

SELF-ASSESSMENT REPORT FOR ENQA AGENCY REVIEWS 2019



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1. INTRODUCTION

ENQA is the European Association for Quality Assurance in Higher Education. It is a membership organisation representing quality assurance agencies in the European Higher Education Area (EHEA). ENQA has over 50 members, which are agencies that have demonstrated compliance with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (the ESG¹), and over 50 affiliated bodies² that work in the field of quality assurance in Europe or on other continents.

Since 2011, ENQA has coordinated the majority of agency reviews against the ESG used for application to membership in ENQA, as well as – in most cases – registration on [the European Quality Assurance Register](#) (EQAR). Since 2015, the reviews have been carried out against the ESG 2015 and have followed a revised review methodology under the name of ENQA Agency Reviews.

The ENQA Agency Review method has never been externally reviewed. After several years of systematic and regular review activity, the consensus among ENQA (its members, Board, and the Secretariat) was that an external review would be beneficial in order to demonstrate the ESG compliance of ENQA's own review process, evaluate the transparency and independence of this process, and to support the improvement of its usefulness and fitness for purpose.

While the review process is an important part of ENQA's work, the activities of the association are much wider and more varied. However, those activities, while briefly described in various sections of this self-assessment report, are not subject to review.

The scope of the review is limited to the "ENQA Agency Reviews". This term encompasses the ENQA-coordinated agency review process and includes the following documents, procedures, and categories of activities:

- The Guidelines for ENQA Agency Reviews (the Guidelines)³
- The coordination of the review processes
- The selection and training of experts and seminars for agencies
- ENQA's membership decision-making process
- The publication of reports
- Follow-up activities
- The analysis of the report outcomes ("thematic analysis")
- The feedback mechanisms and the internal quality assurance of the ENQA Agency Review process
- The appeals and complaints procedures.

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

² Organisations that do not wish to or for whatever reason are unable to apply to become members of ENQA may request affiliate status within ENQA. Affiliates are bona fide organisations or agencies with a demonstrable interest in the quality assurance of higher education and can be located anywhere in the world. To become an affiliate, an organisation needs to fill out an application form, undergo a procedure where ENQA members can express any causes for concern regarding the applicant, and finally ask the ENQA Board for an approval of the application. The Board's decision on affiliation is endorsed by the ENQA General Assembly and is valid for five years. ENQA affiliates cannot claim to be members of ENQA as they do not explicitly comply with the ESG.

³ <https://enqa.eu/indirme/papers-and-reports/occasional-papers/Guidelines%20for%20ENQA%20Agency%20Reviews.pdf>

The criteria for the review are parts 2 and 3 of the ESG, adapted where required⁴, since ENQA reviews agencies, not higher education institutions (HEIs) or programmes, and does not operate in a specific national context.

The review covers the period of ENQA Agency Reviews since 2015. This year was chosen as it marked the beginning of a new methodology used by ENQA for its review process as well as a new set of standards (the ESG 2015).

This self-assessment report (SAR), the development of which is described in detail in chapter 2, is an opportunity for ENQA to reflect on its processes and methods for reviews of agencies, to take stock of positive developments and good practice, and also to identify areas for further development. The SAR will be used as a key source of information for the external review panel and as a tool for ENQA's strategy discussions on the future of ENQA Agency Reviews.

⁴ Such as Standard 2.1 Consideration of internal quality assurance, for example.

2. DEVELOPMENT OF THE SELF-ASSESSMENT REPORT (SAR)

The SAR is a collaborative effort of the ENQA Secretariat, the Board as well as representatives of ENQA stakeholders. The drafting of the report was assigned to the self-assessment group that consisted of two Board member representatives, one Review Committee representative, and two Secretariat staff members. The group managed the self-assessment process, engaged the necessary stakeholders in feedback sessions, recorded the outcomes and gained the Board's approval of the final self-assessment report.

The process for ENQA's external review started in April 2018 with the decision of the ENQA General Assembly that the ENQA Agency Reviews process should undergo an external evaluation. Following this, the ENQA Board appointed an ad hoc independent Steering Committee⁵ to supervise the review. Among other responsibilities, the Committee was tasked with: drafting the terms of reference for the external review, evaluating the proposals for tender for the coordinator of the review, contracting the external review coordinator on behalf of ENQA, approving the review methodology, ensuring the independent appointment of the peer review panel, and approving the final report.

In November 2018, the Steering Committee selected the coordinator of the external review, [Nordic Institute for Studies in Innovation, Research and Education](#)⁶, who then finalised the terms of reference⁷ for the review in January 2019. The document, among others, determined the structure of the self-assessment report.

The drafting of the self-assessment report started with the formation of the self-assessment group. In October 2018, the self-assessment group met for the first time to discuss the work plan, division of tasks, and inclusion of stakeholders. The first draft report was discussed in February 2019, and by mid-May 2019, after receiving the feedback from the ENQA Board, ENQA's members, and all other key stakeholders, the SAR was finalised. During this process, ENQA's stakeholders were engaged in several ways:

- 6 December 2018: focus group with EQAR Register Committee
- 19 December 2018: SWOT analysis of ENQA Agency Reviews performed by the ENQA Secretariat
- 20 February 2019: SWOT analysis of ENQA Agency Reviews performed by the ENQA Board
- April 2019: the review coordinator distributed the user survey to all quality assurance agencies that have participated in ENQA Agency Reviews
- 18 April 2019: feedback session on ENQA Agency Reviews performed by the E4 Group⁸
- 26 April 2019: SWOT analysis of ENQA Agency Reviews performed by ENQA members during the ENQA Members' Forum
- 28 June 2019: SAR sent to ENQA members and the Bologna Follow-Up Group for their information.

⁵ The Steering Committee was composed of three representatives of ENQA's member agencies and three representatives of the main European-level stakeholder bodies.

⁶ The call for an external coordinator has been published on ENQA website and is available [here](#).

⁷ The terms of reference are available on the ENQA website: <https://enqa.eu/wp-content/uploads/2019/05/ENQA-kontrakt-0402.docx-21-27.pdf>

⁸ For the description of E4, see chapter 5.

The findings of the stakeholder feedback analysis are presented in the chapter on stakeholder involvement (chapter 5) and the SWOT analysis (chapter 7).

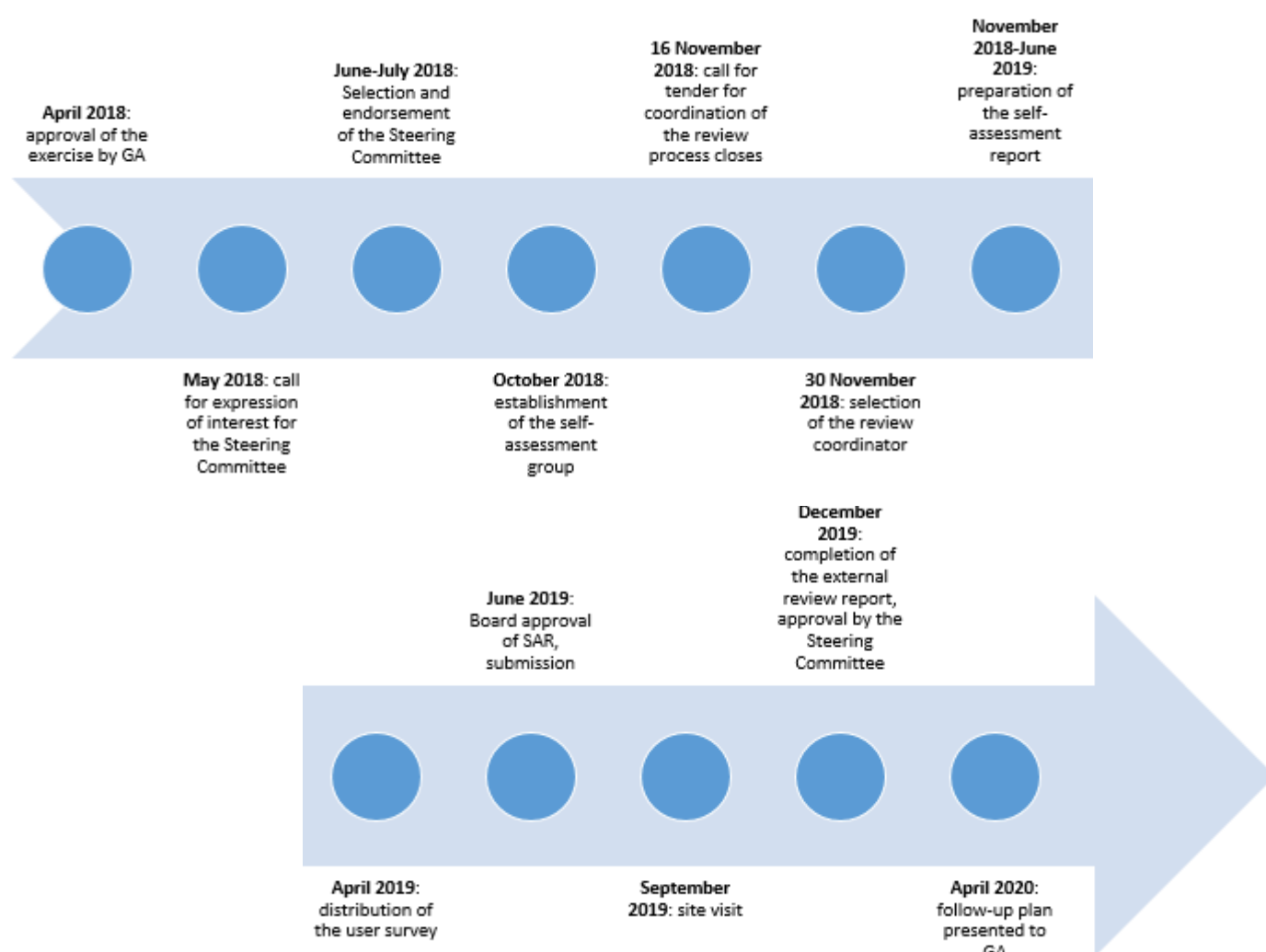
In addition to these specific consultations, ENQA drew widely on the outcomes of standard feedback surveys from the agencies reviewed since 2015 and from panel members who have been engaged in these reviews.

The collected findings regardless of their source are critically reflected upon, with possible solutions presented in blue boxes throughout the report.

The ENQA Board approved the final self-assessment report in June 2019.

Figure 1 below summarises the timeline for the external review of ENQA Agency Reviews.

Figure 1: Timeline for the external review of ENQA Agency Reviews



3. HISTORY, PROFILE AND ACTIVITIES OF ENQA

3.1 ACTIVITIES, POLICY AND PROCESSES FOR QUALITY ASSURANCE (ESG 3.1)

Agencies should undertake external quality assurance activities as defined in Part 2 of the ESG on a regular basis. They should have clear and explicit goals and objectives that are part of their publicly available mission statement. These should translate into the daily work of the agency. Agencies should ensure the involvement of stakeholders in their governance and work.

Translation of the standard for the purpose of this review:

ENQA should engage in agency reviews on a regular basis. Agency review processes should be part of ENQA's activities and expressed in its mission.

BRIEF HISTORY

The idea for the creation of ENQA originated a few years before the signatory of the Bologna Declaration, when the outcomes from the European Pilot Project for Evaluating Quality in Higher Education (1994-95) demonstrated the value of sharing and developing experience in the area of quality assurance⁹. Following this and the Recommendation of the Council (98/561/EC of 24 September 1998)¹⁰, ENQA was established in 2000 as the European Network for Quality Assurance in Higher Education. In 2004, ENQA became the European Association for Quality Assurance in Higher Education. In order to respond to growing expectations towards ENQA with regards to European policy development, including the mandate from the Ministers of Higher Education for the drafting of the ESG, it was concluded that ENQA needed a stronger organisation to respond to these growing European expectations. For this reason, at the ENQA General Assembly in September 2003, a reform process was launched for the transformation of the network into an association, a restructured organisation, with clearly articulated membership criteria and a code of practice¹¹.

ENQA MISSION, GOALS AND OBJECTIVES

ENQA acts as a major driving force for the improvement of quality assurance across all the Bologna Process signatory countries. It is an independent, non-profit, membership association that contributes to the maintenance, enhancement and advancement of a quality culture in European higher education. As the largest association of quality assurance agencies committed to agreed European standards (the ESG), ENQA's mission states that:

"As the largest association of quality assurance agencies committed to agreed European standards, ENQA drives the development of quality assurance by representing agencies internationally, supporting them nationally and providing them with comprehensive services and networking opportunities. ENQA promotes the enhancement of quality and the development of a quality culture in higher education."

⁹ <https://enqa.eu/index.php/about-enqa/enqa-history/>

¹⁰ See <https://enqa.eu/wp-content/uploads/2013/06/Recommendation-of-the-Council-98.561.EC-of-24-September-1998.pdf>

¹¹ More information about the history of ENQA is available in ENQA's 10th Anniversary Publication (see [here](#)).

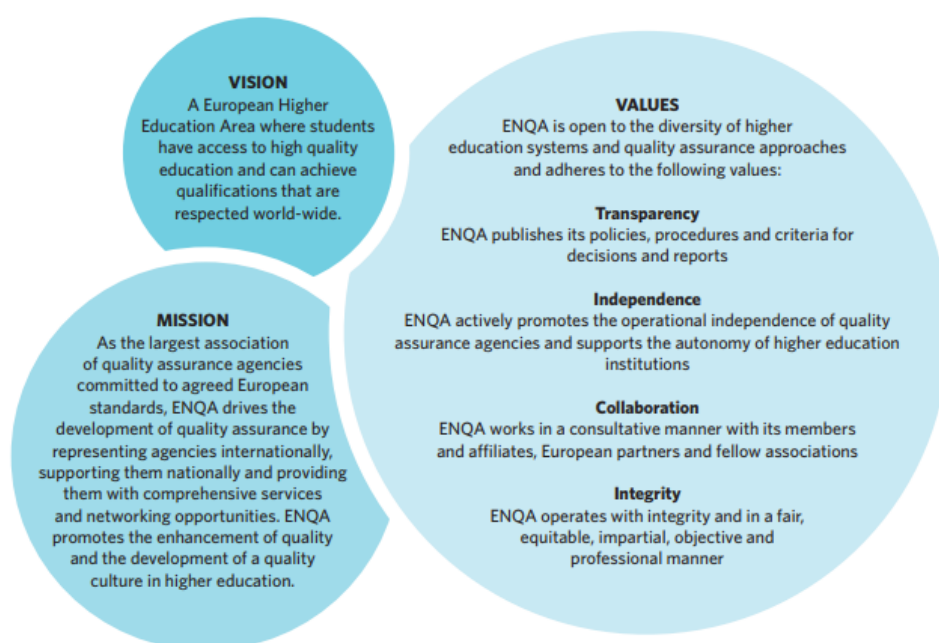
The mission is part of ENQA's Strategic Plan 2016-2020¹². The Strategic Plan 2021-2025 is currently being drafted, building of the current strategic plan, and will be available in spring 2020 at the latest.

ENQA's vision (see figure 2) is to have a European Higher Education Area where students have access to high quality education and can achieve qualifications that are respected world-wide.

ENQA acknowledges the diversity of higher education systems and quality assurance approaches and adheres to the following values, as stated in the ENQA Strategic Plan 2016-2020 (see p. 1¹³):

- "Transparency: ENQA publishes its policies, procedures and criteria for decisions and reports.
- Independence: ENQA actively promotes the operational independence of quality assurance agencies and supports the autonomy of higher education institutions.
- Collaboration: ENQA works in a consultative manner with its members and affiliates, European partners and fellow associations.
- Integrity: ENQA operates with integrity and in a fair, equitable, impartial, objective and professional manner".

Figure 2: ENQA's mission, vision and values



ENQA's mission translates into its daily work through various activities, including policy work, projects, external reviews of QA agencies (i.e. ENQA Agency Reviews) and dissemination of information on experiences, good practice and new developments in the field of quality assurance in higher education. The mission is translated into eight specific goals¹⁴ that cover all of ENQA's activities. Two of these are specifically related to ENQA Agency Reviews: goal 2 and goal 5.

¹² https://enqa.eu/wp-content/uploads/2015/05/ENQA_strategic_plan_2016-2020.pdf

¹³ https://enqa.eu/wp-content/uploads/2015/05/ENQA_strategic_plan_2016-2020.pdf

¹⁴ <https://enqa.eu/index.php/about-enqa/strategic-plan-2016-2020/>

- “Goal 1: ENQA is representative of the diversity of quality assurance agencies throughout Europe.”
- “Goal 2: ENQA supports the continuous development of independent and trustworthy quality assurance agencies operating in line with agreed standards throughout Europe.”
- “Goal 3: ENQA provides advice and represents the interests of its members in the policy-making process.”
- “Goal 4: ENQA is a fruitful network for agencies throughout Europe.”
- “Goal 5: ENQA is the preferred partner for reviews against agreed European standards.”
- “Goal 6: ENQA is a key source of reliable information, expertise and know-how on quality assurance.”
- “Goal 7: ENQA is a reference point for European quality assurance in the international context.”
- “Goal 8: ENQA contributes to the enhancement and innovation of quality assurance.”

In practice, to achieve goal 2, ENQA contributes to the EHEA by promoting quality assurance processes based on the ESG. Concrete measures of achieving the goal are that agencies are successful in demonstrating increasing levels of compliance with the ESG following an external review and that reviews of ENQA member agencies against the ESG highlight features of good practice by established agencies (often in the form of commendations).

According to the Strategy, ENQA is to achieve the listed goal 5 by organising external reviews of QA agencies in a professional manner with appropriately trained and experienced reviewers and in a way that respects the requirements of the ESG. Through the reviews, ENQA supports the development of independent and trustworthy QA agencies and provides mature agencies with suggestions for further improvement that help to enhance their processes, activities and procedures beyond threshold levels. Success is measured through the number of agencies that continue to choose ENQA as review coordinator for the quality and reliability of the reviews; the feedback on review reports and the extent to which they evaluate the reports’ consistency, readability and usefulness; and feedback from agencies indicating the degree of satisfaction that second and subsequent reviews bring genuine added value.

ENQA’s mission and goals are translated into annual work plans which are approved by the General Assembly (GA) each year. The achievement of the goals is tracked through annual activity reports, submitted to the General Assembly each spring. A mid-term evaluation of the strategic plan was carried out in 2017 and a further evaluation will be done in 2019 in view of the preparations for the 2021-2025 strategic plan.

