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External review of ENQA Agency Reviews

Evaluation report prepared by the expert panel

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Executive Summary

This report presents the outcomes of an external review of the European Association for Quality Assurance in Higher Education's (ENQA) Agency Reviews. ENQA is a membership organisation that is composed of quality assurance (QA) organisations in the European Higher Education Area (EHEA). As of December 2024, ENQA had 60 member agencies of which 57 are national agencies located in 32 countries in EHEA and 3 have a European orientation. In addition, 42 European and non-European agencies are affiliated to the Association.

The key membership criterion of ENQA is compliance with Parts 2 and 3 of the *European Standards and Guidelines for Quality Assurance in the European Higher Education Area* (ESG). To assess whether agencies are compliant, an external review process is conducted following a detailed set of guidelines for the process.

Since 2011, the majority of reviews of agencies wishing to apply for or renew their membership in ENQA and/or listing in EQAR are coordinated by ENQA. ENQA manages all aspects of the review process. The ENQA Secretariat coordinates the reviews, manages its pool of experts, organises trainings for the experts participating in reviews, coordinates the site visits to the agencies and oversees the preparation of the review report.

As part of its own QA cycle, ENQA has committed itself to undergo voluntary external reviews of the ENQA Agency Reviews, coordinated by an external organisation. Following an open call for tenders to carry out the review, the Knowledge Innovation Centre (KIC) was assigned as the coordinating body for this review process.

The overall focus of this external review was to assess the various activities and procedures of the ENQA Agency Reviews, with a view to improving their usefulness and fitness-for-purpose.

The main questions the external review addressed are:

1. How do the principles outlined in the standards of ESG Parts 2 and 3 for quality assurance agencies reflected in ENQA's methodologies and practices for the full, partial and targeted reviews of agencies undertaken by ENQA (while adapting them to the context and work of ENQA)?
2. How do the ENQA Agency Reviews contribute to the improvement of quality assurance agencies and allow for innovative approaches to quality assurance processes?

The review in particular reflected on the following topics:

- The new activities and practices ENQA has introduced since the last review (e.g., the new compliance scale, ENQA Agency Review Committee, targeted review methodology).

- ENQA’s collaboration with EQAR, including the existing challenges and opportunities for further enhancement of joint work on the Agency Reviews.
- How ENQA Agency Reviews connect with and contribute to the Association’s key strategic goals 2021-2025 and its overall aims and objectives.

A review panel coordinated by KIC carried out the review. Key elements in the review process included a self-evaluation report and other background material provided by ENQA, and a site visit to Brussels in December 2024, including interviews with representatives of ENQA bodies and meetings with key stakeholders.

Regarding the overall impact of the Agency Reviews on enhancing QA agencies, most representatives from member agencies interviewed during the panel’s site visit confirm that the process has positively influenced their practices and provided valuable lessons. In particular, many emphasise the considerable benefit of obtaining an external perspective. Several meetings during the panel’s site visit have confirmed that there have been significant developments in ENQA’s activities in the last years.

With regard to ENQA’s compliance with ESG Parts 2 and 3, the panel judged that the Agency Reviews meet 13 of the standards and demonstrate partial compliance with one (ESG 2.2 – Designing Methodologies for Purpose).

The main areas needing further attention and development identified by the panel during the external review are:

Balancing accountability and enhancement

The review panel acknowledged that ENQA’s Agency Reviews serve a dual purpose: ensuring accountability and promoting enhancement. While addressing accountability is relatively straightforward, achieving the promotion of systematic enhancement in the reviews has proven more challenging. This difficulty is further compounded by the dual function of most reviews, as they are used both for ENQA membership and for EQAR registration.

To strike a better balance between an accountability-driven approach and a genuine improvement focus, the panel recommends appropriate review methodology innovation, a more expansive interpretation of thematic analyses, and a reassessment of expert selection criteria.

Furthermore, the panel appreciates the introduction of targeted reviews as an innovative approach to Agency Reviews for more mature agencies. Even though these reviews have not yet fully met their objective of providing a lighter, enhancement-oriented approach, they hold significant potential to foster a stronger emphasis on enhancement in the future.

Stakeholder involvement

The panel has consistently observed that ENQA's operations and governance are relatively closed. While the panel recognises the arguments against formally involving external stakeholders in ENQA's governance, it recommends ongoing reflection on this issue to enhance transparency and legitimacy. Although the panel does not intend to dictate specific measures, one suggestion is to establish a standing working group that includes external stakeholders tasked with reviewing and improving the review methodology and associated procedures. In this context, external input would be limited to examining the organisation of the reviews. Similarly, involving external stakeholders in the ARC and ACC could be considered to further bolster transparency and legitimacy.

ENQA's collaboration with EQAR

Significant progress has been made in communication between ENQA and EQAR and the alignment of decisions between them, supported by several initiatives. However, key challenges remain, particularly regarding the interpretation of the ESGs and the differing emphasis on compliance versus enhancement. To address these issues, a more coordinated communication strategy and strengthened collaboration between the two organisations, for example, in the upcoming ESG revision, are recommended.

Furthermore, the panel suggests that ENQA may wish to place greater emphasis on enhancement, further distinguishing its role from EQAR's primary role as a gatekeeper. This would require negotiating with EQAR to establish clear thresholds aligned with EQAR's mandate, allowing ENQA to focus more on the added value it provides to agencies.

Strategic Development

The revision of ENQA's Strategic Plan 2021–2025, alongside the forthcoming ESG revision, presents a timely opportunity for the association to refine its strategic goals and sub-goals related to its Agency Reviews. At the same time, it allows for the development of a renewed vision, mission, and values that reflect the rapidly changing landscape of higher education in Europe and beyond.

The panel believes that ENQA is in a strong position to assert its role as the leading European organisation in quality assurance, working alongside other stakeholders to shape the understanding of quality in higher education and contribute effectively to relevant European policy discussions and institutional contexts.

Building on the current plan's structure, the next Strategic Plan (2026–2030) could offer a more in-depth analysis of the European higher education and quality assurance landscape and also include in the reflection some transversal issues that emerged during the review. This could serve as the foundation for a revised vision, mission, and values, alongside updated strategic goals that align with this analysis.

The panel would also like to commend ENQA for its ongoing commitment to continually enhancing its practices throughout the review process. Over the years, ENQA has actively refined its review methodology, and these improvements have contributed to fairer, and to more consistent, relevant and independent Agency Reviews. Additionally, the panel acknowledges the competent and dedicated staff managing the reviews. The overall review process is both well-structured and well-organised, with all panel members involved in the reviews receiving comprehensive training and support for their work.

Overall, this external review has demonstrated to the panel that, while ENQA conducts its Agency Reviews in compliance with the ESG and has made significant progress in recent years, further strategic and operational refinements have the potential to strengthen ENQA's ability to support its members more effectively and further enhance the quality of higher education across Europe.

Introduction

This report presents the outcomes of an external review of the European Association for Quality Assurance in Higher Education's (ENQA) Agency Reviews, conducted between April 2024 and March 2025. The external review was commissioned by ENQA and has been carried out by a review panel consisting of Jacques Lanarès, Nik Heerens, Peter Maassen, Ivana Borošić and Katrina Koppel.

Jacques Lanarès acted as the chair of the panel and Nik Heerens as its secretary and coordinator, on behalf of coordinating organisation Knowledge Innovation Centre (KIC).

This report presents the views of the external evaluation panel. All panel members have contributed with text and suggestions to the evidence, analysis and recommendations provided in the report. The draft report has also been through a fact check at ENQA.

The review panel would like to thank ENQA for the materials provided in a structured and timely manner, and everyone who participated at the interviews during the panel's site visit in December 2024.

Background of the Review and Outline of the Review Methodology

Background and purpose

The European Association for Quality Assurance in Higher Education (ENQA) is a membership association of QA agencies in the European Higher Education Area (EHEA). ENQA has 60 members, which are quality assurance (QA) organisations from the European Higher Education Area (EHEA) that operate in the field of higher education and in compliance with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (the ESG¹). ENQA also has 42 affiliates across the world.

ENQA's mission is to represent the interests of the membership internationally, support them nationally and provide them with comprehensive services and networking opportunities. Under ENQA's umbrella, the community of agencies drive innovation in quality assurance and refine quality assurance processes.

The key membership criterion of ENQA is compliance with Parts 2 and 3 of the *European Standards and Guidelines for Quality Assurance in the European Higher Education Area* (ESG). The ESG were originally developed by the E4 (ENQA, EUA, EURASHE, ESU) and adopted during the EHEA Ministerial Conference in Bergen in 2005. The ESG were revised based on extensive consultations and recommendations before being adopted in Yerevan in 2015. Following the establishment of the ESG, the E4 were also founding members for

¹ https://www.enqa.eu/wp-content/uploads/2015/11/ESG_2015.pdf

the European Quality Assurance Register for Higher Education (EQAR), a public registry of agencies that comply with the ESG.

External reviews of ENQA's agency review process, coordinated by an external organisation, are considered to be part of its own quality assurance cycle. This commitment follows the principle set out in ESG 3.7, that "*agencies should undergo an external review at least once every five years in order to demonstrate their compliance with the ESG*". This implies that ENQA must demonstrate compliance with the same requirements set for its member agencies. Therefore, ENQA decided to undergo this external review against the ESG following its first external review in 2019. Following an open call for tenders to carry out the review, the Knowledge Innovation Centre (KIC) was assigned as the coordinating body for this review process.

Scope of the review

The overall focus of this external review was to assess the various activities and procedures of the ENQA Agency Reviews, with a view to improving their usefulness and fitness-for-purpose. While this review has been closely aligned with the Agency Review processes used by ENQA, it is not an exact replication; the purpose, scope, and object of this evaluation differ substantially from those of a standard agency review.

Notably, this review also took a forward-looking approach, seeking to help ENQA improve its Agency Reviews. This outlook is clearly reflected in both the panel's working methods and the final report's structure and content.

The main questions the external review addressed are:

- A. How are the principles outlined in the standards of ESG Parts 2 and 3 for quality assurance agencies reflected in ENQA's methodologies and practices for the full, partial and targeted reviews of agencies undertaken by ENQA (while adapting them to the context and work of ENQA)?
- B. How do the ENQA Agency Reviews contribute to the improvement of quality assurance agencies and allow for innovative approaches to quality assurance processes?

The review in particular reflected on the following topics:

- The new activities and practices ENQA has introduced since the last review (e.g., the new compliance scale, ENQA Agency Review Committee, targeted review methodology).
- ENQA's collaboration with EQAR, including the existing challenges and opportunities for further enhancement of joint work on the Agency Reviews.
- How ENQA Agency Reviews connect with and contribute to the Association's key strategic goals 2021-2025 and its overall aims and objectives.

Review panel

The call for tenders stated that the review panel needed to include at least five members of whom one would function as the panel chair. As a whole, the panel had to include:

- External quality assurance expertise, including managing QA reviews.
- Academic higher education expertise, in particular in relation to QA.
- Student expertise.
- European Higher Education policy expertise.
- Expertise on QA outside Europe.
- Appropriate gender and geographical balance.

Furthermore, panel members should have:

- A minimum of 5 years (except student expert) of experience in quality assurance of higher education, ideally with some leadership or management responsibilities.
- Active international experience, e.g. as agency reviewer, by previous engagement in ENQA or other international associations/networks, by being involved in reviews internationally.

The composition of the panel was proposed by KIC and formally approved by the ENQA Steering Committee² for the external review of ENQA Agency Reviews.

² The Review Steering Committee was composed of the following representatives of ENQA's members and partners:

- Hillar Bauman, Estonian Quality Agency for Education (HAKA, Estonia)
- Ailsa Crum, Quality Assurance Agency for Higher Education (QAA, UK)
- Dagmar Röttches, Evaluation Agency of Baden-Württemberg (evalag, Germany)
- Jakub Grodecki, European Association of Institutions in Higher Education (EURASHE)
- Maria Kelo, European University Association (EUA)
- Horia Onița, European Students' Union (ESU)

Potential conflicts of interest were examined in the process and strict eligibility criteria used for the selection. This meant excluding individuals who:

- Currently hold any official function within ENQA (board members, agency review panel members, other committees, staff members), or held any during the past 5 years.
- Currently hold an official function within EQAR.
- Current members of staff of ENQA member agencies that have undergone an agency review after 2022 or are scheduled for one in 2025

KIC proposed a panel consisting of five members, with one member nominated to serve as the panel chair. Nik Heerens was put forward by KIC to act as the coordinator and panel secretary.

Table 1. Composition of the review panel

Name	Role in panel	Criteria	Gender	Country
Jacques Lanarès	Panel Chair, member	Academic, European HE expert, QA expert, non-European QA expertise	Male	Switzerland
Peter Maassen	Member	Academic, European HE expert, QA expert, non-European HE expertise	Male	Norway
Ivana Borošić	Member	QA expert, former QA agency practitioner, non-European QA expertise	Female	Croatia
Nik Heerens	Panel Secretary, member	European HE expert, QA expert, non-European QA expertise	Male	United Kingdom
Katrina Koppel	Member	European HE expert, student expertise	Female	Estonia

Brief biographies of the panel members are available in Annex III.

The review panel had the following roles and responsibilities:

- Sign a non-conflict of interest statement as regards the ENQA external review, covering at least the cases of interest defined in the ENQA Code of Conduct for Reviewers.
- Take part in briefing and training sessions organised by KIC on the main elements of the evaluation.
- Validate and if needed amend the list of interviewees to be involved in the evaluation process.
- Approve of and, if appropriate, suggest additions to the process of evidence collection by ENQA.
- Analyse ENQA documents (self-evaluation report, strategic goals 2021-2025, sample review reports, other relevant documents), identify all areas that require verification, additional information, and clarification during the site visit, and formulate relevant questions accordingly.
- Carry out the site visit to ENQA in Brussels in December 2024 and undertake interviews with relevant internal and external stakeholders.
- Collect all gathered evidence, write the draft report and then produce the final version.

External review process

The methodology for this external review has been closely aligned with the methodology developed and implemented by ENQA for its review of QA agencies. This involved a systematic examination of each Standard outlined in ESG Part 2 and Part 3. The application of these Standards was adapted to suit the specific context of ENQA's Agency Reviews, rather than the original focus of the ESG on internal QA by HEIs, external QA by QA agencies and external QA of QA agencies. The review coordinator proposed clarifications for each standard which were agreed upon by ENQA's Review Steering Committee and are indicated as 'ENQA context' with each ESG in Chapter 2 of this report.

For each Standard, the review panel sought evidence from various sources to evaluate how ENQA addresses the Standard in its Agency Reviews. Information sources the Panel analysed included ENQA's self-assessment report (SAR), interviews undertaken during the panel's site visit to ENQA in Brussels, and supplementary materials such as a sample of ENQA's external review reports, Thematic Analyses reports and written feedback from QA agencies that ENQA collects as part of its regular processes. The panel analysed this evidence in relation to the individual components of each Standard, contextualised for ENQA, and their associated Guidelines.

Subsequently, the panel reached a conclusion regarding ENQA's compliance with the Standard, employing the same 3-point assessment scale utilised in ENQA's Agency Reviews: compliant, partially compliant, or non-compliant.

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

Additionally, the panel has formulated commendations, highlighting good practices and recommendations for further improvement based on its findings.

The review process consisted of the following elements:

Kick-off meeting between ENQA and KIC

During the meeting, KIC presented the main elements of the review process and questions and clarifications were discussed. ENQA received a self-assessment report (SAR) structure in which the ESG had been rephrased for the purpose of this evaluation. The meeting also established the review's terms of reference, including the scope of the external review, the detailed methodology, the timeline, the composition of the review panel, the identification of sources of information, and the planning of the panel's site visit.

Self-Assessment Report

ENQA conducted a comprehensive self-evaluation process resulting in a Self-Assessment Report (SAR). This process was coordinated by a dedicated working group and involved input from various sources. Member agencies and members of ENQA's pool of reviewers provided feedback, and several SWOT analyses—identifying strengths, weaknesses, opportunities, and threats—were undertaken to inform the final report. In addition to the SAR, ENQA also provided supplementary information and documents as requested by the review panel.

In developing the SAR, ENQA followed the agreed guidelines ensuring the self-assessment included:

- A detailed description of the self-assessment process and the production of the SAR.
- An overview of the history and profile of ENQA.
- A comprehensive list of the review activities undertaken by ENQA.
- A description of ENQA's agency review process and its management.
- Separate sections addressing each of the ESG Part 2 and Part 3 requirements.

- A summary of the main findings and recommendations from the previous external review, along with actions taken in response.
- A SWOT analysis.
- An outline of key challenges and areas for further development.

Site visit

The panel visited ENQA on 9-11 December 2024, at the Association's premises in Brussels. The representatives of ENQA's bodies and external stakeholders, whom the panel had the opportunity to meet either face-to-face or online, accurately reflect ENQA's Agency Review activities. As a result, the panel is confident that it has been able to verify and clarify the information gathered prior to the visit. The panel is sincerely grateful for their time and willingness to participate in the interviews.

The panel greatly appreciates ENQA's support both before and during the panel's site visit. The premises and logistical arrangements were well suited to the panel's needs, and all requested information and documents were provided promptly and clearly. The panel acknowledges ENQA's commitment to responding to all requests with professionalism and courtesy and is grateful for the team's cooperation throughout the process.

See Annex I for the full site visit schedule.

Preparation of final report

Following its site visit, the review panel completed its evaluative work by analysing the collected evidence, ensuring a thorough triangulation across multiple sources. This process allowed the panel to verify whether the evidence sufficiently covered the full scope of all Standards in Parts 2 and 3 of the ESG. Based on this analysis, the panel formulated its findings and conclusions regarding compliance with each Standard, including commendations highlighting good practices and recommendations for further improvement.

In addition to assessing ESG compliance, the panel reflected on the broader impact of ENQA Agency Reviews, particularly their contribution to improvement of QA agencies and allowing for innovative approaches to QA processes. The review also considered ENQA's collaboration with EQAR and how the Agency Reviews align with and contribute to ENQA's key strategic goals for 2021–2025.

The panel then prepared a draft report outlining its evaluation findings. The report also provided reflections on new activities and practices introduced since the last review, as well as on the ways ENQA Agency Reviews contribute to quality enhancement, innovation, and strategic alignment within the association.

The final draft report was submitted to ENQA on 3 March 2025, allowing ENQA the opportunity to check it for factual errors. Following this review, the final report was submitted on 31 March 2025.

Main Findings of the previous external review in 2019

The 2019 external view found ENQA to be fully compliant with 7 ESG standards, substantially compliant with 3 and as partially compliant with 3 ESG standards (as set out in the table below).

ESG standard	Compliance in 2019
3.1 Activities, policy and processes for quality assurance	Fully compliant
3.2 Official status	Fully compliant
3.3 Independence	Substantially compliant
3.4 Thematic analysis	Partially compliant
3.5 Resources	Fully compliant
3.6 Activities, policy and processes for quality assurance	Substantially compliant
3.7 Cyclical external review of agencies	Fully compliant
2.1 Consideration of internal quality assurance	<i>Not assessed</i>
2.2 Designing methodologies fit for purpose	Partially compliant
2.3 Implementing processes	Substantially compliant
2.4 Peer-review experts	Fully compliant
2.5 Criteria for outcomes	Fully compliant
2.6 Reporting	Fully compliant
2.7 Complaints and appeals	Partially compliant

The 2019 review lists 13 recommendations. These are listed in relation to the relevant standards in the next section of this report - *Compliance of ENQA with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG)* - and have been part of the panel's reflections throughout the review process.

ENQA's History, Profile and Review Activities

History and profile

ENQA originated a few years before the signature of the Bologna Declaration, following the outcomes of the European pilot project for evaluating quality in higher education (1994–1995), which highlighted the benefits of sharing and developing expertise in quality assurance. Building on these findings and the Recommendation of the Council (98/561/EC of 24 September 1998), ENQA was founded in 2000 as the European Network for Quality Assurance in Higher Education to promote European cooperation in quality assurance. In November 2004, it became the European Association for Quality Assurance in Higher Education with the aim to contribute to the maintenance and enhancement of the quality of European higher education, and to act as a major driving force for the development of quality assurance across all the Bologna Process signatory countries.

As of December 2024, ENQA had 60 member agencies of which 57 are national agencies located in 32 countries in EHEA and 3 have a European orientation. In addition, 42 European and non-European agencies are affiliated to the Association.

One of ENQA's key activities is coordinating external reviews of quality assurance agencies, a professional review service that has been offered since 2011. These reviews are conducted in accordance with the ESG (currently the 2015 edition), and the external review methodology described in the Guidelines for ENQA Agency Reviews³ (last revised in 2021).

