

Analysis of Register Committee Decisions and Quality Assurance Agencies' Compliance with the ESG

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European Quality Assurance Register for Higher Education (EQAR)

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The analysis can be accessed from the EQAR website at:

<https://www.eqar.eu/register/analysis-of-register-committee-decisions/>

1. Introduction

1. How the Register works

EQAR was established in March 2008 as an independent organisation in charge of managing the Register of quality assurance agencies in the European Higher Education Area (further: EHEA).

The criterion for registration is **substantial compliance** with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG). Following a successful initial application, after 5 years the registered agency submits a new application to renew its registration on EQAR, based on a new external review against the ESG.

The decision on ESG compliance rests with the Register Committee (further: RC). The members of the Committee are appointed¹ in their individual capacity so as to ensure that the decisions are taken by an independent body that does not represent the interest of any stakeholder organisation or a national authority. The Committee meets two to three times a year. So far, the RC has held 30 meetings (until September 2021) since it began its work in 2008.

The RC makes a judgement on the agency's compliance with the ESG as a whole, i.e. whether the agency is overall substantially compliant or not substantially compliant with the ESG. Starting with the applications made based on ESG 2015, the Committee has also taken a compliance decision on each individual standard from ESG Part 2 and Part 3; for each standard the Committee makes a decision of compliance, partial compliance or non-compliance.

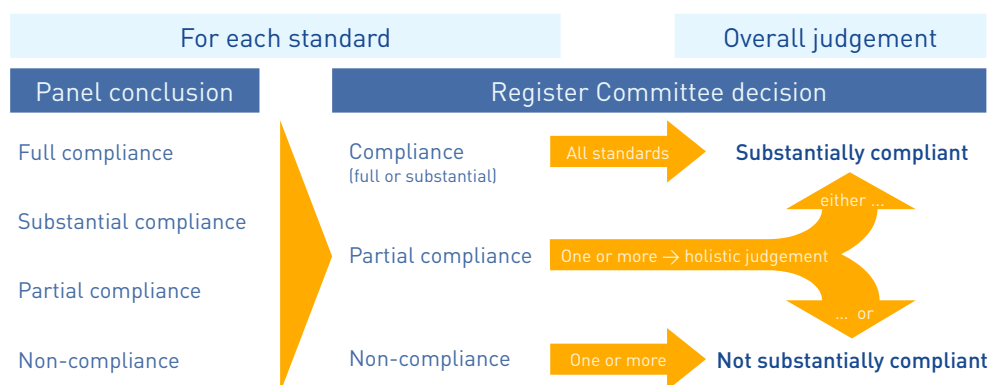


Figure 1: Register Committee decision making process on ESG compliance

To support its consistent decision-making and to assist agencies and review panels preparing for the review, the Committee adopted the Policy on the Use and Interpretation of the ESG (further: U&I)². The policy is built on the Committee's precedent decisions, and was last updated in September 2020.

¹ Two members are nominated by each of the E4 organisations (i.e. EUA, ENQA, ESU and EURASHE), EI-ETUCE and BUSSINESSEUROPE nominate one member each; the President is a non-voting member of the Register Committee.

² See more at: <https://www.eqar.eu/about/official-documents/#use-and-interpretation-of-the-esg>

The Register Committee also considers **substantive changes** reported by agencies and complaints by third parties; both serve as a way of monitoring the agencies's compliance with the ESG for the duration of their EQAR-registration. Agencies are required to report changes to their organisational status, structure or methodology. This allows EQAR to become aware of situations where the agency's current practice would differ substantially from the situation when it was last reviewed against the ESG.

Third parties can address concerns about a registered agency's compliance with the ESG to EQAR. In case of **substantiated concerns**, the Committee may decide to issue a formal warning or initiate a revision of the agency's registration.

Further information on how the Register and the Register Committee work, including all decisions taken by the Register Committee, can be consulted on EQAR's website³.

2. Overview of applications against the ESG

March 2008-September 2021

EQAR's list of registered agencies includes 50 quality assurance agencies (as of September 2021). Between 2008 and 2021, the Register Committee has considered a total of 143 applications for inclusion and renewal of registration (on average 11 applications per year, see Figure 2 below), of which 81 were initial and 62 renewal applications.

