Summary Report of the 1st Register Committee
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1. Introduction

The European Quality Assurance Register for Higher Education (EQAR) was founded in March 2008 by the E4 Group (European Association for Quality Assurance in Higher Education, ENQA; European Students’ Union, ESU; European University Association, EUA; European Association of Institutions in Higher Education, EURASHE) following the mandate received from the Bologna 5th Ministerial Conference in London, May 2007.

EQAR was established to operate and manage the Register as a “white list” of quality assurance agencies that have proven, through an external review, their substantial compliance with the European Standards and Guidelines for Quality Assurance (ESG). Inclusion on EQAR is voluntary for quality assurance agencies. The Register’s objective is limited to identifying applicants who comply substantially with the ESG and does not extend to supporting agencies in achieving substantial compliance.

The decision-making on applications for inclusion on the Register was entrusted to the Register Committee, an independent body comprising of quality assurance experts who have been nominated by the E4 organisations, BUSINESSEUROPE and Education International, and who serve in their personal capacity for a 2-year mandate.

The Register Committee makes its judgements and decisions on the basis of an external review of the applicant quality assurance agency. This review is not conducted by EQAR. The agency itself identifies an independent organisation as a review coordinator. It is the review coordinator which appoints an independent review panel to carry out the actual review.

In preparing this report, the Register Committee aimed at striking an adequate balance between the need for accountability and transparency on the one hand and the confidentiality guaranteed to applicants on the other.
2. Criteria

Consistent with the E4 Group’s Report to the London Ministerial Meeting and the ministers’ decision, the EQAR Statutes stipulate that substantial compliance with the European Standards and Guidelines (ESG) is the decisive requirement for inclusion on the Register.

The Procedures for Applications outline the application process in detail and stipulate requirements for external reviews. Together with the ESG, they form the basis of the Register Committee’s work. The Procedures set out a reliable and consistent process, which allows the Register Committee to identify applicants that comply substantially with the ESG.

2.1 European Standards and Guidelines

The European Standards and Guidelines for Quality Assurance (ESG) were developed as part of the Bologna Process and adopted by European ministers of higher education in 2005. The ESG enshrine common principles and reference points for quality assurance of higher education in Europe.

The ESG are structured in three parts, covering (1) internal quality assurance, (2) external quality assurance of higher education and (3) external quality assurance agencies. Parts 2 and 3 are directly relevant for inclusion on EQAR, whereas part 1 is indirectly relevant due to the reference in standard 2.1.

2.2 EQAR Procedures for Applications

These Procedures have been adopted by the Register Committee in consultation with the General Assembly. The Register Committee prepared draft Procedures in May 2008 and the General Assembly was consulted at its meeting on 25 June 2008 in Sarajevo. Following consideration of the comments and proposals made by the General Assembly, the Register Committee adopted the Procedures on 6 August 2008.

The Register Committee followed some guiding principles when drafting the Procedures for Applications: clarity and transparency of the application process from the applicants’ point of view, fairness and consistency of the decision-making process, and ensuring that decisions are made on evidence-based grounds.

2.3 Requirements for External Reviews

In order to demonstrate their substantial compliance with the ESG, quality assurance agencies are required to undergo an external review of their activities prior to making an application for inclusion on the Register.

The Procedures for Applications stipulate requirements for these reviews. Given that the Register Committee decides on the basis of an external review that has been conducted outside of EQAR’s direct control, these
requirements are crucial in order to ensure that decisions are made on a reliable and consistent basis.

The requirements address, inter alia, the independence of the review process, the involvement of different stakeholder perspectives in the review panel, and that the ESG need to be explicitly considered in the review process.

2.4 Two-Step Procedure

The decision-making on applications follows a two-step procedure:

1) examination of an application’s adherence to the Procedures for Applications, primarily regarding the external review process;

2) consideration of the applicant’s substantial compliance with the ESG.

Meeting all the requirements for the conduct of external reviews, as set out in the Procedures, is obligatory and a precondition for the Register Committee to proceed to consider the applicant’s substantial compliance with the ESG. If the requirements of the Procedures are not met, the external review process is considered not to constitute a sufficiently reliable basis for EQAR’s decision-making. The application is rejected, without, however, making any judgement on the applicant’s compliance with the ESG.