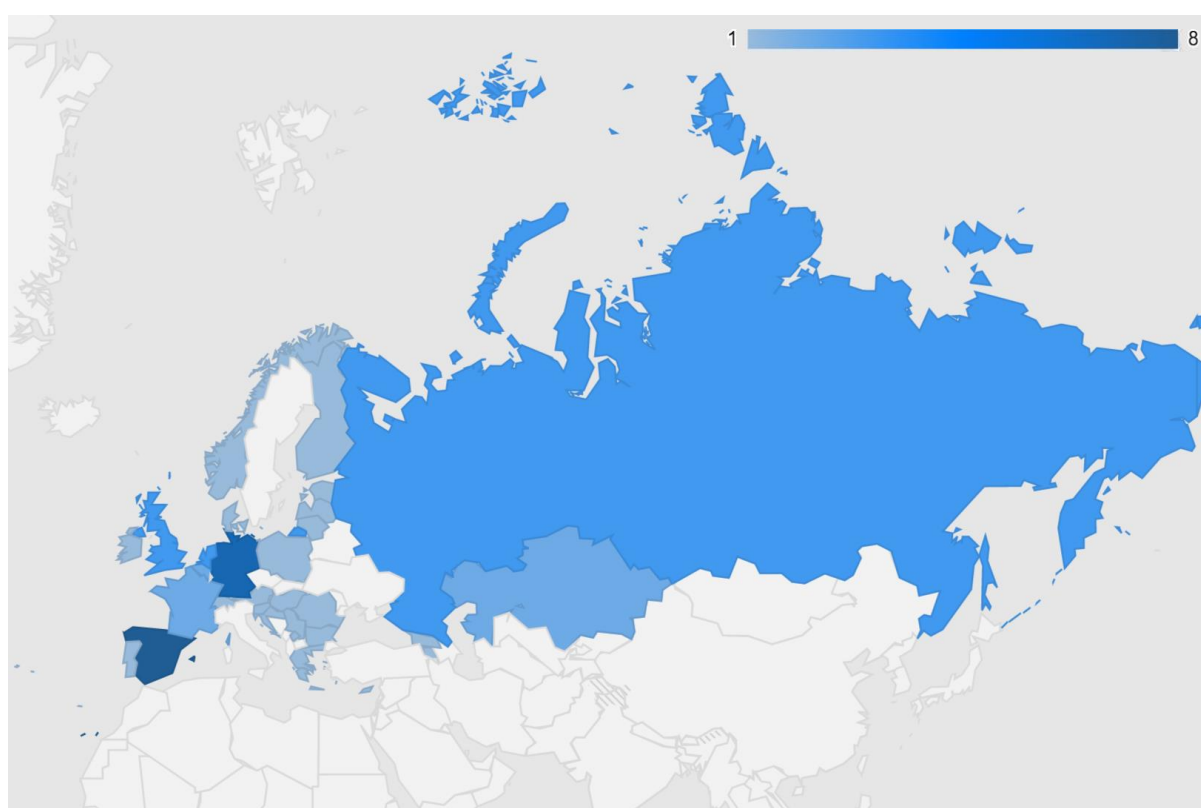
Carrying out reviews is an important part of ENQA’s strategy. In addition to the two goals that address the review process specifically, ENQA Agency Reviews have an impact on several other strategic goals, such as: Goal 1 – representation of the diversity of agencies within the EHEA (through support to countries to establish independent agencies operating in line with the ESG); Goal 6 – ENQA as a key source of information on QA (review reports, thematic analyses); and Goal 8 – enhancement of QA (through feedback provided in review reports, thematic analyses).

GOVERNANCE OF ENQA

ENQA is organised in four bodies.

ENQA is fully governed by its main stakeholder group, namely QA agencies in the EHEA. The 53 member agencies from 29 EHEA countries (as of May 2019, see figure 3) form the General Assembly of the association. The main tasks of the General Assembly include the election of the Board, adoption of the Strategic Plan, endorsement of ENQA membership decisions, and approval of the work plans and annual activity reports. Details of the GA tasks can be found in the ENQA Statutes¹⁵. ENQA affiliates and the association's stakeholders can attend the General Assembly as observers.

Figure 3: ENQA membership across the EHEA (if more than one member agency is present in a country, the country is coloured in darker blue)



The ENQA Board is the executive body of the association, appointed by the General Assembly to implement its decisions and ensure, together with the Secretariat, effective management of business between the biannual GA meetings, i.e. the implementation of the ENQA annual work plan. The Board is comprised of between nine and eleven members (nine regular members and at most two co-opted members to ensure gender and/or geographic balance or other requirements), including the President, two Vice-Presidents and a Treasurer. The General Assembly elects the members of the Board for a regular mandate of three years, renewable once. The membership in the Board changes on rotation, meaning that every year three terms come to an end. Representatives of members may be nominated as candidates for election to the Board. Among other tasks, the ENQA Board takes

¹⁵ <https://enqa.eu/wp-content/uploads/2016/05/ENQA-Statutes-2015-EN.pdf>

membership decisions based on the external review reports and supervises the review process in general (approval of review panels, approval of review reports, decisions on additional policies, and changes to the review process based on feedback or shortcomings identified by staff or the Board).

The director is appointed by the ENQA Board to represent the association in line with its aims and objectives. The duties and responsibilities of the director are set out in the Rules of Procedure¹⁶ adopted by the GA. The Director manages the Secretariat, which takes care of the day-to-day operation and administration of the association, including its financial management, and implements the association's work plan together with the Board. The Secretariat has six full-time staff members: the director, deputy director, reviews manager, project manager, project officer and the administrative officer.

The Appeals and Complaints Committee hears appeals and complaints about membership decisions and the conduct in procedures. The Committee is made up of four representatives from members of ENQA, nominated by the Board and appointed by the General Assembly for a three-year term. The members of the Committee serve continuously for a maximum of six years. A member of the Committee cannot also be a member of the Board, but at least one of the members is normally a former member of the Board.

The involvement of other stakeholders in the governance of ENQA is explained in chapter 5.

ENQA AGENCY REVIEWS

The scope of this review is the ENQA Agency Review process used by ENQA to evaluate whether the agencies' quality assurance activities are in compliance with the ESG. Agencies complying with the ESG are eligible for ENQA membership. The agency review stimulates trust in quality assurance and quality of higher education internationally, and supports and adds to the legitimacy of the reviewed agency at the national level (where relevant). Additionally, EQAR's Register Committee uses the reports for the purpose of registration on EQAR.

Until 2011, ENQA only rarely coordinated the agency reviews (i.e. in cases when no other coordinator was available). In 2011, ENQA approached the reviews more systematically and offered the coordination of reviews as part of its activities. In 2015, the methodology of the reviews was revised and branded as "ENQA Agency Reviews". This occurred in parallel to the adoption of the revised ESG at the 2015 Yerevan Ministerial Conference. Since then, ENQA has coordinated a large majority of the agency reviews in the EHEA (see chapter 6).

The number of agencies that have not chosen ENQA as the coordinator of the review, but rather applied for ENQA membership with the report that was coordinated by another organisation, amounts to five in the period 2015-2019. The identified agencies come from Germany and Switzerland. Until recently, German agencies were obliged to undergo a review by the German Accreditation Council (GAC). Since 2018, German

¹⁶ See chapter 7 of the Rules of Procedure: <https://enga.eu/wp-content/uploads/2018/04/ENQA-Rules-of-Procedure-2018.pdf>

agencies are no longer requested to undergo a GAC review, which resulted in ENQA coordinating the reviews since then. Additionally, ENQA's affiliate organisation MusiQuE opted for a different coordinator than ENQA for their ESG review. However, MusiQuE is the only QA agency that decided to use the review only for EQAR registration and not also for ENQA membership.

ENQA may also coordinate ESG compliance reviews of agencies which do not wish to or cannot apply for ENQA membership, such as QA agencies outside the EHEA. As with all reviews, the terms of reference for such reviews are negotiated with the agency in question, and the review complies with the general rules for ENQA Agency Reviews in terms of content and procedures. So far only one QA agency outside the EHEA applied for an ENQA Agency Review. The Hong Kong Council for Accreditation of Academic & Vocational Qualifications will undergo a review in 2020-2021.

To be eligible for an ENQA Agency Review, the agency should have been operational in quality assurance for at least two years and should have completed at least five reviews and published their reports. The review covers all quality assurance activities of the agency under review that fall under the scope of the ESG¹⁷, regardless of whether these activities are carried out in the agency's predominant country/region of operation, in other countries of the EHEA, or outside the EHEA and regardless of whether the activities are compulsory or voluntary in nature.

The ENQA Agency Reviews should always have a developmental approach and aim at continuous enhancement of the agencies. Furthermore, the reviews analyse the current status of an agency but not planned or foreseen developments. The following principles are followed during the review (see the Guidelines for ENQA Agency Reviews, page 4):

- "The review is an evidence-based process carried out by independent experts.
- The information provided by the agency is assumed to be factually correct unless evidence points to the contrary.
- The review is a process of verification of information provided in the self-assessment report and other documentation. The review process additionally explores any other relevant matters that might have been omitted from that documentation.
- The process is transparent, and outputs are published.
- The level of compliance with the ESG required for ENQA membership is that of substantial compliance overall."

All ENQA Agency Reviews are based on evidence collected during the evaluation process.

The reviews can be full (first or second and subsequent) or partial. The first full review of an agency against the ESG pays specific attention to the policies, procedures and criteria in place and does not require full evidence of concrete results in all areas at this stage (such as completed reports of thematic analyses). This exemption is stated in the Guidelines for ENQA Agency Reviews (see page 4). However, the agency must be able to document (as in action plans with timetables) how they will achieve results across all standards by its next review. The second and subsequent full reviews require clear evidence of results in all areas. In addition, further reviews acknowledge progress from the

¹⁷ E.g. reviews, audits, evaluations or accreditations of higher education institutions or programmes that relate to teaching and learning (and their relevant links to research and innovation).

previous review, which is a mandatory element in both the self-assessment report and the panel report.

Partial reviews are the reviews used by members that, according to the ENQA Board, do not demonstrate compliance with the ESG after a review for membership renewal and are therefore assigned the status of a ‘member under review’¹⁸. This status allows the member to benefit from its membership rights within ENQA for a transitional period of a maximum of two years, when the agency should make the necessary adjustments and then undergo a partial review. Partial reviews focus on all elements as identified as causes of concern by the ENQA Board as well as the elements identified as partially or non-compliant by the panel of the last full review. The agency should also indicate in its self-assessment report if there have been significant changes regarding any other standards since the last full review. If so, these changes should be included in the review process. New applicants to ENQA may not make use of the partial review arrangement as the status of “member under review” cannot be granted to new applicant agencies.

REGULARITY OF ENQA’S EXTERNAL QA ACTIVITIES

Since 2011, ENQA has carried out ESG compliance external reviews of quality assurance agencies in the EHEA on a regular basis. From 2015 on, this has been done on the basis of the ESG 2015, and according to the revised external review methodology described in the Guidelines.

ENQA coordinated one review in 2015. Since 2016, ENQA has coordinated 10-18 review processes each year (see chapter 6). Agencies need to renew their membership in ENQA (and registration on EQAR) every five years, creating thus a regular cycle of reviews. ENQA uses the ESG Part 2 and Part 3 as the criteria for evaluation in the external review process. Part 1 is covered through the evaluation of agencies’ compliance with the ESG 2.1.

ENQA’S ACTIVITIES BEYOND THE REVIEWS

While the ENQA Agency Reviews are an important part of ENQA’s work, ENQA is also involved in many other activities as a membership association of QA agencies. These include principally input towards EHEA and EU policy-making in the field of higher education; coordination of members and other stakeholders for activities supporting the development of quality assurance in the EHEA and in other parts of the world; and contribution to quality assurance projects¹⁹. ENQA organises regular statutory events for its members (the General Assembly and the Members’ Forum²⁰) each year, as well as workshops on specific topics of interest in the field of quality assurance. ENQA provides information about European quality assurance on its website and produces a quarterly newsletter on European and international news about higher education and quality assurance²¹.

¹⁸ If requested by an agency, the partial review can also be used for the purpose of EQAR’s focused review, which addresses issues that led to the agency’s rejection for registration on EQAR.

¹⁹ https://enqa.eu/index.php/projects/enqa_projects/

²⁰ For an example see <https://enqa.eu/index.php/events/9th-annual-enqa-members-forum/>

²¹ See here: <https://enqa.eu/index.php/home/newsletter/>

The ENQA Agency Review activities are mainly carried out by one staff member specifically assigned to these activities. However, the review process is not legally or structurally separated from other activities of ENQA. In practice, ENQA considers that the other activities are compatible with the review activities, and do not create a conflict of interest. ENQA refrains from engaging in specific agency-targeted support activities for preparation for the reviews. While in the past ENQA Board members and/or staff have engaged in ad hoc support visits to agencies preparing for a review, these have not taken place since 2017 in order to ensure that there is no real or perceived conflict of interest, and to ensure that all agencies are treated equally in this respect. Instead, ENQA held its first seminar for agencies preparing for a review in September 2018. The seminar was open to all interested agencies planning to undergo a review process in the near future (see chapter 3.6). As the seminar was considered very helpful by the participating agencies, ENQA has decided to hold such seminars regularly (every two years).

Following the analysis of the event questionnaire, the participants of ENQA's first seminar for agencies preparing for a review²² appreciated most the practical sessions, discussions on the standards, possibilities for peer learning and friendly and collaborative atmosphere. The most appreciated sessions were the one on engaging the participants to reflect on best practices for the self-assessment and the session that presented the main stages of the review process. On the other hand, the participants missed a more structured elaboration on how to interpret and demonstrate compliance with more problematic standards (e.g. thematic analysis), wished for more case studies of good or bad self-assessment reports and requested for reserved time for individual clarifications.

ENQA'S INTERNATIONAL ACTIVITIES

Since there have been many advancements in the harmonisation of higher education quality assurance in the context of the Bologna Process, the work of ENQA is often seen as an example or benchmark for other regions of the world. ENQA has thus acquired a position with a global outreach, which has been strengthened through several projects on capacity-building and development activities in quality assurance beyond Europe.

To mention a few such initiatives, ENQA has actively contributed to the development of a continental framework for quality assurance both in the ASEAN through the SHARE Programme²³ and in Africa through the HAQAA Initiative²⁴. In addition to the already existing standards in the respective regions, the ESG functioned as an important benchmark document in both initiatives. The review guidelines for external reviews of quality assurance agencies were also drafted in both projects by drawing inspiration from the Guidelines for ENQA Agency Reviews. ENQA is also regularly involved in several other capacity building projects in a number of non-EHEA countries.

The international activities of ENQA can also be considered a consolidating mechanism of ENQA's review process, as they have allowed for exchange and reflection with colleagues and within systems from around the Globe. These activities also support a global outlook of quality assurance overall, as

²² The event webpage is available [here](#).

²³ <https://www.share-asean.eu/>

²⁴ <https://haqaa.aau.org/>

different higher education systems can be studied and compared among practitioners in the field in order to support mutual understanding and recognition between systems internationally.

3.2 OFFICIAL STATUS (ESG 3.2)

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

Translation of the standard for the purpose of this review:

ENQA's status as a body responsible for coordinating agency review processes is clear and transparent.

ENQA is an international non-profit association under Belgian law ("association internationale sans but lucratif" or "aisbl"). The ENQA Agency Reviews is an activity conducted by ENQA, and is not a separate legal entity. The ENQA Agency Reviews activity is represented by ENQA in legal and contractual matters.

The recognition of ENQA Agency Reviews stems from the role of ENQA in the wider European framework, namely the Bologna Process and the EHEA. ENQA's reviews operate at the European level and are not linked to a specific national framework. The outcomes of the reviews are accepted by EQAR for the purposes of registration application, and are a legal or regulatory requirement for agencies in some countries to be able to operate in or abroad.²⁵

3.3 INDEPENDENCE (ESG 3.3)

Agencies should be independent and act autonomously. They should have full responsibility for their operations and the outcomes of those operations without third party influence.

Translation of the standard for the purpose of this review:

ENQA should be independent and agency review processes need to be carried out autonomously, without third party influence.

ORGANISATIONAL INDEPENDENCE

ENQA is an independent non-profit association registered under the Belgian law as "aisbl" (see chapter 3.2). Although ENQA cooperates with the European Commission and is a consultative member of the BFUG, its operations and legal status are not connected to those organisations. ENQA's statutes, which are adopted by the ENQA General Assembly, define the bodies of ENQA and their respective roles. ENQA is thus free to determine its structures and way of work independently from national governments and other stakeholders.

As a membership organisation, ENQA is logically not organisationally independent from its members. Similarly, the ENQA Board is composed exclusively of elected representatives from ENQA member agencies, which, in turn, are usually reviewed by ENQA. However, ENQA has fundamental measures

²⁵ National legislation in more and more countries requires EQAR registration rather than ENQA membership for their quality assurance agencies.

in place to safeguard the independence even in this of ENQA Agency Reviews. Independence is important to ensure that procedures are respected and that any decisions taken are based solely on expertise. To avoid any conflict of interest of Board members in the decision-making process for membership purposes, Article 25 of the ENQA Statutes on “Abstention from decision-making” states that “Board members shall abstain from decision-making in a number of situations, which are set out in the Board conflict of interest policy. These rules are accompanied by an up-to-date register of the current Board members’ interests”²⁶. For example, a Board member should abstain from decision-making in the event of an “apparent conflict of interest”, meaning any situation where it can be reasonably perceived that the Board member’s personal affiliation might influence the performance of his/her review-related duties and responsibilities. A Board member who has worked in the agency under review within the last five years constitutes an example of conflict of interest, and Board members may never take part in the discussions and decision-making regarding their own agencies.

OPERATIONAL INDEPENDENCE

ENQA has full operational independence and thus defines its procedures independently as listed in the ENQA Statutes, the Rules of Procedure and the Guidelines for ENQA Agency Reviews, even whilst considering improvements based on feedback from its members and other stakeholders.

ENQA receives nominations of experts from ENQA member agencies as well as from the European University Association (EUA), the European Association of Institutions in Higher Education (EURASHE) and the European Students’ Union (ESU). This said, the selection of reviewers for a specific review process is always carried out by an ENQA review coordinator (without intervention by the agency being reviewed) to avoid conflicts of interest and to preserve the integrity of the process. The ENQA Board approves all panels and appoints the reviewers after consideration of possible conflicts of interest (that the Secretariat might not be aware of) and ensuring that the panel meets the required skills, profiles and backgrounds as stated in the ENQA Guidelines. When appointing reviewers, the key requirement is that the members of the panel should be independent from the agency under review and have a sufficient level of knowledge, experience, and expertise to conduct the review. Experts are required to notify the ENQA review coordinator in writing of any connection or interest which could result in a conflict, potential conflict, or a perceived conflict related to the review. Furthermore, experts are required to notify the ENQA review coordinator as soon as possible of any changes in, or additions to, the interests already disclosed occurring during the review. If experts are unsure as to whether an interest should be disclosed, they should discuss the matter with the ENQA review coordinator. When presenting the composition of the panel to the agency being reviewed, the review coordinator asks the agency to verify that there is no conflict of interest with the experts. In case a conflict is identified and verified, the panel is recomposed.

The experts are also expected to follow the Code of Conduct²⁷ which, among other issues, states that the experts’ duties include acting with strict impartiality and objectivity, and identifying and declaring any real or apparent conflict between personal interests. The Code of Conduct is part of the contract signed by the expert when undertaking the task of an external reviewer. The contract also establishes

²⁶ <https://enqa.eu/wp-content/uploads/2016/05/ENQA-Statutes-2015-EN.pdf>

²⁷ ENQA Code of Conduct for reviewers is available [here](#).

that experts engaged by ENQA – whether nominated by ENQA, EUA, EURASHE, ESU or BusinessEurope) - are acting in their personal capacity and do not represent their nominating organisations.

The respective roles and responsibilities of ENQA, the review panel and the agency are explained in detail in the Guidelines and are also laid out in the contracts signed between ENQA and the agency and between ENQA and the experts. The ENQA coordinator accompanies the panel throughout the process to ensure consistency between reviews and to support the experts with practical questions. But while the coordinator reviews all reports to ensure their consistency, analytical information and quality, the findings and recommendations are the sole responsibility of the review panel. The chair of the panel signs off on the final report and also has the final say should there be a disagreement within the team or regarding suggestions from the review coordinator. The final draft of the report is sent to the agency for a factual checking before it is finalised. However, the agency may in no way influence the panel's findings.

