

Policy on the Internal Quality Assurance of ENQA Agency Reviews

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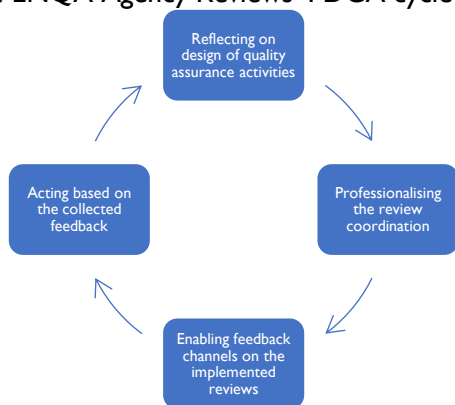
I. Introduction

This policy aims to ensure that all review activities coordinated by ENQA under the umbrella of “ENQA Agency Reviews” are fit for purpose and run optimally. The internal quality assurance of ENQA Agency Reviews thus encompasses the description of processes and tools for planning, implementation, assessment, and improvement of external reviews of quality assurance agencies across the European Higher Education Area.

A detailed description of the review procedure can be found in the Guidelines for ENQA Agency Reviews¹, whereas the purpose of this document is to present the ongoing nature of internal quality assurance for the quality and integrity of the review process itself.

The internal quality assurance policy document of ENQA Agency Reviews is structured around four sets of activities: 1) reflecting on the design of quality assurance activities; 2) professionalising the implementation of review coordination; 3) enabling feedback channels on the implemented reviews; and 4) acting on the collected feedback to support further improvement of quality assurance processes. The four steps form a closed internal quality assurance loop of ENQA Agency Reviews (i.e., a plan-do-check-act or PDCA cycle) (see figure 1).

Figure 1: ENQA Agency Reviews' PDCA cycle



¹ Available at: <https://www.enqa.eu/wp-content/uploads/Guidelines-for-ENQA-Agency-Reviews.pdf>

2. Roles and responsibilities of involved bodies

The ENQA Secretariat (the Reviews Manager, review coordinators and the Director), the Agency Review Committee (hereafter the ARC) and the Board each have their respective roles in assuring the internal quality of ENQA Agency Reviews. Review coordinators manage the daily operations of their assigned external reviews and help ensure their consistency. The Reviews Manager oversees all ongoing reviews and proposes any action for improvement to the Director, the ARC and the Board. The ARC is responsible for the approval of panel compositions, the scrutiny of external review reports and their validation. The ARC also plays a role in supporting the consistency of the reports and may highlight issues of concern that need to be addressed. The ENQA Board oversees the internal quality assurance measures, including the adoption of proposed changes (see Article 18 of the ENQA Statutes²). In addition, several other stakeholders of ENQA have active roles in the internal quality assurance of ENQA Agency Reviews. Input from agencies and reviewers is gathered systematically and in a structured manner following each review and review event. Furthermore, feedback on the review methodology is collected from the European Quality Assurance Register in Higher Education (EQAR) through an open and constructive discussion held at an annual meeting. ENQA also collects feedback from the E4³ and separately with the European Students' Union (ESU) on the performance of their appointed experts and generally on their cooperation with ENQA. These meetings are also held annually.

3. ENQA Agency Reviews' PDCA cycle

3.1 Reflecting on the design of quality assurance activities

ENQA reflects on the design of quality assurance activities to safeguard the independence and consistency of the review process and decision-making, and to ensure the non-conflict of interest of all involved parties.

To ensure as high a degree of consistency of the review processes and decision-making as possible without interfering with the natural differences brought about by the peer review methodology, ENQA:

- 1) assigns Secretariat staff to coordinate the review process. The Secretariat staff screens the self-assessment report, participates in the site visit, screens the review report, and acts as a resource person in the decision-making process.
- 2) asks the review Chair to review any changes suggested by the agency after it has commented on the draft report and produce a table (in cooperation with the review Secretary) reporting all proposed changes and the action of the panel in the revised report. The table is sent to the agency and the ARC.
- 3) asks the review Chair to provide – in cooperation with the review Secretary – an informal feedback letter to the ARC about the review process, including feedback on the overall operation of the review; the usefulness of the preparatory activities; the frankness and completeness of the documentation provided by the agency; the quality of the dialogue experienced during the site visit; the coordination by ENQA; and the report-drafting process. The letter is sent to the ENQA Secretariat together with the completed review report at the latest.

