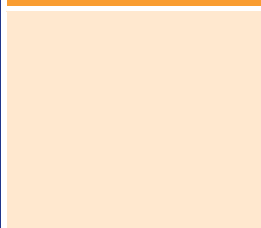
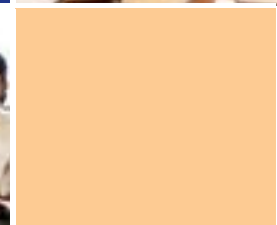
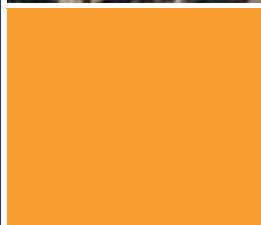




ENQA Review Follow up report

May 2022



BRITISH ACCREDITATION COUNCIL FOR INDEPENDENT FURTHER AND HIGHER EDUCATION

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Introduction

The British Accreditation Council for Independent Further and Higher Education (BAC) completed the ENQA membership process in January 2015 with full membership awarded in March 2015. BAC underwent a second review in September 2019 with full membership reconfirmed by the ENQA board in February 2020.

Since this date, a new Chief Executive Dr Janet Bohrer joined BAC in October 2019. With her background predominantly in higher education and having extensive experience of quality assurance, Dr Bohrer set out to change the mind-set of BAC stakeholders and bring about a paradigm shift that could emphasise the community dimension of BAC and one that would more strongly recognise individual journeys of diverse providers on the quality agenda and BAC's role for those journeys. Dr Bohrer started her term with a clear vision of change at strategic level looking to further develop areas of stakeholder engagement and broaden the national and international reach of BAC involvement in the global quality debate. During her first two years in office, she worked to progress three strategic priorities, with clear direction for intervention as BAC was encouraged to look internally at 'self' and our ways of working, externally at 'others' and ways of engaging, and globally at Europe and international sectors. Subsequently, these priorities developed into the BAC strategy 2021 - 2026, which commits BAC to tactically-planned growth, continued appreciation for diversity, societal and ethical responsibility, salient use of data and information, and meaningful investment in the quality community, through contributions which can strengthen the quality debate.

Along with the rest of the world, BAC took on the challenges of the pandemic and prioritised the continuity of our activities to ensure providers were supported adequately during this difficult time. BAC moved inspections online, after a period of piloting, and launched our Development Workshop Series to intensify the dialogue with our providers, to encourage the sharing of practices, and to bring the sense of community in focus. The approach promoted by the Chief Executive and the BAC Council was to ensure that lessons were considered and embedded in decisions about the post-pandemic future, recognising that the pandemic served as an accelerator of initiatives which were already in train, but would have otherwise taken more time to consolidate. Consequently, BAC is ambitiously digitalising, proposing to make use of an integrated Customer Relationship Management (CRM) system, and expanding our engagement models towards more risk-based and community-driven approaches. Strategically, BAC is looking to strengthen the links it has with other organisations, to develop more collaborative working and to ensure it is well positioned to bring our providers net benefits in relation to their responses to quality drivers.

During this period, ENQA recommendations have stimulated important strategic discussions and have led to operational developments which are paving the way for the implementation of priority objectives. BAC, as an organisation, has included all stakeholder groups in the debate exploring the triggers of the recommendations with a view to eliciting appropriate action and identifying future benefits. We have applied the quality planning in line with how we expect BAC providers to engage with the outcomes of external quality assurance processes and have identified the cause of the concerns, articulated the rationale for change, planned for action and strengthened mechanisms to monitoring change. This has been placed in perspective by the new strategic directions and we have taken a stage-by-stage approach to the operational components as informed by these strategic priorities. As such, the actions surrounding ENQA recommendations, as detailed further, should be viewed in the larger context of updates and developments at BAC.

Summary of updates across all BAC activities

Below we outline recent, important milestones for BAC, which are contributing to the strategic approaches geared on inclusivity and community, as well as on growth and responsibility. These actions, together with BAC's response to the ENQA recommendations, are consolidating BAC's position for our strategic future and our collaborative approaches towards our community of stakeholders, most importantly towards our providers.

- The new BAC strategy 2021-2026 was published in hard copy and online, after extensive consultation with stakeholders. The BAC strategy outlines an ambitious vision for the future and announces a shift towards more enhancement-led approaches and stronger ethical awareness for the BAC stakeholder community.
- The first annual BAC stakeholder event was held in Feb 2020 and annually thereafter. The event has gathered providers, inspectors and other stakeholders and is an opportunity to discuss strategic developments and to build on the BAC community of practice.
- The first annual report was published and circulated with annual accreditation fee invoices in 2021 and annually thereafter. This is ensuring more transparency about BAC operations and gives stakeholders the opportunity to appreciate how BAC functions as a charity.
- Student and international members of Council and Committees have been recruited and inducted. They are now fully functional members with valuable contributions driving the BAC strategic agenda.
- Online inspection processes were developed from March 2020 and implemented from July 2020 to address the restrictions of the pandemic with a view to ensuring continuation and robustness of BAC activities. Following positive feedback from inspected providers and inspectors, BAC has considered the benefits to the process and analysed lessons learned to identify what it should retain for the future.
- Hybrid inspections were developed and launched in November 2021 as a strategic, risk-based approach for the future. All inspections are now subject to a risk analysis and a decision is taken if they are to be organised fully on-site, hybrid or fully online, with benefits and likely challenges considered in detail before the inspection arrangements are confirmed. The hybrid model offers tailored scenarios to ensure full robustness of the inspections being undertaken and an overall positive experience during the interactions with the provider.
- An overarching standards framework is being developed, with substantial stakeholder involvement and thematic analyses of provider performance. The intention is to allow for a unified articulation of quality principles which can be used across all the inspection schemes, while still retaining the variety of the Schemes applied to a diverse provider base. Once finalised, this will pave the way for individual scheme reviews and changes to report writing.
- Thematic debates have been hosted as part of focus-groups with inspectors and providers to identify areas in need of improvement and areas of strengths and good practice. The conclusions from these analyses have been used in a multi-layered approach towards the development of the Strategy, the Standards Framework and Scheme operational applications.