The external review reports of ENQA reviews can also be used for registration on EQAR. EQAR has published its own interpretation of the ESG where it also sets out the minimum requirements for evidence to be provided in the report²⁸. ENQA review panels use the EQAR document in all reviews where the agency is also applying to EQAR. However, the panels are instructed not to use the document as an exclusive checklist, but to refer back to the ESG themselves. The main purpose of the use of the EQAR document is simply to ensure that the report contains all elements expected by EQAR. This enables the agency to use one report for two purposes without further delays and work created by eventual additional questions from EQAR at a later stage if the minimum requirements are not met.

The decisions on ENQA membership and EQAR listing, while based on the same report, are completely independent from each other. Feedback from members has shown, however, that agencies find it confusing and suboptimal that two different decisions by two different European-level bodies (ENQA and EQAR) are taken on the same report.

Members have particularly questioned the possibly divergent interpretations of the ESG by the two organisations, which becomes particularly apparent in cases where ENQA and EQAR come to different overall conclusions regarding compliance (i.e. when ENQA takes a positive decision and EQAR a negative one, based on the same report). Such a situation does not put ENQA's independence into jeopardy, but may not be the best way to support agencies and to strengthen the ESG.

Following this, the membership decisions of ENQA will always need to remain with the ENQA Board, as no external body can decide on ENQA membership. However, the criteria for the decision could be reconsidered (i.e. how agencies demonstrate their compliance with the ESG). The ENQA Statutes specifically state: "Applications for membership are considered and decided upon by the Board on the basis of an independent external review report on the agency's conformity with the respective membership criteria, carried out in a manner and to a standard acceptable to the Board (Article 6)."

²⁸ https://www.eqar.eu/assets/uploads/2018/04/UseAndInterpretationOfTheESGv2_0.pdf

INDEPENDENCE OF FORMAL OUTCOMES

The final outcomes of the review processes remain the responsibility of the ENQA Board. In order to facilitate its decision-making and to further ensure independence, the Board relies on the support of four Review Committees²⁹ for the initial scrutiny of each external review report (ERR). Each Committee is composed of two members of the ENQA Board and one external member (usually a former Board member, or a very experienced reviewer). Each Committee also has one alternate member in the case a permanent member has a conflict of interest related to the review under scrutiny. The main steps of the decision-making process are the following:

1. Once submitted to ENQA by the review panel chair, the report is distributed by the ENQA Secretariat to an ENQA Review Committee (based on rotation).
2. Each member of the Review Committee fills out a scrutiny form that contains an analysis of the report and provides an assessment of each ESG standard as well as an overall recommendation to the Board.
3. The Board takes a decision based on the ERR and the scrutiny by the Review Committee. The Board is not, however, obliged to follow the recommendations of the review panel nor that of the Review Committee.
4. Should the Board deviate from the recommendations of the panel and/or the recommendation of the Review Committee, the reasons shall be specified in the Board's letter to the agency, which will be published on the ENQA website together with the ERR.

The question has arisen as to how far the Board's decisions on other members are really independent since they are also from ENQA member agencies. As explained above, ENQA has integrated several procedures and practices to ensure the impartiality of the Board members and has robust checks for conflicts of interest. Additionally, to strengthen the Board's impartiality and independence for decision-making, the General Assembly is requested to consider gender balance and geographical distribution when electing Board members, which guarantees a diversified representation in the Board (Article 21 of the ENQA Statutes). So far practice has shown that the Board has taken decisions on membership independently throughout the years. This is highlighted in cases where the Board has taken a negative decision on an agency's membership application even when the agency has been represented in the Board at that same moment.

In 2013, in order to involve stakeholders to a larger degree in the ENQA agency review process, ENQA proposed to the E4 Group as well as to BusinessEurope to nominate individuals for ENQA's Review Committee (so that the external member would always be a stakeholder representative). However, at that time, the other E4 organisations agreed that nominating review committee members for ENQA would make the processes of ENQA and EQAR too similar and add to the lack of clarity prevailing at the time regarding the difference in the purposes and tasks of the two organisations. BusinessEurope nominated a review committee member at that time. After a couple of years it became clear that having only one stakeholder representative in only one of the review committees was not very useful or balanced, and this practice was discontinued.

²⁹ <https://enqa.eu/index.php/reviews/3087-2>

3.4 THEMATIC ANALYSIS (ESG 3.4)

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

Translation of the standard for the purpose of this review:

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

ENQA has prepared two reports that are considered to be the first thematic analyses on ENQA Agency Reviews³⁰. Both reports are a result of ENQA's working groups³¹ and describe the general findings on ENQA's external quality assurance activities. The report "Analysis of the European Standards and Guidelines (ESG) in External Review Reports: System Wide Analysis, Resources and Independence"³² was issued in 2015 and is an outcome of the working group VI on "Knowledge on Part 3 of the ESG 2005" (the "KP3 working group"). It provides a transversal analysis on how quality assurance agencies are aligned with Part 3 of the ESG and how the internal quality assurance practices of agencies reviewed against the ESG 2005 could be improved, while also tackling potential challenges that could arise in their subsequent reviews against ESG 2015. Once published, the report was presented on several occasions and its findings were systematically used in the training of experts as well as in presentations to different member agencies. Additionally, a specific dissemination and discussion event was organised in Brussels in June 2015.

The second report relates to the work of the ENQA-IQA working group³³. The group was tasked with analysing the self-assessment reports and external review reports produced through the ENQA Agency Review process in order to help ENQA gain a deeper understanding on how agencies and panels interpret and use the ESG 2015 in their own contexts. Initially, ENQA had planned to publish the IQA-group's final report, but later decided to collect the outcomes in an internal handbook available to the Board and Secretariat. This choice was made to reduce the perceived risk that the report might be used by the panels or the agencies as a checklist, or a parallel set of standards to the ESG. The outcomes of the analysis are rather used to brief panels, train reviewers, and to highlight some common challenges and good practices in the workshops for agencies preparing for a review.

³⁰ The two listed reports are not ENQA's only thematic analyses. In 2011, "[Evaluation of the reports on agency reviews \(2005-2009\)](#)" was written by Fiona Crozier, Josep Grifoll, Nick Harris, Helka Kekäläinen and Thierry Malan. However, since the report was issued before the period that is relevant to this self-assessment report (2015-2019), we only list it as a footnote to the ESG 3.4.

³¹ ENQA working groups respond to the needs expressed by the membership and to fulfil the association's work plan and wider objectives. The main task of the assigned groups is to elaborate ideas on a given theme and to share knowledge and experience among the participants. Once established and approved by the Board, the participants of the working groups have operational, organisational and financial autonomy and meet on a regular basis. At the end of their work, the groups are expected to report to the ENQA Board on tangible (or substantial) results and outcomes. The groups have no duration limits. The following working groups ran between 2015 and 2019: working group on impact of QA, ENQA-IQA working group, ENQA group on quality assurance and recognition, and ENQA group on quality assurance and e-learning. For more information see <https://enqa.eu/index.php/work-policy-area/enqa-working-groups/>

³² https://enqa.eu/indirme/papers-and-reports/workshop-and-seminar/ENQA_workshop_report_23.pdf

³³ <https://enqa.eu/index.php/enqa-iqa-working-group/>

In 2018, ENQA launched two initiatives contributing to thematic analysis:

- 1) a qualitative thematic analysis. The analysis was commissioned to an external researcher who started her work in late 2018 under the guidance of ENQA's Director and is due to be completed by September 2019. The analysis focuses on three ESG standards that have proven to be problematic or unclear to the agencies and in decision-making: 3.4 – Thematic Analysis, 3.6 - Internal Quality Assurance and Professional conduct; and 2.1 - Consideration of Internal Quality Assurance. All 27 reports produced by ENQA between 2015 and 2018 have been included in the analysis. Once the results are completed, the report will be published on ENQA's website. ENQA also plans to present the outcomes of the analysis to its members at the Members Forum 2020 and at other international events, such as EQAF 2020. The outcomes will also be used to improve the review process, e.g. by using the results in the training sessions for new reviewers, and to indicate topics for future webinars or events on issues that have proven challenging for several agencies. Furthermore, the thematic analysis is also identifying cases of good practice related to specific standards, which can be used for peer-learning among ENQA's members.
- 2) an analysis of key characteristics of ENQA member agencies as collected from the agencies' self-assessment reports. Information was collected over the course of October to December 2018, which included: the year of agency establishment; types of activities in external quality assurance (with the number of the reviews undertaken); total FTE staff of an agency as well as the number of FTE staff assigned to external quality assurance activities; and the decision-making structure in place. The Secretariat felt that such information would provide a solid basis for any upcoming qualitatively-focused thematic analyses. The ENQA Board decided in December 2018 to collect such information on a regular basis from the agencies by introducing a "member's profile sheet" which, in current planning, could be added as an integral part of the self-assessment report and would feed into ENQA's membership information database, allowing for searches e.g. by size of staff or type of review processes carried out. The data is expected to lend itself to future thematic analysis and support the contextualisation of the current thematic analysis. Collection of such data will also serve many other purposes, such as support the briefing of the review panels. The development of the profile sheet is ongoing.

Separately from the listed activities, ENQA collaborates in several projects that may result in, but are not limited to, thematic analyses that draw on the outcomes of ENQA Agency Reviews. The projects are not of a regular nature and depend on opportunities for funding. The following topics have been analysed through projects in the observed period from 2015 to 2019:

1. Erasmus Mundus Programme, QACHE project (2015): Cooperation in Cross-Border Higher Education: a Toolkit for Quality Assurance Agencies³⁴; and the final report³⁵

³⁴ https://enqa.eu/indirme/papers-and-reports/occasional-papers/QACHE%20Toolkit_web.pdf

³⁵ <https://enqa.eu/indirme/papers-and-reports/occasional-papers/QACHE%20final%20report.pdf>

2. Erasmus+, Enhancing Quality through Innovative Policy and Practice (2015-2018): Comparative Analysis of the ESG 2015 and ESG 2005³⁶ and Enhancing Quality: from Policy to Practice³⁷
3. Erasmus+, WEXHE project (2017-2019)³⁸: Integrating Entrepreneurship and Work Experience into Higher Education; [the report](#)
4. Erasmus+, LIREQA project (2016-2019)³⁹: Linking Academic Recognition and Quality Assurance.

ENQA has also issued several occasional papers and results of surveys that look into the way in which agencies address one or more elements contained in the ESG and thus support the development of ENQA Agency Reviews:

1. 4th ENQA survey (2015): Quality Procedures in the European Higher Education Area and beyond – Internationalisation of Quality Assurance Agencies⁴⁰
2. Report from the ENQA working group VIII on quality assurance and e-learning (2018): Considerations for Quality Assurance of e-Learning Provision⁴¹.

As presented above, ENQA produces or contributes to many projects, studies and reports on quality assurance. Nevertheless, ENQA is aware of the interest of its members and other stakeholders in providing even more analysis and examination of “what is happening in external QA” across Europe. No other organisation in the EHEA is as well placed to provide such analyses as ENQA, and the sector could surely benefit from more detailed and frequent analysis. ENQA is currently discussing its future strategy for 2021-2025 and setting priorities for future activities. The interest of members in thematic analysis and the usefulness of such information for informed policy-making will be taken into account in the discussions.

³⁶ https://enqa.eu/indirme/papers-and-reports/associated-reports/EQUIP_comparative-analysis-ESG-2015-ESG-2005.pdf

³⁷ https://enqa.eu/indirme/papers-and-reports/associated-reports/equip-publication_final.pdf

³⁸ <https://enqa.eu/index.php/integrating-entrepreneurship-and-work-experience-into-higher-education-iewexhe/>

³⁹ <https://enqa.eu/index.php/linking-academic-recognition-and-quality-assurance-lireqa/>

⁴⁰ https://enqa.eu/indirme/papers-and-reports/occasional-papers/enqa_oc_22.pdf

⁴¹ <https://enqa.eu/indirme/papers-and-reports/occasional-papers/Considerations%20for%20QA%20of%20e-learning%20provision.pdf>

3.5 RESOURCES (ESG 3.5)

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

Translation of the standard for the purpose of this review:

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

HUMAN RESOURCES

As of May 2019, ENQA employs six full time staff members (see chapter 3.1). The job profiles are well differentiated and include the director, deputy director, reviews manager, project manager, project officer and administrative officer. Currently ENQA has one staff member specifically recruited for the role of reviews manager. He is the only ENQA employee working full time for the ENQA Agency Review process. With the volume of agency reviews increasing since 2011, and with the reinforcement of the role of the review coordinator as support to the review panel in each process, the ENQA Board decided in 2015 to hire an experienced review manager with an enhanced role dedicated specifically to the review process.

The reviews and related activities (training sessions, seminars for agencies, coordination of thematic analyses) are coordinated by the reviews manager, but all other staff members of the ENQA Secretariat also work for the ENQA Agency Reviews. Each staff member with the exception of the administrative officer act as review coordinators for 2-3 review processes each year. This ensures that the reviews manager is not overloaded, and also reduces ENQA's dependence on a single person knowledgeable in ENQA Agency Reviews. It also supports staff exchanges on the topic and thus feeds into the improvement of the process when needed. Importantly, by being involved in the reviews, ENQA staff gain skills that are relevant for other ENQA activities too, such as management of European and capacity building projects.

The administrative officer deals with the administrative issues related to reviews, such as reimbursements, contracts, and payments. In addition to these tasks, the administrative officer provides other technical support if and when needed, in particular for the organisation of the review related events and the publication of reports.

While hard to quantify with precision, it is estimated that each staff member (apart from the reviews manager) spends about 10 % of their time on the various activities related to the review process. For the director this is likely to be around 15 %, which means that the approximate staff of ENQA Agency Reviews is 1.5-1.6 FTE. Apart from the reviews manager, other staff involved in other ENQA activities (projects, events, statutory issues, policy-making and representation, communication, etc.).

In addition to the staff, the ENQA Secretariat can rely on nine Board members to carry out many activities of ENQA. Board members are not employed or remunerated by the association. The Board is a valuable resource in several aspects of the reviews, such as approving review panels, performing the scrutiny of ERRs, and decision-making on membership. Board members are also actively involved in workshops and training seminars, although ENQA sometimes engages experts from outside the

Board for these activities, too. Furthermore, as explained above, ENQA has recruited an external researcher to carry out the thematic analysis of the recent review reports.

ENQA's budget foresees an allocation for the training of staff. The funds can be used both individually, according to the training needs of each staff member, or allocated to the whole team when joint training is needed. In the past years, individual staff were trained in the coordination of reviews (in a form of observing the review process and by taking part in the expert training sessions). The staff involved in review coordination are always trained on the job, meaning that each review coordinator will observe a site visit coordinated by an experienced review coordinator prior to coordinating one independently. As a group, ENQA staff have had training days on project management skills, which support the running of review processes, as well as other projects. Great attention is given to prepare all participating staff carefully and comprehensively.

ENQA's staff are considered by the review panels and the agencies to be highly dedicated and well prepared for the tasks of review coordination, and expertise is sustained and built through experience (see annexes 1 and 2). At the same time, practice has shown that there is some inconsistency in how the different staff members coordinate the review processes. It seems also that sometime more junior staff members might find it difficult to address issues related to the consistency of the reviews with some experienced panel members. To address this issue, the ENQA Secretariat has planned a review coordinator training session for September 2019 on the "dos and don'ts" of the review process, and intends to maintain this as a regular internal event.

While the current volume of reviews can be handled by the current staff, only a limited amount of internal resources can be dedicated at the moment to analysis and developmental activities related to the reviews. Any changes in the way the reviews are coordinated, the tasks of the coordinator, the number or type of reviews, and addition or modification of other tasks considered as part of the review process (related events, publications, etc.) would need to be considered carefully with respect to the human resources currently available, and the cost of the review process to the agencies.

FINANCIAL RESOURCES

Since at least ten reviews of QA agencies can be expected every year (which has been the case since 2016), and taking into account the cyclical aspect of the reviews, the income and expenditure coming from the reviews can be considered as predictable and relatively stable. Each review brings in a net income of 7,000 EUR to the Secretariat, which is mainly used to cover the staff costs related to the review process. In addition, each review contributes 1,400 EUR to the training of experts (see table 1), thus ensuring the long-term sustainability of ENQA's pool of trained reviewers. Also, a part of the fee for the Secretariat is used to cover the costs of other review related events (e.g. the reviewers' seminar or the seminar for agencies preparing for the review – in addition to the fee collected for this event).

The total fee paid by the agency for the review process is currently 30,000 EUR. The amount is distributed as described in table 1 below.

Table 1: The review fee structure

Expert fees	13,000 EUR
Travel and subsistence	6,000 EUR
ENQA coordination	7,000 EUR
ENQA training of experts	1,400 EUR
Expert fees progress visit	1,000 EUR
Travel and subsistence progress visit	1,600 EUR
Total	30,000 EUR

Table 2: Percentage of income and expense from reviews since 2015

Year	% of review income on total income	% of review expense on total expense
2015*	10 %	9 %
	71,700 EUR / 721,799 EUR	63,541 EUR / 730,858 EUR
2016	28 %	23 %
	277,200 EUR / 983,834 EUR	223,821 EUR / 975,741 EUR
2017	28 %	21 %
	283,000 EUR / 1,009,001 EUR	206,601 EUR / 1,006,710 EUR
2018**	37 %	26 %
	451,200 EUR / 1,210,105 EUR	313,300 EUR / 1,188,759 EUR

* In 2015, due to the transition from the 2005 ESG to the 2015 ESG and ENQA Agency Reviews, the reviews had been postponed to 2016 in order for agencies to adapt to the changes.

** Includes progress visits.

Overall, when it comes to the coordination of the reviews, the reviews are barely covering the related costs of all direct staff costs, training session costs, and costs of thematic analysis. When one considers the staff time required for the coordination of the reviews, which has increased in the past couple of years due to a more extensive role of the review coordinators, it is clear that related expenses are pushed to the limit of what current revenues can allow. This fact should be taken into account when considering revised roles and tasks of the coordinator, or other changes to the process.

3.6 INTERNAL QUALITY ASSURANCE AND PROFESSIONAL CONDUCT (ESG 3.6)

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

Translation of the standard for the purpose of this review:

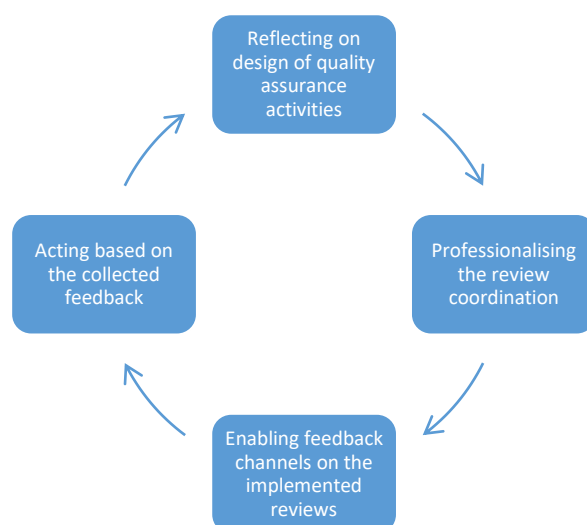
ENQA should have internal quality assurance procedures for its own work processes.

In line with its mission statement (see chapter 3.1), ENQA adheres to the values of collaboration, integrity, independence and transparency in all its activities, including ENQA Agency Reviews. The internal quality assurance of ENQA Agency Reviews encompasses the assessment and improvement of all procedures involving the application for or renewal of ENQA membership. The ongoing nature of internal quality assurance aims not only to secure that the activities are running optimally but, more importantly, that all quality assurance activities within ENQA are fit for purpose. Therefore, ENQA strongly values and carefully monitors its mechanisms for feedback from users and other stakeholders.

