EQAR) to take a decision on whether the agency complies with the ESG. Beyond this, the enhancement aspect has always been an important element of the review process, but admittedly less well served than the compliance requirement. Furthermore, adaptability to a wide range of contexts is key to the relevance and success of the review methodologies, and this builds on the broad applicability of the ESG themselves. Several steps are taken to ensure that the local context is taken into account during the review, including inclusion of an expert with knowledge of the region and local language, a section in the SAR dedicated to the agency's operating context, and a specific meeting at the start of the site visit to ensure the panel's understanding of the background and activities of the agency and the higher education system(s) in which it works.

ENQA collects regular feedback from agencies and review experts after each review and progress visit in order to monitor and adjust the review methodologies (see ESG 3.6). The feedback from agencies, supported by the outcomes of the 2019 review of ENQA Agency Reviews, prompted the ENQA Secretariat and Board to explore how to better operationalise the double purpose of accountability and enhancement. At the same time the Board discussed separating ENQA's membership application procedure more clearly from the review process (see section 3). These discussions led to the revision of the methodology for ENQA Agency Reviews and the design of targeted reviews.

The methodology revision in 2020-2021 included consultation sessions with members and affiliates led by a review follow-up group composed of members from the Board and Secretariat. The discussions with agencies were very successful in generating ideas about how the review process can be made more fit-for-purpose and based on these, the follow-up group formulated a proposal for changes to the review methodology which were reviewed and approved by the Board and published in April 2021. The Guidelines introduced a variety of new elements, the most important of which include:

- A three-point compliance assessment (see ESG 2.5);
- Changes in the application procedure for ENQA membership (see section 3, ESG 3.1 and 2.5);

- Establishment of the ARC (see section 3, ESG 3.1 and 2.5).

In 2020-2021, ENQA collaborated with EQAR to develop a new targeted review process to help avoid 'evaluation fatigue' and a risk that external reviews of agencies turn from meaningful exercises to bureaucratic ones.<sup>52</sup> The new review process was launched in summer 2021, with the first reviews using this methodology in 2022. Overall, the following seven key goals of the targeted review were set when designing the methodology: 1) shorter review; 2) lower review fee; 3) less staff work; 4) strengthened work on the self-selected enhancement area; 5) stronger focus on the remaining challenges with the ESG; 6) providing evaluation of new or changed external QA activities; and 7) evaluating substantial changes within the agency.

In 2023, after the experience from the first 19 targeted reviews (concluded and ongoing), ENQA carried out an internal evaluation of the methodology to review if and how the set goals were being reached, and how the overall value of the targeted review was perceived. The evaluation included an analysis of feedback collected from the agencies and experts after their review, and specific feedback sessions with experts, agencies, and ARC members as well as a joint ARC-EQAR Register Committee meeting. It also considered the perspective of ENQA staff members who coordinate the reviews. The collected information confirmed that while the accountability aspect of the targeted reviews is well covered within the review procedure, its enhancement dimension needs to be further developed and more guidance provided to agencies and experts on how to address it. Limitations to the enhancement dimension and variation in the experience of the review process from the agency perspective have been linked to the need to address new or changed QA activities or other substantive changes in the agency from a compliance perspective in order to cover the terms of reference (ToR) of the review (see ESG 2.3) or, in some cases, linked to the profile of the experts (see ESG 2.4). Moreover, on the coverage of ESG 2.1, the initial experience shows that this standard is covered within the targeted reviews in terms of accountability, rather than as an enhancement aspect as initially foreseen. The evaluation also revealed that targeted reviews are not much shorter, nor do they require less work compared to full reviews (although the work may be different). At the same time agencies have indicated that they do not necessarily expect the review to be easier, but that it should provide more added value from the enhancement perspective. While the internal evaluation revealed several aspects that need further consideration to improve the methodology, on balance agencies and experts' feedback on targeted reviews has been positive, and a full revision of the methodology is not required. Changes should rather focus on refining approaches to the enhancement area including ensuring that all targeted reviews address it sufficiently, reflecting on whether ESG 2.1 should continue to be included as an enhancement area, and better communicating the expectations regarding the review as a whole.

Some adjustments to the targeted review methodology have already taken place or are underway. Based on the initial feedback from experts and the coordinators' experience regarding the level of workload for the panel members, the panel composition of the targeted reviews was adjusted in October 2022 to include four panel members instead of three (see ESG 2.4). Moreover, to strengthen the enhancement dimension, the Secretariat's reviews team has started preparing an internal portfolio of good practices in addressing the specific enhancement-led needs to be used as inspiration in future reviews. Additionally, the briefings for the experts and the agencies on the enhancement dimension have been strengthened and will receive further attention in the upcoming targeted reviews. However, there remains an unavoidable tension between the desire to focus on the enhancement aspect, and the need to still provide a sufficient

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<sup>52</sup> These risks were identified through feedback from ENQA members, the 2019 external review of ENQA Agency Reviews and 2020 self-evaluation of EQAR.

evidence base for confidence and transparency in the agency's continued compliance with the ESG. Moreover, in order to ensure continued transparency and accountability for the agency's activities (also for the purposes of the Bologna Process commitments on QA) the subsequent review for each agency must be a full review, against all standards of the ESG. However, it will be a couple of years until the first agencies do this cycle so the full impact of the targeted review and implications of the approach of alternating the methodologies are still to be explored.

The specificities of partial reviews have not changed since the 2019 external review, however, the overall changes in the ENQA Agency Reviews methodology (see above) apply to this activity as well.

ENQA's stakeholders provide considerable input and feedback, which shapes the development of the review methodology. Following any changes, it is also important that the feedback loop is closed, and stakeholders, but particularly agencies and experts, are clearly informed about the aims and approaches used, including any changes. To achieve this, ENQA organises seminars for agencies preparing for an external review. The latest one was in 2022 and the next one is planned for 2025. The seminar is open to QA agencies that are preparing to undergo an external review against the ESG (full or targeted). It gives insight into the purpose and objectives of the review, discusses best practices related to the self-assessment process and elaborates on how to maximise the benefits of the external review. However, it is not possible to organise the event on an annual basis due to financial reasons, thus not all agencies can benefit from the event the same way.<sup>53</sup> Looking forward, ENQA could consider implementing this seminar as an online event in order to reduce costs and make it more accessible for agencies. This would be in line with other online sessions that ENQA has implemented as an efficient and cost-effective approach to reaching an audience, especially after gaining experience on this during the Covid-19 pandemic. However, bringing agencies together for face-to-face exchange can be more efficient and valuable. Thus, a balance between online and on-site review events need to be kept in mind. For trainings of experts on the revision of methodologies, see ESG 2.4.<sup>54</sup>

### **Recommendations from the 2019 review and ENQA's respective follow-up action:**

#### **Panel recommendation**

The panel recommends that ENQA revise and diversify its methodology so that the agency review processes are more meaningful for all agencies who undergo subsequent rounds of evaluations and for professionally oriented agencies.

#### **ENQA action to recommendation**

Addressed:

In 2021 ENQA launched the targeted reviews that are open for agencies that have undergone at least two successful reviews against the ESG. The internal evaluation of this activity reveals that the review has potential to be meaningful and useful, however, experiences so far vary, and the enhancement dimension needs to be further developed (see above).

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<sup>53</sup> Although a fee is charged to attend the event, it covers only core implementing costs and does not fully cover overheads.

<sup>54</sup> Additionally, in 2024, ENQA launched the Update on ENQA Agency Reviews which shares information related to the Agency Reviews with ENQA's pool of reviewers. The mailing is planned to be sent annually.

ENQA has not revised the review methodology specifically for the professionally oriented agencies. When coordinating reviews of subject-specific agencies, ENQA aims to involve in the panel at least one member that is from the field of the work of the agency.

### **Panel recommendation**

A recommendation put forward in different interviewees [sic] was that ENQA should increase focus on all the work the agencies do, beyond only ESG compliance. The panel echoes this recommendation. The ESG should be read and interpreted in a more flexible manner in order to address each individual case from an enhancement-led perspective. The review could start from what has changed since the last review and ways to move forward. A better balance between recommendations and suggestions for improvement should be achieved.

### **ENQA action to recommendation**

Partially addressed:

During the discussion of ENQA's 2021-2025 strategy it became clear that members want to keep ESG compliance as the decisive membership criteria. Most agencies also apply with the same review report for EQAR registration and assessing agency's compliance against the ESG is a requirement from EQAR. Additionally, EQAR requires that issues flagged in the previous review are addressed in the next review. Therefore, the agency reviews within the EHEA need to address these requirements first and foremost, thus somewhat limiting the scope of such reviews. However, the targeted reviews aim to focus more on the self-selected enhancement area(s), in addition to covering the shortcomings and changes since the last full review. Also, it is important that the review process does not stray into consultancy on agency activities and to acknowledge that ENQA as a membership organisation provides agencies with other services and activities that go beyond the ESG-compliance matters.

Regarding the recommendation on better balance between recommendations and suggestions for future improvement, the ENQA review coordinators continue to explain to panel members the definition and purpose of these two during trainings, briefings and screenings of review reports. The ENQA Secretariat is also organising a specific seminar for panel secretaries in autumn 2024, which aims at providing current and future secretaries with more guidance on review report writing, including formulation of recommendations and suggestions (see ESG 2.4).

### **Panel recommendation**

To strengthen the contextual relevance, one improvement would be the introduction of a national expert could be introduced [sic] as an observer on the panel when none of the panel members is acquainted with that particular national context and/or language of the agency.

### **ENQA action to recommendation**

This recommendation is considered under ESG 2.4.

### **Panel recommendation [given under ESG 2.3]**

The panel recommends that ENQA considers how second and third reviews could provide stronger enhancement value.