The first two application rounds proved that it was not always clear to applicants that all aspects of the Procedures for Applications are mandatory. Even though an individual case might appear to justify making an exception, the Register Committee considered it crucial to apply the Procedures for Applications fully and consistently from the outset, in order not to jeopardise the integrity of its decisions.
3. Process

This section outlines the process used by EQAR to evaluate and decide upon applications by quality assurance agencies for inclusion on the Register. The Register Committee is responsible for making decisions on applications. The Register Committee draws on the assistance of the Secretariat (currently comprising of the Director and one Executive Officer) in analysing applications and preparing its decisions.

Applications are processed in rounds or batches. Currently, there are two application rounds per year, for each of which a deadline for applications is published. These deadlines are usually in February and August, and are announced by EQAR about three months in advance.

Upon receipt of an application the Secretariat checks its completeness and compliance with the formal requirements. Throughout the process the Secretariat serves as the contact point for applicants. It keeps applicants informed about the status of their application and the following steps.

3.1 Rapporteurs

Each application is assigned two rapporteurs who have the responsibility to analyse the documentation and prepare recommendations for the deliberations of the Register Committee. Rapporteurs are assigned by the Secretariat according to a fixed protocol in order of receipt of applications. Register Committee members declare for which applications they have a possible conflict of interest and should thus not be appointed. It is ensured that the rapporteurs for one application are members nominated to the Register Committee by different organisations, so as to always involve a range of stakeholder perspectives.

Each rapporteur team discusses their findings in a teleconference facilitated by the Director. The rapporteur teams summarise their analysis on an Internal Assessment Sheet, structured according to the criteria for inclusion, and outline any problem areas they have identified.

An additional Register Committee member is assigned as third rapporteur. S/he comments independently of the main rapporteurs’ assessment and brings in an additional perspective. This is a mechanism to improve consistency by involving more perspectives in the preparation of the decision-making.

The views of the main rapporteurs and the third rapporteur are not discussed or mediated before the meeting. Possible different perspectives on an application are thus brought before the entire Register Committee.

The Secretariat, in close cooperation with the Chair of the Register Committee, assists the rapporteurs in their work. Since it reviews all applications, the Secretariat can also alert rapporteurs when an application
might raise questions of consistency, for instance, in comparison with an earlier case or another application currently being analysed.

In their work, rapporteurs draw on the records of previous decisions [see section 3.7] in order to identify relevant precedents and to ensure consistency in evaluating applications.

3.2 Clarification Requests
Once the rapporteurs have completed their initial analysis, requests for further information may be addressed to the applicant.

Where a relatively minor issue can reasonably be clarified within about two weeks, applicants receive a request before the entire Register Committee considers their application.

In case major questions remain after the Register Committee has first considered an application, it might defer the application to the next meeting, pending clarification from the applicant. This, however, happens rarely.

In both cases, applicants receive an official, written request. The Secretariat is at the applicant’s disposal for further explanation of the request.

3.3 Making a Judgement on Applications
The judgement as to whether an agency complies substantially with the ESG is not made in a mechanical process or in applying any numerical rules, which would not be in keeping with the spirit of the ESG. A holistic view is sought on the external review team’s analysis of the applicant’s compliance with the different ESG, before reaching a comprehensive judgement.

Given its function as a register, EQAR’s objective is to identify agencies that have evidenced their substantial compliance with the ESG. Decisions made by the Register Committee are therefore based on the factors prevailing when the external review was undertaken. As there is no possibility for an applicant’s “conditional inclusion”, the Register Committee has to have full confidence in an agency’s substantial compliance with the ESG when accepting it on the Register. EQAR does not have an improvement-oriented function and can therefore not decide on the basis of anticipated or planned future developments.

Bearing in mind that the ESG are not a checklist and leave room for discretion of judgement in their interpretation and application, it is evident that different external review teams may not always be consistent in their judgements.

In its deliberations, the Register Committee thus has to level out a range of different interpretations of ESG compliance in order to ensure consistency in its own decision-making. It is possible that the Register Committee, in analysing the relationship between the findings of the external review panel and the evidence base for them, might come to a different conclusion than the panel.
3.4 Possible Decisions, Additional Representation before Rejection
When initially considering an application, the Register Committee makes one of the following three decisions:

1. Accept the application
2. Consider rejecting the application
3. Request clarification from the applicant

In the first case, the applicant is included on the Register for five years, as from the date of the external review report.

