Register of QA Agencies and Future Reviews

Briefing Note for the Members' Dialogue 2021

(sessions 1.1 and 2.3)

1. Main findings

Since the Register started its work in 2008 the Committee has considered 139 applications, of which it has approved 115 applications (59 for initial inclusion and 56 applications for renewal of registration) and rejected 13 applications; 11 applications were withdrawn.

EQAR has continuously updated its website, which now includes more features i.e. infographics, additional publication and full documentation on applications. The Register Committee has since 2015 also introduced a compliance judgment for each standard and a compliance table within each decision.

Following a consultation of QA agencies, review panel members and coordinators, EQAR has updated its Policy on the Use and Interpretation of the ESG in 2020. The Register Committee has recently moved from a confirmation of eligibility to a confirmation of the tripartite Terms of Reference and has adopted a **Policy on the Eligibility of the Review Coordinator**.

1.1 Why agencies seek registration on EQAR

According to the QA agency survey the main reason for most agencies seeking EQAR-registration (for both registered and not registered QA agencies) is the opportunity to improve their international reputation (83%), followed closely by the possibility to facilitate the recognition of reviewed programmes (81%) and to fulfil the expectations of government(s) or stakeholders (75%). EQAR surveyed government have reaffirmed as well the
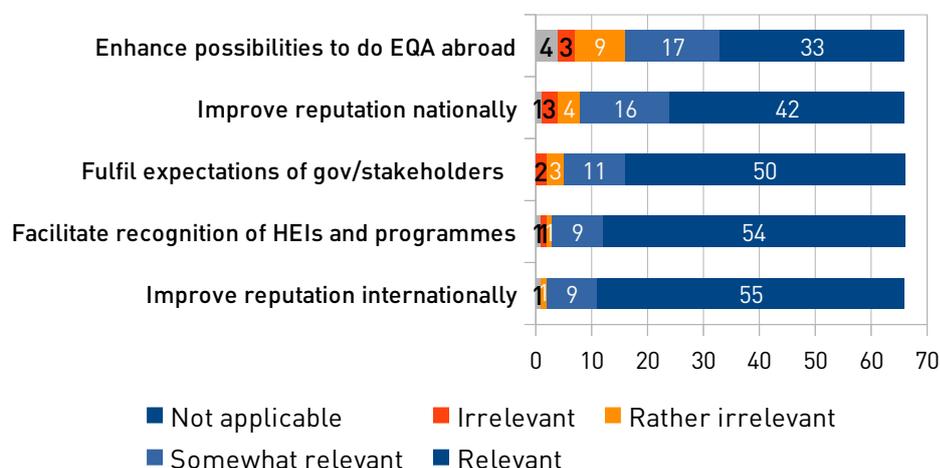

Figure 1: Motivations for registration (survey of QA agencies)

importance (very important or important) that the quality assurance (QA) agencies carrying out external QA is listed in EQAR.

Also relevant to the agency's reason for seeking registration, but to a lesser extent, are the possibilities to improve the QA agency's reputation nationally (63%) and to enhance the external review of HE institutions abroad (50%). See Figure 1.

1.2 QA agencies considering EQAR-registration

Most QA agencies who have not yet applied or have not been successful in their application for registration (70%, 16 of 23 respondents) are considering (re-)submit their application in the future. This shows that EQAR-registration remains of interest for new as well as for those with an initial unsuccessful application.

Some of the surveyed QA agencies raise the fact that their HE system is not yet fully compatible with the ESG, and this inhibits the possibility for the national QA agency to seek EQAR-registration.

A number of QA agencies who have decided not to apply (2 responses) or were unsure on whether they would (re-)apply (5 responses) have cited as main reasons: needing to still adapt their procedures to the ESGs, having to undertake major organisational changes within the agency, the high costs of an external review (i.e. in particular for small non-profit agencies), and the fact that they do not expect to be able to meet EQAR-registration requirements.

Some respondents also admitted that as national conditions are changing (i.e. national regulations requiring EQAR-registration, or the changing of legal framework to be compliant with the ESG) they might revisit this decision.

1.3 Feedback on the registration process

In general, the feedback received from members and QA agencies (through both the current survey and continuous feedback surveys filled by agencies after applications) showed that the registration process is functioning well and efficiently. However, a few areas for development were identified, especially in comments from agencies:

1. While the consultation of the EQAR website and the use of Register has increased, respondents have also pointed out that the decision on applications are not easily comprehensible to those with a lack of expertise in the field. Only half of the surveyed national associations of higher education institution haves so far consulted decisions by the Register Committee.

   The Register Committee plans to consider in the future a more effective, user-friendly presentation of the decisions and conclusions on the agency's registration on the website, e.g. a summary of conclusion or table of compliance added to the agency's Register entry.

2. The results from the regular feedback surveys as well as the current survey of QA agencies show that the remaining area of concern is the *transparency* and *interpretation of the criteria for inclusion*, and *proportionate, consistent and fair decision-making*. The main reason for this feedback are different conclusions reached by the review panel and Register Committee on specific standards; the extent to which this has happened differs largely between standards (see Figure 2). The analysis of Register Committee decisions showed that the standards where most often different conclusion were reached by the review panel and Register Committee were i.e. ESG 2.7, ESG 2.6, ESG 3.1 and ESG 3.3.