- The development workshop series was launched as a strategic move towards strengthening the BAC community and providing opportunities for practice sharing and quality debates, to support providers with their future ambitions and imminent challenges. Timely topics identified by BAC and invited speakers have stimulated quality actions and institutional drivers.
- A CRM was sourced to intensify BAC capability to monitor and systematically respond to operational developments with a view to ensuring that inspection processes can be reviewed more comprehensively, and provider performance can be analysed more swiftly. The CRM is an important acquisition in support of our own internal quality assurance system and our commitment to enhancement, strategically and operationally.
- Staff development is actively encouraged and recorded centrally including that of Council members, where relevant. This allows BAC to build additional capacity and capability into the agency staff.
- Staff contracts have been reviewed, the accreditation team strengthened and the Chief Inspector's role as a monitor of inspections has been reinforced. This now means that the BAC team is fully consolidated and well calibrated to take on the operational tasks which derive from the strategic plans put forward through the new Strategy.
- BAC has proactively identified areas of future interest and has led on and contributed to the quality debate at European level and internationally. An important example of this is the ENQA Working Group on Micro-credentials which BAC proposed to ENQA and for which it now holds the chair. The results of the working group will be disseminated largely in an online event in September 2022.
- Participation at international events, by invitation, to contribute to the quality debate and the solution being explored for the post-pandemic future. This has included dialogue with a number of national governments for support and advice in relation to the implementation of post-pandemic external quality assurance arrangements.
- BAC's plans for international growth are now materialising with planned targets at system-level, additional to intensifying accreditation activities for international providers. A system-wide accreditation project was completed in Bahrain with the Higher Education Council and discussions at governmental level are taking place in Vietnam and Egypt and are being extended to Nepal and Qatar.

We believe that all of these activities are stepping stones for the strategic direction which has now been set and that, as a learning organisation, we have the opportunity to continuously reflect on progress, monitor our achievement and build on the lessons we derive to further strengthen our policies and procedures for full alignment with European and international developments on the quality agenda.

BAC response to the ENQA review report

As recognised by the ENQA panel and highlighted in the report, BAC is fully committed to our ENQA membership and have welcomed the review as an opportunity to consolidate our practice and further develop in directions compatible with the European Higher Education Area.

We have given increased attention to the recommendations formulated, understanding that these carry most importance and BAC would benefit highly from addressing these recommendations both in the medium term and in the longer term. We have incorporated recommendations into our existing action plan and have prioritised operational action in alignment with strategic steps, making interventions as effective and timely as possible with full awareness that the sequencing of actions has meant that some recommendations would take precedence over others in the short term.

The commendations and suggestions for further improvement have also been very valuable and we have given these detailed attention in our planning processes. In many instances the actions devised in support of the recommendations have also had a direct contribution and positive impact on the areas highlighted as good practice or suggested for further improvement.

Below we focus on providing explicit details in relation to the recommendations to allow full understanding of the progress that has been made in the interim. We also summarise the actions in support of maintaining and improving areas of commendation and further developing areas of suggestion.

BAC actions in response to ENQA recommendations

ENQA recommendations have been given full attention and actions agreed and implemented in alignment with the new strategic directions of the organisation. As detailed below, some recommendations have been fully completed, others, which by their nature take more time and more intermediary actions to embed, have been progressed substantially and are still ongoing. And, we also recognise that some areas will be continuously ongoing as they require salient, incremental adjustments in line with constant developments geared on medium and longer-term goals.

Below we highlight the status of the recommendations either as **completed** or **ongoing** and we outline the specific actions that have been taken so far, as well as the actions which are being implemented currently or are planned for implementation, so as to allow BAC to fully meet the recommendations.