In the second case, the applicant is informed of the grounds for possible rejection and invited to make additional representation on those matters. The application remains pending until the next meeting of the Register Committee, where it may be either rejected or accepted, taking into account the additional representation made.

In the third case, the application is deferred to the following meeting, pending further clarification from the applicant. At the following meeting, the application is considered further in the light of the clarification provided.

The applicant can also withdraw the application instead of making additional representation (case 2) or providing further clarification (case 3).

It has proven helpful to invite applicants to make additional representation where rejection is considered. In some cases, applicants could make representations that clarified the existing information or helped to fulfil all requirements for inclusion. In other cases, applicants made use of the possibility of withdrawal to avoid a rejection decision.

3.5 Flagging for Future Attention
For virtually all successful applicants the Register Committee has identified some areas where substantial compliance with the ESG is less obvious than in others, or which warrant particular attention in the future. The Register Committee has flagged such areas for particular attention when the agency subsequently applies for renewal of its inclusion on the Register.

These issues have been indicated in the letters sent to applicants informing them about their inclusion on the Register.

3.6 Timing
The Register Committee convenes twice a year to consider applications. The application deadline for each of the two rounds is usually about 8–9 weeks before the Register Committee meeting.

The following table illustrates typical timelines that applicants might experience. It is purely indicative and not exhaustive, other steps or combinations of these scenarios have occurred in practice.
**Example 1** is an application that is accepted by the Register Committee after a minor issue, identified by rapporteurs, has been clarified before the Register Committee meeting.

In **Example 2**, the Register Committee initially considers rejecting the application. In its additional representation the applicant, however, demonstrates that the grounds for possible rejection are not valid and the Register Committee eventually admits the agency to the Register.

**Example 3** also is an application that the Register Committee considers to reject. The applicant’s further representation does not provide sufficient grounds for reaching a positive conclusion, thus the application is finally rejected.

The indicated time lags are expressed in weeks after the application deadline. They might vary by up to two weeks, depending on various circumstances.

<table>
<thead>
<tr>
<th>Example</th>
<th>Application deadline</th>
<th>Submission of application</th>
<th>Clarification request</th>
<th>Deadline for clarification</th>
<th>Register Committee meeting</th>
<th>Acceptance letter</th>
<th>Invitation to make additional representation</th>
<th>Acceptance letter</th>
<th>Rejection letter (incl. reasons)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Example 1</td>
<td></td>
<td></td>
<td>+ 4-5 weeks</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Example 2</td>
<td></td>
<td></td>
<td>+ 6-7 weeks</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Example 3</td>
<td></td>
<td></td>
<td>+ 8-9 weeks</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>+ 9-10 weeks</td>
<td>Invitation to make</td>
<td>Invitation to make</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>additional representation</td>
<td>additional representation</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>+ 26 weeks (next</td>
<td>Deadline for representation</td>
<td>Deadline for representation</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>representation</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>+ 36 weeks</td>
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<td></td>
<td></td>
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<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>+ 37 weeks</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Table 1: Application Timeline

3.7 Internal Documentation

In addition to correspondence with applicants (clarification requests, acceptance or rejection letters) the Register Committee keeps the following internal records of the application process:
1. Internal Assessment Sheet

The Internal Assessment Sheet serves to prepare and facilitate the deliberations on an application. It records the rapporteurs’ analyses and recommendations on a case in a standard format, following the criteria for inclusion, i.e. the Procedures for Applications and ESG parts 2 & 3.

2. Minutes

The Register Committee minutes record the main points made by Committee members and the decision made on an application.

3. Summary of decisions and precedents

Once a final decision on an application is made, it is added to an internal collection of decisions. The collection contains a brief summary of each case decided by the Register Committee and helps to identify precedents constituted by previous applications.

The Secretariat regularly updates the collection of summaries. It is reviewed at every Register Committee meeting before any new applications are considered.