Several bodies of ENQA are involved in the internal quality assurance of ENQA Agency Reviews in various ways, as presented throughout this chapter. Nevertheless, it is the reviews manager's responsibility to implement and monitor the procedures in place (e.g. provide analysis of feedback) and propose any actions for improvement. The ENQA Board oversees and approves the internal quality assurance measures and the proposed changes (see Article 18 of the ENQA Statutes⁴²).

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

Figure 4: ENQA Agency Reviews' PDCA cycle



⁴² <https://enqa.eu/wp-content/uploads/2016/05/ENQA-Statutes-2015-EN.pdf>

1) Reflecting on the design of quality assurance activities

Reflecting on the design of quality assurance activities safeguards the independence and consistency of the review process and decision-making, and ensures the non-conflict of interest of all involved parties.

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

- assigns Secretariat staff to coordinate the review process. The Secretariat staff pre-screens the self-assessment report, participates in the site visit, pre-screens the review report, and acts as resource person in the decision-making process.
- has Review Committees that scrutinise the review reports prior to decision-making by the Board. Each of the three members of the four Review Committees complete a scrutiny of the report separately to ensure full independence of assessment. All standards where two or more scrutinisers deviate from the judgement of the panel and/or from each other are specifically discussed in the Board meeting. The review coordinator attends the Board meeting whenever possible in order to provide clarifications before the Board takes its decisions.
- maintains a “Book of precedents”⁴³ for the performed reviews. The book, which registers discussions on the specific standards and their judgements from previous reviews, is consulted by the Board when needed to ensure that similar cases are judged similarly. Furthermore, it is used by the coordinator during the review process to ensure consistency between different review processes and the resulting reports.
- keeps track of the Board letters concluding reviews that state⁴⁴ if the Board’s judgement on ESG compliance deviated from that of the review panel. The letters allow ENQA to keep track of panels that were seen by the Board to have been too lenient or too strict compared to other review processes.

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

- ensures that the review panels are checked by the ENQA Board and by the agency under review for a real, perceived or potential conflict of interest prior to the approval of the review panel.
- requires the reviewers to commit to and abide by the ENQA Code of Conduct⁴⁵ when signing the reviewer’s contract. The elements of non-conflict of interest, honesty, ethics, objectivity, independence, safeguarding of confidential information, tolerance⁴⁶, competence and professionalism that are addressed in the Code of Conduct are specifically presented during the training of reviewers as well.

⁴³ The document can be placed at the disposal of the review panel upon request during the site visit.

⁴⁴ Since June 2018.

⁴⁵ https://enqa.eu/wp-content/uploads/2016/09/ENQA-Agency-Reviews_Code-of-Conduct.pdf

⁴⁶ The protection from intolerance or discrimination of any kind is built into the very mission and values of ENQA (see chapter 3.1). The association respects the diversity of European higher education, the diversity of quality assurance and enhancement approaches and measures, and the diversity of approaches to setting up national quality assurance systems.

- asks the review coordinators to declare any conflict of interest. The coordinators will not coordinate the reviews of agencies with which they have a real, perceived or potential conflict of interest.
- applies a two-step procedure to ensure no-conflict of interest of the Review Committee members. First, all Review Committee members are asked to declare any conflict of interests prior to accepting to work on any review report. Second, the Review Committees include alternate members who are invited to replace a committee member in cases of real, perceived or potential conflict of interest. Naturally, a review committee member will never be asked to review the report of his/her own agency.
- asks the Board members to declare conflicts of interests and leave the room when those agencies' reports are discussed. Moreover, the Board members cannot be nominated as reviewers during their term in the Board and cannot be members of the EQAR Register Committee.
- ensures that no EQAR Register Committee members are reviewers for ENQA Agency Reviews or members of any of ENQA's review-related bodies (the Review Committees or the Appeals and Complaints Committee).
- ensures that no experts taking part in an agency's progress visit participate in the subsequent full review to avoid any real, perceived or potential conflict of interest.

2) Professionalising the review coordination

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

- 1) The review process is pre-described in detail (see the Guidelines and chapter 4.3).
- 2) ENQA organises the training of reviewers and the reviewers' seminar (see chapter 4.4) as well as the seminar for agencies preparing for an initial external review (see chapter 4.3).
- 3) Through a de-briefing meeting of coordinators (after each site visit), the ENQA Secretariat exchanges good practices, challenges and issues arising within the ENQA Agency Reviews. The collected feedback leads to revisions or adjustments of processes if or when needed.
- 4) All ENQA coordinators are trained on the job, and each person undertaking a review for the first time will first observe a review process – including the site visit – coordinated by an experienced review coordinator.
- 5) The recruitment of the Secretariat staff, a task of the director, includes a careful examination of the applicant's professional profile against requirements on professional and ethical work⁴⁷.
- 6) ENQA has a procedure in place for the inclusion of external observers during the site visit⁴⁸. The external observers need to ensure that they respect the principles of ENQA Agency Reviews.

3) Enabling feedback channels on the implemented reviews

ENQA Agency Reviews consist of a variety of feedback channels from users and stakeholders.

- 1) ENQA performs regular surveys for the reviewed agencies and review panels for full and partial reviews. The surveys are completed towards the end of the review process (after

⁴⁷ See ENQA Staff Regulations (available upon request in the Secretariat). Additionally, the annual appraisal interviews enable the leadership of ENQA to identify the needs for further professional training of ENQA staff, in which case the Secretariat staff is encouraged to attend workshops and conferences (e.g. the European Quality Assurance Forum, see [here](#)).

⁴⁸ http://enqa.eu/wp-content/uploads/2016/09/ENQA-Agency-Reviews_Protocol-for-external-observers.pdf

completion of reports, but before the decision-making process by the ENQA Board). The outcomes are analysed in detail every 12-18 months and result in detailed improvement suggestions⁴⁹.

- 2) ENQA collects feedback on the usefulness, relevance and quality of the events related to the review process (such as the training of reviewers, experienced reviewers' seminars, seminars for recently reviewed agencies, seminars for agencies preparing for a review and so on), and takes such feedback into account when designing future events. For instance, the training of reviewers now involves more interactive sessions where participants can practice the activities that are normally held during the site visit. Similarly, the briefing of panellists has been modified following the feedback on the experts' needs during the review.
- 3) Most of the mentioned events, and in particular the reviewers' seminar and the seminar for recently reviewed agencies, are opportunities to collect feedback and discuss improvement proposals.

4) Acting based on the collected feedback

The outcomes of surveys are carefully considered by the ENQA Secretariat after each review process or event and prior to the organisation of a new event. They are also more widely analysed, and reports created, every 12-18 months for the feedback on the review processes. The aim of the feedback analysis is to reflect on the performed activities, which in turn leads to the improvement of ENQA Agency Reviews. The Secretariat staff can make small adjustments to the review process immediately without the Board decision, whereas bigger changes require amendments to the Guidelines or other documents, following the Board's discussion on the outcomes of surveys and, if necessary, revision of ENQA's statutory documents. One example of such revision includes the decision of the Board to publish follow-up reports next to the publication of the self-evaluation reports, review reports and Board letters.

The outcomes of the latest surveys (e.g. on the training of new reviewers, a feedback from the agencies that have undergone a review in 2017-2018⁵⁰) are presented throughout this report (see the grey boxes).

The Board discusses the outcomes of the feedback analysis only occasionally. Similarly, ENQA members note that they are not informed what happens after their feedback on the review process has been submitted to the Secretariat. The ENQA Secretariat has taken this point on board and will create a systematic closure of the feedback loop. This will be done by more regular (annual) feedback reporting to the Board, and the inclusion of a brief report on key feedback and action taken in one of the Notes from the President every 12-24 months. In addition, more substantial changes could be presented every two years (e.g. at the General Assembly), when sufficient responses are collected to draw general indications of issues.

The internal quality assurance system is supported by and shaped through an effective involvement of stakeholders (see chapter 5 on stakeholder involvement) and a detailed complaints and appeals procedure (see chapter 4.7). Additionally, the newly developed custom-made software tool Organon

⁴⁹ See annexes 1 and 2.

⁵⁰ See annexes 1 and 2.

will support the Secretariat in its daily activities. The tool, to be launched in 2019, will offer support in all management activities of ENQA reviews, including their administrative operations (such as invoicing etc.) and thematic analyses.

ENQA has an integrated approach to internal quality assurance, even though not summarised into a policy document. A comprehensive IQA policy document could further support the transparency and use of the tools and make them more visible to ENQA's internal and external stakeholders. Secondly, the practice shows that the systematic closure of the feedback loop is weakly implemented, as explained above, and should be given further attention. Last but not least, the self-evaluation process for this review has shown that ENQA has a number of different tools for internal quality assurance in place. It would be worth rethinking whether all listed activities are worth keeping so that all practices could actually serve their purpose and result in concrete improvement plans for the reviews.

ENQA employs no subcontractors for ENQA Agency Reviews. However, when an agency decides to delegate the coordination of its review on compliance against the ESG to another organisation (see chapter 4.3), ENQA as the supervisory body of the coordinator of the ENQA Agency Reviews has a procedure in place to confirm the report that was provided by another review coordinator (see the approval of the report in chapter 4.3).

While the approval of the reports can often be a routine decision, in particular in cases where the Review Committee expresses no concerns in part B. I. of the scrutiny form⁵¹, the approval of the report is still always specifically addressed prior to the discussion on ESG compliance/membership in ENQA.

Last but not least, the ENQA Board recommends using the same Code of Conduct as for ENQA Agency Reviews (see paragraph 4 of the Code of Conduct⁵²) in external reviews conducted by other entities.

3.7 CYCLICAL EXTERNAL REVIEW OF ENQA AGENCY REVIEWS (ESG 3.7)

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

Translation of the standard for the purpose of this review:

ENQA agency review processes should be evaluated on a regular basis.

This is the first external review of ENQA Agency Reviews against the ESG.

⁵¹ The scrutiny form is available here: <http://enqa.eu/wp-content/uploads/2018/01/External-review-report-scrutiny-form.docx>. Part B. I. of the form refers to the integrity of the review process and the quality of the report.

⁵² https://enqa.eu/wp-content/uploads/2016/09/ENQA-Agency-Reviews_Code-of-Conduct.pdf

4. MANAGEMENT OF ENQA AGENCY REVIEWS

4.1 CONSIDERATION OF INTERNAL QUALITY ASSURANCE (ESG 2.1)

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

Translation of the standard for the purpose of this review:
Not provided by the coordinator of the review.

ENQA Agency Reviews (full and partial) differ from the reviews carried out by quality assurance agencies insofar as the subject of the review is not a programme or an institution, but quality assurance agencies themselves. This means that the Part 1 of the ESG, and the IQA systems of individual higher education institutions is not addressed directly by the ENQA review. However, in assessing the agencies' compliance with the ESG 2.1, ENQA requests the agencies to provide a mapping of the agency's own standards against the ESG Part 1, and to indicate how the agency considers the effectiveness of the institution's IQA processes. This is used to verify that the agencies' criteria cover the standards of ESG Part 1 and thus meet the requirements of the ESG 2.1.

ENQA Agency Reviews use the standards of Parts 2 and 3 of the ESG (without modifications or additions) as evaluation criteria. All 14 standards are addressed separately in the reviews, and the reports produced by the external review panels have a separate section for each of those standards. Thus, ENQA reviews address both the IQA of agencies (Part 3) as well as the external QA activities of the agencies (Part 2 of the ESG).

4.2 DESIGNING METHODOLOGIES FIT FOR PURPOSE (ESG 2.2)

External quality assurance should be defined and designed specifically to ensure its fitness to achieve the aims and objectives set for it, while taking into account relevant regulations. Stakeholders should be involved in its design and continuous improvement.

Translation of the standard for the purpose of this review:
ENQA Agency Reviews should be carried out in a manner that uses methodologies that are fit for purpose. Stakeholders should be involved in the design and continuous development of these methodologies.

ENQA Agency Reviews aim at addressing the two key purposes of an external review: accountability and enhancement. The first purpose of the ENQA Agency Reviews is to formally demonstrate an agency's compliance with the ESG 2015. The reviewed agencies use the outcome of the evaluation to apply for membership in ENQA, registration in EQAR, to demonstrate their compliance in different national contexts, and more generally to build trust in quality assurance of the agency itself, and hence the quality of higher education that falls within the scope of its work. Trust in higher education on the part of the public is, if indirectly but no less importantly, adding to the legitimacy, comparability and transparency of the agencies' work in the context of the EHEA. The second purpose of the ENQA Agency Reviews is to help agencies enhance their external quality assurance activities.

Both defined objectives are well reflected in the methodologies of ENQA Agency Reviews. As the ESG form the basic framework for quality assurance in the EHEA, they serve as the sole criteria and reference tool for the ENQA Agency Reviews. The reviewed agency is asked to undergo a self-assessment process and write a report following the template that reflects on each of the standards of the ESG (see chapter 4.3). The review panel then verifies the obtained information through the site visit and analyses any additional required information based on elements provided in the ESG. The final report is then checked once more for factual consistency with the agency under review. The judgement of the agency's QA activities is consistently made against the ESG. The review report focuses on each standard of the ESG individually and states the agency's compliance with it. As the ENQA Agency Reviews might be used for the purpose of registration in EQAR, the review panel is additionally asked to carefully look into the documents that have been used to make EQAR judgements (e.g. Use and Interpretation of the ESG for EQAR⁵³).

While the accountability element has not proven to be particularly problematic to address, the enhancement support for agencies has been more difficult to properly integrate into the review process. Two key developments in this regard need to be mentioned:

1) since 2015, and increasingly since 2017, ENQA has encouraged the experts to provide suggestions for further improvement, even to agencies that reach full compliance with a specific standard. The idea is that even the agencies that meet all the requirements of a standard may further improve their work. The suggestions for further improvement are different from recommendations, which are geared towards indicating to the agency a possible way to move up from their current level of compliance towards full compliance.

2) since 2015, there has been an integration of enhancement-focused progress visits to agencies. When revising the Guidelines and the methodology used by ENQA for the review of agencies in 2013-2015, the Board acknowledged the difficulty of integrating an open discussion about problematic areas of an agency's work in a review process that is also tasked with assessing compliance with the ESG. It was conceived that a separate progress visit, detached from a compliance check, would offer such a possibility and could help agencies improve further.

The compliance aspect of ENQA Agency Reviews is given a strong emphasis in the EQAR registry procedures, which to some extent limits ENQA from being more flexible with its review methodologies, especially when it comes to the desire to introduce a more enhancement-led approach (e.g. by designing different approaches for agencies in different stages of development). This becomes especially relevant in the case of a second or subsequent review. Agencies that undergo a second or subsequent review might face difficulties in identifying the benefit of mostly compliance-oriented reviews, as the report on feedback from the agencies that underwent ENQA Agency Review in 2017-2018⁵⁴ shows. At the same time, as long as agencies need a thorough compliance review addressing each ESG for the purposes of EQAR registration, significant changes in this respect may be hard to elaborate and implement. The progress visit of ENQA Agency

⁵³ https://www.eqar.eu/assets/uploads/2018/04/UseAndInterpretationOfTheESGv2_0.pdf

⁵⁴ See annex 1.

Reviews, as mentioned above, provides an attempt to address this issue by integrating an enhancement-led feature in the review. However, if continued, it may need to be further refined for the next period of ENQA Agency Reviews. The feedback on the progress visits carried out so far has been mixed. For instance, the feedback from the agencies undergoing a review in 2017-2018 shows that agencies would appreciate a more elaborated format (i.e. the aim and goals) of such a visit. The results of the survey for participants of the first seminar for recently reviewed agencies (The Hague, 2017) identify the same issue with the progress visits. On the other hand, the feedback questionnaire directly following the progress visit shows that the visit in general meets the agencies' expectations, with some minor flaws (see below for further elaboration on the outcomes of this questionnaire).

To meet the first listed purpose of the reviews and ensure legitimacy, comparability and transparency of the agencies' work, the methodology of ENQA Agency Reviews requires the outcomes of each review report to be accessible to all interested stakeholders (see chapter 4.6 on reporting). ENQA publishes the link to the agency's SAR, the full final report by the expert panel, and the Board's membership acceptance letter online on a dedicated and easily reachable page on ENQA's website. Next, the outcomes of the reviews are introduced to the membership of ENQA and its wider audience through events, such as the General Assembly, and through newsletters, ultimately adding to the transparency of the review outcomes.

External reviews may have serious consequences for agencies, not only as the basis for membership in ENQA and inclusion in EQAR, but also in terms of indirect judgments on credibility, quality, and other aspects of entire external review systems or even the higher education system of a country or region. Thus, the ENQA Agency Review methodology aims not only to follow the purpose of the reviews, but also to be consistent and trusted, with a constant attention to the quality assurance and improvement of the method itself. The internal quality assurance of ENQA Agency Reviews is described in detail in chapter 3.6.

ENQA's stakeholders were involved in designing the methodologies of ENQA Agency Reviews. The criteria used in ENQA Agency Reviews (the ESG) were created by and are a joint effort of the key stakeholders in EHEA and are therefore not owned by ENQA. The 2015 edition of the ESG was adopted after a long consultative process with several stakeholders by the Bologna Process Ministerial Conference (Yerevan 2015). Since then, members of ENQA were not directly involved in further adapting the review methodologies, primarily because a more robust revision of the methodologies was not planned in such a short period. Rather, the involvement of stakeholders has been indirect through feedback in surveys. It might be useful to consider a periodical consultative process with ENQA members for this purpose in future.

ENQA Agency Reviews bear in mind the level of workload and cost demanded from agencies under review. Agencies that consider undergoing a review are invited to a seminar where the external review process is presented from preparation to follow-up with a special emphasis on how to maximise the benefits of such a review. Furthermore, to help the agency carry the burden of the review, an ENQA coordinator is assigned to each review in order to guide the agency through the review practicalities. Additionally, he or she provides the agency with the self-assessment report template and pre-screens the report once submitted to support a more efficient review.

Feedback from the agencies that underwent an ENQA Agency Review in 2017-2018 shows that most agencies encounter no difficulties in preparing the self-assessment report (84 % of all respondents). Several respondents specifically mentioned that the coordinator's comments on the agency's self-assessment report (within the pre-screening procedure) were helpful and enabled the agencies to improve the document. Nevertheless, the respondents report the need to revise the template to reduce redundancies and make the document clearer to its users, including the review panellists. The revision of the template for the self-assessment report is planned for spring 2020, when the document chapters will be restructured, following primarily parts 2 and 3 of the ESG. Additionally, the template will require the agency under review to provide key statistical data on one page.

More generally on the coordination of the review process, the supportive approach and effective communication with ENQA were mentioned by all respondents (see feedback from the agencies that underwent an ENQA Agency Review in 2017-2018). In particular, agencies appreciated clear guidance from the review coordinators during the whole process, timely responses to their questions and the fact that the initially agreed plan/timelines were carefully followed.

74 % the agencies that underwent an ENQA Agency Review in 2017-2018 agree that the costs of the review were reasonable. Furthermore, 95 % of all respondents agree or strongly agree that ENQA coordinated the review in an effective way.