ESG 3.1 Activities, policy and processes for quality assurance

RECOMMENDATIONS	
<p>BAC is recommended to strengthen the agency's approach to strategic planning, ensuring that plans are robust, that they explicitly translate into the daily work of the organisation, and that the success of their implementation is routinely considered by the Council.</p>	<p>STATUS: ONGOING</p> <p>Actions completed so far:</p> <ul style="list-style-type: none"> ▪ New strategy in place, with clear priorities outlined and underpinned by SMART (specific, measurable, achievable, realistic and time-bound) action plan ▪ Committees strengthened, Terms of References revised, committee membership renewed. ▪ Council agenda revised with permanent item of monitoring ▪ CRM funding earmarked ▪ Review of Quality Assurance (QA) system and BAC processes as part of formal review of governing documents. ▪ Involvement of key operational staff in taking forward strategic agenda <p>Actions planned to consolidate impact:</p> <ul style="list-style-type: none"> ▪ Full monitoring through QA system to measure success, verify robustness of processes and make adjustments
<p>BAC is recommended to introduce student and international members of the Accreditation Committee who attend every meeting during their term, rather than rotating attendance between a pool of members</p>	<p>STATUS: COMPLETED</p> <p>Actions completed:</p> <ul style="list-style-type: none"> ▪ Students appointed to Council (since October 2021), to Audit Committee (since October 2021) and to Accreditation Committee (since September 2021). ▪ International members appointed to Council (since April 2020) and Accreditation Committee (since April 2020)

Since the last review, BAC has strengthened our approach to governance and strategic planning and oversight of the organisation. There are multiple strands of this activity completed and others ongoing with a longer-term planning and implementation proposed.

The new five-year BAC Strategy 2021-2026 was produced using a comprehensive process involving BAC staff and stakeholders. The Chief Executive wrote an initial proposal for the strategy which included ideas influenced by feedback from the Annual Stakeholder Event in Feb 2020 and again in January 2021. The Standing Committee agreed four strategic themes/pillars and a project timeline in September 2021 as a bridge to developing the full strategy. Discussions were then held with BAC inspectors at their annual event, and the

Council had a first look at their meeting in October 2021. Members provided valuable feedback and ideas for actions and a fifth strategic pillar was introduced. The document was drafted and reviewed by the Standing Committee at their meetings in December 2021 and January 2022. Some further amendments and improvements were made to ensure the quality of the content and presentation. The final approved document went through a professional design and proof-reading process and was then published on our website and shared with our stakeholders by email. An official launch of the strategy took place at the hybrid Annual Stakeholder Event on 27 April 2022 where hard copies of the document were provided.

The Strategy can be found on the BAC website [here](#).

The strategic and governance work was facilitated in part by the creation in April 2021, of a new position of Governance and Business Development Manager. This role is part of the senior management and has been embedded into the small head office team. Key responsibilities include oversight of the maintenance of the BAC strategy and related actions; oversight and management of the Council and Committees such as recruitment, preparation of papers and governance reviews; as well as support to the Chief Executive with responsibilities for general management and day to day running of BAC.

One of the Governance and Business Development manager's first tasks in May 2021 was to formally review, along with Council members and legal advice, the governing document of the charity. The Articles of Association were deemed to have stood up to the challenge of the pandemic, because no changes were required even though staff and the committees had to work remotely and substantial changes to our processes were required to maintain continuity during periods of national and international lockdown. The Articles were therefore considered as being fit-for-purpose.

A review of the internal quality assurance of the organisation, embedded within the governance review included an update of the Council and Committee Terms of Reference (ToRs), which has also taken place over the past year. The final documents are due to be submitted to the Council meeting in June 2022 for formal approval. Review of ToRs will be an annual agenda item for each Committee at the start of the financial year, as part of the stronger governance framework being established. In order to facilitate meeting the achievements of the strategic objectives, the Strategy is accompanied by a Strategy Action Plan. This is an internal working document reviewed and monitored by the Audit Committee and reported on at Standing Committee and Council meetings as necessary. Related financial planning models have been developed so that BAC can invest in growth and fund projects that require larger sums of investment from our reserves. An updated Risk Register is also monitored by the Audit Committee. The first draft of these updated Action Plans and Risk Registers will be submitted to the Audit Committee in June 2022 for implementation from September 2022, although many projects are already underway. The Action Plan will drive the daily work of the organisation and will include timelines, key performance indicators and milestones that will be regularly monitored.

The Accreditation Manager appointed in July 2021 also brought experience in the use of integrated data and sustainability which the agency did not have in-house previously and now provides BAC with a more diverse profile of skills to contribute towards achieving strategic goals.

BAC's new Chief Executive is committed to student and international representation and after the ENQA review report recommendation in 2019 acted swiftly to implement this recommendation. We now have permanent student positions on the Council, Audit

Committee and Accreditation Committee. We have international members of Council and the Accreditation Committee. All positions are currently filled. One key appointment made to the Accreditation Committee was of Dr Anthony Manning, appointed Vice- Chair in 2020 and then Chair in October 2021. Dr Manning brings a European and international perspective through his extensive work for the University of Kent as the Dean of Internationalisation, which aligns with BAC’s strategic goals. The Chair of the Accreditation Committee is also a member of Council which provides additional knowledge to BAC’s international and European strategic interests.

Members were recruited by publishing the vacancy advert on the BAC website and sharing of the advert amongst the professional networks of Council, Committee members and stakeholders. Expressions of interest and CVs were reviewed, and a shortlist created before interviews took place. The chosen candidates were nominated to Council for their final approval. An induction process is in place for new members and the option of a fellow member ‘mentor’ to answer any initial queries was offered to new Accreditation Committee members.