### **ENQA action to recommendation**

Addressed:

With targeted reviews ENQA aims to provide stronger enhancement value to agencies that have already undergone two or more reviews. While the enhancement dimension is built into the methodology (addressed in the agency's SAR, in panel's preparation, during site visit and in the external review report), its value to the agencies vary. Some agencies have benefitted from this more, e.g., expressing appreciation for the workshops on the self-selected enhancement standard(s) organised during site visits, while others have experienced that compliance matters have dominated the review or perhaps the experts' profiles were not appropriate to provide added value on enhancement dimension. ENQA is looking into ways of further improving the enhancement dimension (see above).

### **Aspects that work well**

- Revision of the methodology for ENQA Agency Reviews and the design of targeted reviews, to better fit the various needs of agencies
- Close involvement of stakeholders in the design and revision of the review methodologies

### **Aspects for further attention**

- Full reviews still tend to lean toward the compliance aspect
- Ensuring that the enhancement dimension is covered well in all targeted reviews by including more guidance to agencies and experts and by reflecting the scope of the enhancement areas in a more comprehensive manner

## **5.3 Implementing processes (ESG 2.3)**

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.

#### **Translation of the standard for the purpose of this review:**

The ENQA Agency Reviews process should be reliable, useful, pre-defined, implemented consistently and published. The process should 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.

Processes under ENQA Agency Reviews consist of the four main elements of the external review as defined by ESG 2.3: self-assessment, external evaluation, external review report, and follow-up. The review processes are published in the Guidelines for ENQA Agency Reviews (for full reviews) and Guidelines for Targeted Reviews. Specificities of partial reviews are described in the Policy for Partial Reviews. All documents are publicly available on the ENQA website.

The following elements are common to all activities of ENQA Agency Reviews, i.e. full, targeted and partial<sup>55</sup> reviews (see figure 3):

Figure 3. Diagram of processes for ENQA Agency Reviews



### Initiation of the process

The ENQA Agency Review is initiated by a request from an agency that wants to undergo a review. For full reviews, agencies should contact the ENQA Secretariat to initiate the review process about 14 months prior to the expected completion of the review (i.e. the validation of the review report). The targeted review process lasts for up to 9-11 months from the request to the completion of the procedure. The general timelines for full and targeted reviews are included in the respective Guidelines.<sup>56</sup> For partial reviews only, from ENQA’s side the timing to initiate the process remains open to accommodate the wishes of the agency and allows ENQA to anticipate the process within the two-year period of the membership under review. However, if the partial review is coordinated for EQAR-purposes (‘focused review’), the review needs to take place within 18 months from the date of the rejection decision by the EQAR Register Committee.

During the initiation phase, ENQA and the agency agree on the terms of reference (ToR), including the activities to be covered in the review as well as the overall timeline. Agencies wishing to apply to EQAR with the same review report will need to specify this intention when first requesting the review. For dual-purpose reviews, the agency, ENQA and EQAR prepare tripartite ToR. Issues included in the scope of the review in the ToR need to be covered in the agency’s SAR and in the external review report. Each review is assigned to an ENQA Secretariat staff member who acts as the review coordinator. This person serves as the main contact person for the agency and the review panel and supports all those involved throughout the process.

### Self-assessment

The SAR provides a basis for the review panel to get familiar with the procedures of the agency and to request, or collect on its own, additional information that might be needed. In order to be accepted by ENQA, the SAR needs to follow ENQA’s guide of content (available online<sup>57</sup>) and cover all indicated elements as well as all issues set out in the ToR. Full and targeted reviews have separate guides of content, whereas the one for partial reviews is adapted from the one for full reviews. The SAR is expected to contain both factual information and analytical reflections, and in the case of a second or subsequent review, the agency is also expected to follow up on recommendations from the previous review. The review coordinator screens the SAR to make sure that all required elements have been addressed in the

<sup>55</sup> By definition, partial reviews should focus on the deficiencies following the full review, thus they are not expected to include the step of a follow-up.

<sup>56</sup> For reviews used for EQAR registration, ENQA needs to take into account EQAR’s regulations. As per EQAR Procedures for Applications, §3.21 “The report should be submitted no later than 6 months after the site visit and no later than 12 months after EQAR confirmed eligibility of the application.”:

[https://www.eqar.eu/assets/uploads/2022/07/RC\\_01\\_I\\_ProceduresForApplications\\_v5\\_0.pdf](https://www.eqar.eu/assets/uploads/2022/07/RC_01_I_ProceduresForApplications_v5_0.pdf)

<sup>57</sup> Full reviews: <https://www.enqa.eu/wp-content/uploads/Guide-of-Content-SAR-1.docx>

Targeted reviews: <https://www.enqa.eu/wp-content/uploads/Guide-of-Content-SAR-Targeted-Review.pdf>

document and that the information reads clearly. After the screening, the agency is given two weeks to provide the coordinator with a revised report, which the coordinator then forwards to the panel. The agency is expected to publish the SAR on its website, and ENQA in turn publishes the agency's link on its website.

### **External evaluation**

ENQA commissions a panel of independent reviewers to carry out the review (see ESG 2.4). The panel is expected to carry out the review by thoroughly analysing the SAR, studying additional material (such as information available on the agency's website), and attending a 2,5-day site visit at the agency (in case of full and targeted reviews). For partial reviews only, the panel decides whether a site visit should be implemented based on the complexity of identified weaknesses and the evidence provided through the SAR and other documentation. If a site visit is implemented, its duration is normally two days. Other arrangements such as a visit by the panel chair only, or study of the SAR and additional documentation without a visit may also be considered if appropriate. For all reviews, the purpose of the site visit is to verify and expand on the information provided in the SAR through meetings with agency representatives and stakeholders. It is also an opportunity to engage in a developmental exchange between the agency and the panel; this aspect is particularly important in targeted reviews. During the Covid-19 pandemic, ENQA introduced online site visits.<sup>58</sup> However, since May 2022 all the site visits have been organised on-site again.<sup>59</sup>

Since 2021, full and targeted reviews now include a mandatory online meeting between the panel and the agency, taking place well before the site visit. This meeting focuses on the specific national/legal context in which an agency operates and on the key characteristics of the agency's external QA activities, aiming to ensure that the panel has a good understanding of these before the visit. Previously this meeting was organised on-site the day before the first day of the site visit and was optional for panels. The changes were made to improve the panels' understanding of the agencies' operating contexts, which had been identified as a key factor in ensuring a successful review.

### **External review report**

Based on the information collected through documentation and the site visit, the review panel drafts the external review report using a template provided by ENQA. Before sending the report to the reviewed agency for factual corrections, the review coordinator checks the report for completeness of information provision, consistency in following the report template, and overall clarity of text. After the factual check by the agency, the review panel finalises the report, which is then submitted to the ARC which will scrutinise the report to ensure it meets the necessary requirements and is consistent with other reports' decisions on compliance. Prior to final validation of the report, the ARC has the option to request additional (documentary) evidence or clarification from the review panel, review coordinator or the agency if needed, to better understand the agency's circumstances and work before or during the site visit.<sup>60</sup> The ARC can also request changes to the report, if necessary. The site visit remains the cut off point for evidence provision and no further developments at the agency are considered after this visit. If the ARC requests clarifications, the validation of the external review report by the ARC is consequently

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<sup>58</sup> See ENQA protocol for online site visits due to force majeure, available here: [https://www.enqa.eu/wp-content/uploads/ENQA-protocol-for-online-site-visits\\_v2.2.docx](https://www.enqa.eu/wp-content/uploads/ENQA-protocol-for-online-site-visits_v2.2.docx)

<sup>59</sup> In case of force majeure, online site visits are still a possibility as per the Guidelines.

<sup>60</sup> So far, all additional clarification or amendment requests by the ARC (or before the establishment of this body by the Board) have been addressed to the respective review panel, which have consequently revised the review report, and exceptionally engaged in an additional (online) site visit, such as the case of ECAQA (2021).

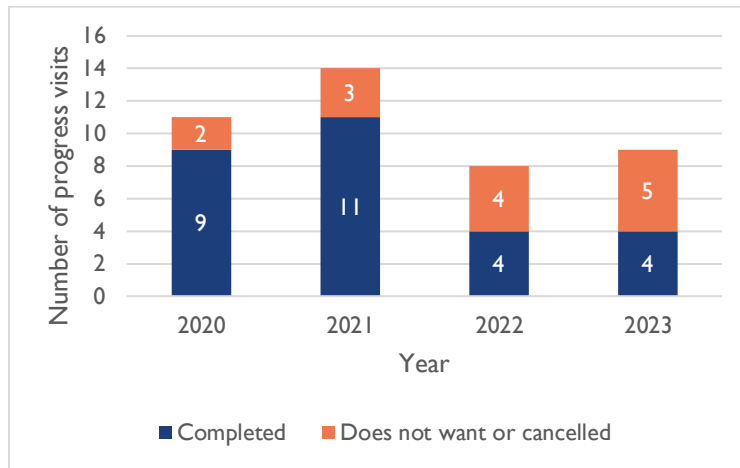
postponed to its next meeting. The ARC then validates the report and issues its statement. At this point the report is considered final and is published on the ENQA website together with the ARC statement, and the agency can then use the report to apply for EQAR listing and/or ENQA membership.

### **Follow-up**

A follow-up is an integral part of a review process and supports the agency in its continuous reflection and the development of its work. Agencies that successfully undergo a full review are required to submit a follow-up report at the latest two years after the validation of the final external review report. The report should demonstrate how the agency has addressed the recommendations made in the review report and explain any further significant changes or developments in the agency. The follow-up report is sent to the ENQA Secretariat, which will scrutinise it prior to discussion by the ENQA Board. After a response letter from the Board, which highlights interesting developments and areas of concern, the report is published on the ENQA website on the same page as the review report. Overall, this part of the procedure has not changed significantly since the 2019 review. Thus, while the follow-up reports give the agencies an opportunity to reflect on their activities and the improvement plans half-way through the cycle, there is a possible risk that agencies take the follow-up as a merely formal procedure as there are no concrete consequences to it. This might undermine the impact and benefits. Nevertheless, the response letters on the follow-up reports in some cases contain additional observations that may help the agencies move forward. Additionally, since 2021 ENQA requires that the follow-up report is produced before the agency's progress visit so that the report can be used to inform the progress visit (see below). For the time being, ENQA does not see the need to further adapt the follow-up procedure since this part of the process serves its defined set of purposes (i.e., the reporting of an agency on its improvement/development measures taken after the review). Nevertheless, it might be worth considering whether follow-up reports could be addressed more thoroughly and meaningfully, with possible consequences introduced for agencies should they in future not be able to show sufficient progress in areas for improvement indicated in the previous full review report, and/or analysing the content and putting more emphasis on this as a starting point for the next review.

