

External Review of QA Agencies Against the ESG

Proposal for a Targeted Review

Register Committee

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1. Introduction

Applications for inclusion and renewal of registration are based on external reviews of QA agencies. These are EQAR’s primary means to ensure that QA agencies carry out their external review processes in line with the ESG, and thus contribute to the trust building and transparency of the EHEA.

Agencies are expected to undergo an external review at least once every five years (in line with ESG 3.7 and EQAR Procedures). EQAR monitors the registered agency’s compliance with the ESG during this period (through annual updates, change reports, complaints by third parties etc). In case of substantiated concerns about the agency’s compliance with the ESG the Register Committee may issue formal warnings or initiate an extraordinary revision of registration against the ESG. As a result, it may reduce the remaining period of registration or exclude the agency from the Register.

Of the 50 registered agencies, 38 have already successfully gone through two consecutive reviews against the ESG. To renew their registration on EQAR, these agencies are currently expected to repeat the same process they did five years prior. Considering their overall compliance with the ESG has already been proven for an extended period of time, the third or fourth external review might become more of a bureaucratic exercise than a useful quality assurance process.



Figure 1: Timeline of an external review cycle including a targeted review

While complying with the ESG, agencies are expected, as any organisation, to evolve, adapt and improve their processes. The present proposal introduces a review with a more targeted approach and an enhancement-led component. Such a review would be followed by a full/complete review against the ESG again after five years (see example of a possible continuous review cycle in Figure 1).

ENQA’s external assessment of its review methodology in 2019 has shown that there is a need to avoid “evaluation fatigue” and to continue providing something meaningful as part of a review process.

EQAR has also raised this matter at its January 2021 Members' Dialogue. The EQAR members expressed the view that such a proposal would need careful consideration and that any change in the review methodology should continue to safeguard the provision of trust in the EHEA provided by the Register.

2. Scope and focus of a targeted review

The targeted review would not change the criteria for registration, but aim to place more focus on those parts that require attention. Issues related to quality assurance agencies' compliance with the ESG that were identified in change reports and the agencies' last renewal of registration would be considered more closely. In addition, the targeted review will provide the opportunity for agencies to get feedback on a self-selected area for enhancement that is relevant for their own higher education system (see 2.4 below).

2.1 Who can opt for a targeted review

The targeted review may only follow after at least two consecutive external reviews against the ESG that have led to a registration/renewal decision by the Register Committee. That is, agencies eligible for such a review will have been listed on the Register for at least 10 consecutive years when the review takes place. Five years after the targeted review, a full external review will follow again, see also Figure 1 above.

Agencies are not eligible if any substantive changes were not duly reported, or not reported on time, during the last 5-year registration period¹. If such substantive changes are not reported but identified after the targeted review, the agency's registration may be suspended, pending an extraordinary review of its registration.

2.2 What the targeted review will address

The current processes of **monitoring ESG compliance** of registered agencies i.e. annual updates, reporting of substantive changes and third-party complaints, will form the basis of identifying the focus areas for the review.

The targeted review will address:	Applicable to QA agencies:
A) all the standards with a "partial compliance" conclusion in the Register Committee's last renewal decision;	if the case
B) standards 2.1 to 2.7 for activities that were newly launched or changed since the agency's last renewal	if the case

¹See EQAR's policy on reporting substantive changes
<https://www.eqar.eu/register/guide-for-agencies/reporting-and-renewal/>

of registration;	
C) any standards affected by other types of substantive changes (organisational identity or structure, other fields of activity and their separation)	if the case
D) ESG 2.1 (see section below)	applicable to all
E) at least one further enhancement area (see section below)	applicable to all
F) any other matters re. ESG compliance arising during the review *	if new issues arise

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* If during the targeted review process panel members notice issues outside the focus areas specified in the terms of reference, but that may affect the compliance with the ESG, they should investigate the matter further and provide an analysis and conclusion so that it can be considered by the Register Committee.

In order to enable this, every review must include interviews with the full range of stakeholders (as in a full review) and reserve adequate spare time for the panel to address any such issues that might arise.

2.3 What is the result of a targeted review

The targeted external review against the ESG would result in the **same type of decision** on agencies' renewal of registration on EQAR as a regular, full review.

The registered agency's compliance with ESG Part 2 and Part 3 will, however, not be reassessed except for the standards covered in the review.

2.4 Enhancement component

Even in cases where QA agencies do not have any past compliance issues or substantive changes to address, the ESG are underpinned by the philosophy of continuous improvement. The targeted review should therefore also include a more enhancement-led approach in reviewing the agency's external quality assurance processes. This approach would allow agencies to demonstrate the benefit and added value of their external QA activities for their higher education sector.

The QA agency is expected to include in its self-evaluation report a reflection of its consideration of internal quality assurance (ESG 2.1) and at least one other area with ongoing or planned developments:

1. ESG standard 2.1 has a crucial importance as it specifies the quality dimensions that external quality assurance processes should be concerned with, i.e. validating that institutions have indeed

implemented ESG 1.1-1.10. The agency should thus always reflect on this aspect, irrespective on whether any changes have been implemented since the last review (see guiding questions below).