ESG 3.4 Thematic analysis

RECOMMENDATIONS	
<p>BAC is recommended to develop an approach to thematic reviews which is more analytical in nature with appropriate commentary on the issues identified, more clearly driven by predetermined outcomes, and has an impact on the approach to quality assurance taken by BAC and accredited higher education providers.</p>	<p>STATUS: ONGOING</p> <p>Actions completed so far:</p> <ul style="list-style-type: none"> ▪ Thematic analysis of Independent Higher Education scheme ▪ Focus groups undertaken and actions confirmed on upcoming enhancement workshops <p>Actions planned to consolidate impact:</p> <ul style="list-style-type: none"> ▪ Implementation of CRM system ▪ Pilot of liaison scheme ▪ Review of all schemes and inspection standards – part of the Standards Framework review

BAC published a thematic analysis for the Independent Higher Education (IHE) scheme prior to the 2019 ENQA review which was used to establish a baseline to extend discussions towards all categories of providers.

Following receipt of the ENQA report, BAC took the approach to hold focus groups to identify key issues and confirm them collectively with inspectors and providers, testing their applicability for other types of providers. The focus group discussions during 2021 used an independent moderator to encourage free discussion and proposed a strong analytical approach. BAC used this approach to understand the type of format a thematic review would need to take to ensure full benefit for both the agency’s work and for accredited providers, rather moving into contracting another written thematic analysis report.

Integrating a higher level of stakeholder involvement allowed BAC to test the appropriateness of aspects of the strategy such as investing in activities focusing on quality enhancement and best practice and it has given BAC a clear vision on what is important for inspectors and providers in analysing the emerging themes and reflecting on how their identification could be maximised for strategic and operational action.

One of the themes emerging from the focus groups was an interest in additional support from BAC for providers to enhance of their quality assurance processes. As a result, BAC announced the launch of a liaison scheme at the annual stakeholder event in April 2022 which will be piloted in late 2022 and potentially implemented from 2023 if successful. In addition, BAC decided to draw down from investments in order to provide capital to invest in a CRM system that will integrate communication and information management. BAC is currently considering which system to purchase and the goal will be to use the system to support analysis of inspection reports in identifying emerging themes and then consistently make use of these analyses in planning, design and implementation processes.

BAC is committed to using a thematic approach to developing inspection methodologies as well as enhancement workshops. This demonstrates that the more systematic approach to thematic reviews is identified on the BAC 2021 – 2026 Strategy, and BAC is committed to investing more time and efforts into making thematic reviews and the analysis of common issues emerging from inspections into a developmental item over the next two years and before the next ENQA review. We are swiftly moving into the direction of confirming a multi-activity approach for thematic analysis and one which will enable us to deep dive into specific areas while also creating overarching, comprehensive impact for our operations.

ESG 3.5 Resources

RECOMMENDATIONS	
<p>BAC is recommended to build capability in the core staff team that better enables it to enhance their understanding of international higher education trends and developments and hence to better reflect on current practice and to inform member institutions and the public about our activities in line with BAC's strategic plan.</p>	<p>STATUS: COMPLETED</p> <p>Actions completed so far:</p> <ul style="list-style-type: none"> ▪ BAC chairing ENQA working group on Micro-credentials ▪ BAC funding made available for staff and Council members to attend seminars and conferences ▪ Appointment of Governance and Business Development Manager ▪ BAC strategy circulated to all accredited providers <p>Ongoing actions to consolidate impact:</p> <ul style="list-style-type: none"> ▪ Notifications and updates sent to member institutions on relevant information and BAC initiatives.

As an organisation, BAC is committed to ensuring that staff are continuing their professional development and enhancing their understanding of international higher education trends. BAC appointed a Governance and Business Development Manager in 2021, who has oversight of BAC strategy and actions relating to it. This allows BAC to increase staff

capacity and support the Chief Executive in implementing strategic objectives. The new Accreditation Manager brought experience in ethics and sustainability which supports the BAC strategy and provides additional expertise to BAC in a topical area in Higher Education. Members of the Board of Trustees are strategic ‘champions’ and work with BAC staff in these different operational areas, ensuring that their knowledge can benefit BAC as an organisation. Staff have access to a development fund which can be used to continue to gain knowledge and share it with others to ensure an increase in capacity.

The BAC strategy has objectives relating to the engagement with the quality assurance community, including undertaking activities in Europe and internationally and one of the actions taken was to secure a European advisor on a consultancy basis to work across the organisation allowing BAC to consider the wider context of quality assurance in the European Higher Education Area (EHEA) and internationally. Activities such as chairing the ENQA working group on Micro-credentials demonstrate our commitment to these objectives and respond to the ENQA recommendations.

The increase in online seminars and conferences between 2020 – 2022, due to the changes in event delivery from Covid-19 restrictions, allowed BAC to ensure all staff had opportunities to attend online events. Regular targeted communications are sent to accredited providers where topics discussed would impact their sectors and BAC has also disseminated this information to the public and accredited providers through webinars. In addition, BAC decided to invite members of the Council to attend events with BAC staff or to represent the organisation.

BAC staff have been actively engaged in responding to surveys and consultations, including INQAAHE’s survey on international standards and guidelines and ENQA’s survey on micro-credentials. The change in inspection method, required due to the Covid-19 pandemic, was initially fully online with the Chief Inspector observing many inspections. BAC has now moved to a hybrid inspection method (see below) and the observational position of the Chief Inspector will remain as this builds knowledge capacity for the organisation and ensures the separation of function between staff and inspectors.