As a membership association, ENQA also engages in a wide range of activities beyond external reviews. These include representing its members' interests in European policy-making bodies, coordinating and participating in projects, organising events, training sessions, and webinars to facilitate networking, peer learning, and professional development. Additionally, ENQA provides expertise on quality assurance topics, publishes reports and studies, and coordinates working groups. However, these activities fall outside the scope of this review.

³ <https://www.engq.eu/wp-content/uploads/ENQA-Guidelines-2021.pdf>

Structure of ENQA

ENQA is structured around five bodies, that is the General Assembly (GA), the Board, the Appeals and Complaints Committee (ACC), the Agency Review Committee (ARC), and the Secretariat.

The main tasks of each body are as follows:

- The *General Assembly* is the main policy and decision-making body of the Association, and its tasks include the election of the Board, ENQA President and Vice-Presidents, the approval of annual work plans and budgets, and the adoption of the Strategic Plan. In relation to Agency Reviews, the GA appoints the members of the ACC and endorses the composition of the ARC and of ENQA membership decisions. It is composed of all ENQA members.
- The *ENQA Board* is the governing and executive body of the association, responsible for its overall management, including strategic and financial planning. In relation to the Agency Reviews the Board adopts the guidelines for the reviews, proposes the members of the ACC, and appoints the members of the ARC. Board members are nominated by ENQA Members and elected by the GA.
- The *ENQA Agency Review Committee (ARC)* is responsible for validating external review reports by assessing the integrity of the review process and checking the quality and consistency of the reports. In the period under review the ARC was composed of experts coming from ENQA Member Agencies who were appointed by the Board.
- The *Appeals and Complaints Committee (ACC)* deals with appeals and complaints made in relation to membership decisions taken by the Board and the conduct of procedures in respect to membership matters and ENQA Agency Reviews.
- The *Secretariat*, led by the Director, is responsible for the daily administration and management of the Association.

ENQA Agency Reviews

One of the core services offered by ENQA is external reviews of quality assurance agencies. An external review against the ESG is a prerequisite for an applicant agency to apply for or renew its membership of ENQA. It is also a requirement for agencies wishing to apply for registration in EQAR. Since 2011, the majority of reviews of agencies wishing to apply for or renew their membership in ENQA and/or listing in EQAR are coordinated by ENQA⁴.

ENQA manages all aspects of the review process. The ENQA Secretariat coordinates the reviews, manages the pool of experts, organises trainings for the experts participating in

⁴ Out of the 43 reviews used for ENQA membership applications in 2020-2023, only one was not coordinated by ENQA. Out of the 56 reviews used for EQAR registration applications in 2020-2023, seven were not coordinated by ENQA.

reviews, coordinates the site visits to the agencies and oversees the preparation of the review report.

ENQA currently carries out three different types of Agency Reviews:

- Full reviews – The review process is described and published in the document *Guidelines for ENQA Agency Reviews*⁵
- Targeted reviews – The review process is described and published in the document *Guidelines for ENQA Targeted Reviews*⁶
- Partial reviews – The specifics of this review are described and published in the document *Policy for Partial Reviews*⁷

ENQA performs *full Agency Reviews* on a regular basis (every five years) for new and existing member agencies. These Agency Reviews assess whether the agencies' QA activities are in compliance with the ESG.

In addition, ENQA offers since 2021 *targeted reviews* to ENQA member agencies wishing to renew their membership who have been through at least two consecutive successful full ESG reviews.

Targeted reviews are intended to focus on the remaining challenges for mature QA agencies in reaching ESG compliance and on substantive changes at the agencies since the previous review, while at the same time further strengthening the enhancement part of the review.

ENQA also conducts *partial reviews* of QA agencies who do not fully comply with the ESG. A partial review of a QA agency focuses on the deficiencies identified in the full review of the agency in question.

⁵ <https://www.enqa.eu/wp-content/uploads/ENQA-Guidelines-2021.pdf>

⁶ https://www.enqa.eu/wp-content/uploads/Guidelines-for-ENQA-Targeted-Reviews_v4.pdf

⁷ <https://www.enqa.eu/wp-content/uploads/ENQA-partial-reviews.pdf>

Overview of the evaluation report

This introductory chapter has provided an overview of the evaluation process. The next section presents the panel’s assessment of ENQA’s compliance with each of the individual standards in ESG Parts 2 and 3.

Following this, the report examines ENQA’s collaboration with EQAR. For this section, the panel has adopted the same structure used in evaluating the ESG standards—describing the evidence, providing a thorough analysis, and concluding with commendations and recommendations for improvement. The panel found that this approach best facilitated a clear and analytical discussion of the topic.

The final reflective section of the report takes on a more formative character. It addresses additional review questions raised in the call for tender for this review, specifically considering *the connection and contribution of ENQA Agency Reviews to ENQA Strategic Goals 2021–2025*, and their *contribution to the improvement of QA agencies and fostering innovative approaches in quality assurance processes*. These topics are discussed in relation to the key challenges identified during the review, and the section concludes with the panel’s view on the *future outlook for ENQA reviews*.

Compliance of ENQA with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG)

ESG Part 3: Quality Assurance Agencies

3.1 Activities, policy and processes for quality assurance

Standard	Agencies should undertake external quality assurance activities as defined in Part 2 of the ESG on a regular basis. They should have clear and explicit goals and objectives that are part of their publicly available mission statement. These should translate into the daily work of the agency. Agencies should ensure the involvement of stakeholders in their governance and work.
ENQA context	ENQA should engage in agency reviews on a regular basis. Agency review processes should be part of ENQA's activities and expressed in its publicly available mission statement. ENQA should ensure the involvement of stakeholders in its governance and work in relation to agency reviews.

2019 Review Recommendations

None

Evidence

A core part of ENQA's portfolio of activities since 2011 is the systematic conduction of external reviews of QA agencies. ENQA is the primary provider of external reviews of agencies in the European Higher Education Area (EHEA) and QA Agencies need to renew their membership in ENQA (and EQAR registration) every five years, which creates a regular cycle of reviews by ENQA. In the period 2020 – 2024, ENQA has conducted a total of 73 Agency Reviews, consisting of 45 full, 23 targeted and 5 partial reviews (SAR, p.10).

ENQA's Strategic Plan 2021-2025⁸ defines the association's mission, vision, values and goals. ENQA's mission states that *“As the designated stakeholder organisation of quality assurance agencies in the EHEA, ENQA represents their interests internationally, supports them nationally and provides them with comprehensive services and networking opportunities. Under ENQA's umbrella, the community of agencies drive innovation in quality assurance and refines quality assurance processes.”*

ENQA's mission is translated into the association's three main goals, which are:

- to represent its members' interests internationally;
- to provide comprehensive services to members and other stakeholders; and
- to drive the development of external QA.

The Agency Reviews primarily fall under the goal of providing services to members. The mission of the association highlights further that integrity, transparency, independence, and social responsibility are essential values in ENQA's work.

In ENQA's Work Plan 2024⁹ it is indicated that the ENQA Secretariat will continue (in 2024 and 2025) to coordinate all requested external full and targeted reviews, and progress visits for ENQA membership and EQAR registration. Furthermore, ENQA's Agency Review Programme is emphasised as the preferred partner for reviews of QA Agencies against the ESG.

ENQA's vision is an EHEA where high-quality education contributes to responsible and active European citizens in democratic and sustainable societies, where access is attainable for all, and where graduates acquire a broad knowledge basis on which to build regionally and globally rewarding careers while inspiring their personal development.

During the panel's site visit, the drafting of ENQA's new strategic plan (2026-2030) was identified as a key process in the further development of and possible innovations in Agency Reviews processes and procedures. This external review process is expected to provide an important input into the preparations for the new strategic plan.

The formal involvement of stakeholders in ENQA's governance is limited to representatives from its member agencies. The ENQA General Assembly (GA) is composed of members, and currently only representatives from member agencies are formal members of the Board, ARC or ACC. Arguments to support this situation mentioned during the panel's site visit interviews were first that ENQA's position as a designated stakeholder organisation for QA agencies in the EHEA (SAR, p. 9) implies that the only stakeholders eligible for membership in the ENQA governance bodies should be representatives from ENQA's stakeholders, that is the member agencies. Second, it was argued that the ENQA bodies function adequately, implying that there is no need for formal involvement of representatives from other stakeholders, also from the perspective that there is regular, constructive interaction between ENQA and other stakeholders (esp. representatives of

⁸ <https://enqa.eu/wp-content/uploads/2020/05/ENQA-Strategic-Plan-2021-2025.pdf>

⁹ <https://www.enqa.eu/wp-content/uploads/Work-plan-2024.pdf>

the E4 organisations) outside of the formal bodies of ENQA. Third, in the interviews during the panel's site visit it was indicated that for functioning effectively in ENQA's governance a high level of specific expertise is required that will be hard to find outside the ENQA member agencies. In the SAR (p. 11) wider stakeholder involvement in the ARC in the future, if desired, was seen as a possibility.

An issue mentioned in the SAR (pp. 10-11) in relation to sub-goal 7 under the third main overall ENQA goal (to drive the development of external QA) refers to the information collated through the Agency Reviews. This information is regarded to be crucial in providing an evidence base for ENQA's other activities. It is indicated that there is room for improvement for connecting the information gathered through reviews more directly with the other activities of the Association. During the panel's site visit it was described how the process to 'filter' external recommendations, feedback, information, and the like, as an input into the innovation of reviews and other activities has already been improved over the last years. The Association's agency review team has a central role in this 'filtering', which represents a more transparent and structural way to select external information as a basis for recommendations for innovations to be proposed to the Board or other ENQA bodies.

Analysis

ENQA performs full Agency Reviews on a regular basis (every five years) for new and existing member agencies. These Agency Reviews assess whether an agency's QA activities are in compliance with the ESG. In addition, ENQA offers since 2021 targeted reviews to ENQA member agencies wishing to renew their membership who have been through at least two consecutive successful full ESG reviews. Targeted reviews focus on the remaining challenges for mature QA agencies in reaching ESG compliance and substantive changes at the agencies since the previous review, while they are at the same time intended to further strengthen the enhancement part of the review. ENQA also conducts partial reviews of QA agencies who do not fully comply with the ESG, and which focuses on the deficiencies identified in the full review. These reviews are part of ENQA's activities, as noted in its mission and goals, that is, especially goal II, subgoal 3 which specifically addresses ENQA's reviews.

Member Agencies are generally positive about the ENQA reviews, and they consider ENQA's reviews to be important for the meaningfulness of their activities, and for creating public trust nationally and when appropriate also internationally. They praise the professionalism of the Secretariat in organising and conducting the reviews, selecting and training the experts, and the communication about the review process and the review report. Issues that need attention in the coming period from the agencies' perspective are first the growing diversity of review and support needs among the various member agencies (new versus mature) which require a more tailor-made approach to the reviews. First reviews of new member agencies seem to be better appreciated, more useful with a real added value, while second and third reviews of mature agencies run the risk of producing diminished returns. While this is acknowledged by ENQA's leadership, this raises resource issues (see also ESG 3.5).

The involvement of stakeholders in ENQA's governance and work in relation to its Agency Reviews raises a number of questions. While the arguments used to restrict the involvement of stakeholders to members (GA) and representatives of member agencies (Board, ACC and ARC) are to some extent understandable, they are nonetheless not fully convincing. The overall impression is that ENQA likes to keep its governance and review activities 'within the family' which over time might undermine the Association's legitimacy. Opening up ENQA's governance to wider stakeholder involvement could clearly start with the ARC, but also involvement of experts from other stakeholders than ENQA member agencies in the ACC should be considered. The careful formulation in the SAR (p. 11) that there is room for wider stakeholder involvement in the ARC in the future if desired and the arguments by the current ARC members why membership has been limited to Member Agencies' representatives suggest that the involvement of other stakeholders in the ENQA governance in the coming period is seen as in essence a theoretical possibility. If the Association is indeed willing to consider the inclusion of experts from other stakeholders as members in the ARC, this marks a possible first step towards wider stakeholder involvement in ENQA governance. If not, this would be a missed opportunity to strengthen ENQA's legitimacy and compliance with ESG 3.1.

Finally, the world has changed dramatically over the last decade. As already mentioned in the 2019 evaluation report, new HE policy agendas linked to excellence, geopolitical tensions, fundamental values, student-centred teaching and learning and digitalisation and AI, have emerged. The SAR hardly takes these new policy agendas and QA realities into account and the question can therefore be raised to what extent the ENQA mission needs a more significant adaptation than is foreseen in the SAR. (See also the section in this report on '*Key challenges and areas for future development*').

Panel Commendations

ENQA is since 2011 Europe's designated provider of QA Agency Reviews and has consolidated this position clearly since the previous review in 2019. Furthermore, ENQA has further strengthened and professionalised its activities in relation to its Agency Reviews in various ways, including the establishment of the ARC, which is much lauded by its Member Agencies. ENQA has also become a frame of reference for QA and Agency Reviews outside EHEA as is visible in the number of non-European affiliated members.

ENQA has strengthened its focus on enhancement in its work in relation to its review activities, amongst other things, through the introduction of the targeted reviews. Even though there is room for further strengthening the enhancement orientation, the developments in the period under review represent an important step towards a more appropriate and desirable balance between compliance and enhancement in its review activities.

Panel Recommendation

1. Wider stakeholder involvement in ENQA governance should be considered in an appropriate and realistic way. The panel recommends ENQA to start the involvement of other stakeholders in its bodies with including an expert from another stakeholder than a Member Agency in the ARC. The experience gained in this can be used to determine whether and if so, how membership of wider stakeholders in the ACC and possibly the Board, GA or other bodies could be desirable and appropriate. In this an important consideration to take into account is the extent to which wider stakeholder involvement enhances the legitimacy of ENQA and its governance bodies.

Panel Conclusion: Compliant

3.2 Official status

Standard	Agencies should have an established legal basis and should be formally recognised as quality assurance agencies by competent public authorities.
ENQA context	ENQA should have an established legal basis and its status as a body responsible for coordinating agency review processes should be widely recognised by the relevant EHEA stakeholders.

2019 Review Recommendations

None

Evidence

ENQA is registered as an international non-profit organisation (Association Internationale Sans But Lucrative, or AISBL, in Belgium), which confirms its official status. All ENQA's agency review activities - including legal and contractual matters - are conducted under the AISBL.

During the panel's site visit, interviews with quality assurance agencies and EHEA stakeholder organisations (representatives of the E4 network, EQAR) reaffirmed ENQA's status and widespread recognition of ENQA as the designated stakeholder organisation of QA agencies in the EHEA. Moreover, quality assurance agencies interviewed consider membership in ENQA essential, and reviews coordinated by ENQA are automatically eligible for EQAR's decision-making processes according to the SAR (p. 12).

Analysis

Since the previous external review, ENQA’s official status has remained unchanged. It is registered as an official organisation, with its independence and legitimacy formally affirmed by its registration as an AISBL.

Among established stakeholders, partner organisations and related networks, ENQA—and its associated status as a body responsible for coordinating agency reviews—is widely recognised as legitimate. The fact that currently 60 QA agencies in the EHEA are members of ENQA is also a clear sign of its recognition.

Panel Recommendations

None

Panel Conclusion: Compliant

3.3 Independence

Standard	Agencies should be independent and act autonomously. They should have full responsibility for their operations and the outcomes of those operations without third party influence.
ENQA context	ENQA should be independent and agency review processes need to be carried out autonomously. ENQA should have full responsibility for its agency review processes and their outcomes without third party influence.

2019 Review Recommendations

- *As ENQA will never be able to reach total independence due to its nature as a membership organisation, it is more important to enhance the actions and policies that ensure the independence of decision-making and integrity of processes. Specifically, the independence of ENQA within reviews should be enhanced by (re-)defining the complaint and appeal procedures and promulgating them to all relevant stakeholders. Furthermore, greater externality should be facilitated by involving stakeholders outside the membership organisations.*
- *The panel observed that the relationship between ENQA and EQAR may raise questions about the independence of agency review processes. The panel recommends that ENQA critically evaluate the impact of meeting EQAR requirements*

on its review processes and take the opportunity presented by its strategic planning exercise to consider the nature of its relationship with EQAR.

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

Evidence

When it comes to the independence of ENQA the SAR (pp. 12-14) distinguishes between organisational and operational independence, and independence of formal outcomes.

As regards its *organisational independence*, ENQA is formally an independent non-profit association registered under the Belgian law. This implies, amongst other things, that the Association operates organisationally autonomously from national governments and other stakeholders in determining its governance bodies and structures, and the way it prefers to work. In order to strengthen its modus operandi ENQA introduced the ARC in 2021. The independence of the way in which the ARC operates is regarded by all involved in the reviews as very helpful. In its activities the ARC listens carefully to the secretariat and provides recommendations to the secretariat when it sees opportunities for improving procedures amongst other things by referring the Secretariat to relevant good practices.

At the same time, as a membership organisation, ENQA cannot be organisationally independent from its members. This is visible in its governance bodies composed 100% of members and employees of Member Agencies. Various measures have been taken to strengthen the independence of the Association. In addition to the establishment of the ARC which removed possible conflicts of interest of Board members in the Agency Reviews process, other measures include that no individual can serve in more than one ENQA body at the same time. Furthermore, ENQA has developed a transparent set of procedures and regulations for the nomination, election or appointment and possible ending of mandates of ENQA body members (described in the ENQA statutes¹⁰) as well as a system of checks and balances.

When it comes to *operational independence* the SAR (p. 13) states that ENQA has full operational independence, and its agency review processes are carried out autonomously. This was fully confirmed by the review panel members who were interviewed during the panel's site visit. In order to guarantee independence of operations as much as possible

¹⁰ <https://www.engq.eu/wp-content/uploads/ENQA-Statutes-2021.pdf>

ENQA uses strict procedures for preventing conflicts of interest. This concerns, for example, the procedures for identifying, nominating and selecting experts for the review panels in which the Secretariat's review team and the ARC have separate roles, while also the QA agency to be reviewed and EQAR (if the agency applies to EQAR registration) check whether there are possible conflicts of interest. As regards who can serve as a member of agency review panels, a distinction is made between ARC and ACC members, who can serve, and Board members, who cannot serve.

A major issue that was noted during the panel's site visit is the way in which EQAR's requirements can influence the independence of the outcomes of the review process. During the panel's site visit and in the SAR (p. 14) it is indicated that reviews that need to take into account EQAR's requirements (e.g. regarding timelines, defining the terms of reference, and reporting), may experience that these requirements are sometimes different from those of ENQA. This apparently can lead to some level of irritation and discontent as indicated by representatives from the agencies that were interviewed during the panel's site visit. (See also ESG 2.5 and 2.6 plus the section in this report on "*ENQA's collaboration with EQAR*").

Assessing the integrity of the review process and *independence of its formal outcomes* is the responsibility of the ARC. While there is general satisfaction about the functioning of the ARC, also in relation to the formal outcomes of reviews there are issues connected to the different expectations of ENQA and EQAR. From an EQAR perspective the ENQA-EQAR relationship is a 'double star system', that is, the two entities are intertwined, move around each other and collaborate closely. To make the relationship more effective, a tripartite Terms of References (TOR) was agreed upon in 2022, after which it was adapted a few times. EQAR representatives argued during the panel's site visit that it is a helpful document for panels in all phases of the review even though it can still be further improved. However, the representatives from the agencies and the reviewers we interviewed seem to be less convinced of the helpfulness in all phases of the review of this TOR. This came also to the fore in EQAR representatives arguing that in some cases specific issues or topics are disregarded or missed in the ENQA reviews that are required by EQAR because the nature of the ENQA reviews and the reporting requirements are not always in line with EQAR requirements. This would imply that the tripartite TOR is less clear (or less helpful) than intended.

Analysis

As regards the *organisational independence* of ENQA questions can be raised about the possible impact of the strict membership foundation of the ENQA governing bodies. To counter possible conflicts of interest in its governance and decision-making processes ENQA has introduced procedures and regulations, and a system of checks and balances that overall seem to promote transparent and relatively independent governance practices. There is also the issue of wider stakeholder involvement in ENQA governance bodies. As is indicated in the SAR (p. 15), in its current strategic plan (2021-2025) ENQA focused on its position as a membership organisation, implying that the Association sees it as appropriate that the Board is solely composed of representatives of member agencies. As argued with

respect to ESG 3.1, while this argument with respect to the composition of the Board and the other ENQA governance bodies is understandable, it is not fully convincing from the perspective of the Association's legitimacy and in relation to that, its independence. Although the SAR (p. 13) argues that organisational independence of ENQA is secured, the strict membership foundation of its governance bodies can raise doubts among certain external stakeholders and the public about ENQA's independence and the extent to which conflicts of interest can be avoided under all circumstances. This might become a more urgent issue in the coming years as a consequence of the decreasing trust in higher education in a growing part of the political system and among the general public where higher education is regularly accused of being elitist and mainly focused on serving its own interests. Even if these doubts and criticisms can be argued to be unfounded, it would be worth considering for ENQA to open up for a wider stakeholder involvement in its governance bodies to enhance the political and public trust in QA.