The follow-up procedure related to full reviews also includes the option of a progress visit to the agency, usually conducted by two reviewers from the original review panel (whenever possible). This voluntary visit normally takes place two to three years after the validation of the final external review report and after the publication of the follow-up report. It can be organised on-site or online. The progress visit aims to generate a stronger, enhancement-oriented dialogue with the agency and experts on topics that the agency finds particularly relevant for its context. When revising the methodology in 2021, ENQA further clarified the purpose and approach to progress visits. The Guidelines now include further description of the expected content of the activity, aiming to better support the context-sensitive and enhancement-led dialogue between the agency and experts. In 2020-2023, 67 percent of the agencies opted for a progress visit, indicating members' support for this activity (see figure 4). During the last two concluded calendar years, agencies opted less often to engage in a progress visit, most often indicating that this is due to a busy post-Covid period which required agencies to restart their on-site visits to HEIs. Other reasons included changes in the agency's leadership, lack of time due to revision of existing methodologies, or the development of new ones.

Figure 4. Number of progress visits in 2020-2023



The follow-up for targeted reviews consists of an online seminar, which all agencies that have undergone a targeted review are required to attend. It is expected that ENQA will organise such a seminar once every two years. The first seminar is taking place in autumn 2024, therefore ENQA does not yet have experience on how the new follow-up concept works in practice. It is planned that the seminar will provide an arena for strategic conversations that allow the agencies to reflect on their key challenges, opportunities, and priorities, primarily related to the self-selected enhancement areas. As attendance at the seminar is obligatory, it is organised online in order not to create additional costs for the agencies.

Partial reviews serve as a separate review activity for those ENQA member agencies that did not achieve ESG compliance at the last full review. This review addresses all elements of concern, including all standards where non-compliance or partial compliance was the outcome and the related recommendations. When the partial review is successful for ENQA membership purposes, the agency is expected to submit a follow-up report and can have progress visit. If the partial review serves only as EQAR's focused review, no follow-up step by ENQA is included. In the past five years, ENQA conducted only one partial review for its membership purposes.

The feedback from agencies and experts collected after the reviews is overall positive regarding the different aspects of the process (e.g. the Guidelines, coordinators' work, SARs, site visits, external review reports and progress visits). However, some suggestions for further improvement were provided, including more detailed guidance on partial review procedure (particularly on SAR drafting) and more guidance on the drafting of the external review reports (see ESG 2.6). Regarding progress visits, there are some different opinions on e.g., how formal the activity should be, how free the agencies can be in defining the programme, and to what extent experts are expected to report back to the agency (either verbally or in a written format).

While ENQA introduced several mechanisms and tools to manage the review processes in a more efficient manner (e.g., the tripartite ToR, joint panel briefings with EQAR), the reviews are still rather lengthy if the report validation and decision-making processes are taken into account. There may be a delay in providing the validated review reports to the agency (and thus to EQAR) if the ARC is not satisfied with the quality of the review report and the report validation is postponed to the next meeting of the ARC. While in theory this should lower the occurrence of the EQAR Register Committee (RC) requesting further information from the review panel or the agency under review, in many cases the Register Committee still asks for such additional information, thus further prolonging the decision-making phase

that follows the review. ENQA and EQAR have identified this issue as a challenge and will address it through the ENQA ARC-EQAR RC meetings that were initiated in 2023.

ENQA is also aware of the slightly different timelines between ENQA's partial review and EQAR's focused review and that the use of two different terms by the organisations can be confusing for agencies. ENQA and EQAR should look into possibilities of addressing these differences as well.

### Recommendations from the 2019 review and ENQA's respective follow-up action:

#### Panel recommendation

The panel recommends that ENQA considers how second and third reviews could provide stronger enhancement value. Moreover, both the progress visits and follow-up procedure need further clarification in order to function as effective enhancement tools.

#### ENQA action to recommendation

Addressed:

The recommendation regarding second and third reviews is considered under ESG 2.2.

In the revised 2021 Guidelines, the progress visit activity is defined in more detail. All the progress visits are expected to start with a strategic meeting (or meetings) with the agency's leadership, where the key questions/topics should be addressed. The role of the experts in the progress visit was clarified and it was confirmed that formal reporting is not required. No major changes to the follow-up report procedure were made apart from the redistribution of responsibilities between the Secretariat and the Board. In ENQA's view, the design of the follow-up as being implemented at the moment is fit for purpose.

### Aspects that work well

- Well-defined, reliable and consistent procedural steps
- Introduction of a better guided, context-sensitive and enhancement-oriented dialogue as part of the progress visits
- Overall value of the coordinators' support throughout the review

### Aspects for further attention

- Looking into possibilities to better align the procedure for partial review for ENQA purposes and focused review for EQAR purposes
- More meaningful use of the follow-up reports
- Lengthy review process from initiation to the decision-making, especially if it serves both ENQA membership and EQAR registration purposes

## 5.4 Peer-review experts (ESG 2.4)

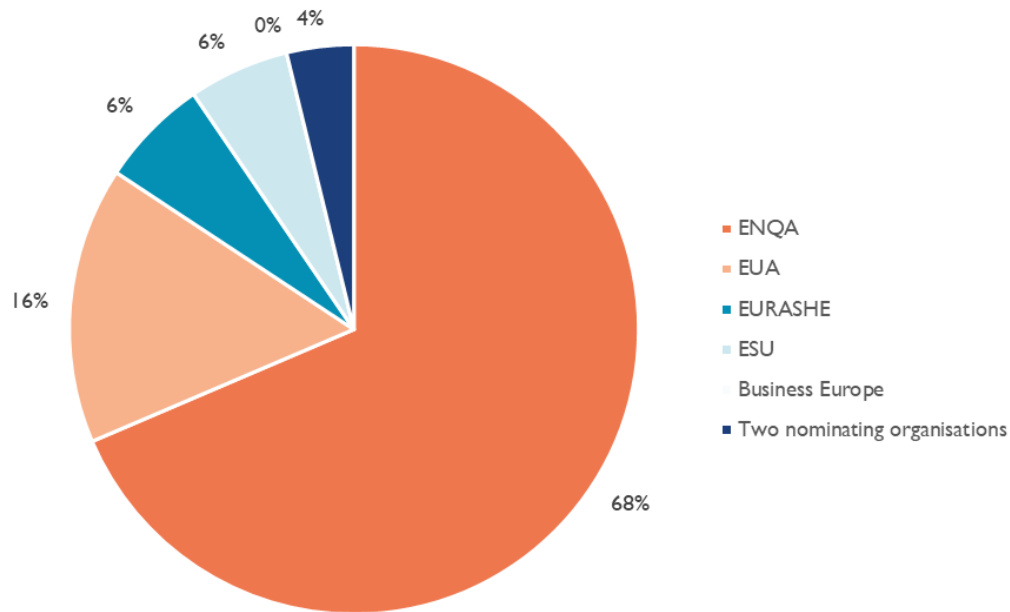
External quality assurance should be carried out by groups of external experts that include (a) student member(s).

#### Translation of the standard for the purpose of this review:

ENQA Agency Reviews should be carried out by groups of external experts, including (a) student member(s), whose composition ensures various perspectives from relevant stakeholders.

For agency reviews, ENQA has an expert database which is updated through regular calls for nominations to ENQA members and stakeholder organisations. Non-solicited nominations are also considered. ENQA receives nominations of experts from ENQA members as well as from the European University Association (EUA), the European Association of Institutions in Higher Education (EURASHE) and the European Students' Union (ESU) (and in case needed, from BusinessEurope). From this database, ENQA invites experts at its own discretion to ENQA expert training sessions according to the expected needs in the coming years. Only nominees who are trained by ENQA are then included in the ENQA pool of trained experts and may be appointed to panels (see figure 5). The ENQA pool of trained experts currently<sup>61</sup> consists of 158 people from 35 countries (see figure 6), out of which 106 experts have participated (or are currently participating) in a review.

Figure 5. ENQA pool of experts by nominations



<sup>61</sup> As of June 2024. The majority of experts come from EHEA countries. ENQA has trained experts from Russia but they are currently not being used.



Figure 6. ENQA pool of experts by country of origin



ENQA Agency Reviews are carried out by experts with a wide range of professional experience in higher education and QA. The review panels for full and targeted reviews include at least four external experts, including one or two QA professionals (of which at least one should be currently employed by a QA agency and both have been engaged in QA within the past five years), (an) academic(s) at an HEI, and (a) student member(s).<sup>62</sup> The panels for targeted reviews were originally designed to consist of three members (one QA professional working at an agency, one academic, and one student), however, the experience and feedback from the first reviews showed that the workload for three experts was too high, and it was also challenging to meet the necessary criteria for panel compositions with only three people. Thus, in autumn 2022, the number of experts in a panel was increased to four. Partial reviews employ a panel of three to four people including at least one academic, one student, and one QA professional. Whenever possible, one or more of the experts who participated in the latest full review are used so that the panel can get a comprehensive picture on the agency.