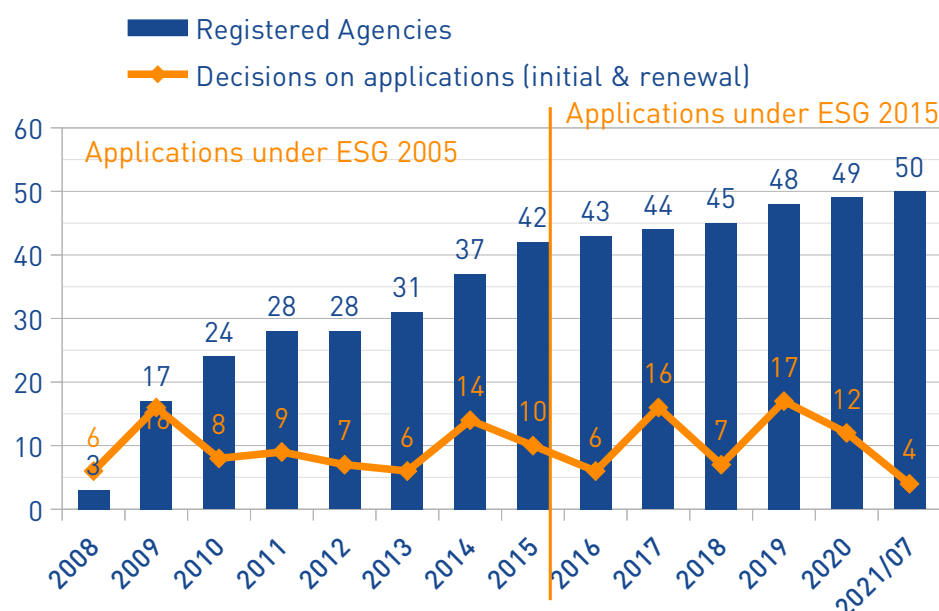


Figure 2: Evolution of applications for inclusion and renewal of registration, November 2008 – September 2021.

Overall, the Register Committee has approved most applications for initial inclusion (61 approved and 10 rejected) and almost all applications for renewal

³ See more at: <https://www.eqar.eu/register/guide-for-agencies/>

of registration (57 approved and 4 rejected). 11 (7%) applications were withdrawn before the final reading of the Committee, hence no decision was taken on them. The main reasons for withdrawal were lack of readiness to meet the ESG standards at the time of application and unforeseen changes in the agencies' organisation or official status. A number of agencies that once withdrew their application have successfully reapplied since, i.e. ARACIS, AIC, NEAA.

Applications under ESG 2005 vs ESG 2015

The Register Committee considered 76 applications under the ESG 2005 (between November 2008 and September 2015) and 67 applications under the ESG 2015 (between October 2015 and September 2021, including the withdrawn applications). As expected, over time applications for renewal of registration have become the majority, while the number of initial applications for inclusion has decreased. Two thirds of the applications considered under the ESG 2015 were renewal applications.

The approval rate on applications considered under the ESG 2005 was higher compared to applications considered under the ESG 2015; this is the case for both initial and renewal applications, but more pronounced for initial ones (see Figure 3 above). The higher number of rejection decisions may be largely

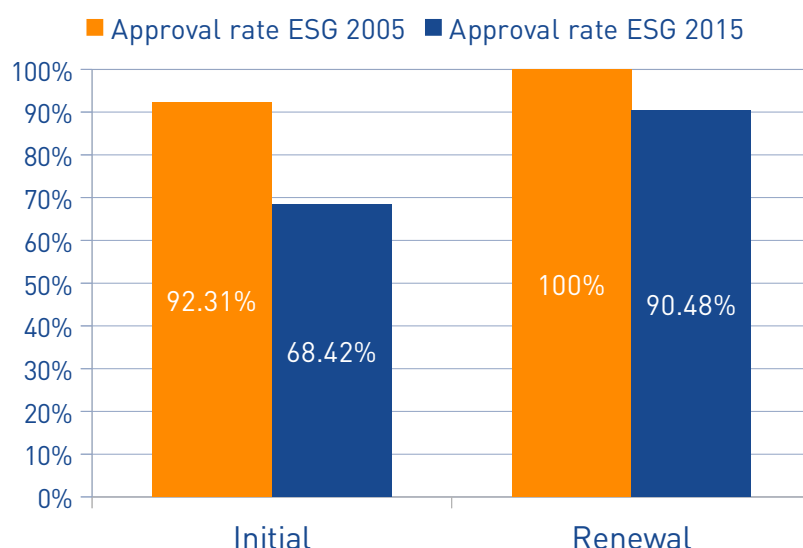


Figure 3: Approval rate by type of application (initial vs renewal) under ESG 2005 and ESG 2015