Specificities of the full review

In addition to the points mentioned above, several further elements support fitness for purpose of the designed methodologies for the full reviews. First, all reviewed agencies are required to demonstrate their improvement through their follow-up report (see chapter 4.3). Secondly, the subsequent reviews engage one member of the previous panel, whenever possible or relevant, and look at the recommendations from the previous review carefully. This adds to the continuity of reviews and enables a better balance between the compliance and enhancement aspects of reviews, as the panels gain more time for in-depth and useful subsequent reviews. Thirdly, the methodology of the full reviews takes into account the enhancement aspect of quality assurance through a progress visit.

The progress visit, created to enable a better balance between the compliance and enhancement missions of ENQA Agency Reviews, provides mixed feelings whether it serves the intended purpose. Out of the responses received so far on the feedback questionnaire about progress visits, all agencies confirm that the visit in general met their expectations, and more specifically, that they were somewhat satisfied or very satisfied with the experts' level of contribution to the discussions on the selected topics (i.e. topics chosen by agencies to support their further enhancement). On the other hand, the respondents wish for: the experts to be better briefed about the agency's context in order to enrich the enhancement purpose of the progress visit; a report to be submitted after the visit (currently, this is not the case as the visit rather focuses on open dialogue); and the visit to last longer (i.e. more than one day).

Specificities of the partial review

Due to the nature of partial reviews (see chapter 3.1), these reviews directly support agencies in their enhancement endeavours as they allow agencies to demonstrate their improvement on the aspects that did not meet the requirements of the ESG before another full review takes place.

4.3 IMPLEMENTING PROCESSES (ESG 2.3)

External quality assurance processes should be reliable, useful, pre-defined, implemented consistently and published. They include:

- a self-assessment or equivalent
- an external assessment normally including a site visit
- a report resulting from the external assessment
- a consistent follow-up.

Translation of the standard for the purpose of this review:

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

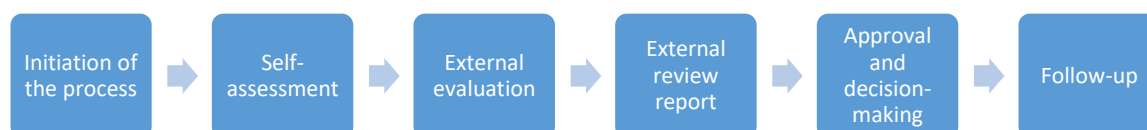
- a self-assessment or equivalent,
- an external assessment that would normally include a site visit,
- a report that is based on the external assessment
- a consistent follow-up procedure.

Processes under ENQA Agency Reviews consist of four predefined steps reflecting four main elements of the external review as defined by ESG 2.3: self-assessment, external evaluation, external review report, and follow-up. By doing so, ENQA Agency Reviews systematically apply the same evaluation principles to all its reviews.

The review processes are published in the Guidelines in a user-friendly manner and available online to all interested parties⁵⁵. Should the Board make changes to the processes, the summary of changes is published on the ENQA website⁵⁶.

The following listed elements are common to both activities of ENQA Agency Reviews, i.e. full reviews and partial reviews (see figure 5):

Figure 5: Diagram of processes for ENQA Agency Reviews



⁵⁵ <https://enqa.eu/indirme/papers-and-reports/occasional-papers/Guidelines%20for%20ENQA%20Agency%20Reviews.pdf>

For partial reviews see also: https://enqa.eu/wp-content/uploads/2016/09/ENQA-Agency-Reviews_Partial-Reviews.pdf

⁵⁶ <https://enqa.eu/index.php/reviews/enqa-agency-reviews/>

Initiation of the process

The ENQA Agency Review is initiated by a request from an agency that wants to be granted or renew ENQA membership. ENQA may also accept requests for reviews against the ESG for purposes other than membership (including reviews of agencies outside the EHEA) and requests for partial reviews when “membership under review”⁵⁷ status was given, in which case the review focuses only on the agency’s deficiencies in meeting the ESG. The agency contacts the ENQA Secretariat to initiate the review process about 15 months prior to the expected completion of the review (and about 10 months before the expected date of the site visit). For partial reviews only, the timing to initiate the process remains open to accommodate the wishes of the agency and allows ENQA to anticipate the process within the two-year period of the membership under review. As soon as the agency notifies the Secretariat of its intent to undergo a review, the review is assigned to an ENQA Secretariat staff member who will act as the review coordinator. This person serves as the main contact person for the agency and the review panel throughout the process and will support all those involved during the different stages of the process.

During the initial phase, ENQA and the agency agree on the terms of reference of the review, including the agency’s ESG-relevant activities to be subjected to the review as well as the overall timeline. Agencies wishing to use the review to apply to EQAR are requested to contact EQAR prior to the finalisation of the terms of reference.

ENQA organises a seminar for agencies preparing for an initial external review⁵⁸. The seminar is open to quality assurance agencies that are preparing to undergo an external review against the ESG. It gives insight into the purpose and objectives of the review, discusses best practices relating to the self-assessment process and elaborates on how to maximise the benefits of the external review.

Self-Assessment

The first main stage of the review process is the production of the self-assessment report (SAR) by the agency under review. The document provides a basis for the review panel to get familiar with the procedures under review and to request, or collect on its own, additional information that might be needed for the external assessment.

In order to be accepted and processed by ENQA, the SAR needs to follow a guide of content as provided in the Guidelines and cover all indicated elements. Some of the requested elements include: the presentation of all QA activities of an agency, the mapping grid on how the agency addresses Part 1 of the ESG, information and opinion of stakeholders, a SWOT analysis as well as the reflection on current challenges and areas for future development. Most importantly, the report should address all standards of Parts 2 and 3 of the ESG separately.

The agency is expected not only to provide factual information on their processes, but also analytical and critical reflections. The critical and analytical components of the self-assessment reports are more strongly emphasised for full reviews, as their aim is to support the enhancement angle of the

⁵⁷ See chapter 3.1 for more information on the status of a “member under review”.

⁵⁸ For an example see <https://enqa.eu/index.php/events/enqa-seminar-for-agencies-preparing-to-undergo-an-initial-external-review/>

performed review in addition to serving the purpose of checking for ESG compliance. The assigned coordinator of the full or partial review then pre-screens the received self-assessment report to make sure that all required elements of the report, as stated in the Guidelines, have actually been addressed in the document. After the pre-screening, the agency is given two weeks to provide the coordinator with a revised report. For partial reviews, the SAR covers elements identified as causes of concern by the ENQA Board as well as all elements identified by the panel of the last full review as partially or non-compliant.

The pre-screening of the SAR has proven to enhance the quality of the reports, and thus to be valuable in assisting the review panel in understanding the initial information about the reviewed agency more comprehensively and in a clearer manner well before the site visit (see chapter 4.2 for the feedback from the agencies that underwent an ENQA Agency Review in 2017-2018).

In the case of a second or subsequent full review, the agency is also expected to make explicit reference to the recommendations from previous reviews, underlining the related developments. It must also highlight changes and developments in relation to all other ESG standards. For partial reviews, the agency should indicate in the SAR whether there have been significant changes regarding any other standards since the last full review. If so, these elements are included in the review process as well.

External evaluation

The ENQA Board commissions a panel of independent reviewers (see chapter 4.4) to carry out the review. The mandate for the review panel is to evaluate the agency's activities and provide their view on whether an agency is acting in compliance with the ESG. The panel conducts a thorough assessment of the SAR for this purpose, studies any additional material (such as information available on the agency's website), and pays a site visit to the agency where the agency leadership, management, administrative staff, and external stakeholders are invited to provide feedback on the activities under review. The purpose of the site visit is to verify information provided in the SAR and to gain new knowledge about the agency under review. It is also an opportunity for the agency to engage in an exchange regarding its activities and development. For partial reviews only, the panel decides whether a site visit should be implemented based on the complexity of identified weaknesses and the existing evidence provided through the self-assessment report and other documentation.

External review report

Based on the information collected through documentation and the site visit, the review panel drafts the external review report (ERR) and sends it to the ENQA Secretariat. The ERR is written using the ENQA Agency Review report template⁵⁹. The template is valid for full as well as for partial reviews (for the latter to the extent applicable, as not all ESG are usually addressed in the review). The panel's judgement on compliance is provided for each standard with the following grading: fully compliant, substantially compliant, partially compliant, and non-compliant. Before sending the report to the reviewed agency for factual corrections, the ENQA Secretariat review coordinator checks the report for completeness, consistency, clarity, and language. After the factual check by the agency, the review

⁵⁹ <https://enqa.eu/wp-content/uploads/2018/10/ERR-template.docx>

panel finalises the report, which is then submitted to ENQA. In addition to the review report, the agency applying for membership/renewal of membership is asked to provide a letter outlining its motivation for applying for membership or its renewal and the ways in which they expect to contribute to the work and objectives of ENQA during membership. In partial reviews, such a letter is not required.

Approval and decision-making

The ENQA Board plays a double role when discussing an ENQA Agency Review report. As the supervisory body of the ENQA Agency Reviews process (i.e. of the ENQA Secretariat as the coordinator of the process), it approves the reports. This is part of the review process and its internal quality assurance. Secondly, as the decision making body for ENQA membership, it assesses the ESG compliance of the applicant agencies and takes membership decisions based on a review report. The two steps are in most cases combined, but can also exist separately. Should the review be coordinated by any other organisation (such as the German Accreditation Council which coordinated all reviews of German agencies until 2017), the report is not approved by the ENQA Board, although a membership decision is still taken by the Board. Conversely, for non-EHEA agencies using an ENQA Agency Review to apply to EQAR or for other purposes, the ENQA Board only approves of the report and does not decide on membership.

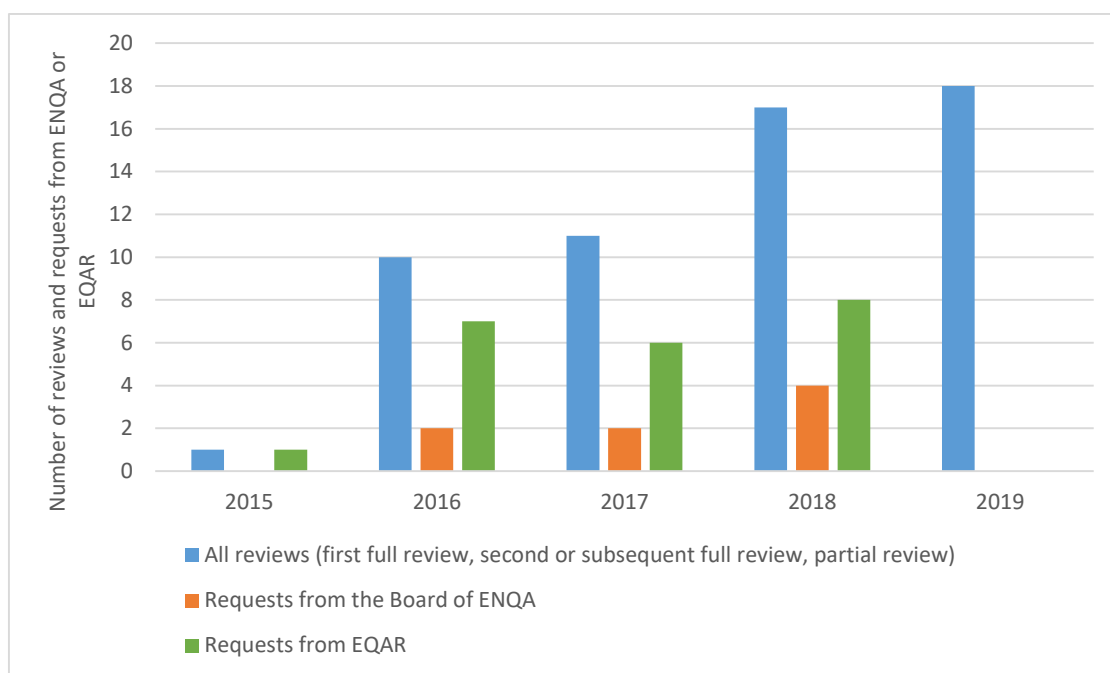
The Board may opt not to approve a report if it considers that the integrity of the process has been compromised or if the report has serious shortcomings or does not otherwise meet the requirements of the Guidelines for ENQA Agency Reviews (e.g. suffers from lack of analysis, uses inappropriate or unclear language or terminology, does not contain conclusions by standard, etc.). If the report does not meet the ENQA requirements in terms of its content, the Board writes a letter to the panel expressing its concerns and asking the panel to make the necessary modifications in the report. The Board does not suggest changes in judgements on ESG compliance but may indicate areas of inconsistencies, if any. Once the report is approved, it is published on the ENQA website and may be sent to EQAR for the registry purposes (if applicable). This procedure is followed for full and partial reviews.

As explained in chapter 3.3, the decisions on ENQA membership and EQAR listing, while based on the same report, are completely independent from each other. Nevertheless, as already elaborated in that same chapter, feedback shows that the agencies find the two processes confusing and suboptimal.

The ENQA Board proceeds with decision-making on membership based on the evaluation and recommendations given in the final ERR. To facilitate its decision-making, the Board asks the Review Committee for the initial scrutiny of the ERR. Additionally, the Board maintains the right to ask for further clarifications and explanations (in the form of a letter) either from the panel, review coordinator or the agency to support its decision-making. Similarly, EQAR might ask for further clarifications and explanations (in a form of a letter) either from the panel or the coordinator to support its decision on the registry. The ENQA reviews manager is informed of such requests. Figure 6 presents the number of requests from the ENQA Board and EQAR since 2015. The figure shows that annually EQAR sends out approximately three times more requests for further clarifications and explanations than ENQA.

The Board's discussions are informed by the recommendations of the ENQA Review Committee, but are not bound by them. If the Board's decision or judgement on specific standards deviates from that of the review panel as indicated in the ERR, the Board specifies the reasons in its letter to the agency.

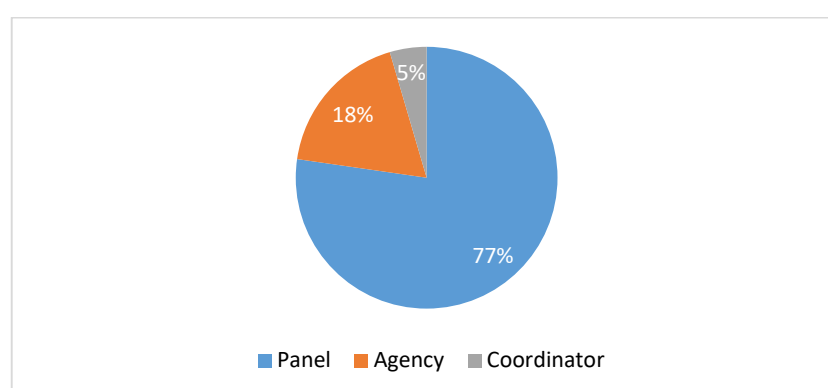
Figure 6: Number of requests for additional clarifications by the ENQA Board and EQAR, 2015-2019*



*The year indicates a site visit year. Year 2018 does not include the outcome of three reviews, as the ENQA Board and EQAR will consider these reviews later in 2019. The same applies for the year 2019.

Figure 6 shows that for approximately one-fifth of the reviews per year, the ENQA Board asks for further clarifications on the reports, whereas when it comes to EQAR decision-making, this number rises up to approximately half of the reviews per year. ENQA considers this a cause for concern, as it clearly indicates that the two organisations have a different understanding of the requirements of the ESG. This may also cause tension in the review panels that feel the need to balance between the two approaches. All requests by the ENQA Board are for the panels, whereas for EQAR this is the case in approximately three-quarters of cases (see figure 7). The rest of EQAR requests are for the agency under the review or for the coordinator.

Figure 7: Distribution of requests for additional clarifications from EQAR, 2015-2019



Follow-up

Full reviews in the ENQA Agency Reviews scheme include a follow-up procedure set up to consider actions taken by the agency after the review in a consistent way. The Board's letter to the agency provides clear guidance on the follow-up process, explaining what actions agencies should undertake following the review based on the recommendations of the panel and the ENQA Board. In addition, the agencies are asked to report any significant changes or developments in their area of operation since the last review. Agencies undergoing a full review are required to submit a follow-up report two years at the latest after the Board's decision on membership. ENQA publishes all follow-up reports on its website.

The partial review (see chapter 3.1), which the agency has to undergo within two years, addresses all elements of concern, including all standards where non-compliance or partial compliance was the outcome. The agencies are thus given the opportunity to focus on those areas where most urgent action is needed. Other recommendations are addressed, together with eventual additional recommendations from the partial review, in the following full review.

While the follow-up reports give the agencies an opportunity to reflect on their activities and the improvement plans half-way through the cycle, there is a risk that agencies take the follow-up as a merely formal procedure as there are no concrete consequences to it⁶⁰. This might undermine the impact and benefits of the follow-up to the agency. Nevertheless, one needs to mention that the Board letters on the follow-up reports in some cases contain additional observations that may help the agencies move forward. At the moment, ENQA does not monitor the usefulness of the follow-up procedure due to the nature of this procedure (i.e. the reporting of an agency on its improvement/development measures taken after the review). Nevertheless, it might be worth considering whether the scrutiny and deliberation on the submitted follow-up report by the ENQA Board should be done more thoroughly, with possible consequences introduced for agencies that are not able to show sufficient progress in areas indicated in the previous full review.

Specificities of the full review

Full reviews are organised as described above. In addition, the following elements are specific to the processes of a full review:

Briefing of panellists

ENQA organises a telephone or videoconference briefing where the entire review processes is discussed between the review panel and the coordinator well before the site visit⁶¹. The briefing focuses on explaining the purpose of the review, roles and responsibilities of panel members, use and understanding of the ESG and judgement of compliance, link between evidence and information,

⁶⁰ The Board has no mechanisms in place to impose consequences for agencies that did not implement the recommendations. After the report is submitted, the Board approves or rejects the submitted report based on whether the agency reflected on actions taken on the recommendations, or explains why the recommendations have not been followed up on.

⁶¹ Usually 3-6 weeks before the site visit and after the receipt of the SAR so that the panel can discuss possible gaps and need for additional information.

analysis, and conclusions in the review report, timeline and management of the site visit, drafting of the report, and submission of the final review report and the decision-making process.

Following the feedback on panel telephone briefing session at the third reviewers' seminar in Brussels in 2017, ENQA modified the procedure focusing less on presenting the process of the review (since this is covered in the reviewers' training and detailed in the Guidelines) and more on getting to know the panellists and allowing them to share first impressions on the agency. The panellists are additionally given more time to agree on the approach to the review, distribute the tasks between themselves and identify gaps and the need for additional information.

Site visit

The site visit has a duration of 2,5-3 days and is used by the panel to reflect on and fully validate the information contained in the SAR, as well as to clarify any points at hand (full description of the site visit is provided at the beginning of this chapter). ENQA provides the panel with the draft planning schedule of a site visit and a mapping grid as found in the Guidelines⁶².

Progress visit

The agency may take advantage of an additional progress visit with two reviewers from the original review panel (whenever possible). The progress visit is available only to agencies whose coordination of the review was done by ENQA and normally takes place about two years after the Board's decision. The specific objective of the progress visit is to generate a stronger, enhancement-oriented dialogue that ordinarily might be difficult to truly integrate in the compliance-focused site visit. Agencies are invited to propose specific areas of interest to be addressed during the progress visit, such as areas in which the agency is struggling to meet the requirements of the ESG, or specific sub-sections of one or more ESG standards.

