



ENQA Review, 2018 Follow-up report

Introduction

1. The Quality Assurance Agency for Higher Education (QAA) underwent its third successful review by ENQA in February 2018. Continuing full membership of ENQA was confirmed by its Board in June 2018.
2. The review judged that QAA was fully compliant in all but one standard (2.4, where QAA was found to be substantially compliant).
3. The review resulted in a **suite of commendations** covering work within 10 standards, namely: 3.1, 3.2, 3.3, 3.4, 3.5, 3.6, 2.2, 2.3, 2.4 and 2.6. In the letter from the Board confirming the outcome, particular mention was made of “QAA’s firm commitment to quality enhancement,” “its enhancement-led approach in thematic analysis” and how “it clearly provides value to the whole Higher education sector”.
4. The report made **one recommendation**, under standard 2.4, on the inclusion of students in all ESG-aligned review methods. Alongside this were a **list of suggestions for further development** within standards 3.1, 3.3, 3.4, 3.5, 3.6, 3.7, 2.1, 2.2, 2.4 and 2.6. The Board’s letter re-stressed the importance of the recommendation, also encouraging QAA to give “more attention to a wider inclusion of international experts as well as employers/professional practitioners in its procedures.” It also highlighted the importance of QAA intensifying activity with respect to the review of transnational education and strengthening its oversight of collaborative provision.

Benefit of, and response to, the review by ENQA

5. QAA benefited from the processes of reflection involved in preparing for the review, in discussing matters with the review panel and through considering the commendations and recommendations since the review report was received. The report recognised that QAA had been undergoing a period of change and that change would be a continuing feature of the quality landscape in UK higher education. QAA developed an action plan to track continuing progress against matters raised and, importantly, it sought to ensure that the substance behind commendations and recommendations informed the thinking behind organisational change and QAA’s continuing development as an agency.

Report structure

6. This report provides an update first in connection with the recommendation (and connected Board comment) followed by the second area highlighted in ENQA’s letter; it then addresses other commendations and suggestions for development. Where suggestions and commendations refer to the same topic area they are considered together to avoid duplication. Annex 1 provides a brief summary of external and organisational changes since the review and Annex 2 provides links to the key documents.



Response to the recommendation (and commentary on student involvement)

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

7. This recommendation was also identified as a specific area for development in the letter from the ENQA Board. QAA would always involve and engage students in all ESG-related review methods where it is able to. It works to ensure that students' interests are safeguarded and that not only student participation, but student partnership is built into ways of working. QAA involves students extensively in its governance and its wider work and gains enormously from students' views and the work that students undertake on behalf of QAA and UK HE. Where students are not included automatically, it is due to external not internal considerations. The letter from ENQA Board acknowledged this by saying "so far as it is empowered to do so."
8. [Gateway Quality Reviews: Wales](#) (GQRW) have come into operation since the Review (with the Handbook published in July 2018). Students are members of GQRW teams and the method is fully in line with the ESG.
9. QAA was especially pleased to have the strength of its involvement of students in review processes commended (2.3). Since the ENQA review, aspects of student involvement in review have been taken further. Quality Enhancement Review (QER) had been developed but not operated as a method at the time. QAA is able to confirm that its additional features are working well in practice (it offers a choice of how students engage with external review and extended the match between the roles of lead student representative and facilitator). In broad terms QAA would look to find ways to strengthen and deepen student partnership each time a method is revised or developed.
10. The changed terms of reference and the emphasis on its strategic role in giving advice to QAA's Board has seen the Student Strategic Advisory Committee's role and value increase. This is evidenced in the Committee's input into drafting QAA's organisational strategy to 2025, where the students made a significant contribution. In QAA's work on the Enhancement Themes in Scotland student-led projects have significant impact and students play a key role in helping to ensure that resources are designed to meet their needs.
11. Across its work, QAA would see protection of the student interest as one of its fundamental purposes and it was good to have that contribution commended (3.2).

Responses to suggestions for the wider inclusion of international experts and others

12. ENQA's letter additionally encouraged QAA to give more attention to:

The wider inclusion of international experts as well as employers/professional practitioners in its procedures.