explained due to the new and more demanding, or more clear, standards that were introduced, e.g. the more explicit requirements to introduce policies for appeals and complaints (ESG 2.7), to publish full reports, while summary reports would not suffice (ESG 2.6), or to ensure that students are part of all external peer-groups (ESG 2.4).

A further reason may be that the external review of agencies in themselves has become more standardised and demanding, i.e. more evidenced based

requirements for review reports, increased level of panel expertise, increase of the threshold for meeting compliance etc.

Applications for renewal of registration are logically only made by agencies that were at least once before found to be in substantial compliance with the ESG. Hence, not surprisingly, these show a higher success rate compared to initial applications, irrespective of whether they were reviewed under the ESG 2005 or the ESG 2015 (see Figure 3 above).

Deferral of applications

Before rejecting an application, the Register Committee first defers the application and invites the agency to make additional representation on the reasons for a possible rejection. Following a deferral, 5 out of 7 applications for initial inclusion have been rejected, compared to only 2 out of 10 applications for renewed inclusion.

Following the rejection, the agency may submit a focused review addressing the issues that led to its rejection. 2 of the 10 agencies rejected under the ESG 2015 (6 initial inclusion and 4 renewals) have undergone a focused review and have successfully been admitted to the Register since (one initial and one renewal); 3 other agencies have started their preparations for a focused review. For 3 of the remaining agencies, the focused review was not an option since they have gone through major changes in their organisational structure or external QA activities, thus requiring a full review against the ESG. For the remaining agencies it remains unclear whether the issues that lead to their rejection has been successfully addressed and whether they are ready to submit an application to EQAR.

3. Analysis of eligibility confirmations

September 2015-September 2021

Starting with September 2015, all applications for inclusion or renewal of registration on EQAR begin with an eligibility stage, which precedes the external review of the agency. Agencies are requested to describe their full range of activities and to state which activities they themselves consider to be within the scope of the ESG. This is done in order to ensure that the external review report will include the relevant analysis and findings covering the registration of the agency on EQAR.

The Register Committee received and processed 89 eligibility applications, of which a third were applications for initial inclusion and two thirds were application for renewal of registration. Of the 89 applications, 67 have been concluded (with a decision or withdrawn), while 21 other applications are ongoing.

Starting with August 2020, EQAR and ENQA⁴ agreed on a model of a tripartite terms of reference (ToR) to be used for all applications henceforth. Instead of a separate eligibility confirmation letter (a document accompanying the Terms of Reference), the Register Committee now directly approves the ToR.

In the consideration of eligibility applications, the agency is often contacted for further clarifications when the application is unclear, incomplete or diverging from the RC's general understanding of (as specified in the U&I) what is considered an activity within or outside the scope of the ESG (see also table below). While before 2017 the Register Committee requested the agency and the panel to clarify these ambiguities during the review process, this approach changed, and such clarification are now made before the start of the review (thus the increase in clarification requests), so as to avoid cases where activities within the scope of the review or the separation of external QA and other activities would not be addressed.

Year/ Type	2021/09	2020	2019	2018	2017	2016	2015
Applications	10	13	10	19	12	18	7
Clarification requested	7 70%	8 61%	5 50%	11 58%	8 67%	3 17%	2 29%
non-EQA included in application	0	0	1 10%	1 5%	3 25%	4 22%	1 14%
EQA not included in application	5 50%	4 31%	3 30%	5 26%	6 50%	8 44%	2 29%
Separation of EQA	6 60%	7 54%	4 40%	5 26%	3 25%	6 33%	5 71%

Table 1. Consideration of eligibility applications by the Register Committee

The findings of the eligibility application analysis revealed the following:

- A request for clarification has been made for almost half of the applications submitted since 2015⁵, with a higher percentage in case of initial applications (58% versus 46% renewal). This shows that for many agencies (in particular for new application) the understanding of what an EQAR registration entails should be further explained and clarified.