The *operational independence* of ENQA's review processes is related to the extent to which they are carried out autonomously from national public authorities, QA agencies and other stakeholders. Overall, the SAR and site visit provide the panel with confidence that ENQA's procedures and regulations and its checks and balances to ensure no conflicts of interest have been strengthened in the period under review and are respected and work well in practice. This can be clearly observed with respect to the working of the Agency Reviews in which the procedures, guidelines, and regulations for identifying, nominating and selecting review panel members, and for ensuring the independence of the review findings and decisions of the review panel, seem to ensure a process that avoids as much as possible conflicts of interest. The latter is specifically strengthened by the establishment and working of the ARC which has removed possible conflicts of interest of the Board members in the Agency Reviews and has as such contributed to the operational independence of the Association. It is, for example, quite rare that any party raises a conflict-of-interest concern, which demonstrates that the existing rules that guide panel composition and the work of the Secretariat's reviews team to pre-check any potential concerns work well and are sufficient (SAR p. 13).

Overall, the internal ENQA system of checks and balances to avoid conflicts of interest seems to be working well and includes a register of ARC and Board members and making the review panel 100% responsible for the findings and recommendations presented in the report. While reports are checked by the reviewed agencies to make sure they do not contain factual errors, neither the agency nor the ARC or another ENQA body is allowed to make changes to the review panel's findings.

More doubts can be raised about the *independence of the formal outcomes* of the review processes. This has first and foremost to do with the use of the review report for ENQA membership and EQAR registration applications. This can result in a situation where the EQAR Register Committee deviates from the conclusion of the ENQA panels and/or the ARC. Even though the relationship between ENQA and EQAR has been improved, and a tripartite TOR provides for a more common understanding of what should be the focus of the review and the issues to be analysed, there is still a need for a better coordination of the requirements for the reviews and the review reports and, related to that, the (different) requirements for ENQA and EQAR. A possible step forward in this can be made in the

coming revision of the ESGs in which both ENQA and EQAR are involved, which provides them with a unique opportunity to coordinate and mutually adjust their contributions to the ESG revisions. (See also the section in this report on “*ENQA’s collaboration with EQAR*”).

Panel Commendations

ENQA has made a commendable effort in the period under review to strengthen its organisational and operational independence. The establishment of the ARC, the introduction of the tripartite TOR for Agency Reviews, and the adaptation and renewal of procedures and regulations as well as checks and balances have contributed to strengthening ENQA’s independence and have reduced potential conflicts of interest and complaints in the period under review.

With respect to the independence of the formal outcomes of the review process the ARC has contributed in a remarkable way to improving the integrity of the review process and checking the quality and consistency of the review reports.

Panel Recommendations

1. While the SAR and the panel’s site visit interviews promoted the position that ENQA as a membership organisation should be governed by its members and employees of its member agencies only, the panel recommends that ENQA’s organisational and operational independence is further strengthened by opening up ENQA governance bodies for membership of representatives from other stakeholders.
2. The panel recommends that additional steps are taken to further improve ENQA’s coordination with EQAR with the aim to strengthen the independence of the ENQA review process. This includes the need to better coordinate the ESG compliance interpretations for ENQA membership and EQAR registration, the opportunity to coordinate and mutually adjust the contributions of ENQA and EQAR to the coming ESG revisions, and a further development of the tripartite TOR. (See also the section in this report about ‘*ENQA’s collaboration with EQAR*’).

Panel Conclusion: Compliant

3.4 Thematic analysis

Standard	Agencies should regularly publish reports that describe and analyse the general findings of their external quality assurance activities.
ENQA context	ENQA should regularly publish reports that communicate general findings of the agency review processes.

2019 Review Recommendations

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

Evidence

ENQA’s 2021–2025 strategic plan explicitly sets out its intention to advance quality by sharing good practices, particularly through the dissemination of review reports and thematic analyses (SP 21-25, Goal III, sub-goal 7). This commitment is further supported by a revision of ENQA’s *Policy on the Internal Quality Assurance of ENQA Agency Reviews*¹¹ (IQA policy), with Chapter 5 detailing the modalities for these activities.

The plan calls for the publication of at least one thematic analysis every two years, thereby making this a systematic part of the Secretariat’s work. To date, the plan has been successfully implemented, with reports published in 2021 (*Diversification of external quality assurance in the EHEA – Reflection following the analysis of ENQA Agency Reviews conducted in 2020-2021*) and 2023 (*What comes after the agency reports are published? An analysis of approaches to follow-up (ESG 2.3) and complaints and appeals (ESG 2.7)*). There are further plans to release a systematic analysis report in 2025 (SAR pp. 16-17). Topics for the analyses are suggested by the ARC and the Secretariat, with final decisions made by the Board (SAR p.16 & IQA Policy p.6).

All thematic analysis reports are available on ENQA’s website and are easy to locate¹². The findings are communicated through various channels – including events, ENQA’s website, newsletters, training seminars, and social media – to reach a wide range of stakeholders. As explained in the SAR (p.17) “ENQA is committed to disseminating the results of the thematic analyses to members and affiliates, and other stakeholders. ENQA’s target groups have been made aware of the publications also through ENQA’s newsletters and social media posts”.

¹¹ <https://www.enqa.eu/wp-content/uploads/Policy-on-the-IQA-of-ENQA-Agency-Reviews.pdf>

¹² <https://www.enqa.eu/thematic-analyses/>

Nevertheless, despite these dissemination efforts, during the panel’s site visit it became apparent that many interviewees were not fully aware of the thematic analysis reports. In particular, these reports are not always identified as distinct publications within all the available resources ENQA provides.

The content of the thematic analysis reports is predominantly descriptive, although in some cases key lessons learnt are highlighted. Several interviewees noted that they found it particularly valuable to gain a global perspective on the activities of other agencies. This is also the perception of ENQA, describing in the SAR that “[T]he feedback received demonstrates that the analysis is considered useful to members and affiliates in terms of evidence and inspiration about how these issues are addressed” (SAR p.17).

In addition to the thematic analyses, ENQA participates in a number of European projects in collaboration with various HE stakeholders. Although these projects are not strictly based on ENQA’s Agency Reviews, they contribute significantly to the development of quality assurance in higher education and are generally accompanied by their own reports (SAR p.17).

Analysis

ENQA has acted on the previous external review’s recommendations by adopting a more proactive, strategic, and systematic approach to managing the knowledge and information it has gathered on internal and external QA in Europe. This approach is now embedded in the Association’s overall strategy and its internal QA policy (IQA). In line with this, thematic analysis reports are produced biennially, made publicly available, and are widely disseminated by ENQA’s Secretariat. Furthermore, it appears that the ENQA Secretariat does not yet have a clear follow-up mechanism in place for monitoring the extent to which these reports are being read and used by the intended target groups.

The current thematic analyses adhere to a narrow interpretation of ESG 3.4, which is not dissimilar to approaches taken by QA agencies in relation to ESG 3.4. However, given ENQA’s leadership in quality assurance, its wealth of information, and extensive supporting resources, this approach appears overly restrictive. Consequently, the panel is of the opinion that ENQA could take a broader perspective when interpreting ESG 3.4. ENQA’s unique role in the higher education QA landscape positions it to take a more strategic approach to thematic analyses—one that emphasises the development and evolution of QA within member agencies rather than merely ensuring strict compliance with the standard. This could involve shifting the focus from simply synthesising reviews to addressing relevant research questions. Furthermore, connecting the information gathered through reviews more directly with the other activities of the Association require more attention.

The panel believes that in its current form, the thematic analyses are not fully realising their potential. Developing these analyses demands considerable resources, and several stakeholders do not always recognise the specific added value offered by the current reports. It would therefore be prudent to address the most pertinent issues for advancing QA in higher education in the thematic analyses and to establish robust methods for monitoring the impact of these publications.

Panel Recommendations

1. The information gathered through Agency Reviews could more directly and effectively be connected to other activities ENQA is involved in. The panel recommends that ENQA adopts a broader interpretation of ESG 3.4 to strengthen the development and purpose of the thematic analyses and develops a more strategic approach to its thematic analyses—one that is driven by research questions rather than solely relying on a synthesis of external reviews. These analyses can be expected to play a role in driving the further development of external quality assurance in the EHEA.
2. The production of thematic analyses requires a significant amount of resources and despite ENQA's efforts to disseminate the results, their impact is not clear. The panel recommends that ENQA develops robust methodologies to evaluate and monitor the impact of its thematic analyses.

Panel Conclusion: Compliant

3.5 Resources

Standard	Agencies should have adequate and appropriate resources, both human and financial, to carry out their work.
ENQA context	ENQA should have adequate and appropriate human and financial resources to carry out the review processes.

2019 Review Recommendations

None

Evidence

ENQA’s primary source of funding for the Agency Reviews is derived from review fees, which provide a predictable income stream. The SAR acknowledges that the Agency Review activities benefit from being part of ENQA’s broader activity portfolio and therefore some cross-subsidisation is possible, but the stated aim remains that the reviews are primarily funded by the income from fees (SAR, p. 22). Until 2023, the fees ENQA charged for Agency Reviews remained stable, despite rising costs and inflation—which have increased both the Secretariat’s salaries and the actual expenses of conducting reviews (such as travel and subsistence). In 2024, ENQA implemented a 10% fee increase to address these challenges, with a further 2% increase planned for 2027 onward.

The structure and level of these fees remain a key point of attention for ENQA’s Board. While recognising the need to further refine both the fee structure and the rates for different types of reviews (i.e., full, targeted, partial), the Board also highlights the risk of increased competition with other agencies due to the relatively high costs associated with ENQA-coordinated reviews.

Since the previous external review, ENQA’s Secretariat has been reorganised by concentrating the responsibility for the organisation and coordination of the reviews in an Agency Review Team. The tasks of this reviews team include coordinating the majority of reviews and related processes as well as tasks related to maintaining existing expertise (e.g. trainings and thematic analyses) and tasks not related to Agency Reviews directly. The introduction of this Agency Reviews Team, consisting of three staff members including a Head of Agency Reviews, has contributed to the further professionalisation of the review processes when it comes to planning, organising, reporting, flexibility, etc. Since other staff in the Secretariat were involved in reviews before the reorganisation, it is still possible to handle peaks in reviews adequately. Moreover, additional expertise can be secured on a temporary contractual basis to meet specific needs.

Due to the cyclical nature of reviews, staff workloads can vary significantly from one year to the next, often resulting in several months of intense activity. Due to the predictability of the cycle of reviews the peaks can be anticipated. Periods with a lower intensity in

conducting reviews provide opportunities for doing other activities, e.g. preparing a thematic analysis in 2025. During the panel's site visit, ENQA staff members readily accepted this variability as an inevitable consequence of the five-year review cycle.

According to the SAR (p.20), ENQA's budget includes an allocation for staff training. However, interviews with staff members indicated that they are not always aware of the availability of these resources and that, in practice, there is limited time and few opportunities for pursuing individual professional development.

Analysis

Since the last review, ENQA has enhanced its financial resources for Agency Reviews, aided by recent adjustments to its review fee structure. While these resources are currently sufficient to fulfil ENQA's core functions, significant concerns remain regarding long-term sustainability. Both the SAR and interviews have highlighted concerns in relation to readily available resources for training and strategic development, and there are ongoing challenges in maintaining financial balance between the costs and income generated from reviews. These limitations, in turn, constrain ENQA's ability to innovate beyond its immediate operational needs. The introduction of targeted reviews has raised an additional resource concern. Although these reviews were intended to be more cost-effective, in practice it has proven but difficult to reduce costs accordingly.

The panel acknowledges ENQA's efforts to establish a sustainable yet affordable fee structure, ensuring that its reviews are financially sustainable by balancing the need to cover the implementation costs while keeping the review affordable for agencies (SAR, p. 22). To ensure long-term financial stability, ENQA would benefit from diversifying its resource base and exploring new funding opportunities beyond review fees.

In terms of human resources, the reorganisation, with a clear division of labour between staff involved in reviews and other administrative staff is overall seen as an improvement. However, it also brings with it the danger of creating silos. While staff meetings are used for updating all staff on the ongoing review processes, part of the staff feels somewhat isolated since they are no longer directly involved in the review processes. Additional measures may be needed to ensure that all staff remain sufficiently engaged and informed.

Interviews with ENQA staff revealed a strong interest in greater opportunities for staff training and professional development. However, the panel gained the impression that not all staff were aware of the available resources and that they remained underutilised, raising concerns about how effectively such staff development opportunities are planned, particularly those requiring a dedicated budget. While ENQA considers periods of lower activity as opportunities for staff training, these periods often coincide with other time-consuming projects, which can limit the availability of training opportunities. Overall, prioritising both individual and team development is essential to ensure that staff training beyond QA events does not fall by the wayside amid other pressing tasks and projects.

Panel Commendation

The panel would like to commend the ENQA agency review team for their outstanding professionalism, which was consistently highlighted during various meetings.

Panel Recommendations

1. In light of ENQA's recent raise in membership fees and the potential for further increases to be unaffordable for some agencies, particularly those in less affluent countries in the EHEA, the panel recommends that ENQA engage with its members to find long-term solutions to this issue and ensure the sustainability of the Agency Reviews for all its members.
2. As ENQA expands its membership and activities, the workload on existing permanent staff will inevitably increase. Additionally, ENQA must consider its strategic priorities, including its involvement in projects and activities outside the EHEA, and carefully consider the impact these decisions will have on its financial and human resources. To maintain operational efficiency and support staff development, the panel recommends that ENQA develop a comprehensive staffing strategy. This strategy should outline expected future staffing needs, include plans for recruiting additional personnel, and ensure dedicated budgets and resources allocated to support staff training and professional growth.

Panel Conclusion: Compliant

3.6 Internal Quality Assurance and Professional Conduct

Standard	Agencies should have in place processes for internal quality assurance related to defining, assuring and enhancing the quality and integrity of their activities.
ENQA context	ENQA should have in place processes for internal quality assurance related to defining, assuring and enhancing the quality and integrity of its Agency Reviews.

2019 Review Recommendations

- Regarding ENQA’s internal QA system, the expert panel sees room for further improvement. ENQA conducts feedback surveys among its members that underwent evaluation processes. Yet, it is not clear through which channel the feedback is analysed and used to inform actions. This is also true for informal and other formal feedback. The expert panel recommends that ENQA implement standardised procedures to catch all feedback received through different channels and analyse it in a comprehensive way.
- While the different elements of an internal QA system (e.g. a ‘Book of Precedents’, collection of feedback, training of reviewers) are present, it may be helpful to have a document that describes the whole system in order to present a more formalised and interlinked internal QA system.

Evidence

In response to a recommendation from the 2019 review, ENQA developed and published a ‘Policy on the Internal Quality Assurance of ENQA Agency Reviews’¹³, which outlines the processes and responsibilities for all review activities coordinated by ENQA.

Additionally, ENQA maintains an operational ‘*Book of Precedents*’, a continuously updated internal tool (hosted on "Smartsheet") designed to ensure consistency across reviews and prevent variations in the interpretation and application of the ESGs by different panels or over time. In 2023, this tool was transferred from an offline format to an online platform, incorporating additional notes on ARC and EQAR Register Committee decisions and discussions. While interviewees during the panel’s site visit emphasised the tool’s usefulness, some also noted its occasional complexity.

ENQA has established regular processes for collecting, analysing, and reporting on feedback from various stakeholders, including its internal bodies, members, partners, reviewed agencies, and members of review panels. Specific feedback mechanisms exist

¹³ <https://www.engq.eu/wp-content/uploads/Policy-on-the-IQA-of-ENQA-Agency-Reviews.pdf>

for each of these groups, encompassing both regular processes—such as collecting feedback following a review—and situation-specific initiatives, such as gathering input on newly prepared documents or reports. In addition, interviews with reviewed agencies indicated that the presence of a coordinator during Agency Review site visits serves as a valuable and frequently used channel for providing informal feedback on the review process, as well as on the quality and efficiency of the Agency Review site visit itself. Since 2021, ENQA has compiled annual analytical reports of its Agency Reviews¹⁴, primarily based on the feedback collected through surveys to agencies under review and review panels. The outcomes of these reports are presented to ENQA’s Board and the ARC, allowing for a more thorough and systematic approach for following up on feedback.

Agencies interviewed during the panel's site visit expressed satisfaction with ENQA’s approach to gathering feedback during and after external reviews. In particular, the direct implementation of certain suggestions—such as adjustments to panel sizes for targeted reviews—was viewed positively. However, ENQA faces challenges in obtaining sufficient feedback from all relevant parties, both internally (from agencies and panel members) and externally (from European partners). This difficulty applies to both structured surveys and informal requests for document feedback, with low response rates reported in several instances. The SAR (p.25) also highlights ENQA’s recognition of the need to refine its internal quality assurance processes to generate meaningful feedback while minimising the resources required for its collection.

While ENQA places significant emphasis on collecting feedback, several interviewed agencies expressed a desire for more individual feedback from ENQA itself about the review process. Agencies also highlighted a lack of clarity on how commendations included in reports are utilised by ENQA as a resource, though they hoped this information informs ENQA’s work.

Analysis

ENQA’s published ‘Policy on the Internal Quality Assurance of ENQA Agency Reviews’ and the ‘*Book of Precedents*’ serve as key tools for ensuring consistency and coherence across reviews. The usefulness of the ‘*Book of Precedents*’ was widely acknowledged. However, its current format as a complex internal tool limits its effectiveness as a resource for internal QA. As this tool continues to develop, greater emphasis on usability and the potential for broader accessibility—perhaps even as a publicly available resource—would be beneficial.

It is clear to the panel that ENQA’s internal bodies, ACC and ARC, play a crucial role in safeguarding the integrity and quality of the work conducted by review panels and the decisions made based on their findings. The establishment of ARC as a separate body since

¹⁴ Summaries of the analytical reports for 2021, 2022, 2023 and 2024 are available at <https://www.engq.eu/about/>

the last external review has strengthened the distinction between the coordination and practical aspects of a review and the subsequent evaluation and decision-making process.

ENQA has clearly considered and implemented the recommendations from the previous external review that ENQA should implement standardised procedures to catch all feedback received through different channels and analyse it in a comprehensive way. The channels and methods of collecting feedback are currently systematised and the background reasonings for collecting feedback are clear to ENQA's members and other parties asked for feedback.

Reviewed agencies, as well as members of the ARC, generally expressed satisfaction with ENQA's approach to collecting and utilising feedback, as did the interviewed E4 representatives. However, relatively low response rates for formal feedback mechanisms and limited input from less structured methods were identified as challenges. In other words, while ENQA has established regular and systematic feedback processes, its ability to use this feedback effectively for quality assurance and internal development is sometimes hindered by the limited responses received. While the panel appreciates ENQA's commitment to comprehensive feedback collection, adopting more streamlined approaches—such as shorter, more targeted surveys—may help improve response rates. During interviews with reviewed agencies and members of the reviewers' pool, several people expressed a greater willingness to provide feedback informally, particularly immediately following an Agency Review site visit. This suggests a potential avenue for ENQA to explore, particularly concerning review processes and outcomes.

The desire expressed by reviewed agencies for more frequent feedback from ENQA presents an opportunity for the Association to enhance its engagement with members on an individual basis. Similarly, while agencies highly value the inclusion of panel commendations in review reports, greater clarity on how ENQA recognises them as examples of good practice and considers them to inform its own work would be beneficial.

Panel Recommendation

1. ENQA's review reports provide an opportunity for panels to highlight exemplary practices within reviewed institutions. The impact of reviews could be strengthened with a systematic process for collecting, analysing, or sharing these commendations. As excellence is a core value of ENQA, harnessing these insights could benefit both its members and its broader policy strategy. The panel recommends that ENQA establishes a structured approach to compiling and disseminating examples of excellence identified in reviews. In doing so, the Association would enable agencies to benefit from its IQA, not only by promoting best practice across the sector but also by providing more systematic feedback to agencies through the recognition and sharing their strengths.

Panel Conclusion: Compliant

3.7 Cyclical External Review of Agencies

Standard	Agencies should undergo an external review at least once every five years in order to demonstrate their compliance with the ESG.
ENQA context	ENQA agency review processes should be evaluated on a regular basis in order to demonstrate their compliance with the ESG, taking into account ENQA's role as a reviewer of agencies rather than higher education institutions.