13. This reflects commentaries under 3.1, 3.5 and 2.4:

- 3.1 asks QAA “to review its structures and procedures and include, at a minimum, an international member on its Board and to expand the membership of international representatives on review panels. It is with an understanding that internationals will bring an external dimension to the work of QAA and to review processes, which is not necessarily the same as of locals who have had or continue to have international exposure or internationals who contribute on an ad hoc basis.” And also, to give “further consideration ... to including representatives from non-higher education stakeholder groups, including those of employers and civil society, on its review panels to ensure that UK higher education reflects the widening diversity of public interest in higher education.
- Under 3.5 the panel addresses organisations beyond QAA as well as QAA itself in the context of the “UK’s principal and continuous commitment to the EHEA ..[it] encourages QAA and its main funders to think how this commitment could be translated into appropriate funding and review arrangements to enable participation of international reviewers.”
- In 2.4 the panel encourages “QAA to build upon the positive experiences of ELIR and IQR teams and to extract from them ingredients that could make regular participation of internationals in reviews across many more review methods a future success story. Sharing with and learning from other QA agencies can also help identify the value of different perspectives and suggest practical ways to overcome perceived barriers.” It also encourages QAA “to expand its local reviewers pool to better represent the diversity of UK providers and students, also incorporating perspectives from business/industry or professional practitioners and civic society. The panel also urges the agency to expand its international reviewers pool and find ways of enabling their participation to meet review requirements and expectations.”

14. Aspects of this territory are also highlighted in the commendations:

- “QAA is commended for its wide involvement of stakeholders (primarily academics, students, administrators, business, and education sector representatives) in the governance of the agency, development of quality assurance policies and procedures, and enhancement work.” 3.1
- QAA’s valuable contribution towards higher education quality advancements internationally (3.2)

15. QAA is strongly committed to ensuring that it is an outward-looking agency, informed by continuing development of quality assurance practice and is often at the forefront of debate. QAA fully agrees with the sentiment behind the recommendation and suggestions but considers that there are other, more effective, ways for it to achieve informed engagement from a range of interests and to remain closely connected to international developments, the interest of employers and industry.

16. QAA is active in ensuring that its work is fully informed by views and practices external to the UK and does so through its extensive and continually growing engagement with European



and International networks and agencies. QAA has active Memoranda of Understanding and Letters of Intent with around 16 agencies alongside its memberships of key organisations and networks in Europe and globally. QAA is part of less formal, practitioner-focused groups (such as Quality Beyond Boundaries or the Quality Audit Network).

17. QAA seeks to ensure that members of its Board represent experience beyond the UK¹. Board members drawn from the UK higher education sector represent institutions with mature Internationalisation strategies covering research and innovation, education, partnerships, faculty and students. Many will have significant TNE activity, including campuses based in other countries, partner delivery and distance learning. Individual such Board members have held senior roles in institutions outside the UK as well as being from other countries themselves. It is QAA's view that the international dimension is not best served by an individual at Board level, but through this deeper and more extensive experience of business and education and through active engagement with debates and developments in quality assurance and quality enhancement across the globe.

18. In addition, QAA would stress how extensively wide interests feed into its work, including at Board level². QAA is, for example, extensively connected to business, industry and the professions. QAA's PSRB Forum shares best practice between professional bodies as well as the latest thinking and challenges in quality assurance. QAA develops and maintains the UK's Subject Benchmark Statements each of which will involve panels of experts from employers and professions as well as academics. Many projects specifically involve employers – from surveys to deepen understanding of the expectations they have of graduates, through work on enterprise and employability to the continuing work on apprenticeships across each of the UK's home nations.

19. Within the context of the UK QAA remains of the view that wide engagement is best served in the ways in which it approaches stakeholder engagement, drawing in expertise to where it is most relevant to its work. This is in the context of the extensive engagement of UK providers with industry and the professions and the strong internationalisation agendas characteristic of most UK HEIs.

20. The involvement of an international reviewer has not been a priority for funding by the UK's regulators and funders, especially in the context of tight budgets. An international reviewer remains an option in the review methods in Scotland and Wales and is a fixed part of IQR. Only a few UK providers subject to external review have sought to have an international panel member.