⁴The reviews for the vast majority of the applications for registration have been coordinated by ENQA (84%), followed by the German Accreditation Council (GAC, 12%); the remaining ones were coordinated ad-hoc by a number of different organisations.

⁵The clarification process entails a minuted phone conversation carried out by the Secretariat with the applicant QA agency.

- A third of applications (34% of initial, 41% of renewal) have not included within their application all external QA activities within the scope of the ESG. This may be due to a misunderstanding of what constitutes an external QA activity within the scope of the ESG and in some cases a divergence in views of what an external review and the registration in EQAR should cover. Usually a clarification request was made to determine the nature and scope of such activities.
- Some applications include as “activities within the scope of the ESG”, activities that are not quality assurance activities in themselves, but that are transversal to the agency’s quality assurance activities. Examples of this include the training of experts (ESG 2.4), thematic evaluations (ESG 3.4) or the internal QA of the agency (ESG 3.6). These are expected to be addressed under the respective standards, but not as a separate activity.
- Approx. a tenth of the submitted applications (12%) had included activities outside the scope of the ESG. In some cases the agency wanted to include activities that would carry the EQAR registration label for external QA activities that were carried out outside of the higher education sector. The incidence of such cases has dropped in recent years (no cases in 2021 and 2020), which suggest that this matter was addressed.
- 40% of applications (most common for renewal applications) included services or other consulting activities that could be construed as within scope of the ESG. A note was added to such applications that the review should address how the agency ensures a transparent separation between its different activities within and outside the scope of the ESG.

In some cases agencies did not include activities that had not yet been launched at the time of their application to EQAR, but were expected to be launched before or shortly after the external review. In such cases the Register Committee requested that these activities were also considered in the self-evaluation and external review to the extent they were ready and defined at the time of the review.

The Register Committee also received two contestations after the agency found that some activities should be within the scope of the ESG or removed from its scope. Following further communication with the agency, the activities were clarified and the Register Committee adopted a new amended eligibility decision. Such complaints are the exception (2%) as most of the issues are clarified before the review.

4. Compliance with the ESG 2015

The Register Committee's judgement on specific standards usually follows the conclusion reached by the review panel, namely in 87% of cases. The situation, however, differs largely between standards, as Figure 4 illustrates. The judgement of the Register Committee differed most often (> 20%) from the conclusions of the review panel for standards ESG 2.7 (Complaints and appeals), ESG 2.6 (Reporting) and ESG 3.1 (Activities, policy and processes for quality assurance). The reason for such differences is due in large to the Register Committee's official interpretation not being stringently followed by the various external groups of experts, or due to a different weighing of issues by the Register Committee and the panel. Where the Register Committee's judgment