For full and targeted reviews, two of the experts are appointed as panel chair and panel secretary, respectively. Each expert is expected to contribute to the work of the panel, examine the SAR and other relevant documentation, actively participate in the site visit, and contribute to the external review report. Nevertheless, the review chair has overall responsibility for the review, the assessment of the agency against the ESG, the production and quality of the report, and to ensure the ToR of the review are respected. The review secretary is specifically assigned to lead the preparation of the site visit programme and draft the final report in collaboration with the other experts. The detailed list of tasks for each of the

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<sup>62</sup> When requested by the agency or when considered particularly pertinent based on an agency's profile, other stakeholders may be included in the review as well (for example, a representative of the labour market). This is always done in dialogue with the agency. In such cases, this person may either replace the second QA professional or be appointed in addition to the four panel members, depending on the importance to individually represent the voice of such stakeholders in the review. Should the fifth panel member be added to the review, the agency needs to cover an additional fee and the travel expenses of this person. In practice, however, the option of including other stakeholders or a fifth panel member is not being deployed by the agencies.



experts' roles is published in the Guidelines (p. 14-17). Partial review panels do not include a secretary; the external review report is written by the chair (in collaboration with other experts).

The Secretariat's reviews team is responsible for composing panels against a set of criteria described in the Guidelines (p. 13-14) and the approval process includes verification from the ARC, agency and EQAR Secretariat (if the agency applies also to EQAR) (see ESG 3.3).

Experts are expected to follow the Code of Conduct which, among other issues, states that the experts' duties include acting with strict impartiality and objectivity, and identifying and declaring any real or apparent conflict between personal interests.<sup>63</sup> The Code of Conduct is part of the contract between ENQA and the expert, which also establishes that experts engaged by ENQA are acting in their personal capacity and do not represent their nominating organisations. Experts are required to notify the ENQA review coordinator of any connection which could result in a real, potential, or perceived conflict of interest. For instance, experts should have not been employed by the reviewed agency for the past five years, including serving as an expert for the agency.

Training sessions for new experts are usually organised jointly for all expert profiles (i.e. QA professionals, academics and students). The training sessions provide experts with the necessary knowledge and guidance on the use of the ESG, on the review process, and on compliance assessment. The sessions also include explanations on expectations from the ARC and EQAR. Some experienced experts (chairs and secretaries) are invited to take part in each training session to share their experiences and good practice. While much of the content is presentations, the reviews team aims to make the training sessions also interactive by including role play and group work. In 2021, ENQA organised its first online training for experts due to Covid-19 and restrictions on travelling. Following the good experience of the format and for financial reasons (see ESG 3.5), the 2022 and 2023 trainings were organised online as well.<sup>64</sup> The next larger training is planned for 2025, although in June 2024 the reviews team organised a small-scale training for some individuals that have a specific profile needed for reviews in 2024-2025. The feedback gathered from the participants of the online trainings shows that they greatly appreciated them, respondents especially praising the interactive sessions. While some participants expressed preference for face-to-face training, the majority of the respondents were satisfied with the online format.

In addition to the training for new experts, ENQA regularly organises a seminar for experienced reviewers to keep their knowledge up-to-date, exchange experience, and discuss further development of the review methodologies. The most recent seminar, organised in September 2023 in Barcelona, Spain, was specifically used to discuss the targeted review methodology, particularly approaches to the enhancement aspects.<sup>65</sup> In December 2021, ahead of the first targeted reviews in 2022, ENQA organised an online reviewers' seminar to provide the experts with information on the targeted reviews methodology, and to facilitate discussion and questions. The seminar was recorded, and the recording was made available to the trained experts. Furthermore, ENQA is organising a specific online seminar for the panel secretaries in autumn 2024. This seminar aims to explore and share good practices and challenges when preparing the external review report, as well as to discuss readers' perspectives on the use of the reports.

Experts in each panel attend an online briefing at the beginning of each review process where the coordinator of the review reminds experts about the purpose of the review; roles and responsibilities;

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<sup>63</sup> <https://www.enqa.eu/wp-content/uploads/ENQA-Code-of-Conduct-for-reviewers.pdf>

<sup>64</sup> The 2023 training materials are available here: <https://www.enqa.eu/events/enqa-agency-reviews-15th-training-of-reviewers/>

<sup>65</sup> <https://www.enqa.eu/events/enqas-2023-experienced-reviewers-seminar/>

use of the ESG; timeline and management of the site visit; report drafting; and the decision-making process. The briefing is also an opportunity to address any questions from the panel and plan the review. Staff from the EQAR Secretariat join briefings of reviews that are used for EQAR registration to explain the scope of the review and to clarify any questions regarding the ToR. This practice, introduced in 2021, has been helpful in clarifying EQAR's expectations to the panel and ENQA review coordinator and helps prevent misunderstandings emerging later in the process.

From the Secretariat's perspective, the pool of experts is good in terms of number of people, experience and diversity. However, there are some challenges such as having enough active students and academics and sometimes it is difficult to fulfil the language and/or system knowledge requirement, especially for small higher education systems where the occurrence of conflict of interest is higher. Moreover, there is a persistent challenge related to having good and available secretaries, for which reason ENQA is organising a specific seminar for panel secretaries (see above). Regarding targeted reviews, there is a challenge to ensure that all panels include members that can fully support agencies on their self-selected enhancement area.

According to the collected feedback, agencies are overall happy with the panel compositions and the panels' performance. Also, the majority of experts are satisfied with the panel compositions and collaboration with other panel members. In general, the aspect bringing least satisfaction from both agencies and experts is the inclusion of local language skills and knowledge of the higher education and QA system in which the agency operates – these issues persist even if the reviews team and ARC have made more effort in ensuring that all panels have at least one expert that satisfies these criteria.

### **Recommendations from the 2019 review and ENQA's respective follow-up action:**

#### **Panel recommendation [given under ESG 2.2]**

To strengthen the contextual relevance, one improvement would be the introduction of a national expert could be introduced *[sic]* as an observer on the panel when none of the panel members is acquainted with that particular national context and/or language of the agency.

#### **ENQA action to recommendation**

Not addressed:

As introducing an observer in the review panel would imply an increase in the review fee, ENQA has not considered this addition. However, the reviews team has further strengthened the efforts to include at least one expert with knowledge of the system and language of the agency in each panel. When asking for nominations and selecting new experts to be trained, the reviews team prepares the invitations with the language/country profiles needed for upcoming reviews in mind. This applies also to experts needed for subject-specific agencies' reviews. Moreover, since 2023, the reviews team has composed all the upcoming panels jointly well ahead of the reviews (as opposed to former practice where each coordinator was individually responsible for panel composition for the reviews they coordinated). This new approach allows the team to optimise resources and share knowledge and to ensure that experts are allocated to reviews in which their knowledge and skills can be best used. It also allows the reviews team to spot any additional training needs well ahead of the planned reviews.

The ARC is also carefully monitoring that language and system knowledge criteria are fulfilled when approving the panels.

Additionally, it is noteworthy to mention that all full and targeted reviews now also include a mandatory online meeting with the agency's resource person that aims to ensure that panels have a good understanding of the agencies' contexts (see ESG 2.3).

### Aspects that work well

- Reviews are carried out by experts with a wide range of professional experience in higher education and QA, nominated by stakeholder organisations
- Thorough trainings of experts, including Reviewers' seminars for experienced experts and improved communication with experts to keep them informed of developments

### Aspects for further attention

- Ensuring active students and academics in the experts' pool
- Ensuring good and available secretaries in the experts' pool
- Fulfilling the language and/or system knowledge requirement especially for smaller higher education systems where the occurrence of conflict of interest is higher
- Balance between online and onsite trainings

## 5.5 Criteria for outcomes (ESG 2.5)

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.

### **Translation of the standard for the purpose of this review:**

Any outcomes or judgements made as the result of ENQA agency reviews should be based on explicit and published criteria that are applied consistently.

The ENQA Agency Reviews use Parts 2 and 3 of the ESG as the criteria for the review process, and the resulting report is used as the basis for decisions on ENQA membership (taken by the ENQA Board) and EQAR listing (taken by the EQAR Register Committee). The criteria, forms of outcomes, judgement scale, and decision-making process are explained in the Guidelines which are published on ENQA's website and referenced during each review for the agency and the panel.

ENQA Agency Reviews are evidence-based. Under each ESG standard, the reports should include evidence<sup>66</sup>, analysis<sup>67</sup> and conclusion, which is the panel's judgement on compliance (see figure 7). In 2021, when revising the Guidelines, the ENQA Board changed the judgement scale from a four-point to a three-point compliance assessment (bringing it in line with the scale used by EQAR). In practice, ENQA merged its former 'fully compliant' and 'substantially compliant' into 'compliant'. The definitions of the judgements are as follows<sup>68</sup>:

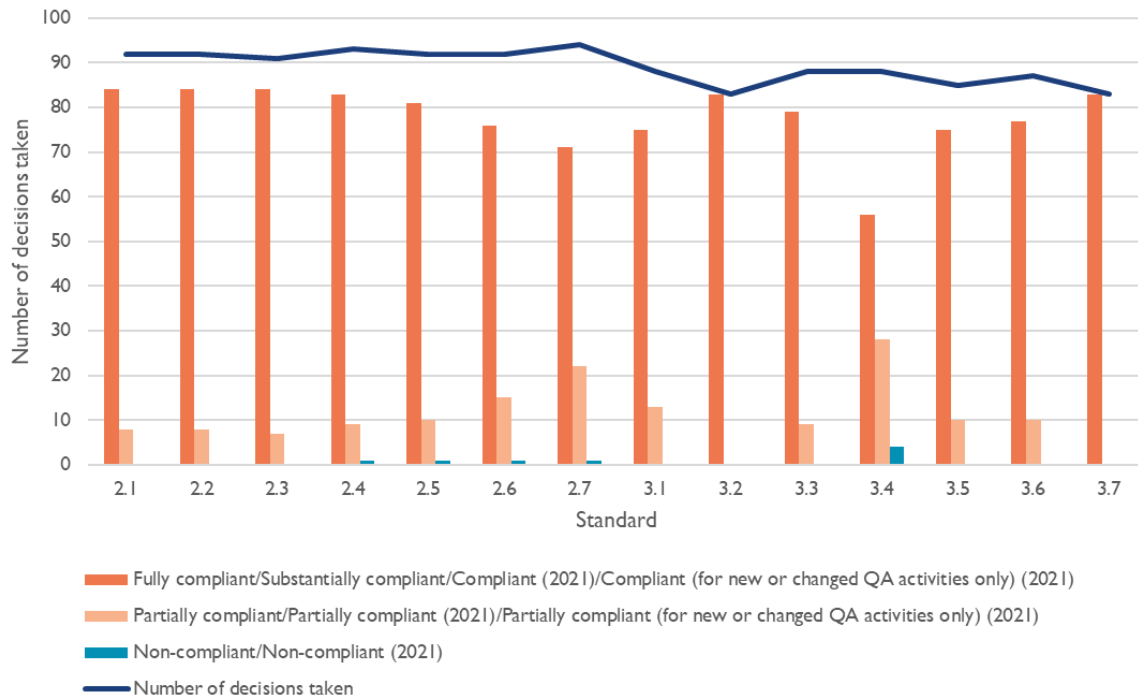
<sup>66</sup> A short description of the evidence gathered – making reference to meetings or documentation explored and – where relevant – to changes implemented since the previous review.