2019 Review Recommendations

None

Evidence

This report presents the findings of the second external review of ENQA's Agency Reviews against the ESG, following the first review conducted in 2019.

Analysis

Conducting an external review every five years aligns with this ESG 3.7. As long as ENQA continues to commission independent external reviews on a regular basis, it will remain fully compliant with this Standard. The panel is confident that ENQA's proactive approach to addressing recommendations from the previous review demonstrates its commitment to continuous improvement. Similarly, the recommendations and areas for improvement identified in this report will assist ENQA in further refining its policies and activities, while reinforcing its adherence to the principles of the ESG for the benefit of its stakeholders.

Panel Commendation

The panel commends ENQA for voluntarily initiating this external review and allocating substantial resources to support it. This proactive approach demonstrates a strong commitment to the ESG and reinforces ENQA's dedication to transparency in its own agency review processes.

Panel Recommendation

1. The panel recommends that ENQA continues the practice of conducting external reviews of its Agency Reviews every five years and ensures that the necessary human and financial resources are factored into its long-term planning.

Panel Conclusion: Compliant

ESG Part 2: External Quality Assurance

2.1 Consideration of Internal Quality Assurance

Standard	External quality assurance should address the effectiveness of the internal quality assurance processes described in Part 1 of the ESG.
ENQA context	ENQA Agency Reviews should verify whether agencies comply with Part 2 of the ESG and whether they effectively address the standards of ESG Part 1 in their external QA activities.

2019 Review Recommendations

None

Evidence

ENQA Agency Reviews differ from those conducted by QA agencies in that the subject of the review is not a programme or an institution, but the QA agencies themselves. Consequently, Part I of the ESG and the internal QA systems of individual higher education institutions are not directly addressed by these reviews. However, when assessing agencies' compliance with ESG 2.1, ENQA requires that agencies include a mapping grid in their Self-Assessment Report that aligns their own standards with those outlined in ESG Part 1. In its Self-Assessment Report, an agency should also explain how it evaluates the effectiveness of the internal quality assurance measures described in Part 1 of the ESG (SAR, p.26). This mapping grid summarises how an agency's external quality assurance activities address the ESG Part 1 standards, and review panels are requested to consider it carefully. Furthermore, ESG 2.1 is always included in targeted reviews as an enhancement area.

The panel heard during its site visit that in assessing an agency's compliance with ESG 2.1, the ENQA coordinator scrutinises the mapping grid for each activity. Furthermore, the ENQA coordinator asks the review panel for the relevant agency review to examine each standard of ESG Part 1, with particular attention on unclear areas.

Analysis

It is clear to the panel that in all its Agency Reviews, ENQA review panels verify whether agencies comply with Part 2.1 of the ESG and whether they effectively address the standards of ESG Part 1 in their external quality assurance activities. Consequently, review

panels must incorporate an analysis of this mapping grid in their reports. Furthermore, review panels are required to examine the agency’s own final external QA reports, with particular attention to how these reports reference ESG Part 1.

ESG 2.1 is incorporated in both full and targeted ENQA reviews. For targeted reviews, ESG 2.1. is listed as an enhancement area, but in practice, it is covered more in terms of accountability and compliance in the same manner as for a full review (SAR, p. 27).

Panel Recommendation

1. Each review’s Terms of Reference (TOR) outlines the agreed activities of the agency within the scope of the ESG criteria. These TORs are established through a mutual agreement between ENQA, EQAR (where applicable), and the agency under review. The panel recommends that each TOR, developed and agreed upon by ENQA, EQAR, and the agency under review, should clearly specify which of the ESG Part 1 Standards are to be specifically addressed as enhancement areas under ESG 2.1. This applies to all Agency Reviews, but is most urgent for targeted reviews.

Panel Conclusion: Compliant

2.2 Designing Methodologies fit for purpose

Standard	External quality assurance should be defined and designed specifically to ensure its fitness to achieve the aims and objectives set for it, while taking into account relevant regulations. Stakeholders should be involved in its design and continuous improvement.
ENQA context	ENQA Agency Reviews should be defined and designed in a manner that are fit for purpose. Stakeholders should be involved in the design and continuous improvement of these methodologies.

2019 Review Recommendations

- *The panel recommends that ENQA revise and diversify its methodology so that the agency review processes are more meaningful for all agencies who undergo subsequent rounds of evaluations and for professionally oriented agencies.*
- *A recommendation put forward in different interviewees [sic] was that ENQA should increase focus on all the work the agencies do, beyond only ESG compliance. The panel echoes this recommendation. The ESG should be read and interpreted in a*

more flexible manner in order to address each individual case from an enhancement-led perspective. The review could start from what has changed since the last review and ways to move forward. A better balance between recommendations and suggestions for improvement should be achieved.

- *The panel recommends that ENQA considers how second and third reviews could provide stronger enhancement value. (NB. This recommendation was provided under ESG 2.3 but more suitable for ESG 2.2)*

Evidence

ENQA performs full Agency Reviews for both new agencies and existing ENQA members. These Agency Reviews assess whether the agencies' QA activities are in compliance with the ESG. For agencies that do not fully meet ESG compliance, ENQA also carries out partial reviews, focusing on the specific deficiencies identified in their full review.

In addition, ENQA offers since 2021 targeted reviews to agencies who have been through at least two consecutive successful full ESG reviews. These reviews are aimed at addressing the remaining challenges faced by well-established QA agencies in achieving full ESG compliance as well as substantive changes at the agencies since the previous review, while further strengthening the enhancement aspect of the review process.

According to ENQA, fitness for purpose is at the heart of its Agency Reviews (SAR, p.27). This means that Agency Review processes of all three types of reviews aim to fulfil two key purposes: ensuring accountability and driving enhancement.

Regarding accountability, agencies are required to demonstrate adherence to the ESG. Review outcomes for this purpose can fulfil multiple functions, such as securing ENQA membership, achieving EQAR registration, proving compliance with national-level legislation (where applicable), and bolstering stakeholder trust.

Nevertheless, interviewed agencies also highly value the focus on enhancement during an Agency Review as it supports their objectives and efforts for continuous improvement of their own work. The panel's site visit revealed that achieving a balance between these dual aims can be challenging in practice, with the SAR (p.27) and several interviewed agencies indicating that the enhancement dimension is overall less well served than compliance aspect.

ENQA acknowledges the significant implications of these reviews for agencies, and several interviewed ENQA representatives stressed that its review methodology not only adheres to its intended purposes but also maintains consistency and trustworthiness, with ongoing attention on methodological enhancements. Following recommendations from the previous external review in 2019 and feedback from agencies, ENQA revised the Agency Review methodology for full- and partial reviews, published in 2021¹⁵, with the aim to better

¹⁵ <https://www.engq.eu/wp-content/uploads/ENQA-Guidelines-2021.pdf>

fulfil the double purpose of accountability and enhancement. This revision followed an extensive process of consultations with ENQA members and affiliates to ensure its fitness for purpose, led by a review follow-up group composed of members from the ENQA Board and Secretariat.

The revised review methodology introduced several new elements of which the most important are:

- Change from a four-point to a three-point compliance scale.
- Changes in the application procedure for ENQA membership.
- Establishment of the ARC.

Moreover, ENQA introduced Targeted Reviews—a distinct review type aimed at strengthening the enhancement focus for agencies that have already undergone at least two consecutive successful full reviews. During 2020–2021, ENQA collaborated with EQAR to develop this new process, with the goal of avoiding ‘evaluation fatigue’ and preventing external reviews from becoming bureaucratic exercises. The process was launched in the summer of 2021, with the first reviews using this methodology taking place in 2022 (SAR, p.28). Targeted reviews are designed to be shorter, cheaper, less staff-intensive and aim to focus more on the self-selected enhancement area(s), in addition to covering shortcomings and changes since their last full review (SAR p.30).

While some agencies generally find that these targeted reviews meet their expectations, others perceive the goals and format as ambiguous. The general opinion expressed during the panel’s site visit confirms ENQA’s observation in the SAR (p.28) that “while the accountability aspect of the targeted reviews is well covered within the review procedure, its enhancement dimension needs to be further developed, and more guidance provided to agencies and experts on how to address it.”

Fitness for purpose also implies that the review methodologies are suitable for all the QA agencies in the EHEA in all their variety and with their specific contexts. The SAR (p. 27) explains that measures taken in this respect include the inclusion of an expert with knowledge of the region and local language, a section in the agency under review’s SAR dedicated to its operating context, and a specific meeting at the start of the Agency Review site visit to ensure the panel’s understanding of the background and activities of the agency and the higher education system(s) in which it works. Interviewed agency representatives and members of the reviewers’ pool confirmed that this is in line with their experience and that review panels are generally sufficiently aware of the specific context of the agency under review.

ENQA emphasises that stakeholders provide considerable input and feedback, shaping the development of the review methodology (SAR p.29). A case in point is the revised methodology for Agency Reviews which was developed with significant involvement from the member agencies and affiliates. Nevertheless, interviews during the panel's site visit revealed that, while this holds true for QA agencies (i.e. ENQA’s members), other relevant higher education stakeholders – such as higher education institutions, students, and

external bodies like ministries or labour market organisations – are not typically involved in this process.

Analysis

The Agency Review processes aim to serve both accountability and enhancement purposes. However, as noted throughout the SAR and during the panel's site visit, integrating the enhancement dimension in the Agency reviews remains a complex challenge. The review processes are heavily weighted toward assessing agencies' compliance with the ESG, often at the expense of mechanisms that could drive enhancement. This is partly related to the additional purpose of EQAR registration which encourages a compliance emphasis by requiring a more specific focus on adherence to the ESG.

In the panel's view, this trend is especially considered problematic in second and subsequent reviews, as agencies typically develop greater maturity and sophistication in embedding ESG standards. The panel acknowledges that this tension between compliance and enhancement reflects broader challenges faced by many QA systems, and it is therefore unsurprising that it also informs ENQA's ongoing reflections on its practices and strategic direction.

ENQA has introduced a methodology revision (2020-2021) which led to several innovations in the Agency Reviews. In this, the establishment of the ARC, the introduction of targeted reviews, and the introduction of a three-point compliance assessment. The establishment of the ARC is seen as positive by the panel since it contributes to consistency, the quality of the reports and the effective communication with the agencies during and in the follow up of the review processes. The ARC's responsibility for checking the quality of the review reports, as an independent body, instead of it being the responsibility of the ENQA board, as it was previously, removed possible (perception of) conflicts of interest given the Board's responsibility for deciding on membership.

The panel recognises that ENQA has implemented several measures to strike a better balance by placing greater emphasis on enhancement. Review panels are now more aware of the role of enhancement, and there is increased flexibility in the approaches used. Nonetheless, further improvements are possible. ENQA's internal evaluation of the first 19 targeted reviews produced mixed results regarding the objectives of this new review format. According to the SAR, "the accountability aspect of the targeted reviews is well covered within the review procedure, its enhancement dimension needs to be further developed, and more guidance provided to agencies and experts on how to address it" (p.28).

In other words, although targeted reviews were explicitly introduced with a strong enhancement focus, they appear to have fallen short in this regard. ENQA attributes this primarily to the limitations it faces due to the continued need to address new or changed QA activities or other substantive changes in the agency from a compliance perspective to meet the review's TOR. In some cases, it is linked to the experts' profiles that have not

always been deemed appropriate to provide added value in the enhancement dimension (SAR p.31 – see also ESG 2.4). This was corroborated by agency representatives interviewed during the panel's site visit, who also noted that another aim of the targeted reviews – to be shorter and require less work than full reviews – has in general not been achieved in practice.

The panel believes that ENQA has taken the right path in introducing targeted reviews and agrees that they have the potential to be both meaningful and useful, although experience to date has not yet sufficiently confirmed this potential. The panel is aware that adjustments have already been made to the methodology of these reviews—for example, increasing the composition of review panels from three to four members and enhancing briefings for both agencies and panels.

Especially the enhancement dimension of the targeted reviews requires further development to be truly fit for purpose, offering greater added value from the enhancement perspective in comparison with full reviews, while still providing a comprehensive evidence base for confidence and transparency in agencies' ongoing compliance with the ESG (SAR, p.28). For instance, developing more tailored approaches that better adapt the review to the agencies' maturity and specific contexts would be beneficial. This also aligns with ENQA's emphasis on the need for the Association to adequately monitor the value for money of the review process (SAR p.54). Furthermore, the panel stresses that whilst targeted reviews may increasingly serve as the primary enhancement-focused assessment, ENQA should also continue its efforts to achieve a better balance between the dual objectives of accountability and enhancement in full reviews.

Although ENQA involved its member agencies and affiliates in designing its current review methodology, there is insufficient evidence of broader stakeholder engagement in developing the Association's review processes. Input has been largely limited to QA agencies (i.e. ENQA's members) through their participation on the ENQA Board, the General Assembly, and other bodies, as well as feedback from surveys of agencies and review panel members. While these are arguably the most significant stakeholders for ENQA's Agency Reviews, the panel contends that their input alone is not sufficient given the crucial role that other higher education stakeholders play in quality assurance, and the necessity to involve them as well in design and continuous improvement of the methodologies of the Agency Reviews.

Panel Commendation

The panel commends ENQA for the significant steps taken in diversifying Agency Reviews, which now feature both full reviews, mainly intended for newer agencies undergoing their first review(s) and targeted reviews for more established agencies. This positive development demonstrates a commitment to addressing the distinct needs and challenges faced by agencies at different stages, ultimately enhancing the overall effectiveness and relevance of the review process.

Panel Recommendations

1. Whilst recognising ENQA's efforts to address the imbalance between accountability and enhancement within its review processes, the panel recommends that ENQA adopt a more comprehensive strategy to reinforce the enhancement dimension of its review methodology, with particular emphasis on targeted reviews. This implies that ENQA should develop more tailored approaches for subsequent reviews of mature agencies to better meet their specific needs. In doing so, it is essential that ENQA considers not only the implementation costs of these approaches but also the impact of extensive economic, social, geopolitical, and technological changes on quality assurance across higher education institutions in Europe and beyond.
2. The panel recommends that ENQA broadens stakeholder involvement in the design and continuous improvement of its review methodologies, in a manner that is both appropriate and realistic. This aligns with the recommendation under ESG 3.1, which advocates for increased stakeholder participation in ENQA's governance structures, thereby enhancing their engagement in the operational aspects of Agency Reviews.

Panel Conclusion: Partially Compliant

2.3 Implementing processes

Standard	External quality assurance processes should be reliable, useful, pre-defined, implemented consistently and published. They include <ul style="list-style-type: none">• a self-assessment or equivalent;• an external assessment normally including a site visit;• a report resulting from the external assessment;• a consistent follow-up.
ENQA context	The ENQA Agency Reviews process should be reliable, useful, pre-defined, implemented consistently and published. The process should include: <ul style="list-style-type: none">• a self-assessment or equivalent;• an external assessment normally including a site visit;• a report resulting from the external assessment;• a consistent follow-up.

2019 Review Recommendations

- The panel recommends that ENQA considers how second and third reviews could provide stronger enhancement value. Moreover, both the progress visits and follow-up procedure need further clarification in order to function as effective enhancement tools. (NB: The first part of the recommendation is more suitable for ESG 2.2 and thus listed there instead).

Evidence

ENQA currently carries out three different types of Agency Reviews:

- Full reviews¹⁶
- Targeted reviews¹⁷

¹⁶ The review process is described in the *Guidelines for ENQA Agency Reviews*:

¹⁷ The review process is described in the *Guidelines for Targeted Reviews*: https://www.enqa.eu/wp-content/uploads/Guidelines-for-ENQA-Targeted-Reviews_v4.pdf

- Partial reviews¹⁸

Each ENQA Agency Review consist of the four main steps that follow ESG 2.3: a self-assessment, an external assessment that includes a site visit by a team of reviewers representing different stakeholders, a written report resulting from the review, and a follow-up process (SAR, p.31).

The different steps, as explained in the SAR (pp.32-35), are detailed below:

- A. *Initiation of the process* - to initiate an Agency Review, a QA agency must submit a request to ENQA. ENQA and the agency must agree on the TOR, which should outline, among other prescribed aspects, the agency's activities within the scope of the ESG and the overall timeline for the review process. If the agency intends to apply for EQAR registration using the same process and review report, this should be specified in the initial review request. In such cases, ENQA and EQAR will prepare a tripartite TOR, which must be agreed upon with the agency.

The general timeline for full and targeted reviews is set out in the respective Review Guidelines. However, the timeline for partial reviews varies between ENQA and EQAR (where it is called a 'focused review'). For ENQA partial reviews, the initiation of the process remains flexible to accommodate the agency's preferences, allowing ENQA to plan the review within the two-year membership evaluation period. In contrast, if a partial review is conducted as part of an EQAR focused review, it must take place within 18 months of the EQAR Register Committee's rejection decision.

ENQA appoints an ENQA staff member who acts as the review coordinator for each review, serving as the main contact between the agency and the review panel and supporting both sides throughout the process.

- B. *Self-assessment* - the agency under review prepares a SAR in accordance with ENQA's prescribed guidelines. For full reviews, the requirements are outlined in the document *Guide of content for self-assessment report of ENQA Agency Reviews*¹⁹ and for targeted reviews in the document *Guide of content for self-assessment report of ENQA Targeted Reviews*.²⁰ The SAR must cover all areas agreed upon in the TOR, provide factual information and analytical reflections and, where applicable, include a reflection on the recommendations from previous reviews. For partial reviews, the SAR is adapted from the format used for full reviews.

The review coordinator screens the SAR to ensure it includes and addresses all required elements. If necessary, the coordinator may request revisions from the agency, which must be submitted within two weeks. Once finalised, the SAR is forwarded to the members of the review panel.

¹⁸ The review process is described in the *Policy for Partial Reviews*: <https://www.engq.eu/wp-content/uploads/ENQA-partial-reviews.pdf>

¹⁹ <https://www.engq.eu/wp-content/uploads/Guide-of-Content-SAR.pdf>

²⁰ <https://www.engq.eu/wp-content/uploads/Guide-of-Content-SAR-Targeted-Review.pdf>

- C. *External evaluation* – the review panel commissioned by ENQA conducts a site visit to the agency under review. Panel members are required to analyse the agency’s SAR and review all additional documents provided by the agency. During a site visit to the agency, the panel interviews agency staff and various stakeholders to verify and expand on the information provided in the agency’s SAR.

All ENQA peer-review experts must complete a two-day ENQA training programme before being appointed. Additionally, a preparatory meeting is held between the panel and the ENQA review coordinator prior to the visit to go over key aspects of the review process. An online meeting is also organised in advance of the Agency Review site visit, involving the ENQA review coordinator, the agency representative, and the panel and focusing on the specific national and legal context in which the agency operates, as well as the key characteristics of its external quality assurance activities.

- D. *External review report* – the review panel drafts a report based on information gathered from the agency’s SAR, the agency’s website, additional documents provided by the agency, and interviews with agency staff and stakeholders. Before the report is sent to the agency, the review coordinator checks it for completeness, consistency, and clarity. The agency then receives the report for factual corrections, after which the panel finalises it.

The final report is submitted to the ARC for validation.

- E. *Report validation* – the ARC scrutinises the report to ensure that the panel has adhered to the ESG and the Review Guidelines. The ARC also verifies that judgements are consistent with other reports and supported by sufficient evidence.

Before its final validation of the report, the ARC may request additional documents or clarification from the review panel, review coordinator, or the agency under review. Based on the evidence provided, the ARC may also request adjustments to the analysis. Additionally, if the ARC disagrees with the panel’s judgements, it has the right to issue a statement outlining its position.

The Agency Review site visit serves as the cut-off point for evidence collection, meaning that any further developments at the agency after this date are not considered.

- F. *Decision-making* – the ARC validates the report and issues its *Statement on the validation of the external review report*. At this stage, the report is considered final and is published on the ENQA website alongside the ARC statement. The agency can use the report for ENQA membership and/or EQAR registration. The ENQA Board takes the final decision on membership and the outcome of the Agency Review is published on the ENQA website.

- G. *Follow-up* – the follow up procedure in the Agency Reviews is explained in detail in the SAR (pp. 34-36). The follow-up is an integral part of the review process, supporting agencies in their continuous reflection and development. In the case of

full reviews, agencies are furthermore required to submit a follow-up report two years after the Agency Review site visit, reflecting on the ongoing development of their work. This report should demonstrate how the agency has implemented the recommendations from the review and outline any further changes and developments. ENQA's Secretariat reviews the follow-up report before submitting it to the ENQA Board for further discussion. The Board then issues a response letter, highlighting key developments and areas of concern. This letter is published in the *Reviews Database* section of the ENQA website, together with the follow-up report.