² Available at: <https://www.enqa.eu/wp-content/uploads/ENQA-Statutes-2021.pdf>

³ Together with EUA, EURASHE and ESU, ENQA forms the “E4 Group”. The Group members engage in ENQA Agency Reviews by nominating experts for the review processes. Next to this, the Group collaborates on European QA policy and meets 3-4 times/year to elaborate joint projects and initiatives. The E4 are the founders of EQAR and manage the organisation as members of its Executive Board.

- 4) has a committee that scrutinises and validates the review reports prior to their further use by EQAR or the ENQA Board. For this purpose, the ARC issues a statement (see point 7 below). The ARC is divided into teams of three members who each complete a scrutiny of the report separately to ensure full independence of assessment. All standards where two or more scrutinisers deviate from the judgement of the panel and/or from each other are specifically discussed in the meeting of the ARC. If, after the discussion, the ARC's view on any of the standards deviates from that of the panel, a statement that accompanies the report will include an elaboration why the ARC's view differs from the one of the panel. This will support the consistency and comparability of the reports across different review panels. The scrutiny of the review report by the ARC always specifically addresses the validation of the review report, referring to the integrity of the review process and the quality of the report. Should the review report not be validated by the ARC, the ARC can ask the review panel to revise the review report. The review coordinator attends the meetings of the ARC whenever possible in order to provide clarifications and to collect feedback.
- 5) maintains a "Book of precedents" for the performed reviews. The book is managed by the ENQA Secretariat and contains records of discussions on specific standards by the ARC (and previously by the ENQA Board) and judgements from previous reviews. The book is used by the review coordinator during the review process to ensure consistency between different review processes and the resulting reports and by the ARC when validating the reports.
- 6) keeps track of the ARC scrutinies of the reviews that state if the ARC's view on the level of ESG⁴ compliance for one or more standards deviated from the judgement of the review panel. The ARC statements will allow ENQA to identify areas or standards that prove challenging to judge, or where differences in judgement occur more frequently, to improve the review training. The review coordinator provides the review panel with information on the ARC's discussions.
- 7) publishes the ARC statements in an annex to the agency review report, which provides information to EQAR and the ENQA Board if the panel has been comparatively stricter or more lenient in its judgement.
- 8) organises four different types of events related to the review process:
 - The training of reviewers provides new reviewers with the necessary knowledge and guidance on the use of the ESG, on the ENQA Agency Reviews process, and on compliance assessment. Only reviewers who have attended an ENQA reviewer training are included in the ENQA pool of trained experts and may be appointed to panels of ENQA Agency Reviews.
 - The reviewers' seminar is for experienced reviewers only and aims to discuss the existing challenges and opportunities in ensuring the consistency, and the enhancement-oriented dimension, of ENQA-coordinated reviews. It also serves as further preparation for future review secretaries and chairs.
 - The seminar for agencies planning to undergo a review against the ESG explains the purpose and objectives of such a review and discusses best practices related to the self-assessment process as well as how to maximise benefits of an external review, including future planning for and development of the agency.
 - The seminar for recently reviewed agencies aims to support the further development of these agencies by inviting them to share post-review progress and good practices as well as to collect further feedback on the review process.

⁴ The Standards and Guidelines for Quality Assurance in the European Higher Education Area are available at: https://enqa.eu/wp-content/uploads/2015/11/ESG_2015.pdf

To safeguard the non-conflict of interest of all involved parties, ENQA:

- 1) ensures that the review panels are checked by the ARC and by the agency under review for a real, perceived or potential conflict of interest prior to the approval of the review panel.
- 2) requires the reviewers to commit to and abide by the ENQA Code of Conduct⁵ when signing the review contract. The elements of non-conflict of interest, honesty, ethics, objectivity, independence, safeguarding of confidential information, tolerance⁶, competence and professionalism that are addressed in the Code of Conduct are specifically presented during the training of reviewers as well.
- 3) asks the review coordinators to declare any conflict of interest. The coordinators will not coordinate the reviews of agencies with which they have a real, perceived or potential conflict of interest.
- 4) applies a two-step procedure to ensure non-conflict of interest of the ARC members. First, all ARC members are asked to declare any conflict of interests prior to accepting to work on any review report. Second, the two sub-committees within the ARC include alternate members who are invited to replace an ARC member in cases of real, perceived or potential conflict of interest. An ARC member is never asked to review the report of his/her own agency, or a review in which he/she has acted as a reviewer.
- 5) ensures that no ENQA Board members are nominated or appointed as reviewers during their term in the Board. A Board member is never asked to decide on the ENQA membership of his/her agency.
- 6) ensures that no EQAR Register Committee members are reviewers for ENQA Agency Reviews or members of any of ENQA's review-related bodies (the ARC or the Appeals and Complaints Committee).
- 7) ensures that no experts taking part in an agency's progress visit participate in the subsequent full review to avoid any real, perceived or potential conflict of interest.

3.2 Professionalising the review coordination

Several elements ensure the professional implementation of ENQA's review coordination:

- 1) The review process is pre-described in detail in the Guidelines for ENQA Agency Reviews.
- 2) Through a debriefing meeting of review coordinators (which takes place about four times per year), the ENQA Secretariat exchanges good practices, challenges and issues arising within ENQA Agency Reviews. The collected feedback leads to revisions or adjustments of processes if or when needed.
- 3) All review coordinators are trained on the job, and each person undertaking a review for the first time will first observe a review process – including the site visit – coordinated by an experienced review coordinator. Moreover, review coordinators occasionally attend the events for agencies or reviewers as listed in section 3.1.
- 4) ENQA has a procedure in place for the inclusion of external observers during the site visit⁷. The external observers need to ensure that they respect the principles of ENQA Agency Reviews.

⁵ Available at: <https://www.enqa.eu/wp-content/uploads/ENQA-Code-of-Conduct-for-reviewers.pdf>

⁶ The protection from intolerance or discrimination of any kind is built into the very mission and values of ENQA (available at: <https://www.enqa.eu/about-enqa/>). The association respects the diversity of European higher education, the diversity of quality assurance and enhancement approaches and measures, and the diversity of approaches to setting up national quality assurance systems.

⁷ Available at: <https://www.enqa.eu/wp-content/uploads/ENQA-protocol-for-external-observers.pdf>

- 5) The recruitment of Secretariat staff, a task of the ENQA Director, includes a careful examination of the applicant's professional profile against requirements on professional and ethical work⁸.

3.3 Enabling feedback channels for the implemented reviews

ENQA Agency Reviews provide the following feedback channels to the agencies under review and other stakeholders:

- 1) ENQA performs regular surveys for the agencies under review and review panels for full and partial reviews, as well as for progress visits. The surveys are completed towards the end of the review process (after completion of reports, but before the validation of the report by the ARC). The outcomes are analysed once per year in the Annual Technical Report (see section 3.4) and result in detailed improvement plans, if required.
- 2) In the survey for panel members, ENQA includes an open question to comment on the panel composition, team dynamics, and allows to commend or raise a concern about any individual panel member⁹.
- 3) ENQA collects feedback on the usefulness, relevance and quality of the events related to the review process (such as the training of reviewers, experienced reviewers' seminars, seminars for recently reviewed agencies, seminars for agencies preparing for a review and so on) and takes such feedback into account when designing future events.
- 4) Most of the events as listed under point 3 of this paragraph, especially the reviewers' seminar and the seminar for recently reviewed agencies, are opportunities to collect feedback and discuss improvement proposals for the review methodology.