21. It is worth stressing that QAA operates across the UK's four home nations. There are distinct differences in educational policy and systems as well as in the approaches by regulators and

¹ QAA HE Board members include a senior member of staff from an institution with a number of branch campuses and with around two thirds of its students based outside the UK; Board members have individual international experience and links and their institutions education and research partnerships across the world including in China, Malaysia, Indonesia, Bahrain, Singapore, UAE, Uzbekistan, in Latin America and in Europe; a number have worked in other countries.

² QAA's Independent Board members have senior experience with Professional, Standards and Regulatory Bodies, have worked in Government, in the media, in Governance, Finance, Audit and marketing as well as bringing Board level experience in CEOs, Chairs and Non-Executive Director roles. Board members have worked for international companies and British multinationals and have held positions in a number of other countries during their careers.



funders. Many QAA review teams do, therefore, reflect more than one national perspective. Teams for ELIR in Scotland and QER in Wales will comprise members from outside as well as from the home nation.

22. QAA is commissioned to advise and support developments by governments and ministries. In this work QAA brings its expertise but also learns from each context in which it works. Recent examples would include: Tunisia, Morocco, Albania, UAE and Nigeria; the work in conjunction with the EU-funded SHARE project in Vietnam, Myanmar and the Philippines; and roles in British Council-led projects.
23. In summary: QAA learns and shares by, *inter alia*: involvement with ENQA; topic specific discussions with CEOs of other agencies; involvement with formal and informal networks and organisations including INQAAHE, QBBG, CBQAN, QAN; involvement on other agencies' reviews and committees; participating in European and international conferences and events; hosting European and International events, commissioned work from governments/ministries internationally, and work as part of funded or sponsored projects. QAA has recently established an international accreditation panel for IQR and will explore how its chair and members might also further help QAA to meet this recommendation.
24. This engagement has been further strengthened with the election, in autumn 2019, of QAA's CEO to the Board of ENQA. It is supported by the use of multiple communication channels, including the commended use of social media and broad public engagement (2.6).

Response to the suggestion on Transnational Education

25. In its letter, the Board of ENQA also identified as an area for appropriate action transnational education review. This is summarised below:

The intensification of TNE reviews activity, strengthening oversight of collaborative provision arrangements in order to better protect students' interests and to safeguard the reputation and standing of UK provision overseas.

Adding: **"For that purpose, additional resources should be allocated."**

26. At the time of the ENQA review QAA was part way through a contract with the UK's four funding bodies and conducting the review of UK TNE in Hong Kong. This contract had been with HEFCE which ceased to exist with the creation of the Office for Students in England, and the contract was terminated in August 2018.
27. Since that point QAA has been in negotiation with the national funding/regulatory bodies and UK HE sector on the optimum way to ensure continued external oversight of the UK's transnational provision. Effective TNE review needs to meet a wide range of interests: the requirements for assurance from international agencies, ministries and partners; the requirements of funders and regulators in the UK; those of UK providers offering TNE; and TNE students themselves, to enable them to have confidence in the standards and quality of the awards for which they are studying.



28. While negotiations were underway, QAA made a one-off call on its reserves to complete what would have been the third year of the contracted programme of TNE reviews, given that the intended destination had been published. This also removed the immediate time pressure and allowed a working group to be established by Universities UK to consider the options and make recommendations. Those recommendations were subject to a joint consultation by UUK/UUKi, GuildHE and QAA. The consultation on future approaches was promoted across Europe and internationally to capture the views of all interested stakeholders.
29. The consultation demonstrated the very strong support for a UK-wide approach and the principles proposed and broad support for continuing in-country activity.
30. The outcome of the consultation was considered by UUK, GuildHE and QAA Boards in spring 2020. Assuming broad consensus, the timetable allowed for the development of any necessary processes for implementation for the 2020-21 academic year. That timetable would have involved consultation on the method and approach during May to July 2020, however due to the disruption caused by Covid-19 it was deemed inappropriate to be calling on the sector to engage with that detail at that time. Development has now started and will continue into 2020-21 with implementation planned for 2021-22.