The follow-up procedure for full reviews also offers the option of a voluntary progress visit to the agency, with the methodology clarified in the Review Guidelines. This progress visit is intended to foster a constructive, enhancement-oriented dialogue between the agency and reviewers, focussing on issues that the agency deems relevant to its context.

For targeted reviews, the follow-up consists of an online seminar that all agencies undergoing a target review are required to attend. The first seminar on this topic was organised in autumn 2024, providing agencies with an opportunity to reflect on the process with an emphasis on self-selected enhancement areas.

The follow-up process for partial reviews is slightly different. If a partial review results in successful ENQA membership, the agency is expected to submit a follow-up report and may also benefit from a progress visit. However, if the partial review is conducted solely for an EQAR-focused review, no follow-up procedure is included by ENQA.

Analysis

ENQA organises through its Secretariat all Agency Reviews for which it has the responsibility. This implies that the Secretariat is responsible for the conduct of the review and the composition of the review panel with its internally trained experts. Each review is an evidence-based process carried out by independent experts, consisting of analysis of the agency's SAR and other documentation, a site visit to the agency, an experts' report resulting from the review and a follow-up. The review panel would like to emphasise the importance of clear Review Guidelines, which is clearly the case for the ENQA reviews.

Although targeted reviews are widely appreciated by Member Agencies, there remains significant scope for improvement in their implementation. The current approach to targeted reviews seldom results in shorter, more resource-efficient processes for mature agencies, and the intended enhancement focus is not as strong relative to the accountability focus as many agencies had anticipated. The panel believes this is primarily an issue of the design of the review methodology (see ESG 2.2), although some concerns regarding implementation were also raised during the panel's site visit.

Based on feedback received during the panel's site visit, the panel suggests that targeted reviews might benefit from clearer explanations for both review panels and agencies and the enhancement areas selected by agencies could be further clarified, with these areas defined more explicitly from the outset. Additionally, the panel observed that final reports in targeted reviews could be improved by offering more concrete information and recommendations for further development.

Regarding partial reviews, the panel noted that there are discrepancies in the timeline between ENQA partial reviews and EQAR focused reviews, as well as confusion caused by the use of different terminology by the two organisations. This inconsistency may create unnecessary confusion for agencies and other interested parties. Additionally, the aims of ENQA's partial review and EQAR's focused review could be more clearly articulated in each partial review's TOR, with both agencies and review panels getting better acquainted with these objectives.

An important constraint in the implementation of Agency Reviews, as described in the SAR (p.35), is that despite introducing several mechanisms and tools designed to streamline the process (for example, the tripartite TOR and joint panel briefings with EQAR), the overall duration—from validation to the final decision and outcomes—remains rather long. Significant delays may occur if the ARC requests further clarifications or if the EQAR Register Committee asks for additional information. This concern was confirmed during the panel's site visit by agencies, and the panel concurs that it remains a significant issue, especially for reviews that serve both ENQA membership and EQAR registration purposes.

Although follow-up reports provide agencies with an opportunity to reflect on their activities and improvement plans, the panel agrees with observations made by several agency representatives during the panel's site visit that there is a risk these reports may, in practice, become a mere formality without leading to concrete measures or actions. ENQA also acknowledges that follow-up reports could be made more meaningful (SAR, p.36) but has not indicated a need to modify the follow-up procedure at this stage.

Additionally, some agency representatives expressed a desire for greater engagement between the panel and agencies during the progress visit, as the current level of interaction is often perceived as limited. The panel recognises that there is a clear demand for improvements in this area. The panel also recognises the follow-up seminar for targeted reviews as an example of good practice, demonstrating how follow-up can provide significant added value. It therefore encourages ENQA to continue organising these meetings and to explore further opportunities for strengthening the follow-up process across all types of reviews.

Panel Commendation

The panel commends the clarity and comprehensibility of the Guidelines for ENQA Agency Reviews. The clear structure and accessible language of the Guidelines for the different review types facilitates a thorough understanding of the review processes, thereby contributing to a more effective and transparent quality assurance framework.

Panel Recommendations

1. The panel recognises the essential role of follow-up activities in supporting agencies' continuous development. The panel therefore recommends ENQA to identify and implement opportunities for strengthening the follow-up process across all types of reviews. The panel specifically identifies targeted review follow-up seminars as an example of good practice, that should be continued to be organised and can serve as a frame of reference for follow up activities with respect to other types of reviews.
2. To improve the efficiency of the review validation process, the panel recommends that ENQA collaborates with EQAR to develop common solutions for a smoother and less time-consuming validation of review reports by the ARC and the EQAR Register Committee. To provide greater clarity and consistency for all QA agencies applying for ENQA membership and EQAR registration, the panel encourages ENQA to formalise these improvements through a structured agreement with EQAR.

Panel Conclusion: Compliant

2.4 Peer Review Experts

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

2019 Review Recommendations

- *To strengthen the contextual relevance, one improvement would be the introduction of a national expert could be introduced [sic] as an observer on the panel when none of the panel members is acquainted with that particular national context and/or language of the agency. (NB: This recommendation was provided under ESG 2.2 but more suitable for ESG 2.4).*

Evidence

ENQA has a pool of trained experts for its Agency Reviews which currently comprises 158 experts from 35 countries out of which 106 experts have thus far participated in an ENQA coordinated Agency Review. The experts involved in the review panels of ENQA's Agency Reviews include QA professionals, academics and students, nominated by ENQA's members and partner organisations EUA, ESU, EURASHE, and, where needed, BusinessEurope.

Procedures for identifying, nominating and selecting experts for review panels have been clearly established, with distinct roles assigned to the Secretariat's review team and the ARC. In addition, the QA agency under review - and EQAR, where applicable - are also given the opportunity to comment on proposed panel members to ensure that no conflicts of interest exist.

In the SAR (p.40), ENQA regards its pool of experts as adequate in terms of number of people, experience, and diversity. On the other hand, ENQA identifies clear challenges, such as ensuring there are sufficient active students and academics, and the occasional difficulty in meeting language and/or system knowledge requirements for all review panels.

Panel members are required to adhere to the *Code of Conduct*²¹, which mandates that they act with strict impartiality and objectivity, and that they identify and declare any real or apparent conflicts of interest. This *Code of Conduct* forms part of the contract between ENQA and the expert, confirming that experts engaged by ENQA are acting in their personal capacity rather than representing their nominating organisations. Furthermore, experts must notify the ENQA review coordinator of any connection that could result in a real, potential or perceived conflict of interest. For example, experts should not have been employed by the agency under review—or served as an expert for that agency—within the past five years (SAR, p.39)

The review panels for full and targeted reviews are typically composed of four external experts, including one or two QA professionals, an academic at an HEI, and a student member. When relevant to the agency's profile, additional panel members may be included. Each review panel is led by a panel chair who holds overall responsibility for the review, including the production and quality of the final report. In addition, a panel secretary is designated, whose primary role is to lead the preparation of the Agency Review site visit programme and to draft the final report in collaboration with the other experts. A critical observation in the SAR (p.40) is that ENQA experiences an ongoing challenge in ensuring the availability of competent secretaries. In response, ENQA has introduced a dedicated online seminar for panel secretaries, which first edition took place in 2024.

As already indicated under ESG 2.2, the panels for targeted reviews were originally designed to consist of three members – one QA professional employed by an agency, one academic, and one student. However, feedback from the initial reviews indicated that the workload for a three-person panel was excessive, and it was challenging to fulfil the

²¹ <https://www.engq.eu/wp-content/uploads/ENQA-Code-of-Conduct-for-reviewers.pdf>

necessary criteria with such a limited composition. Consequently, in autumn 2022, the number of experts on a panel was increased to four. Despite this adjustment, a critical issue raised by agencies during the panel's site visit – and acknowledged in the SAR – is that in targeted reviews it remains challenging to ensure that all panels include members who can fully support agencies in their self-selected enhancement areas.

Partial reviews utilise a panel of three to four members, which must include at least one academic, one student, and one QA professional. Partial review panels also do not include a secretary, but the external review report is written by the chair in collaboration with the rest of the panel (SAR pp.38-39)

Feedback received by the panel from agencies during its site visit was largely positive. This echoes the observation in the SAR (p.40), which indicates that agencies are generally satisfied with the composition of the panels and that their performance is well regarded. ENQA also cites feedback from panel members, the majority of whom report satisfaction with both the panel compositions and their collaborative efforts.

All reviewers undergo training before participating in a review, and ENQA also organises regular seminars for experienced reviewers. In fact, it is a prerequisite for eligibility on a review panel that experts complete a two-day ENQA training course. This comprehensive preparation ensures a well-prepared and active pool of qualified individuals, minimising the need for ad hoc training sessions and guaranteeing that sufficient skilled panel members are always available to ENQA.

In addition to training new experts, ENQA regularly organises seminars for experienced reviewers, providing opportunities to update knowledge, exchange experiences and discuss further developments in review methodologies (SAR p.39).

Once appointed to a review panel, further preparation is provided by the review coordinator for the respective agency review. A pre-visit meeting is held between the panel and the ENQA review coordinator to reiterate the main aspects of the review process. An online meeting is also organised between the review coordinator, the agency representative and the panel to clarify the specific context in which the reviewed agency operates.

At the beginning of each review process, panel members attend an online briefing where the coordinator outlines the review's purpose, roles and responsibilities, the use of the ESG, the timeline and management of the Agency Review site visit, report drafting and the decision-making process. This briefing also serves as an opportunity for the panel to raise any questions and finalise the review plan. For reviews that are (also) conducted for EQAR registration, staff from the EQAR Secretariat join the briefing to explain the review's scope and address any queries regarding the Terms of Reference. According to ENQA, this practice that was introduced in 2021 has been helpful in clarifying EQAR's expectations and preventing misunderstandings later in the process (SAR, p.39)

During the panel's site visit, review panel members provided overwhelmingly positive feedback, expressing their appreciation for the training and support provided by ENQA's Secretariat.

Analysis

The panel can confirm that ENQA's Agency Reviews are conducted by teams of external experts, which include representatives from relevant stakeholder groups. The panel is confident that review panel members act in a personal capacity and receive appropriate training, guidance and support to be adequately prepared for their roles. ENQA takes all necessary steps to consider potential conflicts of interest during the selection process, in accordance with its Code of Conduct.

Although the pool of experts is both substantial and diverse, challenges remain in keeping it current. ENQA acknowledges that there is a persistent difficulty in ensuring that a sufficient number of recently active students and academics with the appropriate experience are included. Feedback and the panel's own observation during the panel's site visit concurs with this, giving the panel the strong impression that the pool is not regularly updated and that ENQA appears to rely on a much smaller group of 'very active' panel members than the overall number of experts composing the pool would suggest.

Addressing other identified ongoing challenges in consistently meeting the requirements for experts with specialised knowledge—particularly in relation to specific language and system expertise. This challenge was already flagged up in the previous external review in 2019 and continues to be an issue, despite the efforts of ENQA's Secretariat and ARC to ensure that every panel includes at least one expert who fulfils these criteria – a strategy that, of course, depends on such experts being available in the pool.

Also, the availability of competent secretaries and experts capable of fully supporting agencies in their self-selected enhancement areas for targeted reviews will require a more proactive approach from ENQA in recruiting potential panel members.

While initiatives such as the dedicated online seminar for panel secretaries and the online meeting with the agency's resource person focused on a better understanding of the agencies' contexts are positive steps, they do not fully resolve the underlying issue of the limited availability of suitable panel members. The panel believes that ENQA would benefit from a comprehensive analysis of feedback from panel members and agencies and engaging in discussions with nominating partner organisations to identify the specific gaps in expertise and implement corrective measures where needed.

Panel Commendation

The panel commends ENQA for the exceptional quality of their review coordinators. Their role is widely acknowledged for its outstanding contribution to ensuring consistency across reviews through comprehensive training, guidance and support provided to review panels, leading to more consistent outcomes and high-quality reports.

Panel Recommendations

1. The panel recommends that ENQA takes further steps to increase the availability of experts with the necessary experience and expertise in its pool of experts to meet the specific requirements of ENQA's different types of Agency Reviews. In particular, ENQA should ensure a sufficient number of experienced and qualified secretaries to effectively support the review process effectively and address language proficiency and system knowledge requirements, especially in smaller higher education systems where the risk of conflicts of interest is higher.
2. The panel recommends that ENQA refines its selection process for panel members appointed to targeted reviews, actively recruiting experts with specific expertise in the areas identified for enhancement. Given the distinct focus of these reviews, ENQA should assess whether the current pool of experts is sufficiently diverse and regularly updated to meet these evolving needs. Additionally, it should explore ways to expand or adapt its pool to better align with the enhancement-oriented objectives of targeted reviews.

Panel Conclusion: Compliant

2.5 Criteria for Outcomes

Standard	Any outcomes or judgements made as the result of external quality assurance should be based on explicit and published criteria that are applied consistently, irrespective of whether the process leads to a formal decision.
ENQA context	Any outcomes or judgements made as the result of ENQA Agency Reviews should be based on explicit and published criteria that are applied consistently.

2019 Review Recommendations

None

Evidence

The ESG Part 2 and Part 3 serve as the fundamental framework and criteria for ENQA's Agency Reviews. Agencies interviewed during the panel's site visit indicated that these criteria are generally perceived as clear and understandable, with broad consensus that the ESG is explicitly and effectively integrated into the review process. Interviewed members of review panels shared this sentiment.

Review panels assess an agency's compliance with the ESGs using a publicly available 3-point scale:

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

Besides assessing each individual ESG against this scale, review panels are also expected to form an overall judgment on the agency's compliance with the ESG. While this overall judgment is not based on a strict mathematical calculation, an agency would typically not be considered ESG compliant if one or more individual standards are judged as non-compliant (SAR, p.43). Although strictly speaking the outcome of an Agency Review is the final judgment on an agency's ESG compliance, the review report also serves as the basis for decisions regarding ENQA membership and/or EQAR registration.

The current assessment scale was introduced in 2021 when ENQA's Board changed the judgement scale from a four-point to a three-point compliance assessment, aligning it

with the scale used by EQAR (SAR, p.41). A key motivation for this change, as indicated in the SAR (p.42), was the expectation that it would reduce confusion between EQAR and ENQA judgements. Additional reasons cited in the SAR include the belief that a three-point scale would simplify the process for review panels to reach a judgement, allow agencies to demonstrate their compliance in varied ways, and promote consistency across different reviews.

However, after three years of using the three-point assessment scale, feedback from agencies and reviewers has been mixed, as noted in the SAR (p.42) and expressed during the panel's site visit. Although several respondents had not experienced any difficulty with the new scale, some raised concerns regarding the difficulty in distinguishing between 'compliant' and 'partially compliant', as well as the challenge of recognising excellence and good practices among agencies. This concern is particularly linked to the removal of the highest category from the previous four-point scale—'full compliance'—which many considered equivalent to 'excellence'.

Additionally, according to the SAR (p.42), review panels tend to adopt a stricter approach with the three-point assessment, often opting for the middle (i.e. partially compliant) if the agency is not entirely compliant with the standard, in circumstances that might previously have led to 'substantially compliant'. This observation, widely confirmed during the panel's site visit, has proven to be the opposite of ENQA's initial expectations when the new scale was introduced, as it was anticipated that panels would be more inclined to adjust their 'substantial compliance' judgements upwards rather than downwards.

The SAR (p.44) emphasises that while consistency in applying the ESG criteria is a priority, final judgements remain inherently qualitative and rely on expert discretion; there is no rigid formula for determining the level of compliance. Nevertheless, ENQA has introduced several measures that are expected to contribute to an accurate and consistent application of the assessment criteria, including:

1. *Trained Experts:* Reviewers undergo targeted training designed to address potential challenges in consistently applying the criteria and to foster a shared understanding among all reviewers.
2. *Review Coordinator Support:* ENQA Review Coordinators provide comprehensive briefings and guidance to panels, helping to maintain consistency throughout the review process and ensuring alignment across different reviews.
3. *Book of Precedents:* Maintained by ENQA's Secretariat, this resource documents previous decisions and interpretations, ensuring that panel evaluations are informed by established precedents and remain consistent with past practices.
4. *ARC:* Comprised of three independent experts, the ARC offers feedback on the clarity of reports and provides independent judgements on the consistency of panel conclusions, as well as on whether the evidence and analysis sufficiently support these conclusions.

Feedback from agencies during the panel's site visit has underscored the effectiveness of these measures, with many noting that consistency has improved over time.

When an agency intends to use its review report as part of an application to EQAR, the ENQA review panel also considers the EQAR document "*Use and Interpretation of the ESG for the European Register of Quality Assurance Agencies*"²² during the review process and needs to ensure that the report contains all elements required by EQAR. In this interpretation of the ESG, EQAR sets out the minimum requirements for evidence to be provided in the report.

During the panel's site visit, reviewers confirmed that the EQAR interpretation serves as an important reference throughout the review. However, it was noted that it is not always clear to what extent these interpretations should be strictly followed when assessing compliance with the ESG. Some reviewers mentioned that they sometimes experience a tension between different purposes of the review for ENQA and EQAR, raising questions about who they are actually working for.

Despite the use of the EQAR interpretation, the contribution of EQAR to the preparation of review panels (see ESG 2.4) and other measures, reviewers indicated that panels are still frequently asked by EQAR for further clarifications after finalising their review reports. This was confirmed by EQAR representatives during the panel's site visit, with the addition that the number of clarification requests have declined over the last years, possibly as a result of more involvement of EQAR in the trainings of reviewers. Nevertheless, discrepancies remain between the decisions made by ENQA and those of EQAR, both in terms of compliance with individual standards and overall compliance decisions (SAR p.45).

Analysis

ENQA's Agency Reviews are firmly grounded in the ESG, which serve as the primary criteria for assessing the work of QA agencies. These criteria are clear and explicit, and based on its analysis of a sample of recent review reports, the panel can confirm that ENQA applies the ESG consistently.

Of course, as ENQA acknowledges, achieving full consistency (and thus comparability) across individual reviews is challenging due to the qualitative nature of Agency Reviews and the human element involved, with varying compositions of review panels for each review.

Despite these challenges, the panel believes ENQA has adequate measures in place to ensure accurate and consistent application of the assessment criteria. Since the last review in 2019, enhancements such as the further development and use of the '*Book of*

²² https://www.eqar.eu/assets/uploads/2020/09/RC_12_1_UseAndInterpretationOfTheESG_v3_0.pdf

Precedents' and the establishment of the ARC contribute significantly to consistency and uniformity in assessments across different reviews.

In contrast, replacing the four-point scale with a three-point scale for assessing compliance has not delivered the anticipated results. The panel contends that this change has diminished clarity regarding the extent to which agencies meet the various ESG standards, reduced the bandwidth available to review panels to fine-tune their judgements, and limited the opportunity to showcase examples of good practice or excellence in agencies' work. While recognising the benefits of employing a consistent scale across ENQA and EQAR, the drawbacks in terms of clarity and interpretative consistency appear to outweigh these advantages.

In the panel's view, the decision to adopt a three-point scale seems more a political choice—designed to simplify agencies' dealings with EQAR—than a strategic approach to the development of QA in European higher education. It may be worth reconsidering, in consultation with all parties involved, what kind of assessment scale would be most appropriate to fulfil the purposes that the ENQA reviews aim to achieve.

Another issue arises from the dual use of review results by ENQA and EQAR. Differing interpretations of the ESG by the two organisations, which frequently result in diverging outcomes, can undermine the overall coherence and reliability of the review process. Given that Agency Reviews more often than not serve as the basis for both ENQA membership and EQAR registration, it is beneficial to establish a consensus on the use of the ESG for this purpose, without implying that one interpretation is the 'right' or sole acceptable one. The forthcoming revision of the ESG may present a pertinent opportunity to achieve this.

In the current situation it is important that review panels fully understand how to include EQAR's requirements in their assessment of ESG compliance, thereby reducing the risk of complications and a lengthy validation and decision process. Although the panel believes that EQAR's interpretation is adequately covered in their reviewers' training, review panels must truly internalise that their work benefits both ENQA and EQAR and that the resulting reports are essential not only for achieving ENQA membership but also for supporting agencies in their EQAR registration. By recognising the dual purpose of these reviews from the outset, review panels can improve consistency and clarity, ultimately enhancing trust in the review process and making it easier for agencies to navigate the demands of both organisations. See for more detail the section in this report on "*ENQA's collaboration with EQAR.*"

Panel Commendation

The panel commends ENQA for its continuous efforts to refine and evaluate the measures that enhance consistency in its review processes. In particular, the panel recognises the significant improvements achieved through the establishment of the ARC as a key step in the process of validating the review outcomes, and the effective use of the '*Book of Precedents*', both of which contribute to greater clarity, reliability, and coherence in decision-making.