The following is a mock-up entry:

[QA agency] [application 2009/xx]

Review coordinator: [organisation]

The following shortcomings as to compliance with the ESG were identified:

1. Reports are only published in summarised form or in aggregate form. The usefulness and readability of reports are not addressed. (ESG 2.5)

2. Questions were raised whether [QA agency] can effectively exercise control over who gets into its pool of reviewers. The relevant recruiting procedures were changed recently. (3.6)

3. A lack of stakeholder involvement on [QA agency]’s governing body, bearing possible independence-related risks due to the exclusively academic composition. (3.6, 3.8)

All three issues were flagged for particular future attention. While only the legislator can change the composition of the governing body (see 3.), and not [QA agency] itself, this has still been flagged and is considered a weakness.

3.8 Communication

All communication with applicants is handled through the Secretariat in close coordination with the Chair of the Register Committee. As notification about decisions or invitation to make additional representation applicants receive a formal letter by the Chair of the Register Committee. Applicants
have been informed about the decision on their application in a timely manner.

Whenever EQAR requests any clarification from the review coordinator or the review panel the applicant receives a copy of the request.

Successful applicants are published on the EQAR website shortly after having received their official acceptance letter.

For now, EQAR guarantees confidentiality to unsuccessful applicants. This has been decided to avoid misleading information: A relatively new agency, which is not (yet) substantially compliant with the ESG, but about to develop further in that direction, might be publicly known as rejected by EQAR, with all consequences for its reputation. At the same time, a clearly dubious establishment or “accreditation mill” would be better off not applying for inclusion at all. This is unavoidable given the voluntary nature of EQAR. Furthermore, EQAR must be mindful of the legal consequences that might follow the publication of information on rejected applications.

Applicants themselves may, however, choose to waive this confidentiality at their discretion.
4. Guide for Applicants

A Guide for Applicants has been published as a practical information resource for quality assurance agencies planning to apply for inclusion on the Register. The Guide summarises the provisions of the EQAR Procedures for Applications in plain, non-legal language and supplements them with further explanation and information. It is updated more regularly than the Procedures themselves and thus allows issues to be clarified more swiftly, where necessary.

The first edition of the Guide was published together with the adopted Procedures on 8 August 2008. A minor update was published on 15 January 2009. After the second application round, applicants were surveyed as to whether the Guide was useful and presented all the necessary information in an unambiguous way. On the basis of the applicants’ (overall positive) feedback and the Register Committee’s own experience from the first two application rounds, a revised Guide for Applicants was published on 11 June 2009.

Following the third application round in November 2009, more applicants were surveyed. As a result, an additional minor update of the Guide for Applicants was published on 18 January 2010.

The aggregated results of the two feedback surveys are presented in Annex 2. Later this year, applicants of the fourth and fifth application rounds are going to be surveyed.
5. Applications for Inclusion – Overview

<table>
<thead>
<tr>
<th>Application round [deadline]</th>
<th>1 (3/10/08)</th>
<th>2 (9/2/09)</th>
<th>3 (26/7/09)</th>
<th>4 (12/2/10)</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Applications received</td>
<td>10</td>
<td>4</td>
<td>8</td>
<td>4</td>
<td>26</td>
</tr>
<tr>
<td>accepted&lt;sup&gt;1&lt;/sup&gt;</td>
<td>7</td>
<td>3</td>
<td>8</td>
<td>1</td>
<td>19</td>
</tr>
<tr>
<td>rejected</td>
<td>1</td>
<td>0</td>
<td>0</td>
<td>n/a&lt;sup&gt;2&lt;/sup&gt;</td>
<td>1</td>
</tr>
<tr>
<td>withdrawn</td>
<td>2</td>
<td>1</td>
<td>0</td>
<td>n/a&lt;sup&gt;2&lt;/sup&gt;</td>
<td>2</td>
</tr>
<tr>
<td>pending&lt;sup&gt;3&lt;/sup&gt;</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>3</td>
<td>3</td>
</tr>
<tr>
<td>Based within / outside EHEA&lt;sup&gt;4&lt;/sup&gt;</td>
<td>9 / 1</td>
<td>4 / 0</td>
<td>8 / 0</td>
<td>4 / 0</td>
<td>25 / 1</td>
</tr>
<tr>
<td>ENQA full members&lt;sup&gt;5&lt;/sup&gt;</td>
<td>8</td>
<td>4</td>
<td>8</td>
<td>4</td>
<td>24</td>
</tr>
<tr>
<td>General / Sectoral&lt;sup&gt;6&lt;/sup&gt;</td>
<td>8 / 2</td>
<td>4 / 0</td>
<td>7 / 1</td>
<td>4 / 0</td>
<td>23 / 3</td>
</tr>
<tr>
<td>Operating in one / multiple countries</td>
<td>5 / 5</td>
<td>3 / 1</td>
<td>4 / 4</td>
<td>3 / 1</td>
<td>15 / 11</td>
</tr>
</tbody>
</table>