3.4 Acting based on the collected feedback

The aim of the feedback analysis is to reflect on the performed activities, which in turn leads to the improvement of ENQA Agency Reviews. The following activities are implemented in this regard:

- 1) The outcomes of surveys are carefully considered by the ENQA Secretariat after each review process or event and prior to the organisation of a new event. The Reviews Manager makes small adjustments to the review process immediately, if appropriate.
- 2) The reviews are more widely analysed on an annual basis. For this purpose, a draft Annual Technical Report is written to the attention of the ARC to provide an aggregated overview of the performed reviews.
- 3) Following the discussions on the draft Annual Technical Report by the ARC, the ENQA Secretariat prepares a final version of the report for the attention of the Board, where key feedback on the reviews is collected, and actions taken on internal quality assurance are communicated and/or proposed for the Board's approval. The Board decides on the proposed changes and possibly requests amendments to the Guidelines for ENQA Agency Reviews and ENQA's statutory documents. The Board's discussion on the matter is held at a meeting in parallel with one of the ARC's meeting to support a joint discussion between the two bodies on any arising issue. Note: the annual meeting between the Board and the ARC is held regardless of whether there are any proposed changes to the review methodology.
- 4) Substantial changes to the review process are communicated to ENQA members and affiliates whenever needed through the Note from the President.

⁸ Additionally, the annual appraisal interviews enable the Director to identify the needs for further professional training of ENQA staff, in which case the Secretariat staff is encouraged to attend workshops and conferences (e.g. the European Quality Assurance Forum).

⁹ The question includes a note that the feedback will be treated in confidence and allows ENQA to address any issues and improve the quality of future panels.

- 5) Once every two years a discussion on the review methodology is raised at the General Assembly to reflect on general indications of issues as collected through the surveys, Annual Feedback Reports, discussions of the Board etc. At the General Assembly, the participants can propose changes to ENQA Agency Reviews.

4. Annual work plan on key internal quality assurance measures of ENQA Agency Reviews

What?	Who?	When?
Approve panel composition	ENQA Agency Review Committee	Part of each review process
Check for conflict of interest of the proposed panel	Agency under review	Part of each review process
Check of criteria for a review panel as defined in EQAR's Guide for Applicants and Registered Agencies	EQAR	Part of each review process
Commit to ENQA Code of Conduct	Review panel	Part of each review process
Screening of the self-assessment report	Review coordinator	Part of each review process
Attend site visit for support on consistency	Review coordinator	Part of each review process
Site visit debriefing	Reviews Manager	App. four times per year
Gather and analyse feedback from the reviewed agency and review panel	Review coordinator	Part of each review process (prior to the validation of the review report)
Screening of the external review report	Review coordinator	Part of each review process
Check for factual accuracy of the external review report	Agency under review	Part of each review process
Scrutiny of the external review report	ENQA Agency Review Committee	Part of each review process
Validation of the external review report	ENQA Agency Review Committee	Part of each review process
Annual Technical Report for the ARC and the Board	Reviews Manager	Once per year

5. Internal quality assurance of thematic analysis

ENQA conducts thematic analyses to describe general findings of the agency review processes. Reports are produced once every two years with a predefined cycle that includes the process of collecting proposals for topics, decision of the topic, carrying out the thematic analysis and the dissemination of the analysis.

Relevant actions of the thematic analysis cycle are presented in ENQA's annual work plan. ENQA gathers proposals for topics from stakeholders through ENQA's events (e.g., General Assembly) and following the findings from the Annual Technical Report. The decision on the topic is made by the ENQA Board based on proposals by the ARC. For example, the analyses can build on the review outcomes as presented in the Annual Technical Reports but should additionally be complemented with other research methods (e.g., questionnaires, webinars, consultations etc.).

The thematic analysis is then produced by the ENQA Secretariat or outsourced based on the available resources of the Secretariat and/or the nature of the analysis. The ENQA Secretariat disseminates the

report to ENQA members and affiliates through its usual dissemination channels (e.g., Note from the President, ENQA events, webinars) and presents key findings of the analysis to other stakeholders (e.g., E4, EQAR) upon request.

6. List of related internal documents and forms

- 1) ENQA Agency Reviews – Feedback questionnaire for agencies
- 2) ENQA Agency Reviews – Feedback questionnaire for panel members
- 3) Progress visits – Feedback questionnaire for agencies
- 4) Progress visits – Feedback questionnaire for experts
- 5) Scrutiny form for the external review report
- 6) Event evaluation forms (4)
- 7) Form for the composition of the panel
- 8) ENQA Code of Conduct