As mentioned above and under chapter 4.2, the progress visit of ENQA Agency Reviews integrates an enhancement-led feature in the review. However, the feedback from the agencies undergoing a review in 2017-2018 shows that the concept of progress visits may need to be further refined for the next period of ENQA Agency Reviews. Agencies stated they would appreciate being better acquainted with the scope and purpose of such visit. Yet, the experience shows difficulties in matching the agency's "specific needs" with the actual review process, and consequently in assigning the experts that can address these needs. For instance, an agency might wish for a progress visit on a topic that is not related to the progress in deficit areas, but on a topic related to the agency's developmental plans, which brings the visit closer to a consultancy service. The second challenge of the progress visit relates to its voluntary nature. The Secretariat encourages the participation in the visits as the fee is included in the initial price of the review. Nevertheless, not all agencies decide to accept the progress visit. Out of 12 agencies eligible for a progress visit since 2015 when the visits were first offered as part of ENQA Agency Reviews, three agencies decided not to take the opportunity.

⁶²<https://enqa.eu/indirme/papers-and-reports/occasional-papers/Guidelines%20for%20ENQA%20Agency%20Reviews.pdf> (see pages 39-42 and 43-44)

Specificities of the partial review

Partial reviews are organised as described above, with the following additional elements to the processes:

Briefing of panellists

Next to all the elements of the telephone or videoconference briefing as explained under the full review, the briefing of panellists for the partial review puts more emphasis on explaining the purpose of a partial review and the differences in processes as compared to full reviews.

Site visit

The duration and programme of the site visit depends on the number of standards and/or the complexity of issues to be examined by the review panel. Usually, the site visit of a partial review lasts for one or two days. The site visit may be omitted when all necessary information can be collected reliably through desk research (such as verification of whether review reports are published online).

Table 3 below provides the summary of evaluation procedures for all ENQA's external quality assurance activities.

Table 3: Summary of procedures for ENQA's external quality assurance activities

	Full review	Partial review
Formulation of the Terms of Reference and protocol for the review	☑	☑
Nomination and appointment of the review panel	☑	☑
Self-assessment by the agency under review including the preparation of a self-assessment report	☑	☑
A site visit by the review panel to the agency under review	☑	Not necessarily
Preparation and completion of the final evaluation report by the review panel	☑	☑
Scrutiny of the final evaluation report by the ENQA Review Committee	☑	☑
Analysis of the scrutiny by the ENQA Board	☑	☑
Follow-up on the panel's and/or the ENQA Board recommendations by the agency, including a voluntary progress visit	☑	☑

Feedback from the agencies that underwent an ENQA Agency Review in 2017-2018 shows that the agencies are generally satisfied with the review process and find it reliable and useful. Agencies reported that the timeline was appropriate, the terms of reference were well defined, and that they had a clear understanding of the purpose and expectations of the site visit. More than 80 % of the agencies that answered the survey encountered no difficulties in preparing the self-assessment report and considered the review panel well-prepared for the site visit. Following the site visit, 17 out of 19 agencies that answered the survey agreed that the external review report correctly reflected the communication between the review panel and the agency, whereas all of them considered the structure of the final report satisfactory, good or very good. Moreover, three-quarters considered the report to be useful for them and their stakeholders.

In regards to the critical remarks to the review process, the agencies noted different perspectives and demands of ENQA and EQAR in the implementation of the review, and suggested to give more attention to the consistency of judgements of different panels. In response, ENQA started to prepare and systematically use the “Book of precedents” both by the coordinators in the site visit, to help the panels calibrate their judgements, and in the Board meetings, to bring more consistency into the decision-making. More care was also given to the nature of recommendations (related only to compliance) through the introduction of additional suggestions for improvement, which could go beyond issues related to compliance. Moreover, some agencies suggested a third review to focus more on the implementation of recommendations rather than undergoing a full review. This has been brought to ENQA’s attention before. However, since agencies need a compliance review against the ESG for EQAR, ENQA decided not to radically change the existing methodology and instead introduced a progress visit, where the most pressing issues of an agency can be discussed with ENQA experts. Last but not least, agencies also wished to share their experiences and good practices in dealing with the recommendations after the review was conducted. For this purpose, ENQA decided to organise a seminar for recently reviewed agencies. The first seminar was organised in the Hague, the Netherlands in October 2017, whereas the second one will be held two years later, i.e. in October 2019, in Lisbon, Portugal.

4.4 PEER-REVIEW EXPERTS (ESG 2.4)

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

Translation of the standard for the purpose of this review:

ENQA Agency Reviews should be carried out by groups of external experts that include relevant stakeholders.

ENQA Agency Reviews are carried out by experts with a wide range of professional experience in higher education and quality assurance. The appointed review panel⁶³ includes at least four external reviewers, including one or two quality assurance professionals (of which at least one should be currently employed by a QA agency and both have been engaged in quality assurance within the past five years), (an) academic(s) at a higher education institution, and (a) student member(s). When requested by the agency or when considered particularly pertinent based on an agency’s profile, other stakeholders may be included in the review as well (for example, a representative of the labour market). This is always done in dialogue with the agency. In such cases, this person may either replace the second quality assurance professional or be appointed in addition to the four panel members, depending on the importance to individually represent the voice of such stakeholders in the review. Should the fifth panel member be added to the review, the agency needs to cover an additional fee and the travel expenses of this person.

All review panels are approved by the Board and the agency under review is given the opportunity to comment on the selected panel members for purposes of signalling any possible conflicts of interest or biases.

⁶³ For the information on who appoints the experts see chapter 5.

The feedback from ENQA members (annex 1) as well as the SWOT analysis (see chapter 7) show that the agencies consider the review panels too small. Since one of the four members (usually the Secretary) is busy making notes, the panel is left with three experts to ask questions during the site visit. In line with the challenge of the panel size, the role of secretary vs. coordinator in ENQA Agency Reviews could be reconsidered so that the task of drafting the review report would be taken from the secretary and given to the coordinator. ENQA will reconsider the panel size and its composition when revising the ENQA Agency Review methodology following this review.

This self-assessment exercise additionally identified the need to further reflect on the profile of panel members (i.e. their seniority and level of expertise). Following the feedback for the SWOT analysis, the panels should make sure that a senior quality assurance expert from a quality assurance agency is always included in the panel to support a peer-to-peer approach to the review.

Last but not least, following the outcomes of the SWOT analysis, ENQA could improve the monitoring and assessment of the quality of each individual panel member. At the moment, the reviewed agencies are asked about the overall quality of the review panel in the agency feedback questionnaire and there is additionally an internal mechanism in place for the coordinator to report about the quality of the panellists (the debriefing meeting takes place in the ENQA Secretariat after the site visit, see chapter 3.6). ENQA plans to address the issue by improving the concept of debriefing, where the element of an individual evaluation would be introduced through a stronger presence of the coordinator on site.

Prior to taking part in a review panel, all reviewers need to be trained specifically by ENQA⁶⁴, regardless of their level of expertise with quality assurance (internal or external) and previous (review) experience gained in other contexts. Training sessions are usually organised for a mixed group of people, i.e. reviewers nominated by ENQA, ESU, EUA, EURASHE and BusinessEurope that attend the event upon an invitation by ENQA (based on ENQA's need for new panel members of different profiles). The training is compulsory for all new reviewers and is organised once every 12-24 months. With the development of the ENQA Agency Reviews methodology, the training sessions have developed to be more engaging, introducing role-playing, group work and explanations on expectations from EQAR. Some experienced reviewers (chairs and secretaries) are invited to take part in each training session to share their experiences and good practice.

In addition to the training for new reviewers, ENQA regularly organises a seminar for experienced reviewers (the "reviewers' seminar")⁶⁵, which gives an opportunity to more thoroughly discuss the ENQA Agency Reviews methodology, good practices, and the use of the ESG for agency reviews. This event also supports the preparation of those reviewers who will be employed as chairs or secretaries for the first time. Due to the level of experience and expertise, the reviewers' seminar is also considered as a form of a feedback for the review process itself. Several suggestions from the seminars have been taken on board for improving the process (e.g. adjustments to the telephone briefing for panels and the introduction of a checklist for the preparation of the self-assessment report).

Two of the external reviewers are appointed as panel chair and panel secretary, respectively. Each member of the panel is expected to actively contribute to the work of the team, examine the self-

⁶⁴ All trainings of reviewers are listed here: <https://enqa.eu/index.php/reviews/training-of-experts/>

⁶⁵ For an example see <https://enqa.eu/index.php/events/enqa-agency-reviews-3rd-reviewers-seminar/>

assessment report and other relevant documentation, actively participate in the site visit, and contribute to the external review report (ERR). Nevertheless, the review chair has overall responsibility for the review, the assessment of the agency against the ESG, and the production and quality of the report, and to ensure the terms of reference of the review are respected. The review secretary is specifically assigned to coordinate the review and to draft and submit the final report in collaboration with the other panel members. The detailed list of tasks for each of the panel member positions is published in the Guidelines (see pages 25-28).

In addition to the above listed key actors of ENQA Agency Reviews, several other people or bodies play an active role in the process, though not as members of a panel:

- The ENQA Board (takes the decision on membership based on the evaluation and recommendations given in the final report provided by the panel)
- The Review Committee (facilitates⁶⁶ the Board's decision-making on the agency's membership)
- The reviews manager (oversees and coordinates all reviews and assigns coordinators to a particular review)
- The review coordinator, a staff member of the ENQA Secretariat (ensures smooth implementation of the review⁶⁷).

The selection and appointment of reviewers for an ENQA Agency Review is always carried out by the review coordinator (without involvement of the agency being reviewed) to avoid conflicts of interest and to preserve the integrity of the process. When appointing reviewers for an ENQA Agency Review, the key requirement is that the members of the panel should be totally independent of the agency under review and have a sufficient level of knowledge, experience, and expertise to conduct the review to a high standard. Experts are required to notify the ENQA review coordinator in writing of any connection or interest which could result in a conflict, perceived conflict, or a potential conflict related to the review. Furthermore, experts are required to notify the ENQA review coordinator as soon as possible of any changes in, or additions to, the interests already disclosed which occur during the review process. If experts are unsure as to whether a conflict of interest should be disclosed, they should discuss the matter with the ENQA review coordinator.

ENQA receives nominations for reviewers from its member agencies as well as from a number of European stakeholder organisations, specifically, EUA, ESU, EURASHE, and BusinessEurope. ENQA sends requests for nominations to its members and stakeholder organisations once per year, although non-solicited nominations may also be considered. The ENQA pool of trained reviewers currently consists of 227 experts from 34 countries (see table 4).

⁶⁶ The Review Committee is a body composed of two Board members and one external member that produces an individual analysis of the ERR and a recommendation on the agency's membership to the Board in the format of a scrutiny form.

⁶⁷ The coordinator's detailed list of tasks is published in the Guidelines (p. 28).

Table 4: ENQA pool of reviewers

Nominee	Number of trained experts	Number of nominees for training	Total
ENQA	165	48	213
EUA	30	1	31
ESU	21	1	22
EURASHE	9	17	26
BusinessEurope	2	1	3

ENQA invites nominated experts to ENQA reviewer training sessions⁶⁸. In order to ensure that the agency reviews are rigorous, fair, transparent, and consistent, such training is obligatory for all potential ENQA reviewers, irrespective of the organisation that has nominated them. Based on the lessons learned, feedback, and materials from completed reviews, the training sessions provide reviewers with the necessary knowledge and guidance on the use of the ESG, on the ENQA Agency Review process, and on compliance assessment. Additionally, the future panel members are briefed about the expectations of the ENQA Board for the reviews and the related reports. Only reviewers who have attended an ENQA reviewer training session (or took part in an individual training, should the need arise to employ an expert with the specific expertise) are included in the ENQA pool of trained reviewers and may be appointed to panels for ENQA Agency Reviews.

The feedback from the training of new reviewers in 2018 shows that the seminar met the expectations of the participants (all participants strongly agreed or agreed to this statement). The participants mostly valued the working groups (e.g. on how to prepare for the site visit using the self-assessment report) and the presentations from the experienced reviewers, which was introduced following the feedback on the implementation of ENQA's previous trainings of new reviewers. Following the seminar, all participants strongly agreed or agreed to have sufficient knowledge of ENQA Agency Reviews and 90 % of them reported that they are prepared to deal with some of the complex issues that might arise during reviews. On the other hand, the participants desired a more detailed explanation of the assessment of different standards, and a role-playing session could have been more inclusive with fewer participants per session. The Secretariat will take into account the feedback when planning the programme of the upcoming seminar for new reviewers in 2020.

In addition to the training seminar for new reviewers, ENQA organises regularly a seminar for experienced reviewers. Attendees of the last such seminar in Brussels in 2017 appreciated the opportunity to exchange experience with the other reviewers, learn how to put suggestions for the agency into action, find ways of building active engagement from all panel members and more specifically, develop methods for supporting student engagement. However, the participants expressed somewhat mixed feelings about the presentation on the expectations from the EQAR Register Committee, felt that more discussion on how to ensure the consistency of judgements was lacking and would have

⁶⁸ The complete list of trainings, including the programme and PowerPoint presentations, is available on ENQA's website (see here: <https://enqa.eu/index.php/reviews/training-of-experts/>).

liked a debate on how to better brief the panel before the site visit and how to then better structure and implement the site visit itself.

Specificities of the full review

The composition of a panel for the progress visit is explained in chapter 4.3.

Specificities of the partial review

The partial review employs a panel of 3-4 people. The panel includes at least one academic, one student, and a quality assurance professional. Wherever possible, one or more of the panel members have participated in the latest full review so that the panel can get a comprehensive picture on the agency. Reviewers come from the ENQA pool of trained reviewers. Differently from the full reviews, it is the chair that writes the external review report for the partial review (in collaboration with all other panellists), as the panel has no secretary. Just as with the full reviews, the review coordinator joins the site visit of the partial review.

4.5 CRITERIA FOR OUTCOMES (ESG 2.5)

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

Translation of the standard for the purpose of this review:

ENQA Agency Reviews should be based on criteria that are explicit and consistent.

The external quality assurance activities of agencies under review are evaluated consistently against the ESG published on ENQA's website⁶⁹. These predefined and published criteria form the sole basis for full and partial reviews of ENQA Agency Reviews and are generic enough to encompass and allow for the diversity of QA approaches in the EHEA. The panel's judgement reflects their view, based on the evidence and analysis (see chapter 4.6 on reporting) of the degree of the agency's compliance with each of the ESG standards. ENQA defines evidence as any written information from documents (SAR, agency methodologies, review reports, analytical papers, legislation, etc.), oral testimonies during the site visit (of agency staff and other stakeholders) or any other available information presented in support of a judgement, when and if applicable to the agency's external quality assurance activities under review. One of four judgements may be given for each standard:

- Fully compliant: The agency is entirely in accordance with the ESG standard, which is implemented in an effective manner.
- Substantially compliant: The agency is to a large extent in accordance with the ESG standard, 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.

⁶⁹ <https://enqa.eu/index.php/home/esg/>

The judgment scale is explained in the Guidelines (see pp. 19-20).

Feedback from the agencies that underwent an ENQA Agency Review in 2017-2018 shows that the agencies appreciate the judgements on compliance, which are included in the draft report when the agency receives the document for factual check (see also chapter 4.7 where it is explained what led to this change in the methodology).

In order to interpret and utilise the rating scale consistently throughout the reviews, panel members are provided the relevant knowledge and guidance on the use of the ESG in the training of agency reviewers (see chapter 3.6). The training is also a forum for discussion and an opportunity to share experiences between new and experienced agency reviewers (see also the reviewers' seminar in the same chapter). Furthermore, every review panel is supported by a review coordinator, who sees to it that the panel interprets the ESG in line with ENQA's understanding of the document and thus adding to the consistency of the reviews. Last but not least, the consistency in interpreting the ESG is assured through the provision of the "Book of precedents". This document supports the ENQA Board in its decision-making as it contains all decisions that have been made for ENQA Agency Reviews per standard since 2015 and the comments concerning the particular standards. The "Book of precedents" is not shared with the review panels, but the coordinators regularly use it as reference material in advising the panels on how other similar cases have been dealt with in the past, both during the site visit as well as when checking the draft external review report as submitted by the panel.

As pointed out in the Guidelines, the final judgement on compliance with the ESG as a whole does not follow a set formula. However, if the agency is judged as non-compliant with one of the standards, the Guidelines state that this "would normally lead to a judgement that the agency is not substantially compliant with the ESG overall" (see page 20). In practice, the Board has thus far decided on non-compliance in all cases where one standard has been non-compliant. Furthermore, if the agency is found to be partially compliant on several standards that are crucial for the agency's functioning (e.g. independence, resources, designing methodologies fit for purpose), the agency is found non-compliant overall.

Full consistency (and thus comparability) between the individual reviews is very hard to obtain: a human element is always present as the evaluation is qualitative rather than quantitative, and the standards provide some scope for interpretation (and different ways to comply with a standard). However, the introduction of the ENQA coordinator in 2015 and the systematic use of the "Book of precedents" have supported the consistency efforts significantly. Since September 2017, decision letters from the ENQA Board state which, if any, judgements on individual standards the Board disagrees with, which also attempts to harmonise differences between panels.

4.6 REPORTING (ESG 2.6)

Full reports by the experts should be published, clear and accessible to the academic community, external partners and other interested individuals. If the agency takes any formal decision based on the reports, the decision should be published together with the report.

Translation of the standard for the purpose of this review:

ENQA agency review reports should be published, clear and accessible for all interested parties, and the decision should be published with the reports.

The reports of all ENQA Agency Reviews, whether full or partial reviews, are published in full on ENQA's website⁷⁰, including the reports where the review panel concluded and/or the Board decided that the agency is not in compliance with the ESG. The reports are published online together with the Board's decision letter on ENQA membership (including comments concerning areas for development and indicating possible differences in judgement of specific standards between the panel and the Board), and the link to the agency's self-assessment report⁷¹. After the agency has provided the follow-up report, this report is added to the list of published documents together with the Board's letter in response to the follow-up report. Should the Board change its decision on the agency's membership with ENQA following an appeal (see chapter 4.7), the final letter is published on ENQA's website as well. The reports and all associated documents are published online within a few weeks after the decision by the Board. They can be searched by year and by agency.

It is worth mentioning that ENQA begins publishing key information about all ENQA Agency Reviews in the early stages of the review process⁷². Information published online before the site visit includes: the terms of reference for the review, which lists all external QA activities of the agency under review; the panel composition; and the name of the review coordinator. The agency under review is required to publish the terms of reference on its website as well.

The ENQA Secretariat follows the internal procedural rules for publishing reports thoroughly and consistently. However, in cases where the Board asks for modifications to the report, or for further clarifications from the panel or the agency, the request letter and the response letter are not published on ENQA's website. The Board asks for further clarifications: 1) when it considers that the report does not meet the ENQA requirements in terms of content, or 2) when further clarifications and explanations are needed for decision-making on membership (see also chapter 4.3). The requests may, for instance, refer to the need to clarify certain conclusions of the panel (i.e. provision of additional evidence), to elaborate on a discrepancy between the evidence and the judgement (i.e. provision of more elaborated analysis), or to correct the report's use of language and references (such as comparisons with other agencies, which should not be included in the reports).

⁷⁰ <https://enqa.eu/index.php/reviews/review-reports-and-decisions/>

⁷¹ It is the requirement for the agencies under review to publish their self-assessment reports on their respective websites. As already noted, ENQA publishes only links to these reports on its website.