Notes:

1. Due to different length of the individual procedures, not all successful applicants from a given round have been included on the Register on the same date.
2. Before rejection, an application is considered at two consecutive meetings [see section 3.4]. The applicant may withdraw before the second consideration. Therefore, applications received in the latest round cannot yet be rejected or withdrawn.
3. These applications were considered by the Register Committee and have been deferred to the following meeting, pending either further clarification by the applicant or additional representation on the grounds for possible rejection.
4. Figures refer to where applicants have their official seat.
5. Agencies that were full members of ENQA when their application was considered by the Register Committee.
6. “Sectoral” refers to agencies that only review institutions or study programmes within one or a few academic disciplines or professional fields.

Table 2: Overview of Applications for Inclusion
6. External Reviews of Quality Assurance Agencies

Within this section, the Register Committee gives an account of its observations in relation to the external reviews that it has considered, as part of the process of making decisions on applications for inclusion on the Register. It should be borne in mind that reviews of quality assurance agencies according to the ESG have only been carried out for about five to six years, and thus are a relatively new concept. Only now the first agencies are actually preparing for their second external review in line with the five-year cycle foreseen by the ESG.

6.1 Reference to the European Standards and Guidelines (ESG)

The EQAR Procedures for Applications require that the external review of an applicant QA agency references the European Standards and Guidelines for Quality Assurance (ESG). In the first rounds of applications, the Register Committee encountered difficulties with some legacy reviews that had not initially been carried out in relation to ESG compliance, but with reference to national criteria or other reference points.

Reports of these legacy reviews were accepted for processing after having been aligned – by the authors of the original report – with the ESG on the basis of existing, not new evidence. The Register Committee anticipates that such difficulties are no longer likely to be encountered, since the relevant requirements are now widely known.

In several external reviews, part 2 of the ESG was only addressed in summary under ESG 3.1, without a clear analysis for ESG 2.1 to 2.8 individually. This has made the Register Committee’s analysis difficult, since ESG part 2 enshrines a number of important principles. Lately, the Register Committee has seen a positive development towards review reports which address ESG part 2 on a standard-by-standard basis.

6.2 Review Panels

The Procedures for Applications stipulate that panels have to comprise of at least four persons with sufficient knowledge, experience and expertise, who represent a range of stakeholder perspectives. At least one academic staff member and one student from a higher education institution have to be on the panel.

While this requirement was not fulfilled for the external review of two applicants, it is now widely known and can easily be taken into account when reviews are organised. Again, the Register Committee anticipates that difficulties in relation to the review panel are not likely to be encountered in the future.
6.3 Review Reports
The external review reports considered by the Register Committee vary considerably in level of detail and comprehensibility. Most reports provide a very clear and comprehensive analysis of the reviewed agency’s activities, and present conclusions supported by clear evidence and argumentation. Where this was the case the Register Committee was usually easily able to follow the review panel’s conclusions.

In some cases, however, the Register Committee was unable to make confident decisions without further clarification. Some conclusions made in review reports were supported only by brief argumentation and insufficient evidence. In other cases, the Register Committee noted that national legislation was generously accepted as a reason for not complying with the ESG.

6.4 Recommendations
A number of recommendations for external reviews have been drawn from ‘good practice’ evident in the applications considered by the Register Committee. The recommendations aim to be a useful resource for all those involved in the external review of quality assurance agencies.