Responses to commendations and other suggestions for further development

31. The panel's review report included a range of commendations as well as a number of further suggestions, to avoid duplication, these have been grouped.
32. **QAA's work on Academic Integrity** (3.4) QAA was encouraged to expand its work on academic integrity and has done so. The Academic Integrity Advisory Group was established in June 2018. It is led by a parliamentarian and has representation from across the UK. It has raised the profile of its the issue at many levels. QAA recently surveyed UK providers to assess the impact of its 2017 guidance on contract cheating. The responses illustrate how guidance is being taken on board and the kind of action being taken, but it also showed that there is more to be done. A key action will be to help support institution-wide action and understanding as well as to disseminate the many examples of good practice gathered as part of the survey.
33. Projects funded by INQAAHE have been completed and the outputs shared, this includes a toolkit to support those addressing plagiarism and academic fraud and a joint project with TEQSA. QAA has actively expanded its work and influence in this area and has support from across the UK, and from a wide range of stakeholders, for this work
34. **Research and thematic analysis** (3.4 and 2.2) Alongside the research and activity on academic integrity QAA was also commended for other aspects of the research and analyses it undertakes. The work on risk-based approaches and the greater use of metrics was highlighted. This work has continued. Whilst under the umbrella of the current Enhancement Theme in Scotland a particularly well-regarded suite of resources have been produced on the UK data landscape, in this QAA has worked with those responsible for planning and data analysis within universities. QAA has also been working with institutions, representative and funding bodies on degree outcomes and degree algorithms. The fact that QAA is well placed to work in partnership with stakeholders, including students, in exploring contemporary challenges in higher education is a particularly valued function it fulfils for its members.



35. The panel encouraged QAA to continue with its plans to extend its thematic analyses. This work will be taken forward as part of membership services as well as a continuing aspect of ELIR. Now a number of QERs have taken place in Wales QAA will be able to start to look across the reports to identify common areas of good practice and areas for development.
36. **Looking beyond QAA:** QAA's independence (3.3); effective management of change (3.5) and approaches to risk (3.6); and publication of a summary of quality arrangements across the UK (2.6)
37. QAA has taken note of this group of suggestions. The panel noted the need for QAA to safeguard its independence in light of changing relationships and new bodies within the UK. The appointment as the designated quality body in England confirmed QAA's independence as it was a criterion for designation.
38. Experience and time continue to demonstrate that QAA's approach to managing strategic risks is effective. Indeed, the panel commended QAA "for managing well through uncertain times" (3.5). QAA has needed to continue to navigate change since the review – and has continued to demonstrate its ability to adapt and to meet the expectations and requirements of its core stakeholders. During 2019 QAA undertook a major change programme 'Transformation, capability and change' as it moved to a membership organisation. Internal re-organisation has aligned services to delivery needs. Quality Assessment, England is dedicated to work for the OfS; Membership, Quality Enhancement and Standards delivers both the UK tools and frameworks and membership services across the UK; Nations and Europe is focused on reviews, enhancement services and direct support of members in Scotland, Wales and Northern Ireland together with QAA's work and relationships in Europe; International and Professional services delivers IQR, leads QAA's work and relationships internationally and delivers commissioned services beyond the UK, within the UK it manages QAA's role as the regulator of Access to HE.
39. QAA has produced an information sheet summarising what is shared across the UK as well as the variations and distinctions in each home nation (2.6). This has proved enormously helpful, especially when speaking to international partners and has been widely used by representatives of governments, regulators and funders. The fact sheet also illustrates how effective QAA is as a responsive provider of quality assurance that meets shared expectations and specific regulatory needs.
40. **Development and training** (3.6 and 2.4). Use of ENQA's Professional Competences Framework and ENQA's Leadership Programme (3.6). Following re-organisation, a whole-agency approach to development is being instituted beginning in 2020. QAA draws on the Framework in the ways it supports the development of quality professionals and as a source to draw on reviewer training. In 2019-20 QAA is supporting ENQA's Leadership Programme through mentoring one of the topic groups.
41. QAA was gratified that the training and professional development of reviewers was identified as remaining and outstanding feature of its work. As a learning organisation QAA seeks to continue to enhance training each time it is delivered. The evaluations received consistently demonstrate how highly it is valued. QAA continues to receive a steady flow of requests from other agencies for individuals to attend and learn from the training it delivers, such requests are accommodated as far as possible.