⁷² <https://enqa.eu/index.php/reviews/current-reviews/>

To ensure consistency and comparability of the review reports, the ENQA Agency Reviews methodology defines the structure and outlay of the final reports for full and partial reviews⁷³. After an executive summary and some background information on the review, including the outline of the review process and the experts involved, the reader is acquainted with the higher education and quality assurance system of the agency under review and the agency's organisation, functions, activities, procedures and funding. The main part of the report focuses on each of the ESG standards providing evidence, the panel's analysis and its judgment on the agency's compliance. A specific chapter is dedicated to any supplementary observations the panel might have made and that it would like to present to the users of the report. The report concludes with a summary of commendations (emphasising the features of good practice), an overview of the judgements and recommendations, and a list of suggestions for further improvement⁷⁴. The panel is additionally asked to annex the report with: the programme of the site visit; the terms of reference for the review; a glossary of abbreviations used; and any other supporting documents the panel considers useful for readers, within reason.

The coordinator of the review (full or partial) always checks the report for completeness, consistency, clarity, and language before the panel secretary sends it to the reviewed agency for factual corrections. The agency under review is given two weeks to send its observations on factual accuracy or any misunderstandings, after which the panel finalises the report and submits it to ENQA.

Specificities of the partial review

In the case of partial reviews, the prescribed structure for the review reports as described above is followed to the extent relevant, as not all ESG are addressed in such reviews (see chapter 3.1). Additionally, more emphasis is put on explaining significant changes since the agency's last full review. The rest of the methodology follows the description above.

4.7 COMPLAINTS AND APPEALS (ESG 2.7)

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

Translation of the standard for the purpose of this review:

ENQA Agency Reviews should include a clear process for complaints and appeals that is part of the design and communicated to participants.

ENQA has 1) an appeals and complaints procedure for agencies that have applied for membership in ENQA (through a full or partial review), and 2) a complaints policy for any concerned (third) party against a member agency's compliance with the ESG. The procedure additionally allows any concerned party to issue a complaint about the integrity of the external review and decision-making process based on which an agency was admitted as a member of ENQA. The appeals procedure can be used by an agency in case of a negative decision on its membership, whether the review was coordinated

⁷³ <https://enqa.eu/wp-content/uploads/2018/10/ERR-template.docx>

⁷⁴ *Recommendations* are the compliance related guidelines for the agencies under review and naturally follow the less-than-full compliance on ESG. The agencies are required to follow-up on the recommendations. Moreover, the panel can also suggest areas or issues for further improvement. These *suggestions* are used solely for development purposes. The agency under review has no obligation to follow up on suggestions.

by ENQA or not. On the other hand, complaints can be filed through the two different processes as explained in table 5 below.

Table 5: Summary of differences between the two ENQA complaints procedures in place

	ENQA Appeals and Complaints procedure as in the ENQA Rules of Procedure	ENQA third party Complaints Policy
Complainant	An agency that has applied for membership in ENQA	Any individual or organisation that has substantiated concerns about an ENQA member agency
Reason for a complaint	Dissatisfaction with the conduct of the ENQA Agency Review process or those carrying it out	A member agency's compliance with the ESG or the integrity of the external review and decision-making process on the basis of which an agency was admitted as a member of ENQA
Deadline for submission	Within two calendar months from the date of receipt of the Board's decision on membership	At any time
Complaint is dealt with by	The Appeals and Complaints Committee	The ENQA Board

THE APPEALS AND COMPLAINTS PROCEDURE FOR AGENCIES BEING REVIEWED

The appeals and complaints procedure is described in the ENQA Rules of Procedure (see chapter 8⁷⁵). The procedure allows an agency that has undergone an ENQA agency review and/or applied for membership in ENQA to state its dissatisfaction with the conduct of the process or those carrying it out (the complaints procedure) or to question the formal outcome (the decision) on membership (through an appeal). According to the Rules of Procedure, an appeal against a decision or a complaint concerning the review process must be submitted to the ENQA Secretariat within two calendar months from the date of receipt of the Board's decision related to that review. Upon receipt, an appeal or complaint is reviewed by the Secretariat to determine whether eligible grounds and supporting evidence have been presented. When this is not the case, either the appeal/complaint is rejected or a request for further information or evidence is made. The ENQA Secretariat then forwards the appeal/complaint to the Board for consideration, and the Board then sends the document(s) to the Appeals and Complaints Committee. The Committee examines appeals as well as complaints (see Article 20 of the Rules of Procedure) and undertakes any further investigations that it considers necessary. This may involve obtaining documents from the appellant/complainant or speaking directly with the appellant/complainant or its representatives. Following paragraph 7 of Article 24, the Committee may decide:

- To dismiss the appeal/complaint;
- In case of an appeal, to uphold the appeal and recommend the Board to reconsider its decision, taking into account the findings of the Appeals and Complaints Committee.

⁷⁵ ENQA Rules of Procedure: <https://enqa.eu/wp-content/uploads/2018/04/ENQA-Rules-of-Procedure-2018.pdf>

- In case of a complaint, to uphold it and recommend the Board to take appropriate action proportional to the issue(s) raised by the complainant, and taking into account the findings of the Appeals and Complaints Committee.

The Committee is requested to submit a report within one month of the receipt of the appeal or complaint. The Board's decision on the appeal/complaint is taken in light of the Committee's report, and it is final and non-appealable. Appellants/complainants are notified in writing of the Board's decision within ten working days of the date of the decision. The Board reserves the right to discontinue an appeal/complaint if the appeal/complaint is pursued in an abusive, offensive, defamatory, aggressive, or intimidating manner.

The Appeals and Complaints Committee comprises four representatives of ENQA member agencies, one of whom is designated as an alternate member. A member of the Committee cannot be a member of the Board at the same time, but at least one member is normally a former member of the Board. In a specific case, the alternate member is used if an ordinary member has previous involvement with the appellant. Members of the Committee are appointed by the General Assembly for a three-year term. Members of the Committee cannot serve continuously for more than six years.

Since 2015, when complaints became an explicit requirement in the ESG, ENQA has received one complaint by an ENQA Member agency regarding the agency's ENQA-coordinated review. The complaint focused principally on criticism for the panel's judgements regarding levels of ESG compliance (some procedural matters were also brought forward, but their origin was rather in dissatisfaction with the judgements than directly identified weaknesses or non-conformity in the procedure itself). In this particular case, the Board considered the complaint (rather than the Appeals and Complaints Committee) as the Board addressed the issue with the agency without that being necessary. The decision was taken to amend one aspect of the Guidelines for ENQA Agency Reviews: once the review panels have finalised the external review report, they will send it to the agency under review for comments relating to factual errors together with the judgments on compliance (they were previously omitted). The Board also decided to make the procedure more robust: should the Review Committee's judgments deviate from those of the review panel, and should the Board agree with the Review Committee, the Board should express their difference of opinion from that of the panel in the decision letter. This applies whether the Board considers some of the panel's judgements to be overly strict or overly lenient in light of the evidence brought forward. The amendments in the procedure were communicated to ENQA members.

Since 2015, ENQA has received five appeals. In two of the cases, the ENQA Board overturned its initial decisions to designate agencies as a member under review following the recommendation of the Appeals and Complaints Committee to renew the agencies' membership. In the three other cases, the Committee rejected the appeals and confirmed the Board's decisions not to grant or renew membership.

THE COMPLAINTS POLICY FOR ANY CONCERNED PARTY REGARDING AN ENQA MEMBER AGENCY'S COMPLIANCE WITH THE ESG

While not directly related to the ENQA Agency Reviews, it may be interesting to know that ENQA has a complaints policy for third parties. According to this policy, any individual or organisation that has substantiated concerns related to a member agency's compliance with the ESG or the integrity of the external review and decision-making process based on which an agency was admitted as a member of ENQA may file a complaint. Details of the policy can be found on the ENQA website⁷⁶.

ENQA has received one such complaint. An individual issued a complaint against an ENQA member agency. The ENQA Board analysed the complaint and concluded that overall there was no breach concerning the agency's compliance with the ESG.

⁷⁶ <https://enqa.eu/wp-content/uploads/2019/05/ENQA-complaints-policy.pdf>

5. STAKEHOLDER INVOLVEMENT

Stakeholders are closely involved in ENQA Agency Reviews:

- **ENQA's member agencies** are ENQA's main stakeholders and nominate experts for the review processes, alongside the other E4 Group members (see below) and BusinessEurope. Each review has at least one ENQA nominee (most often the quality assurance professional[s]), at least one EUA/EURASHE nominee (representing higher education institutions) and at least one student, who is always a nominee of ESU. If requested, a labour market representative may come from among the BusinessEurope nominees or from ENQA. ENQA's members are also the main users of the ENQA Agency Reviews and thus systematically feed into the improvement and revision of the procedures through provision of feedback after their own review process.
- **The E4 Group.** Together with EUA, EURASHE and ESU, ENQA forms the "E4 Group". The Group members engage in ENQA Agency Reviews by nominating experts for the review processes, as indicated above. Next to this, the Group collaborates on European QA policy and meets 3-4 times/year to elaborate joint projects and initiatives. In the recent past, these have included the EQUIP-project⁷⁷ on the implementation of the ESG 2015 and a joint paper (E4 Group and EQAR) on "Key Considerations for Cross-Border QA in the EHEA"⁷⁸ which sets out advice and good practice for agencies and institutions wishing to engage in cross-border QA. The E4 are the founders of EQAR and manage the organisation as members of its Executive Board.
- **EQAR.** In addition to frequent exchanges with EQAR in the context of a review process (i.e. on EQAR Eligibility Confirmation or updates on requests for further clarifications and explanations), ENQA holds regular formal meetings between the ENQA Presidency and representatives of the EQAR Register Committee to discuss issues related to the review process as well as the use and interpretation of the ESG for agency reviews. ENQA is a founding member of EQAR and its representative is a member of the EQAR Executive Board.

On 18 April 2019, a meeting was held with the E4 Group to collect feedback on ENQA Agency Reviews. Firstly, on the involvement in ENQA Agency Reviews, the participants noted that their organisations do not hear much from ENQA once the experts have been appointed to the expert pool, apart from receiving an e-mail on which experts are engaged in the current reviews (the e-mail is sent out by the ENQA reviews manager every three months). Rather, a better feedback/communication mechanism is needed to inform the members of the E4 Group on the quality of the proposed experts, how the experts are selected for a review and how the expert pool is kept updated. Following this, the participants discussed the usage of the review reports by their organisations and noted that the documents are well accessible and standardised (which makes the navigation and comparison between the reports easy), but at the same time they noted that the documents are not regularly consulted (at least not by the participants of the meeting). As the reports are not consulted, the participants further found it difficult to comment on the quality of these reports. At the end of the meeting, the group discussed possible additional engagement opportunities for the E4 Group in ENQA Agency Reviews. ESU proposed to have a stronger role in the training of experts in order to contribute to

⁷⁷ <http://www.equip-project.eu/>

⁷⁸ <https://enqa.eu/indirme/papers-and-reports/associated-reports/Key-Considerations-CBQA-EHEA.pdf>

the development of experts, while EUA noted that the current engagement of the E4 Group in ENQA Agency Reviews is sufficient and the trainings should stay in the remit of ENQA. On a different note, the participants noted that ENQA Agency Reviews need to make sure to remain serving its membership (and by doing so their wider stakeholders as well, such as HEIs and students), which means emphasising the enhancement angle of each review hand in hand with the compliance check. The reviews cannot serve EQAR solely.

The EQAR focus group meeting, held on 6 December 2018 for the purpose of this review, collected the feedback on use of ENQA reports for EQAR decision-making on the registry as well as provided more general feedback on collaboration between ENQA and EQAR in terms of ENQA Agency Reviews. Following the first aim of the focus group, the participants (i.e. the representatives of EQAR Register Committee) noted the overall rise in the quality of the review reports and emphasised that the mismatch between what activities should take part in a review and what should not has been reduced due to the use of EQAR Eligibility Confirmation. Secondly, the participants noted the most useful parts of the review reports, such as the context of the agency under review and most importantly the separate chapters on the ESG. Nevertheless, according to the participants, the ENQA Agency Reviews still do not cover all aspects under each of the ESG consistently, and emphasised that further improvement is needed on substantiating the arguments with evidence. On this matter, the participants mentioned the rise in the number of requests for further clarifications coming from EQAR. The additional remarks from the meeting included a proposal for the ENQA Secretariat to write the reports, a need to design a system to monitor the individual quality of the panel members, the need for larger panels and for panels that are checked by EQAR prior to each review.

Regarding the second aim of the focus group, the participants first confirmed that most reviews against the ESG are coordinated by ENQA. Importantly, the participants noted, the process could be shortened, but at the same time in most cases the reports of ENQA Agency Reviews are delivered on time. The most pressing issue to act upon, in the view of the focus group, was the fact that the judgement on compliance is made twice. The participants believe that this review provides an opportunity to further reflect whether this is necessary. All in all, the focus group emphasised a well-functioning cooperation between ENQA and EQAR on ENQA Agency Reviews.

By the nature of the association, ENQA's work with its stakeholders on ENQA Agency Reviews is always international:

- Out of four (or five) panel members of ENQA Agency Reviews, one panel member is usually engaged⁷⁹ from the country the agency is placed in in order to provide knowledge of the higher education and quality assurance system in which the agency operates. Moreover, that panellist can provide knowledge of the local language, which facilitates the review as then not all requested documents need to be translated by the agency.
- The review panels rarely have two people from the same country. If ever there are two people from the same country on a panel, they cannot be both the chair and the secretary, nor can they come from the country of the agency under review unless there are very exceptional circumstances (e.g. a need to assure good knowledge of the higher education and quality

⁷⁹ The full list of criteria for appointments to the review panel is published in the Guidelines (p. 12).

assurance systems, or for providing knowledge of the local language, as explained above). In all reviews, at least two appointed experts need to come from outside the higher education system under review to provide an external perspective to the agency under review.

- The ENQA Board, which is the decision-making body for ENQA membership (and thus for the ENQA Agency Reviews) can have a maximum of two people from the same country (but never from the same agency).

It is important to note that the criteria used by ENQA for its review process, namely the ESG, were drafted by a group of seven stakeholder organisations, on an equal basis. The group was composed of ENQA, EUA, EURASHE, ESU, Education International, BusinessEurope, and EQAR, and it often held other, wider stakeholder consultations with national ministries (the BFUG), the EU Commission, and the general public.

In ENQA's work apart from ENQA Agency Reviews, ENQA closely cooperates with a larger range of stakeholders, which in addition to those mentioned above includes:

- **The Bologna Follow-Up Group (BFUG)**⁸⁰. ENQA is a consultative member of the BFUG, which is the executive structure supporting the Bologna Process between the EHEA Ministerial Conferences⁸¹. As most members of the group are ministries of (higher) education in the EHEA countries, the BFUG provides an important forum for dialogue with national authorities across Europe.
- **The European Commission**⁸². ENQA is in regular dialogue with the European Commission on QA-related issues. This is formalised through an annual meeting of the E4 Group with the relevant EU officials as well as advice and feedback on specific issues as needed.
- ENQA invites **the key stakeholders**, including the E4 Group, EQAR, EQAVET⁸³, and the European Commission as "partners" to ENQA's annual General Assembly and Members' Forum in order to ensure dialogue and information exchange.

⁸⁰ <http://ehea.info/page-the-bologna-follow-up-group>

⁸¹ <http://www.ehea.info/pid34363/ministerial-declarations-and-communiques.html>

⁸² https://ec.europa.eu/commission/index_en

⁸³ <https://www.eqavet.eu/>

6. OUTCOMES AND FOLLOW-UP OF ENQA AGENCY REVIEWS

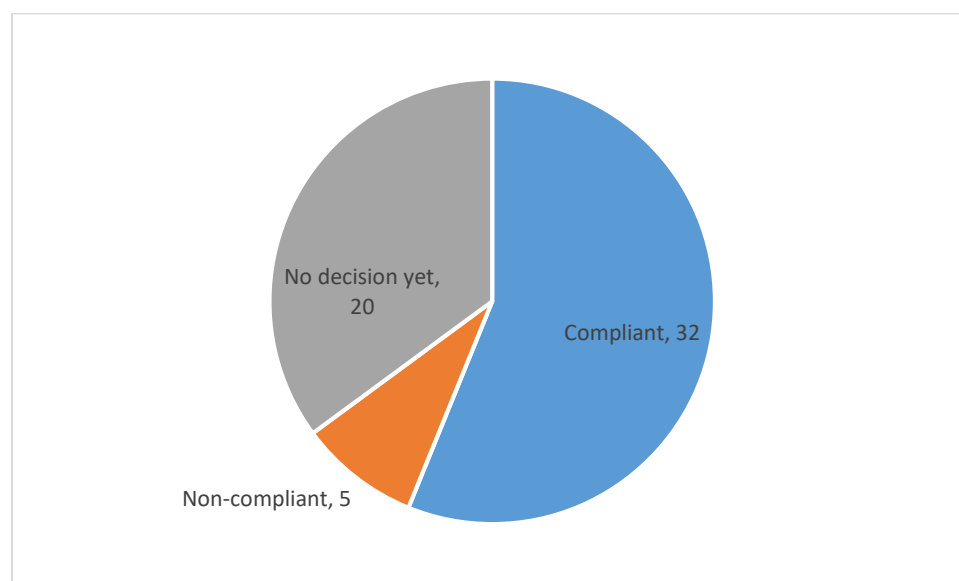
ENQA Agency Reviews that were carried out from 2015 to 2019 are presented in table 6 and figure 8 below. Years 2018 and 2019 include altogether 20 ongoing reviews.

Table 6: Number of ENQA Agency Reviews carried out from 2015 to 2019*

Type of activity	2015	2016	2017	2018	2019 ⁸⁴
First full review/out of which found compliant with the ESG	0/0	4/4	3/1	6/5 ⁸⁵	1/-
Second or subsequent full review/out of which found compliant with the ESG	1/0	6/6	7/6	10/9 ⁸⁶	16/-
Partial review/out of which found compliant with the ESG	0/0	0/0	1/1	1/0	1/-
Total/out of which found compliant with the ESG	1/0	10/10	11/8	17/14 ⁸⁷	18/-

*The year indicates a site visit year.

Figure 8: Compliance with the ESG from 2015 to 2019



From 2015 to 2019, a total of 32 fully or partially reviewed agencies were found overall compliant with the ESG, five overall non-compliant and 20 agencies are still in the review process (see figure 8). The reviewed agencies were fully compliant mostly on standards 3.2 and 3.7, substantially compliant mostly on standards 2.1 and 3.4, whereas the most challenging standards proved to be standards 2.7 with the most partial compliance judgements, and interestingly standard 3.4 with two non-compliant judgements (see table 7 and figure 9). Standard 3.4 was also the standard that had the most cases of

⁸⁴ The ENQA Board will consider the outcomes of the reviews only in late 2019 or 2020.

⁸⁵ The remaining one review will be considered by the ENQA Board later in 2019.

⁸⁶ The remaining one review will be considered by the ENQA Board later in 2019.