ESG 2.1 Consideration of internal quality assurance

RECOMMENDATIONS	
<p>BAC is recommended to strengthen the coverage of ESG 1.4 in the inspection process so that the provider’s policy on the recognition of qualifications is specifically considered, taking note of most recently available international guidance on the matter.</p>	<p>STATUS: ONGOING</p> <p>Action completed so far:</p> <ul style="list-style-type: none"> ▪ Inspection standards on recognition of qualifications are in place ▪ International guidance reviewed <p>Actions planned:</p> <ul style="list-style-type: none"> ▪ This area falls under the standards framework activities and will be reviewed in detail once the framework is approved.

<p>BAC is recommended to evolve the inspection process and the Accreditation Committee's decision making to more explicitly address the effectiveness of the internal quality assurance processes described in Part 1 of the ESG.</p>	<p>STATUS: ONGOING</p> <p>Actions completed so far:</p> <ul style="list-style-type: none"> ▪ Inspectors' training has included reviewing how inspectors address the effectiveness of internal quality assurance processes and activities and make secure judgments as part of their inspections. This focus is ongoing. <p>Actions planned to consolidate impact:</p> <ul style="list-style-type: none"> ▪ The outcomes will be included in a future revision of the inspectors' handbook ▪ Accreditation Committee away day will review internal quality assurance, ToR and the decision-making process
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During the review of the Independent Higher Education scheme, internal quality assurance was one of the themes that BAC included throughout the revised scheme. BAC has undertaken an initial analysis of all of the accreditation schemes to identify where additional focus and intervention may be needed. It was determined at the initial analysis that the schemes include criteria that focus on the providers' internal quality assurance processes and their effectiveness and impact.

Following the initial scheme analysis, and taking into consideration recommendations from the ENQA review, BAC has included how inspectors address the effectiveness of internal quality assurance processes and activities and make secure judgments as part of their inspections, as part of our inspector training and briefing activities. Additional information and guidance is given as part of the onboarding process for inspectors to ensure that how a provider's internal quality assurance policies demonstrate compliance of key indicators is included in inspection reports to inform the decision making of the Accreditation Committee.

To maintain a logical sequence of activities, the cycle of annual scheme reviews has been paused while BAC is investigating the overarching standards framework. The next stage of the standards review is an online consultation and review of the proposed overarching standards framework. We are carrying out a thorough review to ensure that BAC is in the best position to create an effective framework. Once the framework has been approved, we shall move to rolling it out to the individual scheme as we conduct reviews to ascertain the changes which will be necessary.

As BAC makes changes to our schemes and identifies areas that need a stronger focus, additional training will be provided as required. Updated guidance to inspectors on remote and hybrid inspections is either complete, as a written document and is being used by inspectors, or is under development. This includes an online training workshop. The content of the guidelines includes areas relating to the inspection of internal quality assurance aspects. The Inspectors' Handbook and Report Writing Guidelines will be adapted and extended as necessary in the planned October 2022 revision.

The Accreditation Manager agreed with the new Chair of the Accreditation Committee, appointed in October 2021, to organise scheduled meetings for committee members and office staff to be implemented at the start of the next financial year (September 2022). The

first such “away day” will focus on the ToR and the AC’s decision-making processes in a higher level of detail, and will ensure that office staff are fully aligned with the expectations of the Accreditation Committee and can support its work more effectively. Equally, it is an opportunity for the Accreditation Committee to gain more understanding about the routine operational processes which feed into the Committee’s work. Moving forward, such activities will become integral to the internal quality assurance system and contribute directly to streamlining decision-making processes under adequate operational support.

Please also see the comments made below under **ESG 2.6 Reporting** that also support the meeting of this recommendation relating to evolving the inspection process and, by definition, the inspection reporting process, to more explicitly address the effectiveness of the internal quality assurance processes described in Part 1 of the ESG.

ESG 2.4 Peer-review experts

RECOMMENDATIONS	
<p>BAC is recommended to clearly separate the functions of staff and inspectors, including the role of the Chief Inspector.</p>	<p>STATUS: COMPLETED</p> <p>Actions completed:</p> <ul style="list-style-type: none"> ▪ Monitoring programme in place for the Chief Inspector to monitor a range of inspections ▪ Updated job description of Chief Inspector ▪ Drafts of inspection guidelines and training module are complete for hybrid and online inspections, including clear roles of the inspection team members as distinct from observers or monitors – undergoing a final review before being published <p>Actions planned to consolidate impact:</p> <ul style="list-style-type: none"> ▪ Monitoring of effectiveness of actions through internal QA system, specifically feedback.

BAC previously utilised the experience and expertise of the Chief Inspector as an active member of an inspection team, and this was declared at all Accreditation Committees where the relevant inspection report was discussed. The recommendation from the ENQA review was to ensure there was a clear separation between the monitoring and managerial role of the Chief Inspector and the possible conflict of interest that may occur due to being an active member of the inspection team. BAC confirms that the role of the Chief Inspector is to manage, quality assure, monitor and provide oversight of the inspection activity and individual inspections. She no longer plays any part in the conduct of the inspection.

The Accreditation Manager and his team deal with all the providers throughout the accreditation/re-accreditation application process. When the Accreditation Manager is satisfied that the provider meets all the application related due diligence requirements and can proceed to the inspection stage, the file is passed to the Chief Inspector for the inspection organisation process. The Chief Inspector then works with the Inspections Co-ordinator to organise the inspection and deploy the members of the inspection team. This

process ensures there is an appropriate and secure separation between the accreditation and inspection activities.