The recommendations express what the Register Committee has considered helpful in making a judgement on an agency’s compliance with the ESG, but they do not aim to be exhaustive. External reviews of quality assurance agencies frequently also have other purposes than assessing compliance with the ESG and serving as a basis for inclusion on EQAR, and these additional purposes may require other features.

The recommendations are presented in Annex 1.
7. Using the European Standards and Guidelines (ESG)

The decisive criterion for inclusion on the Register is substantial compliance with the European Standards and Guidelines (ESG). For decisions on the notion of substantial compliance, the ESG are not used as a checklist, but a set of agreed principles and reference points, which may be applied differently depending on the individual (national) context.

This section summarises the Register Committee’s observations from applying the ESG in its decision-making.

7.1 Applicability to Different Types of Organisations

The ESG do not specifically indicate the kind of organisations for which parts 2 and 3 have been written. Beyond what is implied in the standards, the ESG do not explicitly define what constitutes a “quality assurance agency”.

The Register Committee has concluded that both the introductory sections and the standards themselves indicate that parts 2 and 3 of the ESG are applicable to organisations whose core activity (or one of their core activities) is to review, evaluate, accredit or audit higher education institutions, organisational units or individual study programmes.

Organisations that do not directly perform such activities are normally not considered “quality assurance agencies” in the sense of the ESG and thus not considered for inclusion on the Register.

The complex realities of different systems, however, may not always allow a sharp distinction between bodies with direct responsibility for external quality assurance and meta-level bodies with standard-setting or other, similar responsibilities. Consequently, the applicability of the ESG always is considered carefully based on the application’s own merits.

7.2 Geographical Scope

The European Standards and Guidelines (ESG) have been written primarily for the European Higher Education Area (EHEA). At the same time, the principles enshrined in the ESG are not incompatible with other principles of good practice for external quality assurance, used in other contexts and settings. There is, for instance, significant overlap with the Guidelines for Good Practice published by the International Network for Quality Assurance Agencies in Higher Education (INQAAHE).

Users of the Register will assume that all registered quality assurance agencies generally work in substantial compliance with the ESG. Any limitation of the scope of registration would risk jeopardising clarity and transparency. Furthermore, such a limitation would create an additional burden on registered agencies to clearly communicate the limited scope of registration.
As a rule, the Register Committee therefore expects applicants – in their evaluation, audit and accreditation activities – to comply substantially with the ESG wherever they operate within or outside the EHEA. While the particular circumstances of the jurisdiction(s) in which an applicant operates are always taken into account, the Register Committee has not, as yet, been faced with cases where local regulations would explicitly forbid compliance with certain aspects of the ESG.

7.3 Agencies that Run Several Activities

The Register Committee has seen that many applicants perform a range of activities. While some of these might not be considered external quality assurance in the understanding of the ESG, several applicants run multiple external quality assurance schemes in parallel (for instance, a programme-level accreditation system and an institutional audit scheme).

While most of the ESG part 3 refers to quality assurance agencies at organisational level, ESG 2.1 to 2.7 as well as ESG 3.7 make provisions for specific external quality assurance activities/schemes, rather than for an agency as a whole. Consequently, the Register Committee analyses substantial compliance with those standards on a scheme-by-scheme/activity-by-activity basis. It was extremely useful for the work of the RC when external review reports were structured in that way.
8. Conclusions

In its work during EQAR’s first two years of operation, the Register Committee can bear witness to the fact that the European Standards and Guidelines (ESG) have become a widely agreed reference point for the work and functioning of quality assurance agencies in Europe. The Register Committee has considered many applications from quality assurance agencies that have aligned their organisation and processes with the ESG’s principles. The eagerness of quality assurance agencies to work in line with the ESG can be recognised in the many improvement-oriented measures that have been implemented by agencies to follow up their external reviews.

The Register Committee was glad to see broad interest in inclusion on EQAR amongst European quality assurance agencies. While there has only been one non-European applicant thus far, several quality assurance agencies from outside the EHEA have been in contact with EQAR and expressed their general interest in registering.

The Register Committee hopes that this account will be useful to future applicants and other stakeholders, in understanding the procedures and criteria for inclusion on EQAR, and the way they are used in practice. The Register Committee invites everybody to share their feedback on this report, as well as on the Guide for Applicants and other information published by EQAR.
Annex 1: Recommendations for External Reviews
(as of September 2010)

The following recommendations have been drawn from 'good practice' evident in the applications considered by the Register Committee. These recommendations aim to be useful to all those involved in the external review of quality assurance agencies, and the Register Committee invites them to take these recommendations into account.