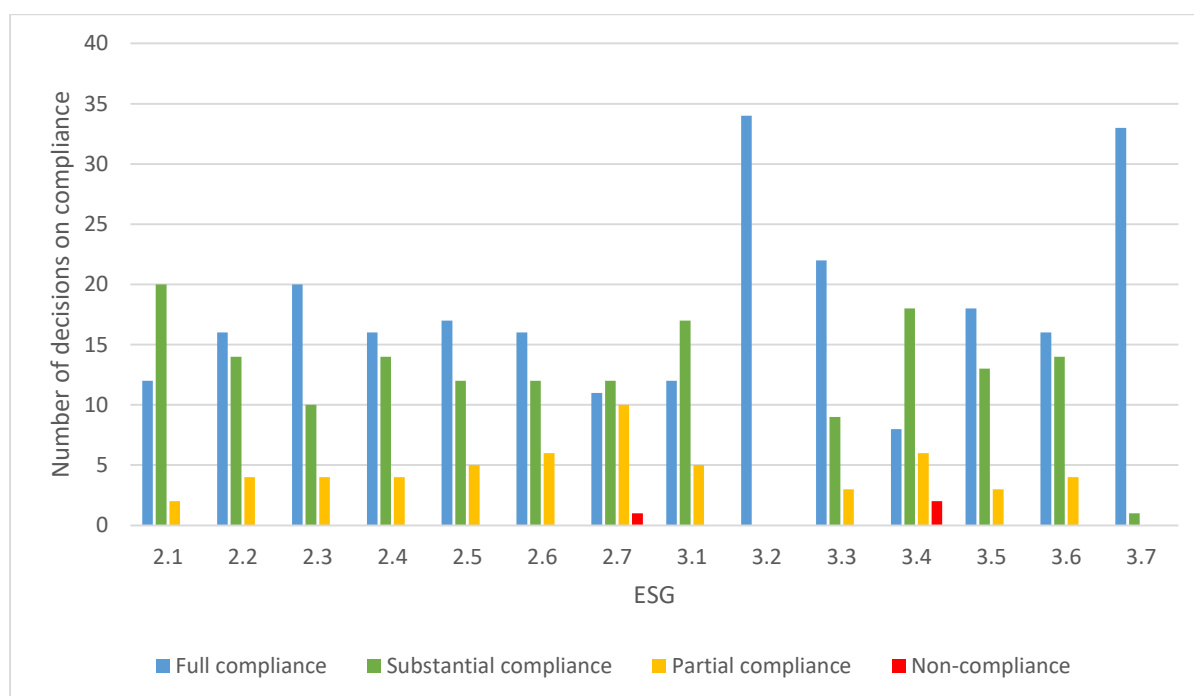
⁸⁷ The outcomes of the remaining two reviews will be considered by the ENQA Board later in 2019.

an upgraded compliance by the Board during its decision-making processes, whereas the most often downgraded compliance on a standard was for standard 2.7 (see table 7, rows 7 and 8).

Table 7: Outcomes of the reviews by panels from 2015 to 2019 per ESG

ESG	2.1	2.2	2.3	2.4	2.5	2.6	2.7	3.1	3.2	3.3	3.4	3.5	3.6	3.7
Full compliance	12	16	20	16	17	16	11	12	34	22	8	18	16	33
Substantial compliance	20	14	10	14	12	12	12	17	0	9	18	13	14	1
Partial compliance	2	4	4	4	5	6	10	5	0	3	6	3	4	0
Non-compliance	0	0	0	0	0	0	1	0	0	0	2	0	0	0
Total	34	34	34	34	34	34	34	34	34	34	34	34	34	34
-Out of which upgrade of compliance by the Board			1	1	1	1					3		1	
-Out of which downgrade of compliance by the Board				1	1		2			1				

Figure 9: Number of decisions on compliance per ESG by panels, 2015-2019 (34 reviews included, without partial reviews)



Apart from the panel's judgement on compliance with the ESG, the outcomes of the ENQA Agency Reviews provide the reviewed agency with a summary of commendations that emphasise features of good practice, an overview of judgements and recommendations, and suggestions for further development (see chapter 4.6). The statistics on recommendations, commendations and suggestions from 2015 to 2019 is presented in table 8 and figure 10.

Table 8: Statistics on recommendations, suggestions and commendations given in ENQA Agency Reviews, 2015-2019

ESG	3.1	3.2	3.3	3.4	3.5	3.6	3.7	2.1	2.2	2.3	2.4	2.5	2.6	2.7
Recommendations Total	41	2	26	39	32	41	7	40	46	27	49	33	33	38
Recommendations average	1.11	0.05	0.7	1.05	0.86	1.11	0.19	1.08	1.24	0.73	1.32	0.89	0.89	1.03
Suggestions Total	33	2	17	10	13	18	1	6	9	14	19	4	10	8
Suggestions average	0.89	0.05	0.46	0.27	0.35	0.49	0.03	0.16	0.24	0.38	0.51	0.11	0.27	0.22
Commendations Total	22	4	10	10	17	14	1	8	14	13	25	4	11	3
Commendations average	0.59	0.11	0.27	0.27	0.46	0.38	0.03	0.22	0.38	0.35	0.68	0.11	0.3	0.08

Figure 10: Number of recommendations, commendations and suggestions given in the observed period (for all concluded reviews), with the average per review

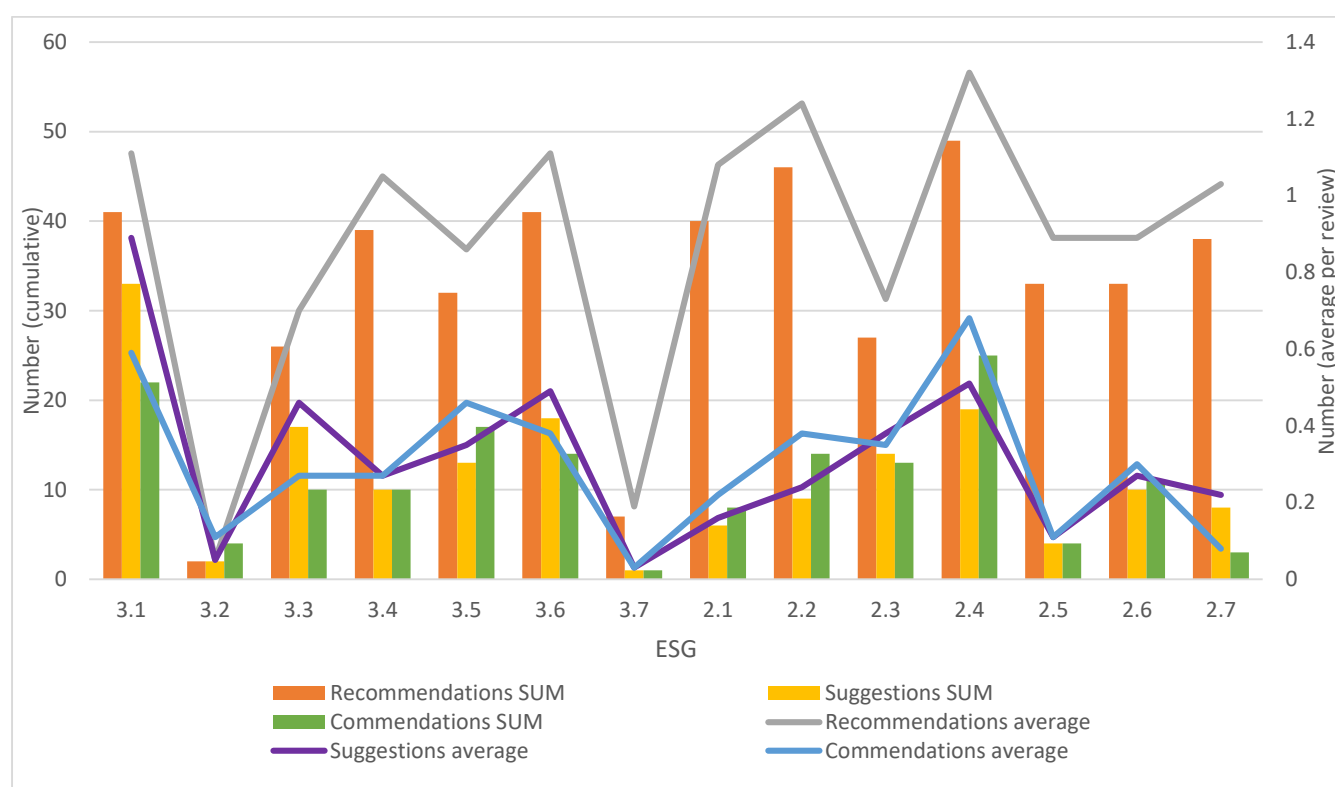


Figure 10 shows a strong orientation in ENQA Agency Reviews towards ESG compliance. Nevertheless, the panels on average do provide a considerable number of (non-compliance-related) suggestions for further improvement (the number amounts to approximately one third of the number of given recommendations), which proves that ENQA Agency Reviews support agencies in their enhancement. The data seconds the findings of the SWOT analysis (see chapter 7), where it states that the ENQA Agency Review process is helpful in providing agencies an opportunity for self-reflection and external feedback on their performance.

7. SWOT ANALYSIS

The SWOT analysis presented below lists the items of strengths, weaknesses, opportunities and threats in no order of importance.

STRENGTHS
<ul style="list-style-type: none">- Methodology and process are well-developed, robust, widely accepted and appreciated, and applied in a consistent and independent way that enjoys a high level of trust by users and stakeholders. ENQA has extensive and unique experience in coordinating agency reviews in Europe.- The ENQA Agency Review process is helpful for the enhancement and development of agencies and supports the advancement of quality assurance practices across Europe. It provides agencies an opportunity for self-reflection and external feedback on their performance.- Professional and well-trained ENQA Secretariat staff ensure a strong and supportive coordination of the processes, which is highly appreciated by panel members and the reviewed agencies.- ENQA reviewers, who are at the centre of the review process, are committed, professional, experienced, and well-trained. ENQA can draw on a wide pool of experts that reflects peer and stakeholder diversity within Europe and offers an international perspective to the reviewed agencies.- QA is one of the Bologna Process key commitments providing a strong remit for the legitimacy and relevance of ENQA's activities. The review process itself is an instrument for promoting the ESG and for setting a common standard for agencies in Europe. In addition, the reviews provide information on the state of QA in the EHEA.- ESG-based external reviews of agencies are a requirement in many EHEA countries and for registration on EQAR, meaning that demand for agency reviews against the ESG is unlikely to decrease in the foreseeable future.
WEAKNESSES
<ul style="list-style-type: none">- Some specific elements of the process need improvement, such as the guidelines and the related templates. The panels are considered by some to be rather small, in particular as one of the panel members takes on the role of the review secretary.- Quality of reports is dependent on the individual panels. Despite the training of experts, guidance by the ENQA coordinator, and the available report template, there is some diversity in the way reports are written and standards judged, which may have a negative impact on consistency. In addition, the diversity of contexts creates high potential for misunderstandings.- The process is considered resource-intensive and requires significant preparatory work by the agency. Different languages of the agencies may result in additional costs (such as for interpretation and translation).- The added value of the second and subsequent reviews decreases due to a focus on compliance rather than enhancement. The processes are sometimes perceived as not supporting innovation and not challenging mature agencies.- Agencies are not sufficiently informed of ENQA's IQA processes. Information on collected feedback and improvement plans needs to be better disseminated. In addition, communication on the results of thematic analysis should be improved.- There is no separate governance structure for ENQA Agency Reviews (from ENQA as the association of QA agencies), which may lead to the lines between ENQA as a reviewer and ENQA as a representative body being blurred.

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- **The current ENQA-EQAR double decision-making process on ESG compliance** is complex to explain both to the agencies and other stakeholders. It adds time and other constraints to the process that are out of ENQA's control and can make the work of the agencies and reviewers more complicated.
-

OPPORTUNITIES

- **Further developing the enhancement aspect** of the second and subsequent reviews and exploring more flexible review methods that would allow for innovation and diversity in the field of QA. ENQA Agency Reviews could be adapted more to new developments, also in terms of the scope of the reviews, while finding the right equilibrium between stability and change.
 - **Increasing the range of review services** (e.g. reviews for agencies outside of the EHEA, system reviews, additional reviews outside the regular cycle is requested by members, etc.) could support the development of a sound long-term business model for the ENQA Agency Reviews.
 - **Further development of thematic analyses**, the results of which could support innovation in QA and strengthen the fitness-for-purpose of the reviews.
 - **Leaving compliance judgements on ESG to EQAR**, in order to be better able to support and coach agencies and to reduce potential conflicts of interest between ENQA's decision-making and quality enhancement functions. This could result in a clearer separation of ENQA's review activities and activities as a membership organisation.
 - **Further articulating the shared understanding of the ESG** among all parties, including with EQAR.
 - **The European Universities Initiative** and other European projects can help strengthen the role of ENQA and the ENQA Agency Reviews.
-

THREATS

- **Demand for ENQA Agency Reviews may decrease in the future** due to competition from other review coordinators, or if agencies do not see any added value in an ENQA review.
 - **Increasing demands on ENQA coordinators** and their role in the process without additional funding may lead to an overload on the Secretariat staff, which could in turn have a negative impact on the quality of the review process.
 - **The financial pressure on the reviews** and the need to make the review process financially sustainable while keeping the cost acceptable to the agencies.
 - **The new ENQA strategy (to be adopted in 2020) may lead to different requirements for accession to membership** and/or different priorities of ENQA's members and thus affect the demand for ENQA reviews or their centrality in ENQA's operations.
 - **Lack of external stakeholder engagement** in ENQA's decision-making bodies may raise questions of independence of the review process and may reduce its legitimacy among stakeholders.
 - **Differences in ENQA and EQAR interpretation** of the ESG and inconsistency between the ENQA and EQAR decisions may diminish the credibility of the process. In addition, EQAR is in a position to steer the review process and shape its methodologies in a direction that is not in line with ENQA members' needs. It currently impacts the review process to an extent that is noticeable to both agencies and review panels.
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8. KEY CHALLENGES AND AREAS FOR FUTURE DEVELOPMENT

This self-assessment exercise, as well as the current revision process of the strategy of ENQA for years 2021-2025, have brought out a range of challenges for ENQA as a whole and for the ENQA Agency Reviews specifically.

As the SWOT analysis indicates, some of the challenges are internal and some external; some are under ENQA's direct control, while others are not. Some are relatively easy to address while for others the way forward is not yet clear.

Several of the challenges related to the review process are inherent to the procedure itself, as determined by the ESG. The European QA framework relies on peer review as its methodological approach. This is of great value for the process but poses also a number of challenges. While important efforts have been made to train the reviewers, monitor their performance, brief them, and support their work before, during and after the site visit (through the presence of a review coordinator), some panels or individual panel members do not always adopt a sufficiently neutral and/or open attitude towards the reviewed agency. Also, the way reports are written and how individual standards are evaluated may vary between panels, which can have a negative impact on consistency between reviews.

ENQA's reviews are international: panels almost never have two people from the same country, and the Chair and the Secretary cannot come from the country of the agency in question. In addition, efforts are made to make the geographical spread of the panel members as varied as possible, covering different regions of Europe. While often mentioned as one of the key benefits of the ENQA Agency Reviews, the international dimension also poses challenges, mainly related to language and understanding the local context of the agency. Despite the expectation that panels include at least one person with knowledge of the agency's main language of operations, and at least one person with a good understanding of the local HE system, this is sometimes considered insufficient. It will be important for ENQA to address this complexity in future rounds of the agency reviews.

ENQA Agency Reviews face the difficult balance between the two purposes of the reviews: establishing the agency's compliance with the ESG and supporting it in its enhancement through a profound understanding of an agency's context, mission, and specificities. ENQA has attempted to support the enhancement aspect through the introduction of an optional progress visit, and by encouraging panels to systematically highlight good practice and provide suggestions for further improvement that go beyond compliance requirements. However, it is clear that particularly agencies undergoing their third or fourth review find the process bureaucratic and see little added value in terms of their enhancement efforts. At the same time, as long as agencies will need a regular, comprehensive ESG compliance review for the purposes of EQAR registration, the combination of the two purposes will remain a complex issue for the ENQA Agency Reviews.

A further challenge is related to the cost of the reviews. While experts consider their financial compensation just about adequate, agencies consider the review fee to be already at the top end of

what they consider affordable. At the time, there is some indication that agencies would like to have larger review panels, a stronger role of the ENQA coordinator throughout the process, additional training organised to familiarise the panels with the different national contexts, and a higher degree or personalisation of the review processes, for instance. However, under the current financing model and price, the review fee is not even fully covering all costs related to the review process in a wide sense (thematic analysis, full staff time of the ENQA Secretariat, etc.). Thus, it will be important to consider future reforms to the system in a comprehensive manner, including a sustainable funding model that ensures sufficient and appropriate human resources. Furthermore, the increasing focus within ENQA on the ENQA Agency Reviews, and a more substantial role of the coordinator within the review process, has led to a change in the profile of staff needed by ENQA, meaning that current staff may need to be retrained.

The criteria used by ENQA in its review processes, the ESG, focus on teaching and learning in higher education. However, many agencies have multiple tasks in their (national) contexts, and often cover other aspects e.g. vocational education, evaluation of research, recognition issues, and so on. It may be challenging for panels to evaluate one element of an agency's activities separately from the rest (i.e. activities strictly related to the ESG), and – on the other hand – agencies may wish to have a review that is better able to capture their operations “as a whole” (including those activities that are not directly linked with the ESG). The big questions on the table here are whether the ESG should remain the (only) criteria for the ENQA Agency Reviews and possibly even further, whether the ESG themselves might need to be adapted to the changes in external quality assurance. Related to this, there are questions around the development of higher education and quality assurance itself, and the quest for innovation in both. Current and future changes in the field of higher education pose a constant challenge but also a stimulus to QA agencies and to ENQA. ENQA needs to be able to keep abreast of the developments, not only to react to them but also to proactively drive them. The question to address here is whether a quality assurance process focused almost exclusively on compliance with the ESG will be sufficiently able to detect, appreciate and encourage innovation in external quality assurance.

As the result of this external review and ENQA's reflections on its future strategy 2021-2025, the review process will likely undergo some important changes. In addition, ENQA will consider whether to widen the scope and range of its review services, for instance by promoting ENQA Agency Reviews outside of Europe; specialisation and development of additional/different review processes that agencies could ask for; or offering system reviews to countries in the EHEA. These or other similar developments could offer an interesting future opportunity for ENQA Agency Reviews and – eventually – support a sustainable financial model for the process.

Finally, ENQA faces an important conceptual challenge in how to position itself legitimately as both a regulator and a membership organisation at the same time. This is one of the key topics in developing ENQA's future strategy and in discussing ENQA's relationship to EQAR in the European QA framework.

Our hope is that this external review process will provide us with a number of practical and useful yet visionary suggestions for our future development. We intend to pick up the self-assessment report, our own analysis of the future challenges, and the external review report as precious tools to guide in-depth discussions with ENQA's members in the course of 2020. These discussions will hopefully aid

the implementation of such improvement plans that can make the ENQA Agency Reviews a quality leap forward and at the same time “future-proof” so that they remain relevant and sustainable in the fast changing higher education landscape.

9. GLOSSARY OF TERMS

ASEAN	Association of Southeast Asian Nations
BFUG	Bologna Follow-Up Group
BusinessEurope	Confederation of European Business
E4 Group	ENQA, EUA, EURASHE and ESU form the E4 Group
EC	European Commission
EHEA	European Higher Education Area
EI	Education International
ENQA	European Association for Quality Assurance in Higher Education
EQA	external quality assurance
EQAR	European Quality Assurance Register
EQAVET	European Quality Assurance in Vocational Education and Training
ERR	external review report
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
FTE	full-time equivalent
GA	General Assembly
the Guidelines	Guidelines for ENQA Agency Reviews
HEI	higher education institution
IQA	internal quality assurance
QA	quality assurance
SAR	self-assessment report

10. ANNEXES

Annex 1: ENQA Agency Reviews – feedback from the agencies 2017-2018 (internal document)

Annex 2: ENQA Agency Reviews – feedback from reviewers 2017-2018 (internal document)



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