Since the last ENQA agency review, the Chief Inspector has exercised her monitoring and oversight role throughout the processes mentioned below.

Risk based approach

A paper on online inspections, which was put together by the Chief Inspector in collaboration with other BAC staff members, and after consultation with a range of stakeholders, including providers and inspectors, was agreed by the Council on 18 June 2020. The paper set out a risk-based approach to deciding if an online inspection was appropriate for providers requiring a re-accreditation inspection as well as for new providers, whether there should be a requirement for an onsite follow-up element and what length of accreditation should be awarded. All decisions are made on a risk basis.

The risk factors included in the risk assessment related to how well the provider had engaged with BAC and the application process, the nature and severity of any outstanding action points, how well they were prepared for the inspection and their level of information technology connectivity.

We have now carried out many online single and team inspector inspections both in the United Kingdom (UK) and internationally, at universities in Nepal, Jakarta, Slovenia and Qatar. The feedback has confirmed that online inspections allow the same robust level of evidence gathering as inspections carried out in-person. The full online inspections have been carried out by a small team of inspectors and one of our highly experienced inspectors carried out the first pilot inspection in the UK and has supported all inspectors doing their first full online inspection to ensure inspectors are appropriately trained and that there is consistency in approach. The Chief Inspector has also observed and monitored many of the full online inspections, both in the UK and internationally as part of her quality assurance and monitoring role.

Throughout this period of time, detailed guidelines on running successful online inspections have been developed and produced, including running virtual premises tours, observations of course delivery and the submission and organisation of the inspection documentation.

Hybrid inspections

As a result of this online inspection approach, BAC has recognised that there are many benefits of running inspections online. The benefits include greater flexibility in setting the inspection dates, enabling a day free between the inspection activities for reflection and additional evidence gathering; being able to move quickly from one activity to another on the chosen online platform and, of course, the environmental benefits of working remotely. BAC recognises that there are also challenges to this approach, way to mitigate them are addressed in the risk assessment and included in the briefing document provided to the inspection team. In addition, there are, of course, many benefits of carrying out inspection activities onsite, for example the greater ease relating to observing face-to-face classes and carrying out reviews of premises.

BAC has therefore decided to make use of both online and onsite inspection methods through the introduction of hybrid inspections, normally involving one day onsite and the rest of the time online or, for international inspections, the Lead Inspector onsite for the whole inspection and the other inspectors joining online.

For the reasons set out above, our default inspection method is hybrid although the Chief Inspector reserves the right to conduct inspections totally online or onsite, depending on the outcome of the risk assessment.

A paper, developed by the Chief Inspector and with input from other staff and stakeholders, that set out the process for deciding on what type of inspection method, including a risk assessment, would produce the most effective and robust inspection outcome was agreed by the Council on 14 October 2021.

Hybrid inspections started from November 2021.

In order to make a decision about the most appropriate inspection method, a written risk assessment is carried out for each provider, on an individual basis, in order to determine the method that will work best for the provider, in order to carry out a robust and effective inspection. The risk assessment is carried out by the Chief Inspector, in conjunction with the Accreditation Manager.

Decisions about what approach to use are based on a set of objective criteria, in order to ensure consistency. The criteria include any relevant government restrictions in place, including those relating to Covid-19; whether the provider is a new applicant for accreditation or an existing accredited provider; the nature of the provision, i.e. whether the teaching is delivered in the classroom or online, whether it is practical in nature and the extent to which the staff are working remotely rather than in the provider's premises.

The hybrid method has proved to be very successful and we are committed to learning from each experience and acting on the feedback we receive to make sure that we constantly increase robustness, efficiency and impact.

Inspector training and monitoring

Inspectors have been supported and trained to enable them to carry out robust and effective online and hybrid inspections.

As mentioned above, inspectors have been coached and mentored by an inspector with significant online inspection experience as well as the Chief Inspector throughout the process of running these inspections.

A set of online inspection guidelines have been produced. These have been shared with all inspectors undertaking online and hybrid inspections.

The Chief Inspector has monitored the first international hybrid inspection of a Higher Education institution based in Geneva in Switzerland. The inspection went well and the provider's feedback was positive. There were learnings that are being considered and addressed, for example about additional measures to ensure effective team working when one inspector is onsite and the others are online and how to ensure effective communication in all meetings.

The guidelines are being expanded to take account of the learning from the hybrid inspection approach.

An online training module is in the process of being developed. The module deals with preparing for and carrying out online and hybrid inspections. This module will be rolled out to all inspectors in conjunction with the written online inspection guidelines and the existing Inspectors' Handbook.

There are regular inspector training events, including an online event run in 2020 and a hybrid event in 2021, as part of which online and hybrid inspections have been discussed to keep inspectors up to date.

As a result of the above measures, we have built further capacity. Inspectors have an even better understanding of the process, they are briefed and trained on relevant updates in a timely manner and they have confirmed they feel fully confident to work independently, and request procedural clarifications from the Chief Inspector, only as needed.

Accreditation Committee

Decisions about whether to award accreditation are not made by BAC staff or inspectors. They are made by the independent Accreditation Committee (AC) following a scrupulous analysis of the inspection reports. The BAC accreditation team works with the AC to support their decision-making and to ensure that robust decisions are made. There are plans to run an away day to further support team building and build the AC's capacity. This was discussed further in ESG 2.1.