The recommendations express what the Register Committee has considered helpful in making a judgement on an agency’s compliance with the European Standards and Guidelines (ESG). Their aim is to promote the development of clear and comprehensive external review reports that form a reliable basis for fair and consistent decision-making on applications.

The recommendations do not aim to be exhaustive. External reviews of quality assurance agencies frequently have additional, other purposes than assessing compliance with the ESG and serving as a basis for inclusion on EQAR, and these additional purposes may require other features.

The recommendations should be seen as good practice which might require adaptation depending on the profile and context of the individual agency under review. They should not narrow the room for different approaches and methodologies to give effect to the ESG.

1. While the review might have various purposes, it should be clear that evaluating the extent to which the agency complies with the ESG is one of the review’s purposes. The ESG should be clearly mentioned as a reference point of the review.

2. Where an agency also performs activities that might not be considered external quality assurance in the sense of the ESG, this should be pointed out in the review report. In order to enhance transparency the review report should specify all activities which were not considered "ESG-relevant" by the panel and thus were disregarded in the review.

3. Where an agency operates in several countries, the review report should normally address the agency’s activities in all countries, and not be limited to its "home" country. For the sake of clarity the review report should specify which activities in which countries the panel took into account, and if any were disregarded for specific reasons.

4. The review report should explicitly address all standards of parts 2 and 3 of the ESG. It benefits readability and comprehensibility if the report contains for each standard:
- A summary of the evidence reviewed
- A weighing analysis of the agencies’ activities in the light of the standard
- An argued conclusion as to the agency’s substantial compliance with the standard

For those standards that refer to activities rather than organisational aspects (ESG 2.1 to 2.7 and ESG 3.7), the report should address each activity/quality assurance scheme separately.

5. If an agency is already registered on EQAR, it should ensure that the review panel is informed of the matters flagged in the acceptance letter. These should be addressed in the review report.

These recommendations should be considered in conjunction with and in addition to the mandatory requirements for external reviews, as set out in the Procedures for Applications:

- The review has to be coordinated by an organisation that is independent of the applicant. The coordinator has the responsibility to appoint an independent review panel. [see Art. 5]
- The review panel has to include at least four persons who possess sufficient knowledge, experience and expertise. The panel has to include at least one academic staff member, one student and one international member. [see Art. 6]
- The self-evaluation report has to be a critical self-reflection on the applicant’s compliance with the ESG. [see Art. 7]
- The review report has to be agreed by all panel members. It has to provide sufficient evidence for substantial compliance with the ESG. [see Art. 8]

References for further information:

- Procedures for Applications [adopted 6 August 2008]
  http://www.eqar.eu/fileadmin/documents/eqar/official/RC_01_1_ProceduresForApplications_v1_0.pdf

Total replies received: 16 of 22 applicants in the first three rounds
- by email: 6
- via website form: 10
- anonymous: 2

Q 1: Please rate on a scale from 1 (not at all) to 5 (fully satisfied) the extent to which the Guide for Applicants provided you with all necessary information to enable you to make your application:

<table>
<thead>
<tr>
<th>1 (not at all)</th>
<th>2</th>
<th>3</th>
<th>4</th>
<th>5 (fully)</th>
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<tr>
<td></td>
<td></td>
<td></td>
<td>7</td>
<td>9</td>
</tr>
</tbody>
</table>

Q 2: Which other sources of information did you consult (if any)?

EQAR website:
- 14 Frequently asked questions (FAQ)
- 13 Procedures for Applications

Personal contacts:
- 9 EQAR Secretariat
- 1 Member(s) of the Register Committee or other EQAR bodies
- 1 Agencies that are already included
- 1 Other peers/colleagues in the community

“I spoke to colleagues in [other QA agency].”
“Agency which had made an application”

Q 3: Which issues did you find clear and well explained?

Respondents described the Guide as providing sufficient information, which is generally presented clearly and unambiguously. Some respondents also made reference to information available on the website and the application forms.