Panel Recommendations

1. The panel recommends that ENQA reconsiders the assessment scale used in its reviews. Although the transition to a three-point scale was implemented for valid reasons – including aligning with EQAR's approach – it has resulted in diminished clarity and challenges in differentiating between varying levels of compliance. In consultation with all relevant parties, ENQA should evaluate whether returning to the previously used four-point scale - or possible other alternatives - would better fulfil the objectives of its reviews. This would likely provide greater precision, enhance the clarity of compliance assessments, and allow for a more consistent and nuanced interpretation of agency performance.
2. The panel recommends that ENQA prioritises closer coordination with EQAR in the review process towards a shared and consistent interpretation of the ESG standards in the assessment of compliance. While recognising the different purposes of its Agency Reviews, the panel emphasises the importance of aligning ENQA and EQAR's interpretations to avoid conflicting decisions. Achieving this alignment will not only enhance trust in the review process but also provide agencies with greater clarity and confidence in meeting the requirements of both organisations.

Panel Conclusion: Compliant

2.6 Reporting

Standard	Full reports by the experts should be published, clear and accessible to the academic community, external partners and other interested individuals. If the agency takes any formal decision based on the reports, the decision should be published together with the report.
ENQA context	Full ENQA agency review reports should be published, clear and accessible for all interested parties, and the decision on compliance with the ESG should be published together with the reports.

2019 Review Recommendations

None

Evidence

All ENQA reports are published on the ENQA website under the ‘Reviews Database’ section.²³ In addition to the review reports, for each reviewed agency ENQA also publishes the Self-Assessment Report, Terms of Reference (TOR), ARC statement, ENQA Board decision, follow-up report and ENQA Board letter regarding the follow-up report. These documents are readily accessible and can be searched by agency, by year of publication, and by review status (ongoing/completed).

ENQA Agency Review reports are written by peer-review experts under the coordination of a panel secretary. To ensure consistency and comparability, ENQA provides a publicly available panel template, which differs for full²⁴ and targeted²⁵ reviews. When an agency intends to (also) use the review report for its application to the EQAR register, the ENQA review panel needs to take into account the EQAR document "*Use and Interpretation of the ESG for the European Register of Quality Assurance Agencies*"²⁶ during the review process and ensure that the report contains all elements required by EQAR.

The review coordinator responsible for the relevant review within the ENQA Secretariat checks the draft report for completeness, consistency, clarity, and language before the panel secretary forwards it to the reviewed agency for factual corrections. The agency is given two weeks to provide feedback, after which the panel finalises the document and submits it to ENQA. The ARC then scrutinises the report, requests further clarification if

²³ <https://www.enqa.eu/review-database/>

²⁴ https://www.enqa.eu/wp-content/uploads/ERR-template_full-reviews_2021.docx

²⁵ <https://www.enqa.eu/targeted-reviews/>

²⁶ https://www.eqar.eu/assets/uploads/2020/09/RC_12_1_UseAndInterpretationOfTheESG_v3_0.pdf

necessary, and ultimately decides on its validation. Once validated by the ARC, the report is sent to the reviewed agency and then published on ENQA's website.

Agencies that were interviewed during the panel's site visit expressed their satisfaction about the quality of ENQA's review reports and informed the panel that the quality of the review reports has improved significantly over the years, particularly following the establishment of the ARC. Key improvements in the reports, as highlighted by agencies, include better evidence-based findings and improvements in language and tone. Agencies particularly appreciate the effort to avoid overly prescriptive language, striving instead for a more balanced approach.

Analysis

The panel can confirm that all ENQA Agency Review reports, including decisions on compliance with the ESG, are published on ENQA's website. Additionally, the panel echoes the views of the interviewed agencies, reaffirming that the reports produced during the review period are of good quality, follow a clear template, and are accessible to HE stakeholders and other interested parties.

The ARC plays a crucial role in dedicating more time to the evaluation of review reports, resulting in a more focused review process and greater consistency in reporting over time. As one of several 'filters' in the agency review process, the ARC ensures consistency across reports while helping to enhance their quality. The panel believes that its establishment has significantly reduced discrepancies between reports and judgements.

ENQA review panels take into account the EQAR *'Policy on Use and Interpretation'* when an agency applies for EQAR registration with the aim to minimise clarification requests from the EQAR Register Committee. Nonetheless, such requests remain relatively frequent in practice (SAR, p.47). In response to stakeholder requests for clarification in similar cases, ENQA is considering revising the template to help panels and the ARC gather all necessary information and evidence more effectively – an initiative the panel fully supports.

One issue that ENQA could consider as well when revising the template is an occasionally perceived inconsistency between the oral report given to the reviewed agency at the end of the Agency Review site visit and the final written report, as noted by some agencies interviewed by the panel. While new agencies are generally very positive about the whole review process and the report, some of the mature agencies interviewed indicated that they experienced a dissatisfying difference between the relevant and insightful interactions and feedback during the Agency Review site visit and the more general formulations in the final report.

Panel Commendations

The panel commends ENQA for its good practice of making all documents related to Agency Reviews publicly available. This commitment to transparency ensures that key documents—including review reports, self-assessment reports, Terms of Reference, ARC statements, Board decisions, follow-up reports and the Board letters regarding the follow-up reports—are easily accessible to all stakeholders. By making all relevant documents publicly available, ENQA sets an example of transparency which encourages confidence in the review process among all stakeholders.

Panel Recommendations

1. The panel recommends that, as ENQA plans to revise the report template, it engages with EQAR to clarify the information and evidence required in the final report from EQAR’s perspective. This will help minimise the need for clarification requests and ensure that all necessary elements are addressed from the outset, thereby enhancing the efficiency and consistency of the review process.

Panel Conclusion: Compliant

2.7 Complaints and appeals

Standard	Complaints and appeals processes should be clearly defined as part of the design of external quality assurance processes and communicated to the institutions.
ENQA context	ENQA Agency Reviews should include a clearly defined process for complaints and appeals, which is communicated to the agencies involved.

2019 Review Recommendations

- *While the system exists, it is important that all participants in agency review processes are aware of the system in place and what can be appealed. The different roles and processes related to appeals and complaints in the process should be further clarified, and a detailed description of cases in which the agency can appeal should be stated and communicated to all participants.*
- *While the case load for the committee is low, training/introduction should be provided to the committee, to ensure that both the panel members and alternate members have the same starting point when cases arise.*

- *Beyond the narrower interpretation of this standard here, the panel also suggests that complaints from those who have participated in the process (e.g. panel members) should be taken into account.*
- *[T]he independence of ENQA within reviews should be enhanced by (re-) defining the complaint and appeal procedures and promulgating them to all relevant stakeholders. (N.B: This recommendation was provided under ESG 3.3 but it is more suitable for ESG 2.7).*

Evidence

Following the recommendations from the 2019 review, ENQA has introduced several changes to its complaints and appeals procedure. Specifically, the information on the ENQA website has been updated to clearly outline the conditions, process, and format required for both complaints and appeals²⁷.

ENQA has two distinct procedures in place: the appeal procedure, which pertains to the membership decision-making process, and the complaint procedure, which addresses the integrity of the ENQA Agency Review process. Complaints and appeals are processed by the Appeals and Complaints Committee (ACC), composed of four members who come from ENQA Member Agencies and possess relevant expertise (SAR p.49). At least one of the ACC members has to be a former member of the ENQA Board. The members of the ACC are proposed by the ENQA Board and appointed by its General Assembly for a three-year term, which may be renewed once. Of the four members, one is designated as an alternate in cases where a conflict of interest of an ACC member arises. To prevent (perceived) conflicts of interest, ACC members cannot sit on the ARC or be a current member of the ENQA Board.

To prepare them for their role, ACC members receive training from the Head of Agency Review, and their work in considering a complaint or appeal is guided by detailed documentation, typically spanning 10-12 pages as described during the panel's site visit. The full complaints and appeals process is described with all the steps in the "*Rules of procedure*", Article 23.²⁸ Appeals can only be made against the final decision regarding admission or renewal of ENQA membership, and not against decisions concerning specific standards or conditions.

A third process, which is unrelated to reviews, addresses third-party complaints.²⁹ These involve conflicts between individuals or institutions and an ENQA member agency concerning compliance with the ESGs. The third-party complaints procedure is processed by the ENQA Board based on a report and evidence provided by the Secretariat, with the decision being made following a discussion that references the statutes (SAR p. 49). Several interviewees, however, suggested that the third-party procedure could be more

²⁷ <https://www.enqa.eu/complaints-and-appeals/>

²⁸ <https://www.enqa.eu/wp-content/uploads/ENQA-Rules-of-Procedure-2021-1.pdf>

²⁹ <https://www.enqa.eu/wp-content/uploads/ENQA-complaints-policy-1.pdf>

comprehensive. In response, ENQA mentioned during the panel’s site visit that it has recently established a working group to explore ways to improve the handling of such cases.

For all three processes described above, the ENQA Board has the final decision, and this is not subject to appeal.

Between 2020 and 2024, ENQA conducted 73 reviews, with two appeals and three complaints submitted (including one rejected appeal due to failure to meet criteria). Additionally, two third-party complaints were received during this period, both of which were rejected for not meeting the criteria (SAR p. 50). This relatively low number of complaints and appeals in recent years³⁰ may be partly due to the introduction of the ARC whose work “*supports the consistency and comparability of the reports across different review panels*” (SAR p. 23) and implementation of the ‘*Book of Precedents*’. Both initiatives have contributed to greater consistency in review reports.

ACC members indicated during the panel interview that they collectively possess the necessary competencies to handle appeals and complaints. ENQA’s leadership has stated during the panel’s site visit that it does not plan to recruit external members for the ACC or seek a member with specific legal expertise. However, a lawyer may be hired if deemed necessary.

Analysis

ENQA has clearly followed up on the recommendations from the previous external review in 2019, making notable improvements in the clarification of procedures, communication, and training for members of the ACC.

The complaints and appeals procedures are well-defined and easily accessible to agencies or any interested individuals. While the information provided for third-party complaints is adequate, there seems to be a desire to further develop and structure the process. This is less about improving the information available to complainants and more about refining the process itself. However, the current system does not hinder anyone’s right to lodge a complaint, as the necessary information on how to proceed is readily available.

Appeals and complaints are managed by a team of highly experienced individuals from the external QA sector, agencies, and ENQA, all of whom have received thorough induction. The appeals and complaints process relies on agency review reports that have already been scrutinised by the ARC, thereby improving the alignment between evidence and conclusions. Moreover, the process is supported by comprehensive documentation, ensuring that the criteria for handling appeals and complaints professionally are consistently met.

³⁰ In comparison in the period 2015-2019, ENQA received 5 appeals and 1 complaint (Source: External Review Report 2019, p.43).

Although ENQA has implemented mechanisms to prevent conflicts of interest, the possibility of “conflicts of loyalty” among those involved in the organisation cannot be entirely eliminated. At present, the system operates in a somewhat insular manner. Many agencies include external members on their own complaints and appeals committees. Similarly, for ENQA, the addition of one or more external members to the ACC could strengthen the legitimacy of its decisions.

Appeals are currently only accepted in relation to ENQA membership decisions. While the intended outcome of an Agency Review is the admission or renewal of membership, this can be influenced by subsidiary decisions regarding standards that agencies may find problematic, such as the evidence provided, the criteria applied or the ARC’s decision to validate the report. During its site visit, the panel heard that allowing appeals against individual ESG judgements would create an excessive burden and may be unnecessary, as such appeals could be seen as merely for “window dressing” purposes. However, the panel believes that expanding the scope of appealable decisions would contribute to a greater sense of fairness and transparency in the review process.

Panel Recommendations

1. The panel recommends that ENQA considers including external members, i.e. individuals not affiliated with ENQA members, in the Appeals and Complaints Committee (ACC) to enhance the legitimacy and objectivity of decisions, thereby ensuring a more transparent and impartial process.
2. Recognising that expanding the scope of appealable decisions would enhance transparency and fairness by offering agencies a more robust mechanism to address concerns within the review process, the panel recommends that ENQA, in consultation with its member agencies, carefully considers the advantages and disadvantages of broadening the range of decisions subject to appeal, particularly those related to individual ESG judgements.

Panel Conclusion: Compliant

ENQA's collaboration with EQAR: Challenges and Opportunities

Evidence

ENQA and EQAR maintain strong ties, with the majority of EQAR decisions currently based on ENQA review reports (SAR p.51). The rationale behind this arrangement—where EQAR decisions rely on reviews conducted by ENQA or other coordinators—was to prevent duplication of procedures, minimise additional costs, and reduce administrative burdens for QA agencies. As highlighted during interviews, while agencies highly value ENQA's support for their activities, EQAR registration is often a legal requirement in many countries, making it essential for most. Moreover, under the current arrangement, ENQA membership follows the EQAR decision.

A key issue discussed during several meetings at the panel's site visit concerns occasional discrepancies between ENQA and EQAR evaluations.

“The differences in outcomes from the ENQA and EQAR decision-making processes stem from various factors. The first relates to the use of the ESG. ENQA's view is that the ESG were created through a consensual process and approved by the EHEA Ministers, and no organisation, or sub-body of an organisation has the mandate to interpret the ESG, whereas EQAR also applies their Policy on the Use and Interpretation of the ESG” (SAR p.52).

Interviews during the panel's site visit confirmed these differing perspectives, with representatives from both ENQA and EQAR acknowledging that a central challenge in their collaboration lies in their distinct approaches to ESG interpretation.

EQAR's 'Use and interpretation of ESG' led to the perception of additional requirements for compliance with the standards of the ESG and admittance to the Register (SAR p.52). While ENQA has been consulted on updates to this document—alongside other E4 members—it has formally expressed concerns, following internal consultations within its Secretariat, Board, and membership. In a formal letter to EQAR, ENQA raised the issue of what it perceives as additional requirements extending beyond the ESG. Based on interviews conducted during its site visit, the panel sees a fundamental difference between the two organisations, with ENQA maintaining that the ESGs—developed collaboratively within the Bologna Process framework—should remain unmodified, while EQAR argues that some level of formal interpretation is necessary for standards it considers too vague.

A key concern is the divergence in compliance decisions, with some assessments being adjusted either upwards or downwards. During the panel's site visit, several agency heads expressed confusion over the reasons behind these differing evaluations. Additionally, procedural inconsistencies were noted, such as EQAR accepting additional information after the Agency Review site visit, whereas ENQA does not, and variations in re-application deadlines (18 versus 24 months for partial/focused reviews) (SAR p.52). These discrepancies have caused frustration and uncertainty among various stakeholders, including ENQA's Secretariat, agencies, and members of review panels.

To address these discrepancies, several measures have been introduced:

1. *EQAR participation in ENQA’s expert training*

EQAR has been invited to take part in ENQA’s training for reviewers. Although review panel members and ARC members do their work on behalf of ENQA, they are expected to incorporate EQAR’s interpretation of the ESGs into their assessments. As one interviewee remarked, “reports are infused with EQAR’s understanding of the ESG.” This blending of ESG interpretations has led to confusion among some reviewers, who are uncertain whether they are assessing agencies against the ESGs themselves or EQAR’s interpretation of them. Given that EQAR registration is highly important—and often essential—for agencies, it is understandable that EQAR expects ENQA review panels to consider its requirements carefully.

2. *Role of the Agency Review Committee (ARC)*

Established by ENQA to enhance consistency in review reports, the ARC ensures that reports are validated for content and supporting evidence. While the ARC does not influence the panel’s conclusions, it consults a ‘*Book of Precedents*’—a record of decisions from both ENQA and EQAR since 2015—to clarify any uncertainties regarding the evidence provided (SAR p.23).

3. *Tripartite Terms of Reference*

Since 2022, ENQA, EQAR, and agencies have agreed on tripartite Terms of Reference (TORs) (SAR p.32) for dual-purpose reviews. While some interviewees found these documents useful, particularly in guiding panels through all phases of a review, both agency representatives and reviewers expressed reservations about their overall effectiveness. The preparation of tripartite TORs is often perceived as complex and time-consuming. Additionally, EQAR representatives have raised concerns that certain issues or topics they require are sometimes overlooked or insufficiently addressed in ENQA reviews. Although preparation meetings for reviewers include a session with an EQAR representative to present EQAR’s interpretation of the ESGs (SAR p.52), further alignment between ENQA’s and EQAR’s perspectives remains necessary. Each panel’s mandate requires consideration of both organisations’ interpretations, yet this dual focus is not always fully realised, leading to gaps in the review process.

4. *Modification of the assessment scale*

Since the previous review in 2019, ENQA has modified its assessment scale from a four-point to a three-point system to align it with EQAR’s approach. However, some interviewees noted that this change resulted in the loss of the ‘substantially compliant’ and ‘fully compliant’ categories, meaning that, in practice, “we lost excellence.” See ESG 2.5 for a further reflection on this change in the assessment scale.

5. *Adjustment of decision sequences*

ENQA membership decisions are now made after EQAR registration decisions to streamline the process and enhance coherence between the two organisations.

6. Improved communication and collaboration

More frequent meetings and exchanges of information have strengthened communication between ENQA and EQAR (SAR p.52).

These initiatives have led to noticeable improvements. The number of clarification requests has decreased over recent years, as have differences in assessments. Both ENQA and EQAR emphasise that communication and collaboration have significantly improved as a result of these ongoing efforts.

Analysis

It is clear that for agencies seeking dual recognition, strong collaboration between ENQA and EQAR is essential. However, discrepancies between ENQA and EQAR's compliance decisions have led to frustration and confusion, sometimes creating the impression that two different sets of standards are being applied.

As a founding member of the E4 group that developed the ESG, ENQA has a legitimate sense of shared ownership over the standards. Additionally, ENQA played a key role in establishing EQAR alongside the other E4 members, which may contribute to certain expectations regarding their relationship. However, EQAR derives its legitimacy primarily from its responsibility to the EHEA ministries. Notably, the EQAR Register Committee represents the same stakeholder groups as the E4, whereas ENQA is governed solely by its members agencies. Consequently, accountability practices within the two organisations may differ.

It is widely acknowledged that quality assurance processes serve two key purposes: accountability and enhancement. Rather than being distinct categories, these represent two dimensions on a continuum, with every review incorporating elements of both, albeit in varying proportions. While ENQA fully recognises its accountability role, its membership-based nature means it places greater emphasis on enhancement than EQAR. This focus has been further reinforced through the introduction of Targeted Reviews, which are specifically designed to strengthen this dimension. EQAR, on the other hand, while not disregarding enhancement, remains more focused on its gatekeeping function, ensuring that agencies meet the minimum requirements for registration.

These differing orientations are reflected in the missions of the two organisations. ENQA's mission states that *“As the designated stakeholder organisation of quality assurance agencies in the EHEA, ENQA represents their interests internationally, supports them nationally and provides them with comprehensive services and networking opportunities. Under ENQA's umbrella, the community of agencies drive innovation in quality assurance and refines quality assurance processes.”*³¹ In contrast, EQAR's mission highlights a

³¹ <https://www.engq.eu/about-engq/>

different focus: “EQAR seeks to provide clear and reliable information on quality assurance provision in Europe, thus improving trust among agencies”³².

These differences along the accountability-enhancement continuum may influence the methodological approaches of ENQA and EQAR. As EQAR is not directly involved in reviews, it tends to adopt a more 'checklist' approach, concentrating on specific evidence. In contrast, ENQA panels, which are on-site, take a broader view, with a stronger focus on enhancement. ENQA is also expected to consider the maturity level of agencies—a factor that may not be as relevant for EQAR, which primarily ensures that agencies meet minimal requirements.

QA assessments are not an exact science, and the fact that ARC members refer to the *'Book of Precedents'* when uncertain further illustrates this. There is always room for interpretation, raising the question: should decisions be based on a holistic appreciation or on specific evidence? It appears that ENQA and EQAR have yet to reach a consensus on how to answer this question.

This discrepancy reflects a fundamental tension, which, in the panel's view, could be characterised as 'whoever reviews, decides on how the ESGs should be applied' (ENQA) versus 'the reports should provide us with the specific information we need to provide reliable data to the ministers' (EQAR). This tension should be considered within the broader European policy context, as EQAR was established by governments to minimise conflicts of interest between agencies' membership of ENQA and the need for an independent register of agencies in compliance with the ESGs. The panel believes that, rather than seeking complementarity, the two organisations appear to be more in competition. However, the framework established by the BFUG calls for a complementary relationship, not a power struggle. Therefore, it is vital to focus on strengthening mutual communication and to examine whether the differences are substantive or largely a matter of principle. The fact that agencies utilise a document from EQAR, yet, according to several interviewees during the panel's site visit, do not fully understand the origins of the divergences, indicates that further work is needed.