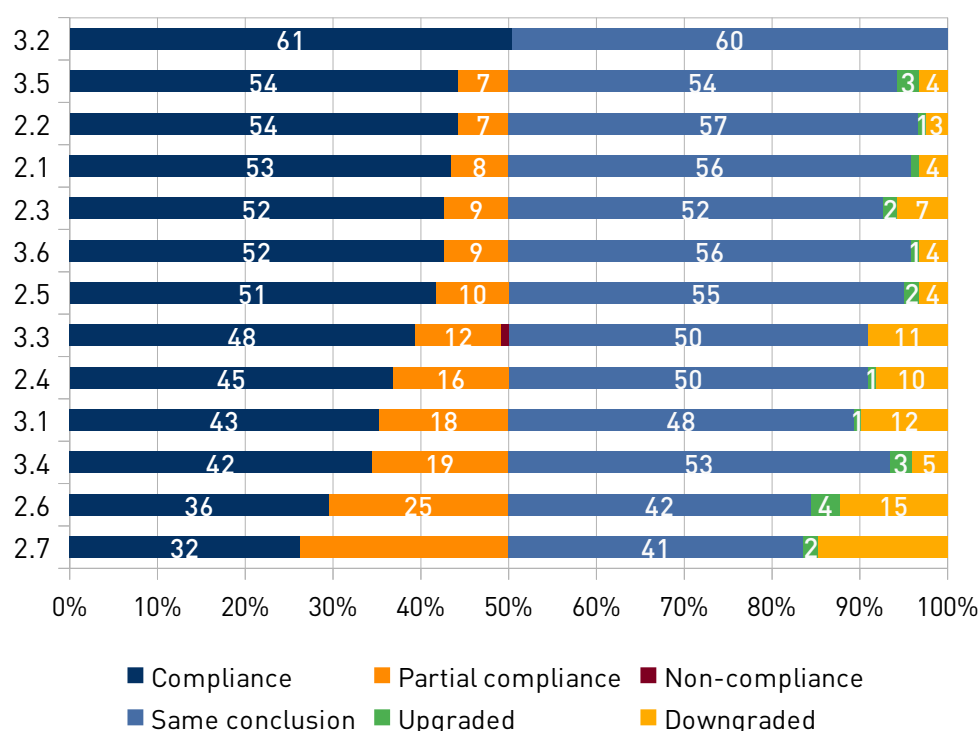


Figure 4: Compliance levels and areas of divergence with the review panel

differs to that of the review panel a clarification is normally sought from the review panel and in exceptional cases from the QA agency. Following the clarification request the Register Committee tends to follow the panel's judgement, namely in 61% of cases, while in 39% of cases a different judgment is made (see also Chapter 5). As Figure 6 below shows, a divergence in views with the panel is more prevalent for ESG 2.7, ESG 2.6, ESG 3.1 and ESG 3.3. These largely also correspond with the standards where the Register Committee more often concluded that the agency did not meet compliance with the standard.

In some cases, the consideration by the Register Committee comes quite some time after the review panel has made its conclusions, time in which the agency might have already addressed concerns or recommendations made by the panel.

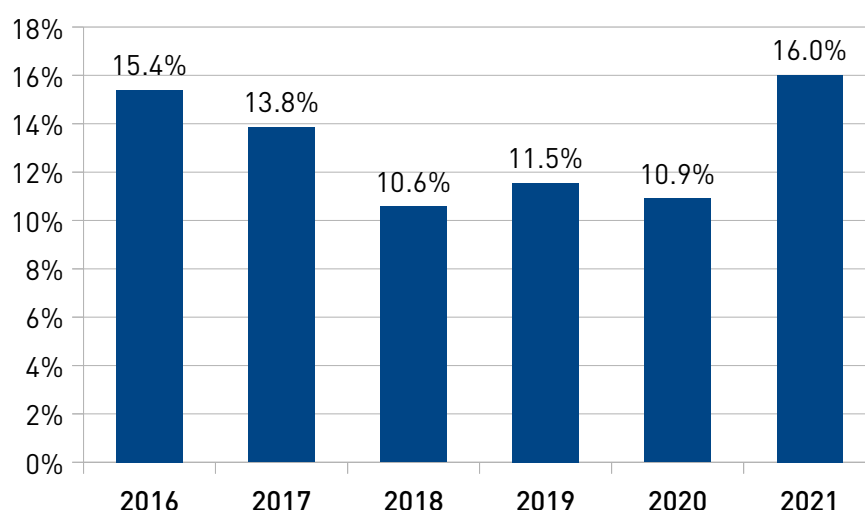


Figure 5: Divergence between Register Committee and Review Panel by year (2016 – September 2021)