“We have had nearly no questions!”
“The process itself and the pro formas were clear and easy to use”
“The Guide was fully satisfactory to us in explaining the background, criteria and formal procedures for EQAR application.”
Q 4: Which issues were unclear, ambiguous or difficult to understand, and would benefit from more information, explanation or clarification?

"The payment instruction were not clear at all. After contact, the problem was solved."
- F’up: provide more detailed and clear information on when the different fees have to be paid (5.8, p. 14)

"I was confused by the fact that the application could only be transferred by mail but that the signed documents (or all documents?) needed to be posted or faxed (as well). I contacted the secretariat for further information."
- F’up: explain this better, including reasons (5.3, p. 13)

"The reference to the ESG and the design of the report in this context respectively."
- F’up: explain better that we expect each ESG to be addressed in the external review report (4.6, p. 11)

"The main source of uncertainties and doubts were related to the extra information that the Register could request to the applicant when we began the procedure. Nevertheless, when we received the request for extra information was completely clear."
- F’up: new section (after 5.4, p. 13) to explain that additional information might be requested before the RC meeting

"We sought and received clarification on the amount of evidence required to support the application."

"The amount of supporting information needed for the application could have been further specified."
- F’up: Appreciating that it would be difficult to give detailed instructions, a short section "5.2 Additional documentation" is added to the Guide for Applicants, explaining that additional supporting information is welcome where it adds information (e.g. due to changes after the external review) and that it should be as extensive as needed, but as concise as possible.

"We sought and received clarification on the timing of the payment of the fee [I recall that there were some inconsistencies in the documentation]."
- F’up: Clarify the Guide (section 5.9), which indeed is ambiguous. The FAQ are already more precise than the Guide in that respect.

"No issues remained unclear, ambiguous or needed further explication. The other sources we consulted were mainly for checking practicalities or issues specific to our application."

- 23 / 25 -
Q 5: Which issues, in your judgement, were missing and should be added to the Guide for Applicants?

"Clear deadlines for each level of procedure, not only for submitting the application" [seems to refer to the same as comments on fees and possible requests under Q4]

➢ F’up: see above.

“Guidelines on the maximum size of submission [including annexes] would have been helpful. As you remember, we threw everything at our application as the ENQA membership application document was very large with numerous annexes thus we feared not giving enough information to EQAR. We wanted to give as much as possible to strengthen the case from the outset rather than have you ask for additional documentation at a later date. I am not sure if that was the right or the wrong thing to do!”

➢ F’up: See above, new section 5.2.

Q 6: Which issues, in your judgement, were repetitive or redundant and could easily be removed from the Guide?

“Everything seemed appropriate”

Q 7: Was the application process described clearly and understandably?

All answers were affirmative.

Q 8: Any further comments on the Guide and/or the application process?

“Not on the guide as such but there could be more information and communication concerning the trajectory once the application is accepted. The applicant does not know when the decision will be taken. It seems that there is too many time between the application moment and the final decision.”

➢ F’up: explain how long it will normally take, see also Q4 (4th)

“The different steps of the procedure after sending the application and once you received the formal letter with the result are not enough clear concerning the schedule. For instance, regarding the payment of the second invoice [= annual listing fee – ed.] [we didn’t exactly how much time we should receive the request]. Nevertheless, it didn’t deal with the core part of the review procedure.”

➢ F’up: see Q4 (1st and 4th), Q5 and preceding comment.

Other comments:

“The application form itself was well structured, so that we didn’t have to use the application guide intensively. All additional information, that can be standardised, is presented in the guide. For specific questions the members of the EQAR secretariat can be contacted quite freely and without any problems.”

“In order to fill in the documents I found it useful to look at the information of the listed members, available on the EQAR website.”
“I am really not able to raise issues for improvement. The information in the website was clear and helped to get easily through the application process.”

“While we were happy to give 17 copies of the application to EQAR we didn’t really think about the additional postage costs for you sending them to members of the committee. Rightly so I might add. But perhaps you could add that to the guidance notes so people are aware.”

- F’up: Discontinue the possibility of paper submission. It has not proven to be crucial in the first 3 rounds of applications, as all applications have anyway been available electronically, and has only caused unnecessary, additional logistic effort.