ESG 2.6 Reporting

RECOMMENDATIONS	
<p>BAC is recommended to further strengthen the transparency of how inspections consider the effectiveness of providers' internal quality assurance processes in the published reports by increasing their analytical content and listing the inspectors involved.</p>	<p>STATUS: ONGOING</p> <p>Actions completed so far:</p> <ul style="list-style-type: none"> ▪ Thematic workshops with highlight on analytical reporting ▪ Standards framework focus groups considered approach to reporting <p>Actions planned to consolidate impact:</p> <ul style="list-style-type: none"> ▪ Overarching standards framework consultation ▪ Review of inspection reports to include analytical content ▪ Purchase of CRM system to work with report submission

Current BAC reports are designed to be evaluative and impact-based. They include commentary on how the standards and criteria are met and the commentary will be expanded to include further and appropriate analytical content.

BAC has been organising a range of online and, more recently, in person stakeholder events, including training events and workshops. These events have involved both inspectors and providers and have been used for a number of projects. Since we have now established a system of consulting and reaching out to stakeholders, including inspectors, this allows us to set up detailed workshops with inspectors to build on the existing stakeholder consultation activities that have been undertaken and implement outcomes from the groups.

One project that is in progress with stakeholders, including inspectors, is the development of an overarching standards framework. The overarching standards framework will enable the various accreditation schemes to continue to function in order to meet the distinctive

contexts of our different providers whilst, at the same time, providing a set of centralised standards within which all the schemes will sit. This will allow for better communication of what BAC accreditation stands for in terms of overarching quality standards and the commitments that our accredited providers have made to achieving the best outcomes and experiences for their participants and students.

As a result of publishing the finalised set of overarching standards, the various individual schemes will be reviewed and revised where necessary, to build on the individual accreditation scheme reviews that have already taken place, making use of focus groups consisting of inspectors, providers, specialists and BAC staff.

As part of the new strategic plan, a review of the reports will be undertaken alongside the purchase of the CRM system. In addition, the introduction of the standards framework will include a review of the inspection methods and report format.

BAC has developed a draft report template that takes on board the various improvements and comments made by the ENQA review team. A first inspector focus groups included detailed discussion on the report as an emerging operational theme in need of attention. A subsequent inspector focus group will review the changes proposed to the report and approve or amend it alongside consideration of the following elements:

- requiring inspectors to include more evaluative (rather than descriptive) text in the comments sections
- evidence referencing throughout the text as numbers in brackets in the relevant paragraphs, coupled with a full list of evidence that would be included as an annex to the report
- identifying inspectors by name and title
- introducing a short executive summary
- introducing non-binary assessment markers

The intention of this activity is to allow BAC to ensure that inspection reports are sufficiently analytical in their content, and fully consider the effectiveness of providers' internal quality assurance processes. This should be done so that the reports are not unduly discursive and descriptive and maintain the current crisp, evaluative and impact approach.

Changes to the report template will be announced to inspectors at the annual inspectors' training event within the overall context of the approach to inspections, including the new hybrid approach.

The changes to how evidence is referenced and recorded will explicitly allow for a stronger link and more transparency between the findings and the evidence which underpins these findings, making reports more accessible to our varied audiences.

BAC actions in response to ENQA commendations

ENQA commendations are important for BAC and have been given attention to ensure that sufficient resources are kept available to allow for these areas to be maintained and further developed.

The actions presented below summarise key areas of preoccupation as a response to the ENQA commendations.

The maintenance and development of these areas is also further stimulated by the actions described in detail in the section above on Recommendations.

COMMENDATION 3.1	
<p>The impact of BAC's work to engage higher education providers that would not otherwise benefit from external quality assurance.</p>	<p>Actions to maintain and develop this area:</p> <ul style="list-style-type: none"> ▪ New strategy highlights diversity ▪ Plans to develop in the area of micro-credentials ▪ Development Workshop Series further supports providers ▪ Plans to work with governmental organisations overseas seeking international accreditation for higher education institutions. ▪ Continuing reduced fees for institutions in middle and low income countries who otherwise may not have sufficient funds for external quality assurance.

COMMENDATION 3.5	
<p>The stability brought to the operational delivery of core business in recent years.</p>	<p>Actions to maintain and develop this area:</p> <ul style="list-style-type: none"> ▪ New appointments made to strengthen capacity for continuity and oversight of governance ▪ CRM system will allow for better inspection management and data collection and control in support of operation ▪ SOPs and regular staff meetings to share information

COMMENDATION 3.6	
<p>The successful streamlining of internal processes and the implementation of a robust approach to internally managing the quality of its operations.</p>	<p>Actions to maintain and develop this area:</p> <ul style="list-style-type: none"> ▪ Further developments have been brought to retain robustness of operations ▪ Pandemic lessons have revealed areas of opportunity and further system developments ▪ Establishing hybrid inspections and applying a risk based inspection planning process

COMMENDATION 2.3

The rigorous approach taken to follow-up after accreditation is awarded.