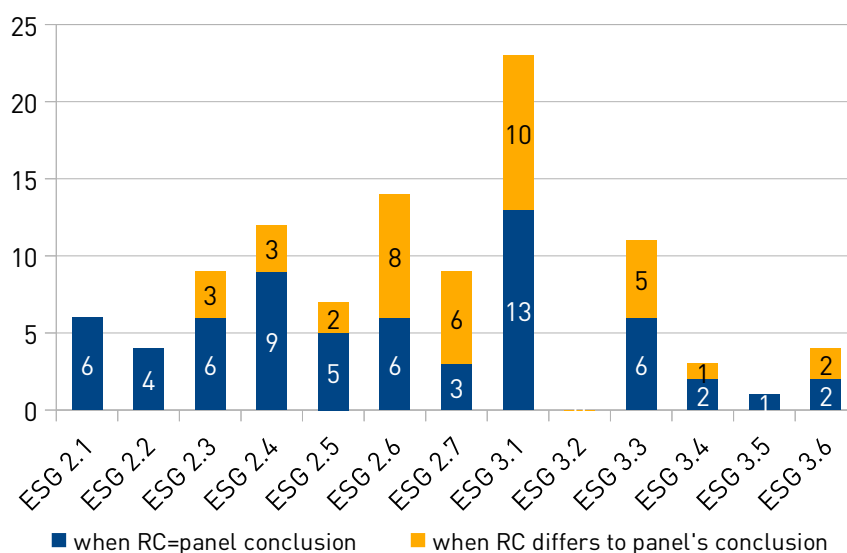


Figure 6: Standards where the RC sought further clarification

Considering the possible divergence in the panel and Register Committee's conclusions by year, Figure 5 shows, there is a tendency of an increasing consensus (from 2016 to 2019) with the exception of 2021, which may be explained by the low number of applications considered (until July 2021) that can amplify such differences in individual conclusions by standard.

Cases where the Register Committee most often concluded that the agency failed to meet compliance are addressed in more detail under the corresponding standards below including possible divergences with the conclusion of the panel.

4. ESG 2.7 Complaints and appeals

52% applications compliant / 48% partially compliant

Almost half of the applicant agencies failed to substantially meet the requirements of standard 2.7. Factors that weighed into the decisions of partial compliance were:

- the lack of a specific and independent body to handle appeals (most common issue);
- the limited scope of the appeals, allowing higher education institutions to question the outcome only for some external QA procedures, e.g. not for voluntary/ad-hoc procedures or for reports without a formal yes/no decision;
- cases where appeals could be addressed only in a court of law and not with the agency that carried out the review;
- the lack of a formal complaints procedure that would allow institutions to state their dissatisfaction about the conduct of the review process or those carrying it out.

Divergence with the review panel

The panel's analysis showed that the agency's appeals and complaints processes were often not clearly defined or inappropriately designed i.e. the role of the appeals' body was advisory in nature, the body deciding on appeals was identical to the body that made the decision being appealed, the appeal was limited to some, but not all the agency's external QA activities, the composition of appeals committee presented conflict of interest issues.

While some review panels found the possibility to appeal in court sufficient, the view of the Register Committee was that agencies should also provide higher education institutions with a possibility to appeal aspects that would normally not be taken up in a public system of appeal. The court appeal option while welcomed it is not sufficient to safeguard the interest of institutions under review, as the agency should remain responsible for its own processes.

Review panels found it often adequate if institutions were able to voice complaints in an informal manner. The Committee underlined that, in the absence of a complaints process, it remains unclear what complaints may be put forward, what are the recurring issues or how the agency is expected to address them, therefore complaints related procedures should be explicitly spelled out, e.g. in the relevant guides for institutions.

4. ESG 2.6 Reporting

59% applications compliant / 41% partially compliant

The Register Committee could not reach a judgment of compliance with ESG 2.6 when the following issues were present:

- the publication of summary reports but not of full reports;

- the agency did not publish initial accreditation reports (ex-ante), those with a negative outcome or the results from a pilot external QA procedure;
- lack of quality reporting: inconsistency in the content or structure of reports, shortcomings in the reporting format, reports provide only limited qualitative insights etc;
- accessibility of reports: discrepancies between the information (published reports) available in the local language and the English language version of the website.

Divergence with the review panel

In a number of cases the review panel did not consider necessary the publication of ex-ante accreditation reports. The panels considered that these reports served as a base for the programmes to be established and did not carry information directly addressed to the general public, and that such information would be confusing for readers as the programme does not exist. The Register Committee considered that the standard clearly requires the publication of all external quality assurance reports, and that it is in the public interest that both positive and negative decisions are made public and fully transparent. The public has a right to read and vet all decisions, including which concepts were refused by an agency. In addition, other agencies might see re-applications for accreditation by the same institution/programme and need to be able to know that those were refused by another agency previously.