Despite the stated differences in positions, the panel observes that, in practice, there is notable convergence that ultimately benefits agencies and their recognition. By scheduling the ENQA membership decision after the EQAR registration decision, ENQA effectively acknowledges the validity of EQAR's assessment. From a pragmatic perspective, it would be beneficial to ensure that both the agencies and reviewers involved in training have a clear understanding of the expectations, as well as the differences in priorities between the two organisations.

Based on the interviews, the panel senses a genuine commitment to enhancing collaboration. The panel encourages ENQA and EQAR to seize the opportunity presented by this review, in the hope that the upcoming revision of the ESG will help to further address and reduce the existing discrepancies.

³² <https://www.eqar.eu/about/close-up/#eqars-vision-mission-and-values>

Panel Commendations

The panel commends ENQA for directly engaging with the challenges in its collaboration with EQAR as part of this external review. ENQA's proactive approach and commitment to improving this collaboration underscore its dedication to improving the overall effectiveness and value of its agency review processes for the benefit of agencies.

Although several issues remain to be addressed in the ENQA-EQAR relationship, notable progress has been made in many areas. There now appears to be a solid foundation for further improvements, particularly in relation to the upcoming ESG revision process.

Panel Recommendations

1. The panel recommends that ENQA continues to prioritise and strengthen communication with EQAR at all levels to improve collaboration and ensure clarity in roles and processes. As part of this, ENQA should consider inviting EQAR team members, particularly from the EQAR Register Committee and EQAR Secretariat who have not yet participated in a review process, to engage in review activities such as Agency Review site visits and working on review files. This would provide EQAR team members with a deeper understanding of the perspectives and contexts involved in the review process, further fostering alignment and improving overall collaboration.
2. The panel recommends that ENQA initiates discussions with EQAR to reach a mutual agreement on the evidence required for compliance assessments, given that only a small number of standards lead to divergent conclusions. This would help to streamline the process and reduce discrepancies between the two organisations.
3. The panel recommends that ENQA makes the specific viewpoints and expectations of both ENQA and EQAR more explicit in documents for agencies and experts (such as tripartite Terms of Reference), ensuring that the roles and priorities of each organisation are clearly communicated.

Key challenges and areas for future development

As ENQA advances its mission under the 2021–2025 Strategic Plan and looks ahead to the next phase, it encounters both evolving challenges and emerging opportunities in strengthening its role as a leading organisation in quality assurance within the EHEA. This section explores these challenges and opportunities, focusing on key areas that require attention, such as the alignment of ENQA Agency Reviews with the Association’s Strategic Goals, the contribution of ENQA Agency Reviews to the enhancement of quality assurance agencies and innovative approaches to quality assurance processes, and the future direction of ENQA’s Agency Reviews.

Connection and contribution of ENQA Agency Reviews to ENQA Strategic Goals 2021 – 2025

As ENQA focuses on the new strategic plan (2026-2030), attention has shifted more towards potential future developments (as discussed in the next section). Nevertheless, this report will also briefly address how ENQA’s Agency Reviews contribute to the achievement of the 2021–2025 Strategic Plan.

The ENQA Strategic Plan 2021-2025 (SP21-25) aims to provide direction for the association and its members in addressing ambitions and challenges as expressed in its three overall goals and seven sub-goals. As noted in the SAR (p. 11), “*although the Agency Reviews are only explicitly mentioned in two of the sub-goals, they contribute to the majority of ENQA’s other goals.*” This refers first to subgoal 3: ‘ENQA’s Agency Review Programme is the preferred partner for reviews against the ESG’. This subgoal expresses ENQA’s strategic ambition of organising external reviews of quality assurance agencies in a professional manner with appropriately trained and experienced reviewers, consistent with the ESG. Through its Agency Reviews, ENQA wants to support “*the development of independent and trustworthy agencies and provides mature agencies with tailor-made reviews that improve and enhance their processes, activities and procedures beyond threshold standards* (SP 21-25, p. 4).”

The SAR and panel’s site visit underscore that while the SP 21-25 contains only two subgoals that refer explicitly to the Agency Reviews, there is a connection between the reviews and most of the other strategic goals. ENQA has effectively professionalised the coordination and conduct of its Agency Review Programme, which contributed to the realisation of its strategic goals 2021-2025. The further development of ENQA’s organisation of the reviews, including the establishment of the ARC and the revision of the ‘*Book of Precedents*’ have strengthened ENQA’s agency review programme and contributed to the realisation of ENQA’s strategic goal of being the preferred partner for reviews against the ESG reviews in the EHEA in a period which saw the rise of potential competitors and

the growing complexity of the national European and global context for QA in higher education.

Although the objectives in the current strategic plan are somewhat general regarding Agency Reviews, there are more specific projects within the work plans (see e.g. the 2024 and 2025 work plans) directly stemming from the strategic plan and focused on the reviews. Notable examples include the introduction of targeted reviews and the development of thematic analyses. These initiatives have further reinforced the central role of ENQA's Agency Review Programme for its member agencies, ensuring alignment with the strategic objectives of SP21–25. In doing so, they have contributed to strengthening the overall quality assurance framework across member agencies.

In summary, from the panel's perspective, all efforts aimed at improving the review process have, in effect, contributed to the realisation of the 2021–2025 Strategic Plan.

Contribution of ENQA Agency Review to the improvement of quality assurance agencies and innovative approaches to quality assurance processes

The Panel's view is that ENQA plays a critical role in improving quality assurance (QA) agencies and fostering innovation in QA processes in Europe and beyond.

ENQA is a global entity with a broad perspective on quality assurance in higher education (HE) and its evolution. As outlined in the SP 21-25, one of ENQA's primary challenges is representing its members' interests within the Bologna Process while offering meaningful services. Additionally, it is crucial for external quality assurance processes to be periodically reassessed to ensure they remain fit for purpose and to explore emerging concepts of quality and quality assurance.

To support the evolution of QA in HE, ENQA has pioneered new methodologies, in line with SP 21-25 Subgoal 7: 'ENQA explores new ways of quality assurance'. This subgoal highlights that review reports provide valuable insights into quality in higher education. ENQA also fosters and encourages research projects that leverage these reports to identify trends, innovative practices, and areas requiring attention (SP 21-25, p. 6). As noted in the SAR (p. 11), information derived from Agency Reviews serves as a critical evidence base for ENQA's broader activities, and the panel's site visit revealed how the ENQA Secretariat's review team systematically filters this information to drive review innovation and other initiatives.

Interviews conducted during the panel's site visit confirmed that member agencies generally have very positive experiences with ENQA's Agency Reviews, affirming ENQA's position as the preferred provider of agency reviews within the EHEA. Regarding the overall impact of the Agency Reviews on enhancing QA agencies, most representatives from member agencies interviewed during the panel's site visit confirm that the process has

positively influenced their practices and provided valuable lessons. In particular, many emphasise the considerable benefit of obtaining an external perspective.

Moreover, the interviews highlighted the continued development of ENQA's review processes, including the establishment of the ARC, the professionalisation of the Secretariat in coordinating and conducting reviews, and the increased use of digital tools to support the review process, such as the revision of ENQA's *'Book of Precedents'*. Additionally, in the previous years, ENQA has further developed thematic analyses to strengthen its approach.

Over the past five years, ENQA introduced targeted reviews, which acknowledge the development of QA agencies and encourage innovation. However, during the same period, ENQA transitioned from using a four-level scale to a three-level scale for evaluating compliance with standards. While this change may facilitate collaboration with EQAR, it has also reduced the opportunity for agencies to move beyond the "substantially compliant" evaluation, potentially encouraging a more compliance-driven approach.

Given the increasing diversity of ENQA's member agencies, ensuring that reviews benefit all agencies remains a challenge. Although targeted reviews aim to address this issue, their effectiveness has been mixed. Revisiting their methodology to better serve mature agencies, alongside refining expert selection and training, could enhance the value of targeted reviews and further promote innovation within the sector.

A key consideration for ENQA's future development is how to ensure that insights from its Agency Reviews are better integrated into other association activities. This aligns with ESG 3.4, which stresses the importance of making review outcomes a fundamental component of quality assurance development. One approach to achieve this could be sharing notable innovations and best practices from agencies, often highlighted in review reports (e.g. commendations), but not currently disseminated widely. ENQA can play an increasingly important role in encouraging innovation by facilitating this broader sharing of good practices.

To further strengthen ENQA's role in driving innovation, addressing concerns about the potential isolation of the review team from the broader Secretariat, as raised in the SAR and during the panel's site visit, could also be beneficial. This could enhance ENQA's overall effectiveness in fostering innovation across the QA sector.

Future outlook for ENQA reviews

Looking ahead, ENQA's strategic planning process may want to consider a thorough analysis of both internal and external factors—such as developments, trends, opportunities, and threats—when deciding whether the next strategic period should be a continuation and adaptation of the SP 21-25 or represent a new approach with more proactive goals, along with a revised vision, mission, and values. The elaboration of ENQA's Strategic Plan 2021-2025 and the upcoming revision of the ESG provide a timely opportunity for ENQA to re-assess its strategic direction, ensuring that its Agency Reviews remain relevant in a rapidly evolving HE landscape, both in Europe and globally. ENQA must continue to assert its role as the leading European organisation in QA, contributing effectively (together with other stakeholders) to the further development of the understanding of quality in higher education and QA within the relevant European (and global) policy arenas and institutional contexts. Building on the current plan's structure, the next Strategic Plan (2026-2030) could provide a more comprehensive analysis of European higher education and QA contexts, followed by a revised vision, mission, and values, as well as updated strategic goals that are derived from this analysis.

While ENQA has largely achieved its strategic goal of becoming the preferred provider of agency reviews in the EHEA, specific developments affect its ability to meet its other two overarching goals: 'Representing the interests of QA agencies' and 'Driving external QA development'. In addition to the increasing diversity among ENQA's member agencies, several external factors—many of which have emerged rapidly in recent years—are influencing the landscape. These include growing geopolitical tensions, an increasing focus on fundamental values such as academic freedom within the EHEA, the rapid expansion of European university alliances, a growing emphasis on student-centred teaching and learning, and the rapid development of digital technologies and AI in higher education.

The need to better connect information from reviews to other ENQA activities has already been highlighted as an area that requires further attention if ENQA is to maintain its position as the central provider of QA agency reviews in the EHEA. However, it is worth considering whether this alone will be sufficient.

As ENQA prepares its next Strategic Plan, adopting a participatory approach that involves its membership offers an opportunity to ensure alignment with stakeholder expectations and test hypotheses for future development. Given the complexity and uncertainty in the current QA context within higher education, the association may benefit from developing strategic scenarios alongside its formal Strategic Plan. These scenarios would offer ENQA's General Assembly and Board adaptive strategies to respond effectively to changing circumstances.

The review panel has identified several issues and questions that are important to consider in determining the strategic goals and priorities for the coming years.

It is, of course, for ENQA to decide whether the new strategic plan will represent a more incremental evolution or a more significant shift in its strategic development. However, the review panel sees clear opportunities for ENQA to become more proactive in its role as the leading organisation in Europe driving the development of QA and the policy

understanding of higher education quality. This would allow ENQA to maintain, if not enhance, its key function of representing the interests of its members and providing adequate services to them.

The evaluation and analysis of ENQA's compliance with the ESG bring to light various overarching issues that could influence future strategic planning. These include the involvement of external partners, adapting methodologies to better consider the specifics of each agency (e.g. their level of maturity, their specific constraints, national contexts, etc.), ENQA's function as a role model for quality development, and its collaboration with EQAR.

This report has consistently noted that ENQA's operations and governance are somewhat closed. While the panel acknowledges arguments against formal involvement of other stakeholders in ENQA's governance, it suggests ongoing reflection on this issue to increase transparency and legitimacy. It is not the panel's role to dictate how this should be done, but, for instance, the idea of creating a standing working group that includes external stakeholders to analyse and improve review methodology could be explored. In this case, external input would be limited to reviewing the organisation of the reviews (methodology, procedures, etc.). Similarly, including external stakeholders in the ARC and ACC could also be considered.

As previously mentioned, the significant diversity among ENQA's approximately 60 member agencies presents a challenge in tailoring its Agency Reviews to benefit all agencies optimally. While targeted reviews aim to address this, they have not fully met their objectives in a consistent manner. Revisiting their methodology could better serve mature agencies, while improving expert selection and training for targeted reviews could also offer more tangible added value to agencies.

Further strengthening ENQA's role as a model for QA is another potential strategic focus. This includes better integrating review information into ENQA's own activities, in line with ESG 3.4, and setting a high standard of ENQA's own compliance with the ESG as an example of best practice for other agencies. The role of a model also requires ENQA to take proactive steps to address changes in the higher education landscape.

One aspect of this role model function involves positioning ENQA's Agency Reviews within the continuum between accountability and enhancement. As pointed out in interviews and the SAR, ENQA, like any organisation committed to quality assurance, must balance the tensions between accountability and enhancement. Because of its associative nature, ENQA tends to emphasise enhancement in its review processes, which has led, for example, to the introduction of targeted reviews and the establishment of the ARC.

Nevertheless, the desire to reduce discrepancies between ENQA and EQAR has, in some instances, resulted in further complications. A clear example of this is ENQA's decision to shift to a 3-point assessment scale rather than the previously used 4-point scale, aligning it more closely with EQAR. While this change may seem logical for fostering alignment, it has led some agencies to feel that 'excellence has been lost' and to the impression that panels are more inclined to downgrade their previous assessments of 'substantial compliance' to 'partial compliance', rather than upgrading them to 'compliance'.

From the review panel's perspective, this decision to move to a 3-point scale appears more of a political choice aimed at facilitating alignment with EQAR, rather than a strategic move to advance the development of QA in European higher education.

The panel suggests that ENQA may wish to place greater emphasis on enhancement and distinguish itself from EQAR's primary role as a gatekeeper. This would involve negotiating with EQAR to agree on thresholds that align with EQAR's mandate, and then focusing on the added value that ENQA provides to agencies. This is, of course, not an easy task given the political positioning of the organisations and the ongoing ESG revision process. However, in a context where, as ENQA's members themselves admit, competition among organisations conducting agency reviews is likely to increase, the review panel believes that the question of added value is central to ENQA's future. A stronger focus on ENQA's added value would require a clearer distinction between the complementary roles of the two organisations. Throughout this report, the importance of improved coordination and collaboration between ENQA and EQAR has been emphasised as a key issue and one of the major challenges for ENQA to address in the coming years.

Panel commendation

The panel commends ENQA for effectively professionalising the coordination and conduct of its Agency Review Programme, which contributed to the realisation of its strategic goals 2021-2025. It has maintained its position as the preferred provider of agency reviews in the EHEA in a period which saw the rise of potential competitors of ENQA and the growing complexity of the national European and global context for QA in higher education.

Panel Recommendations

1. In the preparation of its next Strategic Plan (SP) ENQA is recommended to make a thorough analysis of internal and external factors (developments, trends, opportunities and threats) when determining whether the next SP should be a piecemeal adaptation and continuation of its SP 2021-2025 or represent a new approach with more proactive goals, and a new vision, mission and values.
2. Given the complexity and uncertainty characterizing the current context of QA in higher education in the EHEA and beyond, it might be appropriate for ENQA to develop complementary to its SP 2026-2030 also a set of scenarios that would support its General Assembly and Board in the adaptation of its strategic goals if changing circumstances would require ENQA to do so.

Conclusion

The panel considers ENQA to be in compliance with the following ESGs: 2.1, 2.3, 2.4, 2.5, 2.6, 2.7, 3.1, 3.2, 3.3, 3.4, 3.5, 3.6 and 3.7.

The panel considers ENQA to be in partial compliance with ESG 2.2.

Overview of Commendations

The panel offers the following commendations in relation to ENQA's ESG compliance:

ESG 2.2

The panel commends ENQA for the significant steps taken in diversifying Agency Reviews, which now feature both full reviews, mainly intended for newer agencies undergoing their first review(s) and targeted reviews for more established agencies. This positive development demonstrates a commitment to addressing the distinct needs and challenges faced by agencies at different stages, ultimately enhancing the overall effectiveness and relevance of the review process.

ESG 2.3

The panel commends the clarity and comprehensibility of the Guidelines for ENQA Agency Reviews. The clear structure and accessible language of the Guidelines for the different review types facilitates a thorough understanding of the review processes, thereby contributing to a more effective and transparent quality assurance framework.

ESG 2.4

The panel commends ENQA for the exceptional quality of their review coordinators. Their role is widely acknowledged for its outstanding contribution to ensuring consistency across reviews through comprehensive training, guidance and support provided to review panels, leading to more consistent outcomes and high-quality reports.

ESG 2.5

The panel commends ENQA for its continuous efforts to refine and evaluate the measures that enhance consistency in its review processes. In particular, the panel recognises the significant improvements achieved through the establishment of the ARC as a key step in the process of validating the review outcomes, and the effective use of the 'Book of Precedents', both of which contribute to greater clarity, reliability, and coherence in decision-making.

ESG 2.6

The panel commends ENQA for its good practice of making all documents related to Agency Reviews publicly available. This commitment to transparency ensures that key documents—including review reports, self-assessment reports, Terms of Reference, ARC statements, Board decisions, follow-up reports and the Board letters regarding the follow-up reports—are easily accessible to all stakeholders. By making all relevant documents publicly available, ENQA sets an example of transparency which encourages confidence in the review process among all stakeholders.

ESG 3.1

ENQA is since 2011 Europe's designated provider of QA Agency Reviews and has consolidated this position clearly since the previous review in 2019. Furthermore, ENQA has further strengthened and professionalised its activities in relation to its Agency Reviews in various ways, including the establishment of the ARC, which is much lauded by its Member Agencies. ENQA has also become a frame of reference for QA and Agency Reviews outside EHEA as is visible in the number of non-European affiliated members.

ENQA has strengthened its focus on enhancement in its work in relation to its review activities, amongst other things, through the introduction of the targeted reviews. Even though there is room for further strengthening the enhancement orientation, the developments in the period under review represent an important step towards a more appropriate and desirable balance between compliance and enhancement in its review activities.

ESG 3.3

ENQA has made a commendable effort in the period under review to strengthen its organisational and operational independence. The establishment of the ARC, the introduction of the tripartite TOR for Agency Reviews, and the adaptation and renewal of procedures and regulations as well as checks and balances have contributed to strengthening ENQA's independence and have reduced potential conflicts of interest and complaints in the period under review.

With respect to the independence of the formal outcomes of the review process the ARC has contributed in a remarkable way to improving the integrity of the review process and checking the quality and consistency of the review reports.

ESG 3.5

The panel would like to commend the ENQA agency review team for their outstanding professionalism, which was consistently highlighted during various meetings.

ESG 3.7

The panel commends ENQA for voluntarily initiating this external review and allocating substantial resources to support it. This proactive approach demonstrates a strong commitment to the ESG and reinforces ENQA's dedication to transparency in its own agency review processes.

The panel offers the following commendations in relation to ENQA's collaboration with EQAR:

The panel commends ENQA for directly engaging with the challenges in its collaboration with EQAR as part of this external review. ENQA's proactive approach and commitment to improving this collaboration underscore its dedication to improving the overall effectiveness and value of its agency review processes for the benefit of agencies.

Although several issues remain to be addressed in the ENQA-EQAR relationship, notable progress has been made in many areas. There now appears to be a solid foundation for further improvements, particularly in relation to the upcoming ESG revision process.

The panel offers the following commendations in relation to key challenges and areas for future development:

The panel commends ENQA for effectively professionalising the coordination and conduct of its Agency Review Programme, which contributed to the realisation of its strategic goals 2021-2025. It has maintained its position as the preferred provider of agency reviews in the EHEA in a period which saw the rise of potential competitors of ENQA and the growing complexity of the national European and global context for QA in higher education.

Overview of Recommendations

The panel offers the following recommendations in relation to ENQA's ESG compliance:

ESG 2.1

Each review's Terms of Reference (TOR) outlines the agreed activities of the agency within the scope of the ESG criteria. These TORs are established through a mutual agreement between ENQA, EQAR (where applicable), and the agency under review. The panel recommends that each TOR, developed and agreed upon by ENQA, EQAR, and the agency under review, should clearly specify which of the ESG Part 1 Standards are to be specifically addressed as enhancement areas under ESG 2.1. This applies to all Agency Reviews, but is most urgent for targeted reviews.