■ upgraded ■ equal ■ downgraded
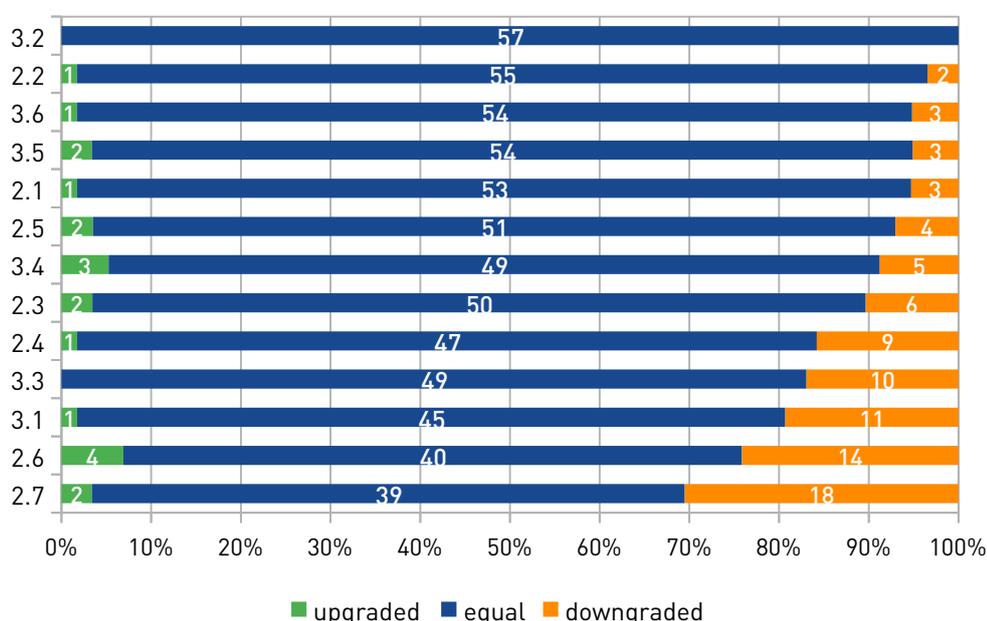
Figure 2: Register Committee decisions vs Review Panel conclusions

3. The reason for such differences is that the Committee is expected to ensure the consistency of its decisions and to follow its own interpretation, which may differ at times to that of an external group of experts. While this is a normal part of any similar external QA and decision-making process based on peer review, it is nevertheless desirable for all sides to minimise such cases.

> The Register Committee plans to discuss with ENQA whether the involvement in training and briefing of experts could be enhanced to further address this issue.
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> The Register Committee also suggested that a more detailed debriefing with coordinators and panel members, allowing the opportunity to discuss cases where the RC conclusion differed from the panel's, would be helpful in order to better understand and also try to achieve more convergence in the future.

4. Since 2008, EQAR's Appeals Committee has considered 5 appeals by registered agencies. The experience of the Appeals Committee showed that there is a need to streamline the current procedure to allow for appeals to be more effectively and faster considered.

5. While EQAR has a complaints procedure allowing individuals or organisations to rase substantiated concerns about a registered agency's compliance with the ESG, EQAR has no system in place that would allow agencies to make a complaint about EQAR's processes, the agency review process and does not require review coordinators to have a complaints process.

   The Register Committee suggested updating its procedures so as to allow QA agencies to bring up (in a formal manner) any concerns with its review processes. Additionally, EQAR could check that all review coordinators provide a process for complaints to applicant agencies.

6. EQAR has an Internal Handbook to inform and support the work of EQAR. The Register Committee uses the results of the ongoing feedback surveys (filled by applicants after their application) to improve the clarity and usefulness of the Guide for Applicants, EQAR website, procedures and policies. These analyses of the feedback received through the survey has not followed a periodic pattern or fixed cycle so far.

   The Register Committee plans to formalise the review of feedback received with a two-year cycle. Moreover, the brief report/analysis, summarising feedback and steps taken/discussed, if any, should be published in the future.

1.4 Future of the registration process (mid-term reviews)

For 38 of the 49 registered agencies the next review will be their third review against the ESG. Similarly to higher education institutions, quality assurance agencies maintain the primary responsibility for reviewing and improving their own quality and processes.

Endlessly repeating the 5-year cycle of reviews could lead to fatigue and a check-box ticking approach. As a result of reflections in regular discussions with ENQA as well as highlighted by some survey respondents, the Register Committee has begun to consider possible changes to its processes by emphasizing EQAR's role as a gate-keeper and reconsidering whether the "one-size-fits all approach" is still fit for the purpose.

Proposal: Introducing a mid-term review for the 38 QA agencies that will be submitting their third external review report against the ESG. Rather than providing for a comprehensive analysis against all standards of the ESG, the agency would be asked to elaborate on the standards that were judged to be partially compliant with the ESG in

the previous Register Committee decision, reflect on substantive changes in the agency following the last review and address any new changes that might affect the agency's compliance with the ESG. This proposal anticipates a cycle of 10 years for full reviews, with such a focused and lighter mid-term review in between, provided that the agency remains compliant with the ESG in the meantime.

2. Questions for discussion

Register (session 1.1)

1. Do you find the above proposal and plans adequate and sufficient?

2. What additional measures could enhance the use, the consistency and understandability of Register Committee decision?

3. Where legal frameworks inhibit compliance, how should EQAR take those up with governments?

4. Do EQAR's different processes cater for risk-based methods and approaches?

Future of registration process (session 2.3)

5. Should EQAR accept new ways of performing EQA that are not directly linked to "processes" involving panel, self-evaluation, reports and follow-up?

6. Do you support the proposal to introduce a focused mid-term external review for mature QA agencies?

7. What kind of monitoring and ongoing interaction with the agencies would you expect from EQAR?

8. How to ensure that the mid-term review will provide value to reviewed QA agencies?

3. Reference/links

• EQAR Self-Evaluation Survey for Members and Potential Members

• EQAR Self-Evaluation Survey for QA agencies

• Analysis of Register Committee Decisions and Quality Assurance Agencies' Compliance with the ESG (2018)