In contrast to the review panel, the Register Committee found the agency's publication policy problematic if the higher institution could retain its assessment report before an accreditation decision is made (by a different accreditation body). The Committee underlined that the agency itself bears the responsibility to follow the ESG and therefore needs to ensure (e.g. contractually) that it is in a position to publish all reports of its external quality assurance procedures.

The Register Committee maintained its decision of partially compliant with ESG 2.6 when issues that were flagged in the previous review of the agency were not clearly addressed or implemented i.e. change in the policy to publish all reports; improvement in the readability and consistency of reporting.

4. ESG 3.4 Thematic analysis

68% of applications compliant / 32% partially compliant

The lack of compliance with the requirement of ESG 3.4 resulted mainly from to:

- limited human and financial resources available/allocated to thematic analyses;
- lack of a systematic approach in carrying out thematic analysis on a regular basis;
- limited use made of existing thematic analysis to feed back into the agency's development of its processes.

Divergence with the review panel

The Committee's judgment was different to that of the review panel, after the agencies provided proof that it has addressed the matters that lead to a partial or no compliance conclusion by the review panel:

The Committee considered the findings of the panel's review reports that showed that the level of development of thematic analysis was limited, that such analysis were not yet systematically carried out and that there was no clear use of these analysis. The Register Committee could therefore not follow the panel's conclusions of (substantial) compliance.

4. ESG 3.1 Activities, policy and processes for quality assurance

70% of applications compliant / 30% partially compliant

The agency did not meet the requirement of compliance with ESG 3.1 due to:

- a lack of stakeholder involvement in the governance of in the decision making processes;
- unclear classification of activities within and outside the scope of the ESG; or
- the lack of separation between external QA activities from other (non-ESG) activities, such as consultancy or support of other QA agencies;
- lack of strategic planning, mission statement not translated in the daily work of the agency.

Divergence with the review panel

In a number of applications, the Committee diverged from the review panel's conclusion of compliance in view of the lack or limited involvement of students or other stakeholders, especially labour market representative, in the agency's governance and work. The Committee did not find the argument of 'a lack of legal framework to allow for the involvement of students' as persuasive. The Committee underlined that the agency may improve its consultation processes with its different stakeholder and may also pro-actively suggest a change of its current legal framework.

In its eligibility confirmation the Register Committee often requested that the external review addresses how the agency ensures a clear distinction between external quality assurance activities and its other fields of work. In some cases the panel claimed that this separation is assured but provided little or no evidence on how this ensured. Where the agency had no policies in place to avoid carrying out consultancy activities and later assessments for the same degree programmes the Register Committee remained unable to concur with the panel's conclusion of compliance but concluded that the agency complies only partially with standard.

4. ESG 2.4 Peer-review experts

74% of applications compliant / 26% partially compliant

The agency did not meet the requirement of compliance with ESG 2.4 due to:

- issues re. the recruitment of experts;
- limited activities for the training and preparation of experts;
- absence of student experts from some panels.

Divergence with the review panel

The Committee found at times that the analysis of the panel and its findings would support a conclusion of partial rather than (substantial) compliance:

- students involvement was not fully assured as for all other expert panel members, but was rather limited to the assessment of specific aspects of the report;
- students were not involved in some types of assessments, such as ad-hoc reviews or assessment of PhD training programmes;
- inconsistencies in the number of experts listed by the agency in its published reports and the number of experts expected to be involved according to the agency's own methodology;
- contrary to the agency's policy and practice, it was decided at the request of the reviewed higher education institution not to include a student panel member;

4. ESG 3.3 Independence

80% of applications compliant / 20% partially compliant

The agency did not meet the requirement of compliance with ESG 3.3 due to:

- organisational independence, e.g. appointment of the members in a way that allows unrestrained influence by government, ministry, a specific stakeholder or founding organisation;
- operational independence, due to the potential for conflicts of interest that may arise regarding the different roles played by the agency's members within different committees;
- lack of transparency in the nomination and dismissal of the Board members of the organisation;
- Independence of formal outcomes, measures to prevent undue influence of some actors in the findings, analysis, conclusions and recommendations of the agency.