<sup>67</sup> A consideration of how far, based on the evidence available, the agency does (or does not) meet the ESG standard and eventual reasons or explanations for any lack of compliance.

<sup>68</sup> Guidelines, p. 25

- *Compliant: The agency is entirely or to a large extent in alignment with the ESG standard, which is implemented in an effective manner, and the principle/spirit of which is followed in practice.*
- *Partially compliant: Some aspects or parts of the ESG standard are met while others are not. The interpretation of the ESG standard is correct, but the manner of implementation is not effective enough.*
- *Non-compliant: The agency fails to comply with the ESG standard.*

Figure 7. Conclusions by the panels in 2019-2023



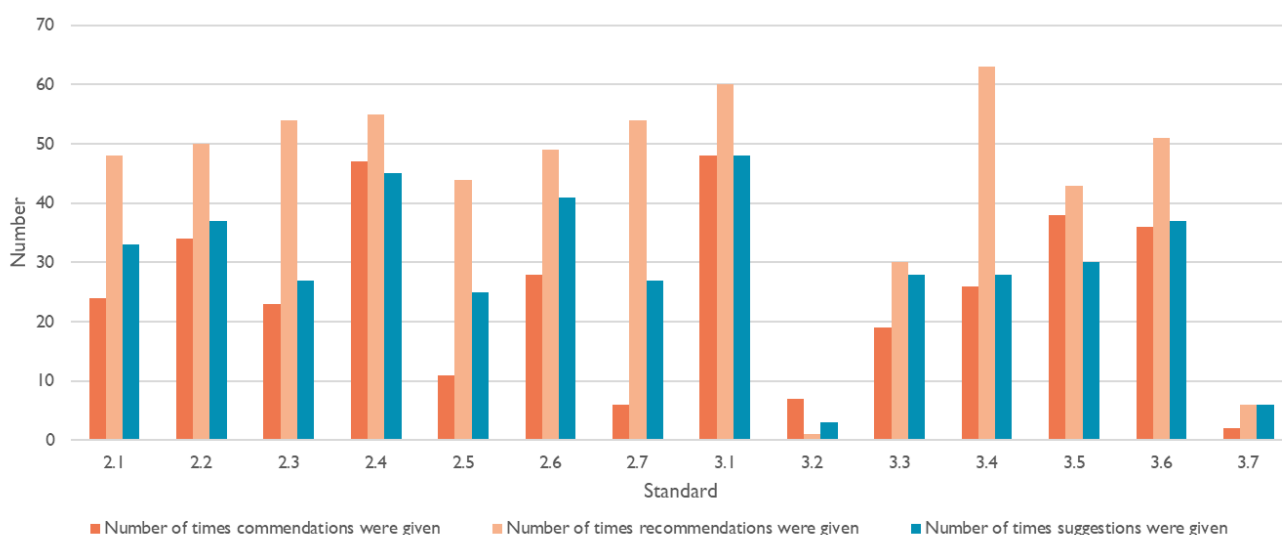
Some of the reasons to change the assessment scale, identified by the Board and backed up by consultation with members, were that it would eliminate the time that the panel spend on deciding between fully and substantially complaint – a differentiation that in practice did not make any difference to the overall judgement of ESG compliance – and that it would provide more flexibility for agencies to demonstrate their compliance in different ways. The three-point scale would also better support the consistency of assessments between different reviews. Finally, it would reduce the scope for confusion between EQAR and ENQA judgements. However, it was also discussed that having four grades differentiates ENQA from EQAR, and that four grades gives more scope for improvement, thus underlining ENQA’s enhancement approach, while also allowing agencies to showcase themselves as ‘fully compliant’.

After three years of using the three-point assessment scale, the experience shows that there are mixed responses to it. While the feedback gathered after each review process shows that agencies and experts are in general satisfied with the existing scale, some experts have expressed dissatisfaction highlighting challenges in delineating the distinction between ‘compliant’ and ‘partially compliant’ as well as the difficulty in highlighting excellence and good practices among agencies. Additionally, the Secretariat, the ARC and the Board have observed that panels have become stricter with the three-point assessment, often opting for the middle (i.e. partially compliant) if the agency is not entirely compliant with the standard, in circumstances that might previously have led to ‘substantially compliant’. ENQA will continue to monitor the use of the three-point scale and ensure focus on its use in the training for experts.

In addition to giving a compliance judgement on individual standards, the panels are requested to give their consideration on the agency’s overall compliance with the ESG. The Guidelines state that *“the overall judgement on compliance does not result from a mathematical calculation. However, a case of non-compliance for any individual standard would normally lead to a judgement that the agency is not compliant with the ESG overall.”*

For all standards, the panel can give recommendations, suggestions for further improvement and commendations (see figure 8). Agencies are obliged to follow up on recommendations, whereas suggestions are solely for development purposes. Any standard judged as partially or non-compliant needs to be accompanied with (a) recommendation(s) addressing the deficiencies. Recommendations can also be given to those standards that the panel judges as ‘compliant’. However, all recommendations need to relate specifically to the requirements of the standard. Commendations are used to highlight and promote good practice.

Figure 8. Recommendations, commendations and suggestions for further improvement by the panels in 2019-2023



In order to use the rating scale consistently throughout the reviews, panel members are provided with the relevant knowledge and guidance on the use of the ESG in the training of agency reviewers and during the briefing at the start of each review process (see ESG 2.4). Furthermore, the review coordinator contributes to the consistency of panels’ judgements across the reviews. When supporting the panels in applying the criteria, the coordinators benefit from their own experience in coordinating reviews, the input from other members of the reviews team if needed, as well as the book of precedents. The coordinators can consult the book of precedents to help the panel reach their judgement by referencing similar cases. As explained under ESG 3.6, in 2023 the book of precedents was revamped. The revision aims to provide more detailed information on previous judgements as well as recommendations and suggestions formulated by peers. In addition, the reviews team has started preparing excerpt sheets which summarise the elements and conditions behind a certain level of compliance for different standards. Excerpt sheets concerning ESG 3.1, 3.3 and 2.7 have been developed so far. The Secretariat is continuing this work in 2024 to cover other challenging standards and use the documents during the site visits and for the reviewers’ trainings.

Additionally, EQAR has published its own interpretation of the ESG where it sets out the minimum requirements for evidence to be provided in the report.<sup>69</sup> ENQA review panels use exclusively the standards of the ESG as the criteria for their decisions, however, they refer to the EQAR document in all reviews where the agency is also applying to EQAR to ensure that the review reports contain the evidence requested by EQAR.

The ARC is an important body contributing to the consistent application of the criteria. The three members of a sub-committee individually complete a scrutiny of the review report to check the consistency of panels' conclusions and whether the evidence and analysis provide sufficient information to support the panel's conclusion. All standards where two or more scrutinisers deviate from the judgement of the panel and/or from each other will be specifically discussed in ARC's validation meeting. With the help of the Head of Agency Reviews, the ARC can also consult ENQA's book of precedents to support its discussions. Should the ARC disagree with any judgements on individual standards by the panel, this is stated in the ARC's statement published together with the review report. The ARC can also request further clarification from the panel (or agency or coordinator) or a change in the report in order to ensure it contains the necessary evidence. These requests and their outcomes are also mentioned in the ARC statements. ARC statements contribute to making the process transparent and to smooth out the differences between panels, but without interfering with their decisions on compliance as noted in the review reports. Initially, the Committee very frequently requested revisions of the review reports.<sup>70</sup> However, practices were consolidated during the first mandate of the Committee, thus limiting the ARC's role to ensuring clarity and sufficient evidence in the review reports, and providing for the consistency of judgements, rather than requesting language changes and 'nice-to-have' information.

In 2024, the reviews team will carry out an analysis of the decisions taken by the ARC since its establishment in 2021. In particular, this analysis will focus on those cases in which the ARC has deviated from the judgements made by the panels, in order to support further understanding and training.

Full consistency (and thus comparability) between the individual reviews is very hard to obtain: a human element is always present as the evaluation is qualitative rather than quantitative, and the standards provide different ways to comply with them. The consideration of diverse operating contexts across the EHEA remains an ongoing challenge. However, the continuous improvement of how reviews are coordinated and the establishment of the ARC contribute to harmonising the application of criteria, the quality of the reports and overall consistency of the reviews.