42. **Fair Recognition** (2.1) The advice to assure institutional recognition processes are fully covered by the IQR system and institutional practices remain in line with the principles of the Lisbon Recognition Convention including higher education qualifications, periods of study, and recognition of prior learning was taken fully into account in the development of the advice and guidance that accompanies the revised UK Quality Code. The full suite of Quality Code Advice & Guidance was successfully launched in November 2018.
43. **Governance and management** (3.3 and 3.6) Several aspects of QAA's governance and management were commended. QAA has continued to build on and extend the best practices recognised by the panel. A planned periodic Governance Review has been undertaken and this has resulted in some improvements and clarifications to processes relating to the Board and its sub-committees, and new arrangements for communicating with company members and other key external stakeholders. At the time of the review QAA was commended for its robust governance and well-developed, rigorous internal quality assurance system. QAA's work as the Designated Quality Body has since meant that the rigour of internal systems have been further strengthened to ensure effective delivery against the designation agreement. Separately, internal systems have been developed to meet QAA's move to become a membership organisation. QAA remains an adaptable organisation with robust and multi-purpose internal systems.
44. **International Quality Review (IQR)** (3.6) IQR is a further area where QAA has built on the commendations of the panel to extend its approach and operational practice. IQR was re-launched in autumn 2019 offering accreditation as the outcome. IQR remains fully in line with the ESG and has been strengthened with a formal mid-point process to confirm continuing good standing.
45. **Enhancement and follow-up** (2.2 and 2.3) Finally, as an early proponent of enhancement QAA was pleased to see its value for "high-achieving institutions...long-term organisational; development and ownership of quality." QER in Wales is now delivering similar benefits for institutions and the system there and less formal means, such as regional networks, quality insights events etc. are used to support the discussion and sharing of practice in the spirit of enhancement across the UK. These forms of dialogue, as commended by the panel, together with mechanisms such as reports, monitoring and action plans following up review, continue to ensure the wider and long-term impact of QAA reviews.



Appendix 1 – summary of changes since the ENQA Review

Since the Review in 2018 the following methods have been introduced or discontinued:

New types of activities?	Yes, related to Designated Quality Body (DQB) work in England, and Gateway Quality Review Programme in Wales (GQRW). All new types of activities are based on existing approaches.
Are there substantial changes in existing activities?	Yes, New Degree Awarding Powers work (DAPs)
Have some or all existing activities been discontinued?	<p>Yes, QRV programme in England and NI; TNE – the last TNE review was of Malaysia which was published in May 2020. However, a proposal to develop a new approach to TNE review was recently accepted by the UUK, Guild HE and QAA Boards. Work has now begun in QAA to develop this approach during Autumn 2020.</p> <p>From 31st July, QAA discontinued its review activity on behalf of the General Osteopathic Council.</p>



Appendix 2 – Source documents

The key supporting documents are listed and linked below:

- The [Self Assessment Report for the Review of QAA by ENQA, January 2018](#)

This is a comprehensive account of QAA and its work within scope of the Review

- The [ENQA agency review: Quality Assurance Agency for Higher Education \(QAA\), June 2018](#)

This is the full report of the review panel. The conclusion of the review are summarised on pages 68-71

- [The Reconfirmation of membership of QAA in ENQA from ENQA Board, June 2018](#)

The ENQA Board letter giving the outcome and the Board's view

- [The Standards and Guidelines for Quality Assurance in the European Higher Education Area \(ESG\), 2015](#)

These were revised and approved at the EHEA Ministerial Summit in Yerevan in 2015. The revision was led by ENQA in conjunction with the European Students' Union (ESU), the European Association of Institutions in Higher Education (EURASHE) and the European University Association (EUA) together with Education International (EI), BUSINESSEUROPE and the European Quality Assurance Register for Higher Education (EQAR).