ESG 2.2

Whilst recognising ENQA's efforts to address the imbalance between accountability and enhancement within its review processes, the panel recommends that ENQA adopt a more comprehensive strategy to reinforce the enhancement dimension of its review methodology, with particular emphasis on targeted reviews. This implies that ENQA should develop more tailored approaches for subsequent reviews of mature agencies to better meet their specific needs. In doing so, it is essential that ENQA considers not only the implementation costs of these approaches but also the impact of extensive economic, social, geopolitical, and technological changes on quality assurance across higher education institutions in Europe and beyond.

The panel recommends that ENQA broadens stakeholder involvement in the design and continuous improvement of its review methodologies, in a manner that is both appropriate and realistic. This aligns with the recommendation under ESG 3.1, which advocates for increased stakeholder participation in ENQA's governance structures, thereby enhancing their engagement in the operational aspects of Agency Reviews.

ESG 2.3

The panel recognises the essential role of follow-up activities in supporting agencies' continuous development. The panel therefore recommends ENQA to identify and implement opportunities for strengthening the follow-up process across all types of reviews. The panel specifically identifies targeted review follow-up seminars as an example of good practice, that should be continued to be organised and can serve as a frame of reference for follow up activities with respect to other types of reviews.

To improve the efficiency of the review validation process, the panel recommends that ENQA collaborates with EQAR to develop common solutions for a smoother and less time-consuming validation of review reports by the ARC and the EQAR Register Committee. To provide greater clarity and consistency for all QA agencies applying for ENQA membership and EQAR registration, the panel encourages ENQA to formalise these improvements through a structured agreement with EQAR.

ESG 2.4

The panel recommends that ENQA takes further steps to increase the availability of experts with the necessary experience and expertise in its pool of experts to meet the specific requirements of ENQA's different types of Agency Reviews. In particular, ENQA should ensure a sufficient number of experienced and qualified secretaries to effectively support the review process effectively and address language proficiency and system knowledge requirements, especially in smaller higher education systems where the risk of conflicts of interest is higher.

The panel recommends that ENQA refines its selection process for panel members appointed to targeted reviews, actively recruiting experts with specific expertise in the areas identified for enhancement. Given the distinct focus of these reviews, ENQA should assess whether the current pool of experts is sufficiently diverse and regularly updated to

meet these evolving needs. Additionally, it should explore ways to expand or adapt its pool to better align with the enhancement-oriented objectives of targeted reviews.

ESG 2.5

The panel recommends that ENQA reconsiders the assessment scale used in its reviews. Although the transition to a three-point scale was implemented for valid reasons – including aligning with EQAR's approach – it has resulted in diminished clarity and challenges in differentiating between varying levels of compliance. In consultation with all relevant parties, ENQA should evaluate whether returning to the previously used four-point scale - or possible other alternatives - would better fulfil the objectives of its reviews. This would likely provide greater precision, enhance the clarity of compliance assessments, and allow for a more consistent and nuanced interpretation of agency performance.

The panel recommends that ENQA prioritises closer coordination with EQAR in the review process towards a shared and consistent interpretation of the ESG standards in the assessment of compliance. While recognising the different purposes of its Agency Reviews, the panel emphasises the importance of aligning ENQA and EQAR's interpretations to avoid conflicting decisions. Achieving this alignment will not only enhance trust in the review process but also provide agencies with greater clarity and confidence in meeting the requirements of both organisations.

ESG 2.6

The panel recommends that, as ENQA plans to revise the report template, it engages with EQAR to clarify the information and evidence required in the final report from EQAR's perspective. This will help minimise the need for clarification requests and ensure that all necessary elements are addressed from the outset, thereby enhancing the efficiency and consistency of the review process.

ESG 2.7

The panel recommends that ENQA considers including external members, i.e. individuals not affiliated with ENQA members, in the Appeals and Complaints Committee (ACC) to enhance the legitimacy and objectivity of decisions, thereby ensuring a more transparent and impartial process.

Recognising that expanding the scope of appealable decisions would enhance transparency and fairness by offering agencies a more robust mechanism to address concerns within the review process, the panel recommends that ENQA, in consultation with its member agencies, carefully considers the advantages and disadvantages of broadening the range of decisions subject to appeal, particularly those related to individual ESG judgements.

ESG 3.1

Wider stakeholder involvement in ENQA governance should be considered in an appropriate and realistic way. The panel recommends ENQA to start the involvement of other stakeholders in its bodies with including an expert from another stakeholder than a

Member Agency in the ARC. The experience gained in this can be used to determine whether and if so how membership of wider stakeholders in the ACC and possibly the Board, GA or other bodies could be desirable and appropriate. In this an important consideration to take into account is the extent to which wider stakeholder involvement enhances the legitimacy of ENQA and its governance bodies.

ESG 3.3

While the SAR and the panel's site visit interviews promoted the position that ENQA as a membership organisation should be governed by its members and employees of its member agencies only, the panel recommends that ENQA's organisational and operational independence is further strengthened by opening up ENQA governance bodies for membership of representatives from other stakeholders.

The panel recommends that additional steps are taken to further improve ENQA's coordination with EQAR with the aim to strengthen the independence of the ENQA review process. This includes the need to better coordinate the ESG compliance interpretations for ENQA membership and EQAR registration, the opportunity to coordinate and mutually adjust the contributions of ENQA and EQAR to the coming ESG revisions, and a further development of the tripartite TOR.

ESG 3.4

The information gathered through Agency Reviews could more directly and effectively be connected to other activities ENQA is involved in. The panel recommends that ENQA adopts a broader interpretation of ESG 3.4 to strengthen the development and purpose of the thematic analyses and develops a more strategic approach to its thematic analyses—one that is driven by research questions rather than solely relying on a synthesis of external reviews. These analyses can be expected to play a role in driving the further development of external quality assurance in the EHEA.

The production of thematic analyses requires a significant amount of resources and despite ENQA's efforts to disseminate the results, their impact is not clear. The panel recommends that ENQA develops robust methodologies to evaluate and monitor the impact of its thematic analyses.

ESG 3.5

In light of ENQA's recent raise in membership fees and the potential for further increases to be unaffordable for some agencies, particularly those in less affluent countries in the EHEA, the panel recommends that ENQA engage with its members to find long-term solutions to this issue and ensure the sustainability of the Agency Reviews for all its members.

As ENQA expands its membership and activities, the workload on existing permanent staff will inevitably increase. Additionally, ENQA must consider its strategic priorities, including its involvement in projects and activities outside the EHEA, and carefully consider the impact these decisions will have on its financial and human resources. To maintain

operational efficiency and support staff development, the panel recommends that ENQA develop a comprehensive staffing strategy. This strategy should outline expected future staffing needs, include plans for recruiting additional personnel, and ensure dedicated budgets and resources allocated to support staff training and professional growth.

ESG 3.6

ENQA's review reports provide an opportunity for panels to highlight exemplary practices within reviewed institutions. The impact of reviews could be strengthened with a systematic process for collecting, analysing, or sharing these commendations. As excellence is a core value of ENQA, harnessing these insights could benefit both its members and its broader policy strategy. The panel recommends that ENQA establishes a structured approach to compiling and disseminating examples of excellence identified in reviews. In doing so, the Association would enable agencies to benefit from its IQA, not only by promoting best practice across the sector but also by providing more systematic feedback to agencies through the recognition and sharing their strengths.

ESG 3.7

The panel recommends that ENQA continues the practice of conducting external reviews of its Agency Reviews every five years and ensures that the necessary human and financial resources are factored into its long-term planning.

The panel offers the following recommendations in relation to ENQA's collaboration with EQAR:

The panel recommends that ENQA continues to prioritise and strengthen communication with EQAR at all levels to improve collaboration and ensure clarity in roles and processes. As part of this, ENQA should consider inviting EQAR team members, particularly from the EQAR Register Committee and EQAR Secretariat who have not yet participated in a review process, to engage in review activities such as Agency Review site visits and working on review files. This would provide EQAR team members with a deeper understanding of the perspectives and contexts involved in the review process, further fostering alignment and improving overall collaboration.

The panel recommends that ENQA initiates discussions with EQAR to reach a mutual agreement on the evidence required for compliance assessments, given that only a small number of standards lead to divergent conclusions. This would help to streamline the process and reduce discrepancies between the two organisations.

The panel recommends that ENQA makes the specific viewpoints and expectations of both ENQA and EQAR more explicit in documents for agencies and experts (such as tripartite Terms of Reference), ensuring that the roles and priorities of each organisation are clearly communicated.

The panel offers the following recommendations in relation to key challenges and areas for future development:

In the preparation of its next Strategic Plan (SP) ENQA is recommended to make a thorough analysis of internal and external factors (developments, trends, opportunities and threats) when determining whether the next SP should be a piecemeal adaptation and continuation of its SP 2021-2025 or represent a new approach with more proactive goals, and a new vision, mission and values.

Given the complexity and uncertainty characterizing the current context of QA in higher education in the EHEA and beyond, it might be appropriate for ENQA to develop complementary to its SP 2026-2030 also a set of scenarios that would support its General Assembly and Board in the adaptation of its strategic goals if changing circumstances would require ENQA to do so.

Annexes

Annex I: Programme of the Site Visit

TIME (CET)	TOPIC	PERSONS FOR INTERVIEW
Monday 9 December – Day 1		
9.30-10.00	Review panel's private meeting	
10.00-10.30	Meeting with the team responsible for preparation of the self-assessment report	Goran Dakovic , ENQA Head of Agency Reviews Milja Homan , ENQA Project and Reviews Officer
10.30-10.45	Review panel's private discussion	
10.45-11.30	Meeting with staff in charge of coordination of Agency Reviews	Goran Dakovic , ENQA Head of Agency Reviews Milja Homan , ENQA Project and Reviews Officer Alexis Fábregas Almirall , ENQA Project and Reviews Officer
11.30-11.45	Review panel's private discussion	
11.45-12.15	Meeting with other ENQA staff dealing with ENQA Agency Reviews (finances, administration)	Anaïs Gourdin , ENQA Senior Resource Manager Julia Rozanska , ENQA Administrative Officer Nathalie Lugano , ENQA Project Officer
12.15-13.15	Lunch (panel only)	

TIME (CET)	TOPIC	PERSONS FOR INTERVIEW
13.15-14.00	Online: Meeting with the ENQA Agency Review Committee (ARC)	<p>All online:</p> <p>Alastair Delaney, ARC Chair, former Executive Director of Operations and Deputy CEO of QAA, UK</p> <p>Ronny Heintze, ARC member, Deputy Director for International Development of AQAS, Germany</p> <p>Esther Huertas, ARC member, Head of Quality Assurance Department, AQU Catalunya, Spain</p> <p>Eva Jaroszewski, ARC member, Director, AEQES, Belgium</p> <p>Ulf Hedbjörk, ARC member, Senior Analyst, UKÄ, Sweden</p>
14.00-14.15	Review panel's private discussion	
14.15-15.00	Online: Meeting with Appeals and Complaints Committee (ACC)	<p>All online:</p> <p>Padraig Walsh, ACC chair, Chief Executive, QQI, Ireland</p> <p>Núria Comet Señal, ACC member, Project manager and head of internal quality assurance, ACU Catalunya, Spain</p> <p>Aurelija Valeikienė, ACC member, Deputy Director, SKVC, Lithuania</p> <p>Henning Schäfer, ACC alternate member, Managing Director, ZEvA, Germany</p>
15.00-15.15	Review panel's private discussion	
15.40-16.40	Meeting with the leadership	<p>Douglas Blackstock, ENQA President, International consultant and former Chief Executive Officer of QAA, UK</p>

TIME (CET)	TOPIC	PERSONS FOR INTERVIEW
		Anna Gover , ENQA Director
16.40-17.30	Wrap-up meeting among panel members and preparations for day 2	
	Dinner (panel only)	
Tuesday 10 December – Day 2		
9.00-9.15	Review panel's private meeting	
9.15-10.15	Meeting with the ENQA Board	<p>Daniela Cristina Ghițulică, ENQA Vice-President, Director General of ARACIS, Romania</p> <p>Doris Herrmann, ENQA Vice-President, Managing Director of AQAS, Germany</p> <p>Patrick Van den Bosch, ENQA Board Member and Treasurer, Head of VLUHR QA, Belgium</p> <p>Marilena Maniaci, ENQA Board member, Governing Board Member of ANVUR</p>
10.15-10.30	Review panel's private discussion	
10.30-11.15	Online: Meeting with heads of some reviewed agency representatives	<p>All online:</p> <p>Jürgen Petersen, Managing Director, AQ Austria (targeted review)</p> <p>Mary Koutselini, President, CYQAA, Cyprus (full review, renewal)</p> <p>Ole-Jacob Skodvin, Director for Evaluation and Analysis, NOKUT, Norway (targeted review)</p>

TIME (CET)	TOPIC	PERSONS FOR INTERVIEW
		<p>Robert Redhammer, Chair of the Executive Board, SAAHE, Slovakia (full review, initial)</p> <p>Kirsty Williams, Education Quality Improvement Manager, RCVS, UK (full review, renewal, field-specific agency)</p> <p>Valéria Csépe, President, MAB, Hungary (full review, renewal)</p>
11.15-11.30	Review panel's private discussion	
11.30-12.15	Online: Meeting with agency staff of some reviewed agency representatives	<p>All online:</p> <p>Liia Lauri, Head of Higher Education, HAKA, Estonia (targeted review)</p> <p>Gregor Rebernik, Head of Quality and International Cooperation Sector, SQAA, Slovenia (targeted review)</p> <p>Enrique Barón González, Technical Assistant, AQUIB, Spain (full review, initial)</p> <p>Petra Gerlach, Scientific Advisor, evalag, Germany (targeted review)</p> <p>Maria Manatos, Research Coordinator, Studies and Analysis Office, A3ES, Portugal (targeted review)</p> <p>Yerulan Sagidolda, member of the Secretariat, CAAAE, Kazakhstan (full review, initial)</p>
12.15-13.15	Lunch (panel only)	
13.15-14.00	Online: Meeting with representatives from the pool of reviewers	<p>All online:</p> <p>Eva Fernandez de Labastida, Evaluation Manager, Unibasque, Spain (ENQA nomination, QA professional)</p>

TIME (CET)	TOPIC	PERSONS FOR INTERVIEW
		<p>Arnoldas Solovjovas, PhD student, Vilnius University, Lithuania (ESU nomination, student)</p> <p>Simona Lache, Professor and Vice-rector for Internationalization and Quality Evaluation, Transilvania University of Brasov, Romania (EUA nomination, academic)</p> <p>Bryan Maguire, Director of Quality Assurance, QQI, Ireland (ENQA nomination, QA professional)</p> <p>Pegi Pavletic, Senior Assistant, Faculty for Biotechnology and Drug Development, University of Rijeka, Croatia (EUA nomination, academic/ESU nomination, student)</p> <p>Tue Vinther-Jørgensen, Assistant Manager, The Danish Agency for Science and Higher Education, Ministry of Higher Education and Science, Denmark (ENQA nomination, QA professional)</p> <p>Dan Derricott, Director of Education Policy and Quality, University of Warwick, UK (ENQA nomination, QA professional)</p>
14.00-14.15	Review panel's private discussion	
14.15-15.15	Meeting with EQAR	<p>Stéphane Lauwick, EQAR President (online)</p> <p>Aleksandar Šušnjar, EQAR Director</p> <p>Blazhe Todorovski, EQAR Policy and Project Officer</p>
15.15-15.30	Review panel's private discussion	

TIME (CET)	TOPIC	PERSONS FOR INTERVIEW
15.30-16.15	Meeting with European stakeholders	<p>Maria Kelo, Director of Institutional Development, EUA</p> <p>Jakub Grodecki, Project and Policy Manager, EURASHE</p> <p>Iris Kimizoglu, President, ESU</p>
16.15-17.00	Wrap-up meeting among panel members: preparation for day 3 and provisional conclusions	
Wednesday 11 December – Day 3		
9.00-10.00	Meeting among panel members to agree on final issues to clarify	
10.00-11.00	Meeting with leadership to clarify any pending issues	<p>Douglas Blackstock, ENQA President</p> <p>Anna Gover, ENQA Director</p> <p>Goran Dakovic, ENQA Head of Agency Reviews</p>
11.00-12.30	Private meeting between panel members to agree on the main findings	
12.30-13.30	Lunch (panel only)	
13.30-14.00	Final de-briefing meeting with ENQA representatives to inform about preliminary findings	<p>Douglas Blackstock, ENQA President</p> <p>Anna Gover, ENQA Director</p> <p>Goran Dakovic, ENQA Head of Agency Reviews</p> <p>Milja Homan, ENQA Project and Reviews Officer</p> <p>Alexis Fábregas Almirall, ENQA Project and Reviews Officer</p>

TIME (CET)	TOPIC	PERSONS FOR INTERVIEW
		<p>Doris Herrmann, ENQA Vice-President, Managing Director of AQAS, Germany (online)</p> <p>Esther Huertas, ARC member, Head of Quality Assurance Department, AQU Catalunya, Spain (online)</p> <p>Alastair Delaney, ARC Chair, former Executive Director of Operations and Deputy CEO of QAA, UK (online)</p> <p>Marilena Maniaci, ENQA Board member, Governing Board Member of ANVUR (online)</p> <p>Eva Jaroszewski, ARC member, Director, AEQES, Belgium (online)</p> <p>Patrick Van den Bosch, ENQA Board member and Head of VLUHR QA, Belgium (online)</p> <p>Ronny Heintze, ARC member, Deputy Director for International Development of AQAS, Germany (online)</p> <p>Ulf Hedbjörk, Senior Analyst, UKÄ, Sweden (online)</p>

Annex II: Glossary

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

Annex III: Brief Biographies Panel Members

Jacques Lanarès

Jacques Lanarès has been Vice Rector of the University of Lausanne between 2006 and 2016. He was in charge in particular of Quality, Development of Teaching and eLearning. He is involved in Quality matters at national and international level. He was member of the Swiss Accreditation Council (2013-2022), of EQAR (2019-2023) and Quality expert for several organisations such as the European Association of Universities (EUA/IEP), ENQA or the World Bank and various national accreditation agencies (He has been involved in the evaluation of HEI's in 25 countries). His academic background is neuropsychology. He was Professor at the University of Lausanne.

Nik Heerens

Nik Heerens has worked in higher education for over 20 years, focusing on the Bologna Process, Quality Assurance, inclusion, student engagement, and regional development. He has held roles at Dutch QA agency QANU and senior management positions in development charities ATA/SPARK (North Macedonia/Kosovo), as well as Signal (UK/East Africa), the Scottish higher education agency sparqs, and the European Students' Union. From 2008 to 2021, he was a member of the Flemish Quality Assurance Board (VLUHR). Nik was one of the authors of the first version of the ESGs (2005) and contributed to the ESG evaluation (MAP ESG), which informed the 2015 revision. He undertook PhD research at the University of Exeter, examining European, national, and regional policies and practices on universities as drivers of regional development, with a particular focus on peripheral regions in Europe.

Peter Maassen

Peter Maassen is professor at the Faculty of Educational Sciences, University of Oslo (UiO), Norway, and extraordinary professor at Stellenbosch University, South Africa. His main research interests are higher education and science governance and policy, academic freedom, and global science collaboration. He has extensive experience in national and international expert committees and evaluation panels and has had various leadership positions in higher education. He is currently member of the executive board of the Barratt Due Music Academy, Oslo, the academic coordinator of the studies undertaken for the European Parliament Academic Freedom Monitor, and member of the Working Group established by the Council of Europe for implementing the 4-year project "Democratic mission of higher education" (2024-2027). He has produced over 250 international publications.

Ivana Borošić

Ivana Borošić has been working in the field of quality assurance in higher education and science for over 18 years. Currently she works at the Faculty of Teacher Education, University of Zagreb as a Head of the Quality Assurance Office. Previously, she worked at the Croatian Agency for Science and Higher Education (ASHE) as a Head of Department of Accreditation in Higher Education. While at ASHE, she was also involved in various domestic and international, including those in Bosnia and Herzegovina, Montenegro, Ukraine and Kosovo. In the academic year 2011/2012. Ivana was a US Government Hubert H. Humphrey Fellow, dividing her time between studying at the Pennsylvania State University and working as an intern at the Council for Higher Education Accreditation (CHEA). Ivana holds a Master's Degree in History from the University of Zagreb.

Katrina Koppel

Katrina Koppel has been active in the field of Quality Assurance for over 10 years, both in the field of higher education as well as outside of it. She was a member of the European Students' Union's Executive Committee in 2017-2018 and a member of its presidency in 2018-2019, having been active in the Estonian student movement since 2011. From 2020, Katrina was engaged in Tallinn University as a junior researcher and PhD student, with her focus being on political communications, populism and discourse.



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