Decisions on membership in ENQA are taken by the ENQA Board (see table 4).<sup>71</sup> If the agency is registered on EQAR, the Board will take the membership decision on the basis of the confirmation of this status and the agency's application letter. If the agency is not listed on EQAR (either because it did not apply for EQAR or it was unsuccessful in its application), the Board will take the membership decision on the basis of the external review report, including the statement by the ARC, and the agency's application letter. It should be noted that the ENQA Board is only likely to reach a different conclusion from EQAR's if the judgement on ESG compliance is borderline or if the EQAR decision went against the findings of

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<sup>69</sup> [https://www.eqar.eu/assets/uploads/2020/09/RC\\_12\\_1\\_UseAndInterpretationOfTheESG\\_v3\\_0.pdf](https://www.eqar.eu/assets/uploads/2020/09/RC_12_1_UseAndInterpretationOfTheESG_v3_0.pdf)

<sup>70</sup> The ARC can either validate the review report; validate the report but at the same time ask for minor revisions to it; not validate the report but request for further information or an amendment of the report; or reject the review as unacceptable.

<sup>71</sup> Membership is valid for five years from the date of the Board's decision for agencies that undergo a successful full or targeted review. For agencies that undergo a successful partial review, membership is valid for five years from the date of the Board's decision on the outcome of the latest full review.

both the external review report and the ARC. The Board will conclude with a negative decision when it considers that there is non-compliance with any standard. Other than that, the decision is based on a holistic assessment and is not the result of a mathematical equation or fixed boundaries.

Table 4. ENQA membership application outcomes in 2020-2023 (the year refers to the site visit year, the decision may have been taken the following calendar year)

Year	Member	Not a member	Member under review	Discontinued
2020	5			1 <sup>72</sup>
2021	13			
2022	14	1 <sup>73</sup>		
2023	12	1		

The creation of the ARC in order to separate ENQA membership application procedure more clearly from the review process has been overall positive but it has not solved all the issues that originally led to its establishment. Transferring the Board’s responsibilities regarding review report scrutinies and approval to the ARC and basing most membership decisions on an agency’s EQAR listing has certainly freed up time for the Board to focus more on strategic discussions during the Board meetings. However, the changes in the procedure have made the process longer (see ESG 2.3). Moreover, there are still discrepancies between the decisions made by ENQA and EQAR, both in terms of compliance with individual standards (i.e. between conclusions of the panel, the ARC, and the EQAR Register Committee) and in terms of overall compliance decisions (i.e. between the panels, the ENQA Board and the EQAR Register Committee).

### Aspects that work well

- Role of the review coordinators, the ARC, and the book of precedents in assuring the consistency of the review outcomes

### Aspects for further attention

- Adapting to the change of the judgement scale from a four-point to a three-point compliance assessment
- Differences in compliance decisions by ENQA and EQAR

## 5.6 Reporting (ESG 2.6)

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.

<sup>72</sup> During the review process, the ENQA Board confirmed procedural irregularities and proposed to the agency that the review process be discontinued by mutual consent which the agency agreed to. The review was thus discontinued in 2022.

<sup>73</sup> The agency became a member in 2024 after an appeal.



**Translation of the standard for the purpose of this review:**

Full ENQA agency review reports should be published, clear and accessible for all interested parties, and the decision on compliance with the ESG should be published together with the reports.

The reports of all ENQA Agency Reviews are published in full on ENQA's website<sup>74</sup>, including the reports where the review panel concluded and/or the Board decided that the agency is not in compliance with the ESG. The reports are published online together with the ARC's statement (see ESG 2.5) and Board's decision letter on ENQA membership. Should the agency appeal the Board's decision on membership (see ESG 2.7), the final letter by the Board explaining the appeal process and its outcome is published on ENQA's website as well. The reports and associated letters are published online within a few weeks of the respective decisions by the ARC and the Board.

The reviews database on ENQA's website allows anyone to search reviews by year, status (ongoing/completed) and agency. It could be useful to introduce more search filters, such as review type (full/targeted/partial) and country.

To ensure consistency and comparability of the review reports, ENQA provides a template for the panels, published also online. There are separate templates for full<sup>75</sup> and targeted<sup>76</sup> reviews. Both reports include an executive summary and introduction (covering information on the background and scope of the review, main findings from the previous review, and review process). However, whereas the full review report includes detailed information on higher education and QA system of the agency as well as on the agency (organisation/structure; functions, activities, procedures; and funding), the targeted review report includes information solely on the changes since the previous review. The main parts of both reports focus on findings on the agency's compliance with the ESG standards, providing evidence, the panel's analysis and judgement, including possible commendations, recommendations and suggestions for further improvement (see ESG 2.5). Targeted review reports include a separate chapter on the enhancement area(s). In both reports an optional chapter is dedicated to any supplementary observations that the panel might have made, not related to ESG compliance. The reports conclude with a summary of commendations, an overview of the judgements and recommendations, and a list of suggestions for further improvement. Annexes to the reports include the programme of the site visit; the ToR of the review; a glossary of abbreviations used; and a list of documents used to support the review. Reports for partial reviews are adapted from the full review report template with all relevant parts retained.

ENQA Agency Review reports are always produced by the review panels, under the coordination of the panel secretary, and the names of the review panel members are published in the report. The review coordinator checks the report for completeness, consistency, clarity, and language before the panel secretary sends it to the reviewed agency for factual corrections. The agency under review is given two weeks to send its observations on factual accuracy or any misunderstandings, after which the panel finalises the report and submits it to ENQA. After this, the ARC scrutinises the report (see ESG 2.5). Only after the ARC has validated the report, can it be published and used by the agency.

ENQA review panels need to consider the Policy on the Use and Interpretation of the ESG document by EQAR in all reviews where the agency is also applying to EQAR (see ESG 2.5 and section 6). This is to

<sup>74</sup> <https://www.enqa.eu/review-database/>

<sup>75</sup> [https://www.enqa.eu/wp-content/uploads/ERR-template\\_full-reviews\\_2021.docx](https://www.enqa.eu/wp-content/uploads/ERR-template_full-reviews_2021.docx)

<sup>76</sup> [https://www.enqa.eu/wp-content/uploads/ERR-template\\_Targeted-reviews\\_lastupdate150222.doc](https://www.enqa.eu/wp-content/uploads/ERR-template_Targeted-reviews_lastupdate150222.doc)



ensure that the report contains all elements expected by EQAR and reduce clarification requests from the EQAR Register Committee, although in practice this still happens quite frequently.

According to the feedback surveys, most agencies find the external review report to be useful for them and their stakeholders. A majority of experts did not experience difficulties in drafting the review report, considered the template clear, comprehensive and helpful, and deemed the comments from the review coordinator helpful in improving the review report. However, some experts have asked for more guidance and examples on the expected content (e.g., provision of sufficient information related to each element of the standard in question). Following this request and similar feedback received from the ARC, the Secretariat is planning a revision of the external review report template building on consultations with key stakeholders. The revised template aims to further advise panels on elements of a good report as well as help the panel and the ARC in collecting all necessary evidence for evaluation of the agency's compliance against the ESG, while allowing for sufficiently capturing the diversity of external QA within the EHEA and supporting agencies' enhancement efforts.

### Aspects that work well

- Screening of draft review reports by the review coordinators, followed by the scrutiny of the ARC
- Database of review results on the ENQA website

### Aspects for further attention

- External review report template needs further revision to increase consistency in reporting
- Ensuring that review reports contain the necessary evidence for both ENQA and EQAR purposes
- Low number of filtering functions for the review database on the ENQA website

## 5.7 Complaints and appeals (ESG 2.7)

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

### **Translation of the standard for the purpose of this review:**

ENQA Agency Reviews should include a clearly defined process for complaints and appeals, which is communicated to the agencies involved.

Since the previous review of ENQA Agency Reviews, ENQA still has two separate procedures in place – Appeals and complaints for agencies under review, and Complaints policy for third parties.

Information on the appeals and complaints procedures is included in the Guidelines and ENQA's website.<sup>77</sup> The full details of how to submit an appeal or complaint by an agency and how they are dealt with are set out in the rules of procedure (article 23). Full details of the principles, process and format for complaints for third parties can be found in the ENQA General Complaints Policy for Third Parties.<sup>78</sup>

<sup>77</sup> <https://www.enqa.eu/complaints-and-appeals/>

<sup>78</sup> <https://www.enqa.eu/wp-content/uploads/ENQA-complaints-policy-1.pdf>

## The ENQA Appeals and Complaints for agencies under review

This procedure covers two possibilities:

1. An agency whose application for membership is not accepted by the ENQA Board may appeal the decision;
2. An agency that is dissatisfied with the conduct of the review process or those carrying it out may submit a complaint.

An appeal or complaint can only be considered as official if substantiated and supported by appropriate evidence, references, and examples. An appeal/complaint should clearly and concisely explain the grounds, referring to specific standards or guidelines of the ESG or to specific sections of the ENQA Agency Review Guidelines. A decision on appeal/complaint will be made by the ENQA Board on the basis of a report and recommendations for action compiled by the ACC. The procedural steps and timeline are illustrated in the table below.

Table 5. Appeals and complaints procedure of ENQA membership procedure

Action	Timeframe
1. Appeal/complaint submitted to the ENQA Secretariat.	Within two calendar months from the date of receipt of the Board's decision.
2. Appeal/complaint reviewed by the Secretariat to determine whether eligible grounds and supporting evidence have been presented. 3. The receipt of appeal/complaint acknowledged by the ENQA Secretariat.	Within seven days.
4. ENQA Secretariat forwards eligible appeal/complaint for the consideration of the Board.	No defined timeframe.
5. The Board distributes the appeal/complaint documentation to the ACC.	Consideration by the Board at the next Board meeting or via email if appropriate.
6. The ACC submits a report on the analysis of the appeal/complaint including recommended action for the Board.	Within one month of the receipt of the appeal/complaint.
7. The Board's decision on the appeal/complaint taken in light of the Committee's report.	At the next Board meeting.
8. Appellant/complainant notified in writing of the Board's decision.	Within ten working days of the date of the decision.