Actions to maintain and develop this area:

- Continued under the pandemic
- Liaison scheme is being developed
- Provider focus groups organised to share follow-up actions
- Continual effectiveness of the accreditation department
- CRM system will support central record keeping and post-accreditation follow up

Overall, BAC has endeavoured to keep commendations in focus to ensure its does not lose or side-track important features of good practice.

BAC actions in response to ENQA suggestions for further improvement

Suggestions for further improvement as highlighted in the ENQA report are considered in the BAC action plan and synergies between actions and cross-implications from one area to another are considered to ensure effectiveness and impact on all areas highlighted by the ENQA panel.

SUGGESTION FOR FURTHER IMPROVEMENT 3.1

Formalise and accelerate the implementation of BAC's plans for enhancing the engagement of stakeholders in its work.

STATUS: COMPLETED

Actions taken to improve area:

- Annual stakeholder event
- Stakeholder focus groups and consultations
- Strategic plan outlining areas of engagement
- Stakeholder engagement included in marketing plan

SUGGESTION FOR FURTHER IMPROVEMENT 3.4

Given the centrality of the Accreditation Committee to the way BAC exercises its independence and fairness in making decisions about accreditation, there could be greater transparency and clarity about the function, membership and operation of the Committee on BAC's website.

STATUS: ONGOING

Actions taken to improve area:

- More reports drafted and published about BAC activity, including for increased financial transparency
- Additional information provided on BAC website about the function and operation of the Accreditation Committee

SUGGESTION FOR FURTHER IMPROVEMENT 3.6

Publish its IQA approach more comprehensively on its website so that stakeholders can be more fully assured and the public more fully informed.

STATUS: ONGOING

Actions taken to improve area:

- Additional information provided on the BAC website
- BAC Employee Handbook available on BAC website

Ensure sufficient attention is given in the coming years to further improve the quality of feedback collected from inspectors and providers, and the way in which that feedback is systematically used to improve BAC's operations.

STATUS: COMPLETED

Actions taken to improve area:

- Focus groups with inspectors organised
- Notes discussed with the Steering Committee
- CRM system will include record keeping of feedback
- Chief Inspector report to Council includes inspection feedback and provides method to share, discuss and implement any improvements

SUGGESTION FOR FURTHER IMPROVEMENT 3.7

Develop an action plan in response to the recommendations and suggestions for further improvement arising from the ENQA review with actions that are SMART. As a minimum, annual reports on progress towards these actions should be scrutinised by the Council, used to inform the mid-point progress report to ENQA, and available to the review panel undertaking the next ENQA review.

STATUS: COMPLETED

Actions taken to improve area:

- Action plan developed
- New strategy fully considers the strengths and opportunities highlighted by the ENQA panel
- Engagement with ENQA and the EHEA, including ENQA recommendations and suggestions for improvements, is a standing item for Council meetings

SUGGESTION FOR FURTHER IMPROVEMENT 2.2

Take forward the lessons learnt from piloting the Higher Education Focus Group into the next iteration and build on these by achieving even wider and deeper engagement, including from the network of accredited higher education providers.

STATUS: COMPLETED

Actions taken to improve area:

- Stakeholder event with HE provider participation
- Focus groups and workshops with HE provider involvement
- Standards Framework review includes a consultation period with all accredited providers, including those delivering higher education.

SUGGESTION FOR FURTHER IMPROVEMENT 2.4

Continue to professionalise the recruitment of inspectors and diversifying the experiences they bring to BAC inspections, including Student Inspectors.

STATUS: COMPLETED

Actions taken to improve area:

- Clear recruitment process of inspectors listed on the BAC website
- Chief Inspector maintains overview of inspectorate and identifies any subject or skills requirements for future recruitment
- On-boarding and training process streamlined
- Mentoring of student inspectors in place

Review the decision to not introduce international inspectors (those based outside of the UK) as part of the IHE Scheme.

STATUS: ONGOING

Actions taken to improve area:

- Further discussions in Council and Standing Committee meetings

SUGGESTION FOR FURTHER IMPROVEMENT 2.5

Further develop supporting guidance available alongside the minimum standards in the IHE Scheme so that providers can see what good practice would look like when meeting the standard.

STATUS: ONGOING

Actions taken to improve area:

- BAC Strategy 2021 – 2026 includes focus on sharing good practice and enhancement and action plan produced to implement this.
- Marketing plan includes collection of enhancement videos on best practice
- Case studies on good practice to be published on the BAC website

SUGGESTION FOR FURTHER IMPROVEMENT 2.6

Evolve the templates for inspection reports to include a short summary that could be published by itself for public consumption, drawing on the recommendations of ENQA's EQArep project.

STATUS: ONGOING

Actions taken to improve area:

- EQArep project documentation reviewed and recommendations compared with BAC practices
- Review of inspection reports ongoing, including planned focus group with inspectors to discuss report template

Overall, BAC has noted that many of the actions designed to address the recommendations have also had a very positive impact on the areas highlighted by the ENQA panel under the suggestions for further improvement and that the new strategic commitments also relevantly complement these areas.

Conclusion and next steps

BAC will continue to develop our activities and processes in-line with the Action Plan and the ENQA commendations, recommendations and further suggestions. In a commitment to ongoing quality improvement, further work to create an overarching standards framework is underway and will align with the ESG 2015. The actions in response to the ENQA report have long lasting impact and will be taken forward longer-term for further enhancement work conducted by BAC.