2. In addition, the agency should chose at least one area of development from amongst those ESG Part 2 and 3 standards presented in the **Annex: Questions for Enhancement Areas in a Targeted Review**, where it can demonstrate specific ongoing or planned enhancement beyond the minimum requirements.

The area should be identified in the terms of reference and should be different from any standards already addressed per A – C above. The chosen standard(s) will be confirmed by EQAR as part of the eligibility application.

The review panel is expected to provide feedback, recommendations or commendations on the initiated developments as it sees fit.

The Register Committee will take note of these further developments in its decision on renewal of registration.

3. Process

EQAR does not carry out reviews itself, but agrees to the tripartite terms of reference (ToR) for the review with the coordinator and applicant agency.

The steps for the external review process would be the same as for full reviews. The review process is, however, expected to be shorter as it is more focused and thus covers fewer issues.

The tripartite terms of reference shall include the details of what the review (SER & RR) is expected to cover (according to points A – E above). In order to ensure a good shared understanding, the coordinator is required to organise a joint briefing with the panel and EQAR.

To ensure continuity and build on institutional knowledge in the external review process, the coordinator of the targeted review should normally be the same organisation that has coordinated the previous full/complete review against the ESG.

The review may be carried out by a smaller panel of three instead of four experts (current minimum in the EQAR Procedures).

The reports are expected to be shorter, as they will not repeat any analysis that has been already made in the past review. The analysis under each corresponding ESG standard (Part 2 and Part 3) will reflect on the Use and Interpretation of the ESG in those areas specified in the ToR.

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Review elements	Full review process	Targeted review process
Focus	All ESG Part 2 and Part 3 standards	A) Compliance issues B/C) Substantive changes since the last review

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		D) ESG 2.1 E) Enhancement area(s) F) Additional issues arising
Panel composition	Four panel members	Three panel members (at least one student and one HEI staff member)
Site-visit	Live, blended, online	Same (but shorter). Sufficient time must be allocated in case unexpected issues arise.
Timeframe	±12 months	Shorter (up to 8 months)
RC decision on ESG	Holistic decision Compliance table → compliance /partial compliance / non-compliance assessed for all standards	Holistic decision Compliance table → compliance / partial compliance / non-compliance for issues in focus → compliance “inherited”/kept for other standards

Table: Outline of main changes in a targeted external review

4. Next steps

- **May/June 2021:** preparation of necessary amendments to the Procedures for Applications
- **July 2021:** new approach with targeted reviews launched and ready to use in practice

5. Annex: Questions for Enhancement Areas in a Targeted Review

ESG Part 2: Standards and guidelines for external quality assurance

2.1 Consideration of internal quality assurance

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

- Has the agency considered the effectiveness of the higher education institution's internal QA processes i.e. has the agency drawn on findings from its analysis of ESG Part 1?*
 - Does the agency intend to enhance the effectiveness in addressing the internal QA of higher education institutions and the consideration of ESG Part 1?*
- * If yes, this should be described in the self-evaluation and external review report.
 * If no, the agency should specify if any changes have been planned or not.

2.2 Designing methodologies fit for purpose

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.

- How does the agency plan to improve its stakeholder consultation process as part of its design and continuous improvement of its methodologies?

2.3 Implementing processes

n/a (this standard cannot be selected as an enhancement area)

2.4 Peer-review experts

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

- How does the agency intend to improve the training, briefing and work of the groups of experts?

2.5 Criteria for outcomes

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.

- How does the agency intend to improve its processes and criteria

- How does the agency intend to improve its consistency in the application of its criteria?

2.6 Reporting

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.

- How does the agency intend to make its reports/decisions clearer and understandable to the general academic community, external partners and other interested individuals?

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2.7 Complaints and appeals

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

- How does the agency intend to improve how the appeals and complaints processes are handled and communicated to institutions?

5.1 ESG Part 3: Standards and guidelines for quality assurance agencies

3.1 Activities, policy and processes for quality assurance

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.

- How does the agency intend to improve how its objectives translate into the daily work of the agency?
- How does the agency intend to improve the involvement of stakeholder in its governance and work?

3.2 Official status

n/a (this standard cannot be selected as an enhancement area)

3.3 Independence

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.

- How does the agency intend to improve the provisions guaranteeing the independence of the agency?
- How does the agency intend to improve its operational independence in managing its own staff, in defining its own procedures and methodologies and in the recruitment, nomination and appointment of experts?

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3.4 Thematic analysis

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

- How does the agency intend to improve its analysis resulting from the general findings from its quality assurance activities?

3.5 Resources

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

- How does the agency intend to improve its human and financial resources?

3.6 Internal quality assurance and professional conduct

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

- How does the agency intend to improve its internal QA processes?