After considering the evidence, the ACC may:

- In case of an appeal, to uphold the appeal and recommend the Board to reconsider its decision, taking into account the findings of the ACC.

- In case of a complaint, to uphold it and recommend the Board to take appropriate action proportional to the issue(s) raised by the complainant and taking into account the findings of the ACC.
- Recommend to the Board to dismiss the appeal/complaint.

The Board's decision on the appeal/complaint shall be taken in light of the Committee's report and shall be final and non-appealable.

The ACC comprises four representatives of ENQA members, one of whom is designated as an alternate member, who steps in if one of the other members has a conflict of interest. No member of the ACC shall be a current member of the Board, but at least one member shall be a former member of the Board. In appointing members to the ACC, the GA shall have regard to whether the ACC as a whole has experience of the review procedure gained by having served on a review panel; international experience gained by being involved in international activities; and managerial position held within an agency for at least five years. ACC members are appointed by the GA for a three-year term, renewable once. The Committee members are trained by the Head of Agency Reviews. The new Committee endorsed by the GA in October 2023 was trained in January 2024.

Since 2020, ENQA has received three complaints from agencies under review, all concerning full reviews. In all cases the Board has followed the recommendations of the ACC (in one case fully accepting the complaint, in one case partially accepting the complaint and in one case dismissing the complaint).

Since 2020, ENQA has received one appeal (in 2023) from an agency that underwent a full review. The Board's initial negative decision on the agency's overall compliance with the ESG and consequently on the agency's membership in ENQA was made on the basis of the external review report, ARC statement and the agency's application. Following the agency's appeal and on the basis of the analysis and recommendation from the ACC, the Board decided to uphold the agency's appeal thus overturning the Board's initial decision. Additionally, in 2021 ENQA received an appeal from an agency that had undergone a successful review. The appeal focused on standards in which the agency had received a partial compliance judgement. As this was not an appeal as per ENQA's procedure, it was addressed informally in cooperation with the agency.

The various outcomes of the appeals and complaints suggest that the system is known to agencies, and works. Besides this, the good relations between agencies and ENQA and the accessibility of the review coordinators mean that minor problems can be brought up informally at the point of the issue and resolved or clarified before they become a bigger problem, thus reducing the need to use formal procedures.

### **Complaints policy for third parties**

While not directly related to the ENQA Agency Reviews, it is worth mentioning that individuals or organisations that have substantiated concerns about an ENQA member agency's compliance with the ESG may submit these to ENQA in line with the Complaints Policy for Third Parties. ENQA will only consider complaints that are related to a member agency's compliance with the ESG or the integrity of the external review and decision-making process on the basis of which the agency was admitted as a member in ENQA. The third-party complaints will be considered by the ENQA Board. Since 2020, ENQA has received two complaints from third parties. In both cases, the Board concluded that the complaints did not fall within the scope of the Policy for Third Parties, thus they were outside of the remit of the Board's competences and possibilities to react.

Table 6. Appeals and complaints in 2020-2024

Year	Appeal	Complaint	Third-party complaint
2020			2 <sup>79</sup>
2021	1 <sup>80</sup>	2	
2022		1	
2023	1		
2024			

**Recommendations from the 2019 review and ENQA’s respective follow-up action:**

**Panel recommendation**

While the system exists, it is important that all participants in agency review processes are aware of the system in place and what can be appealed. The different roles and processes related to appeals and complaints in the process should be further clarified, and a detailed description of cases in which the agency can appeal should be stated and communicated to all participants.

**ENQA action to recommendation**

Addressed:

The Board decision letter on the agency’s membership in ENQA contains a provision on how to appeal. Moreover, ENQA’s website has been updated since the last review in order to clarify the two possible procedures on complaints.

**Panel recommendation**

While the case load for the committee is low, training/introduction should be provided to the committee, to ensure that both the panel members and alternate members have the same starting point when cases arise.

**ENQA action to recommendation**

Addressed:

To introduce the ACC to ENQA’s regulations in place regarding the appeals and complaints, the Head of Agency Reviews organised an induction session to the newly appointed Committee in January 2024. Prior to the session, the ACC members were provided with the reading material, links to all relevant documents, and examples of recent cases. In addition, ENQA provided the Committee with an online repository to facilitate the group work.

<sup>79</sup> These were submitted as third-party complaints but following review by ENQA it was found that they did not meet the criteria and therefore were not considered further.

<sup>80</sup> This was submitted as appeals but following review by ENQA it was found that it did not meet the criteria and therefore were not considered further.

### Panel recommendation

Beyond the narrower interpretation of this standard here, the panel also suggests that complaints from those who have participated in the process (e.g. panel members) should be taken into account.

### ENQA action to recommendation

Not addressed:

ENQA has not produced additional complaints procedures beyond agencies and third parties. In the case of complaints from the experts, these would be addressed within the Secretariat (by the review coordinator, Head of Agency Reviews or Director as necessary) or if needed, the matter could be brought to the attention of the Board. As with agencies, accessibility of the review coordinators aims to ensure that panel members can raise up issues informally at the point of the issue and be resolved or clarified before they become a bigger problem.

### Panel recommendation [given under ESG 3.3]

[T]he independence of ENQA within reviews should be enhanced by (re-)defining the complaint and appeal procedures and promulgating them to all relevant stakeholders.

### ENQA action to recommendation

Partially addressed:

ENQA has not redefined the procedures, but it has paid attention to ensuring that appeals and complaints procedures are clearly communicated to agencies.

## Aspects that work well

- Overall low number of appeals and complaints
- Clarity of procedures related to managing appeals and complaints
- Professional and independent functioning of the ACC

## 6. ENQA's Collaboration with EQAR

ENQA, as a founding member of EQAR,<sup>81</sup> and the largest coordinator of the external reviews of QA agencies against the ESG in the EHEA, naturally has a rather close relationship with this organisation.<sup>82</sup> The majority of ENQA's review reports also serve as the basis for EQAR's decision on including an agency on the Register. Due to this, the cooperation between the two organisations has a significant impact on

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<sup>81</sup> The European Quality Assurance Register for Higher Education (EQAR) was founded in 2008 by the E4 Group (ENQA, EUA, EURASHE and ESU) at the request of the EHEA ministers for education, as part of the Bologna Process. EQAR's role is to maintain a list of external QA agencies that operate in substantial compliance with the ESG. In this way EQAR aims to provide clear, accessible and trustworthy information about QA agencies in order to help increase trust in and recognition of QA, HEIs, programmes and qualifications. Decisions on an agency's inclusion on the register are taken by EQAR's independent Register Committee on the basis of an external review against the ESG.

<sup>82</sup> One representative of ENQA is also a member of the Board of EQAR, i.e., the body in charge of the overall governance and management of the organisation, including its strategic coordination, and administrative and financial oversight. ENQA also nominates two members of the EQAR Register Committee and is represented at the EQAR General Assembly.

the smooth running of the review process and the overall experience as perceived by agencies. In order to ensure fruitful cooperation, while maintaining the separate identities and ownership of the respective processes, a number of measures have been introduced:

- A closer collaboration during individual review processes (e.g., tripartite terms of reference, panel composition check by EQAR and involvement of EQAR in panel briefings);
- Updates from EQAR on substantive changes reports that they receive from agencies;
- Monthly meetings between the ENQA Head of Agency Reviews and EQAR's Policy and Project Officers to exchange information on daily operations related to review processes;
- Annual meetings between the leadership of each organisation to discuss strategic matters, support common understanding of the expectations on external reviews of QA agencies, manage the identified challenges when implementing them, and to brainstorm on future developments and joint activities;
- Occasional meetings between members of ENQA's ARC and EQAR's Register Committee to explore areas where judgements between the two organisations differ most frequently.

The organisational and administrative collaboration on the review process has been enhanced by the monthly meetings between staff of the two organisations as well as the other measures mentioned above. However, the different approaches to decision-making, on the basis of the same review report, still create confusion and inconsistency for agencies, experts and the broader higher education community.

The differences in outcomes from the ENQA and EQAR decision-making processes stem from various factors.<sup>83</sup> The first relates to the use of the ESG. ENQA's view is that the ESG were created through a consensual process and approved by the EHEA Ministers, and no organisation, or sub-body of an organisation has the mandate to interpret the ESG, whereas EQAR also applies their Policy on the Use and Interpretation of the ESG. While this document was produced with the aim of ensuring transparency and uniform application, it has also led to the perception of additional requirements for compliance with the standards of the ESG and admittance to the Register. Secondly, the organisations have different roles in the higher education landscape, and ENQA's position as a membership association lends itself to a supportive approach that is demonstrated, e.g., through a specific provision for agencies undergoing their first review, and the possibility of being designated as a 'member under review' following a decision on non-compliance with the ESG for existing members. Finally, the evidence base for the decision-making differs between the two organisations. The review report refers to the situation up to the time of the site visit, and the panel may not collect additional evidence afterwards. When the ENQA Board takes compliance decisions, it does so only on the basis of the peer review, i.e., the external review report and the ARC statement. However, EQAR allows agencies to make additional representation of evidence, which may include information about actions taken since the review process to remedy issues raised by the panel and which are taken into account in the decision-making.

While many of the points above are not directly connected to the review process itself, they nonetheless have an impact on the perception of the activities. In ENQA's view some aspects of these differences are legitimate and attributable to the different roles of the two organisations, however more work needs to be done to communicate this clearly. For this reason, ENQA has proposed that the two organisations

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<sup>83</sup> See the EQAR's Analysis of Register Committee Decisions and Quality Assurance Agencies' Compliance with the ESG. The document is of internal nature but can be shared upon request.

consider a joint statement and a common language in order that both can communicate more clearly and consistently.

Other areas for further consideration, more explicitly linked to the implementation of ENQA Agency Reviews, include:

- Further investigation of the areas in which judgements differ between the various bodies (ENQA’s panels, ENQA’s ARC, EQAR’s Register Committee, and ENQA’s Board) in order to reach a common understanding of the differences and discuss possible resolutions;
- Ensuring the high quality of reports that also fully meet the needs of EQAR. For this reason, the seminar of panel secretaries is being organised;
- Sufficiently incorporating input from EQAR in ENQA’s training of experts, while maintaining ENQA’s independence and ownership of the review process;
- Exploring if the length of the decision-making process can be shortened. The possibility for the ARC and the Register Committee to request clarification or changes to the report (ENQA) or additional representation (EQAR) and the gaps between scheduled meetings of those bodies can significantly lengthen the process overall.

## 7. SWOT Analysis

This SWOT analysis of the ENQA Agency Reviews is a synthesis from the individual SWOTs performed by the ENQA Secretariat, the ARC and the Board for this SAR (see section 2).

<p><b>Strengths</b></p> <ul style="list-style-type: none"> <li>• Well established, reputable and trusted service</li> <li>• Extensive experience on external reviews of QA agencies</li> <li>• Quality of the methodology</li> <li>• Targeted review methodology strengthen the enhancement aspect and offer more meaningful exercise for well-established agencies</li> <li>• Experienced and professional review coordinators</li> <li>• Experienced reviewers from various stakeholder bodies that have been carefully selected and trained</li> <li>• ARC: consistency of reports is improving and there is a dedicated body with an overview of matters arising from the reviews (content and process)</li> </ul>	<p><b>Weaknesses</b></p> <ul style="list-style-type: none"> <li>• Financial resources and staff time</li> <li>• Staff resources in relation to increasing number of reviews</li> <li>• Financial sustainability vs. cost of the review</li> <li>• Targeted review methodology has not yet fully met its aim to provide more enhancement-led approach</li> <li>• Three-point judgement scale (transfer from former four-point scale)</li> <li>• Variations in the depth of understanding of the agency’s context by panels</li> </ul>
<p><b>Opportunities</b></p> <ul style="list-style-type: none"> <li>• ENQA is free to further develop its review methodologies, e.g. following the outcomes of the forthcoming external review of ENQA Agency Reviews and revision of the ESG</li> <li>• Strengthening of the inter-organisational trust between ENQA and EQAR</li> <li>• Affiliates coming forward for reviews e.g. following initiatives such as the SEQA-ESG project</li> <li>• Potential market for reviews outside the EHEA</li> </ul>	<p><b>Threats</b></p> <ul style="list-style-type: none"> <li>• Substantial changes in review methodologies need to be considered in light of any impact on the use of reports for EQAR</li> <li>• EQAR’s use of the Policy on the Use and Interpretation of the ESG</li> <li>• External financial pressures driving up the cost of reviews and affordability for agencies</li> <li>• Fluctuations in numbers of reviews per year</li> <li>• Competition from other coordinators offering reviews at a lower price</li> </ul>

## 8. Key Challenges and Areas for Future Development

This self-assessment exercise on the ENQA Agency Reviews has proved to be valuable for ENQA as it identified and further clarified some of the organisation's key challenges. This section summarises several of these challenges and linked areas for future development, which relate not to specific standards of the ESG, but, in line with the focus of this review, more generally to the role of agency reviews within ENQA as an organisation, the relationship of ENQA with EQAR, and the overall usefulness and impact of the agency reviews.

The first acknowledged challenge is one that ENQA has in common with many QA systems, namely how to appropriately balance the accountability and enhancement aspects of external QA. This has already been widely explored at ENQA, including during the last external review in 2019. The difficulty of balancing the two purposes of the reviews has to a significant extent been addressed through recent developments. The aims and approaches for the progress visit have been better formulated to focus on the enhancement aspect and now includes a set of strategic level questions<sup>84</sup>, there is further guidance on use of suggestions for improvement within the review reports, and importantly, ENQA, together with EQAR, developed the new targeted reviews. The information set out in this SAR demonstrates that targeted reviews add value for more mature agencies that have already been through several external reviews, and ENQA has already been able to make some adjustments to the methodology based on the first experiences. However, there is still room for further improvement. In ENQA's view, there is scope for ensuring an even more in-depth understanding of the agency's context in relation to the self-selected enhancement area and continuing the work to ensure a consistent experience for agencies. Another avenue would be to explore support to agencies on issues that go beyond the specific topics of the ESG standards. However, both points require an increased time investment from the panel, and require specific profiles of experts to properly conduct the work. Care also needs to be taken not to stray into the realms of a consultancy service. When exploring any options, ENQA needs to carefully monitor the value for money of the review process for agencies, since agencies are signalling that an external review against the ESG is an expensive procedure.

The overall financial sustainability of ENQA Agency Reviews is the next challenge that requires attention. While agencies wish to spend less on the reviews, it is also well recognised as a necessary exercise in order to maintain trust and transparency in European higher education. Since the last external review, ENQA managed to keep the review fee for agencies relatively unchanged despite the high inflation rates affecting costs for salaries and international travel. Nevertheless, these aspects, combined with an expected need to increase the fees for experts, mean that ENQA will need to carefully reconsider the overall review fee and the distribution of expenses within it.

The third challenge is about the placement of ENQA Agency Reviews within the overall organisation both operationally and strategically. The agency reviews have a prominent role as a vital service to agencies and indirectly to other stakeholders (Point II of the current strategy). Since the last external review, the ENQA Secretariat made great efforts to further professionalise the review coordination including strengthening the reviews team with two more staff members, organising regular weekly meetings of the review coordinators, and making better use of digital tools to support the review process. However, in doing so, there is a concern that the reviews team could become disconnected from the rest of the organisation; an issue compounded by the growth of the ENQA Secretariat as a whole, and the effects of hybrid working arrangements since the Covid-19 pandemic. ENQA therefore needs to ensure a better exploitation of the

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<sup>84</sup> See chapter 9.2 of the Guidelines for ENQA Agency Reviews.



so-called spill-over effect of the lessons learnt from the agency reviews to the other segments of the organisation's work. There is scope to better strengthen the transmitting of practice in external QA from the field to policy making, avoid the creation of silos in the ENQA Secretariat, and further utilise the production of thematic analyses for better reflection and brainstorming on future of external QA in the EHEA.

The above point is particularly relevant for the upcoming revision of the ESG,<sup>85</sup> which will pose both challenges and opportunities for the ENQA Agency Reviews. ENQA is already coordinating the QA-FIT project that is conducting a comprehensive mapping exercise of the state of play of internal and external QA in the EHEA, and taking a critical look at the ESG as to see how they have been adapted to different contexts and recent and emerging developments in higher education.<sup>86</sup> It will be vital that the lessons learnt from the reviews are fully taken on board during the revision process, and that the impact of changes on the review process is fully thought through. The revision provides an opportunity to address some of the challenges in interpreting the ESG, particularly in those areas that most frequently lead to differences in judgements between the bodies that use the external review reports. ENQA's work in analysing these differences and the dialogue with EQAR on identifying the causes will therefore be particularly helpful in informing the ESG revision. It will also provide an opportunity to discuss further with EQAR issues around interpretation and thresholds for compliance, with a view to reducing the different outcomes of decisions based on the same review report. While this occurs only in limited circumstances, the impact on agencies and national QA systems, together with perceived incoherence for the wider higher education community, should not be underestimated.

The revision will also consider calls from agencies to allow more flexible approaches to external QA, which may in turn influence ENQA's approach to the agency reviews. As one of the co-authors of the ESG, ENQA is very well placed to both draw on the lessons of the agency reviews and highlight the implications of any changes. The transition period to the next version of the ESG (expected in 2027) will also pose practical challenges for ENQA, in terms of reviewing processes, training experts and agencies, and adapting the review schedule. This will need to be very well planned and can draw on the lessons learnt from the last transition period in 2015. Finally, the revision of the ESG might have an impact on the provision of the possibility to undergo a targeted review (especially should the requirements for compliance with the ESG considerably change). ENQA will carefully monitor the developments and reconsider the enhancement aspect of the review methodology, if needed.

One additional consideration to keep in mind when exploring future activities relates to ENQA's work outside the EHEA. ENQA's primary remit of activities remains focused on the EHEA, however, globalisation of higher education and the fundamental links between QA and recognition mean that the EHEA and ENQA cannot function in isolation. ENQA already conducts activities in other world regions, and there is an emerging interest in ESG reviews from agencies outside the EHEA. ENQA will need to carefully consider the extent to which it wishes to pursue this as an area of opportunity. The consideration will need to keep in mind the impact on (incoming and outgoing) resources, how it fits with ENQA's core mission and strategy, and whether there is a risk of undermining the development of other regional harmonisation processes for QA.

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<sup>85</sup> The primary authors of the ESG are ENQA, ESU, EUA and EURASHE (the E4 Group), in cooperation with Business Europe, EI and EQAR. The Tirana Ministerial Communiqué (May 2024) gave a mandate to the authors to propose a revised version for adoption in 2027.

<sup>86</sup> See here: <https://www.enqa.eu/projects/quality-assurance-fit-for-the-future-qa-fit/>

## 9. Glossary of Terms

ACC	Appeals and Complaints Committee
AI	Artificial intelligence
ARC	Agency Review Committee
BFUG	Bologna Follow-Up Group
BusinessEurope	Confederation of European Business
E4	ENQA, EUA, EURASHE and ESU form the E4 Group
EHEA	European Higher Education Area
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
ESU	European Students' Union
EUA	European University Association
EURASHE	European Association of Institutions in Higher Education
GA	General Assembly
HEI	Higher education institution
QA	Quality assurance
SAR	Self-assessment report
ToR	Terms of reference

## 10. Annexes

Annex 1: Panel composition template

Annex 2: Analysis of ENQA Agency Reviews 2023



**2024 Self-Assessment Report  
for ENQA Agency Reviews**

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This report can be downloaded from the ENQA website at  
<https://www.enqa.eu/external-review-of-enqa-agency-reviews/>

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