Divergence with the review panel

The Committee could not follow the panel's conclusion of compliance, where the analysis showed that the agency needed to ensure a clear separation from a supervisory body in terms of staff recruitment process, finances, infrastructure and management.

The Register Committee has also held a strict interpretation on the acceptable reasoning and conditions for the dismissal of a director or the members of the

board from their function. The Committee expects that the reasons/conditions for such dismissal to be reasonable, transparent and clearly limited to what is defined within the specific laws and regulations, the absence of influence alone is not enough.

The Register Committee underlined the importance of ensuring not just a balanced representation in the nominated delegates to the Board but also of formal mechanisms and regulations to safeguard its organisational independence.

The Committee also at times diverged from the panel's conclusion of compliance in cases where the founding organisation exerted full control of the agency, including sharing the same staff and maintaining a responsibility in appointing the head of the agency. The Committee's view is that the agency's organisational independence continues to be constrained by the close link and dependency in both legal and practical terms from its founder and the current setup cannot prevent one single interest group from gaining full control. While the Register Committee considered it usual and acceptable for the main founder and hence key stakeholder of the agency, to be involved, the Register Committee underlined that the requirement of independence should be understood to the effect that the new organisation, once it has been founded, should be able to function independently as required by the standard.

Review reports have in particular brought up situations where the existing legal frameworks make it difficult or impossible for agencies to comply with the ESG, in particular under ESG 3.3 and ESG 2.7, and as such the issues would need to be raised with the responsible authorities/ministries.

5. Analysis of clarification requests

In some cases, EQAR might request additional information or clarification from the external review panel, the applicant, the coordinator or other relevant party before the Register Committee considers the application at its meeting.

In the consideration of the 61 applications under ESG 2015, the Register Committee sought a clarification in approximately two thirds of the applications considered (where a final decision was made). Cumulatively the RC has addressed 49 clarification requests between 2016 and 2021/06, including requests made to review panel, QA agency, review coordinator and other (see Table below).

	2016	2017	2018	2019	2020	2021/06
Number of applications considered	6	16	7	17	12	4
Number of applications where a clarification request was made	4 (66%)	9 (56%)	3 (43%)	11 (65%)	9 (75%)	3 (75%)
Total number of clarification requests (review panel,	5	10	4	13	13	4

agency, coordinator, other)						
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Table 2: Number of clarification requests per application

While the number of decisions per year varies, the number of applications where additional clarifications was sought decreased between 2016 and 2018 and increased again in 2019 (see table below). The main reason might be due to the launch of the revised Use and Interpretation of the ESG (U&I as of November 2017) and the more detailed version of the RC's internal assessment that followed the new U&I.

Requests for further information and clarification were addressed mainly to panel members (71%). In cases where the information could not be clarified by the panel, the Register Committee has addressed some of these requests to the agencies themselves (24%). The number of such clarification requests has been somewhat rising in recent years. The RC has only exceptionally requested additional clarification from the coordinator of the review panel or other actors relevant to the agency's application on EQAR, e.g. external decision making body of the agency. The requests to coordinator usually addressed potential conflict of interest of a nominated panel member.

	2016		2017		2018		2019		2020		2021/09	
	Total no.	%	Total no.	%	Total no.	%	Total no.	%	Total no.	%	Total no.	%
Panel	4	80%	8	80%	3	75%	8	61%	9	64%	3	75%
Agency	1	20%	1	10%	1	25%	4	31%	4	36%	1	25%
Coordinator	0		1	10%	0		1	7%	0		0	

Table 3: Share of clarification requests addressed to panel, agency and coordinator

Clarification were more often sought from agencies coming for an initial registration, rather than the renewal of their registration. It would be logical to expect that renewal applications raise fewer questions/issues, which is also reflected in the higher success rate of such applications. Once agencies are registered, it is likely that most of the thinkable queries would have been addressed in the earlier review of the agency already. Agencies that have already been through the procedure once, might develop a better understanding on what should be covered in the self-evaluation reports, therefore also leading to better structured and content tailored external review reports. Nevertheless, more than half of the applications for renewal of registration for which a decision has been made were subjected to a clarification request.

	2016		2017		2018		2019		2020		2021/09	
Initial applications	2		4		3		5		2		3	
clarification requested	2	100%	2	50%	2	67%	4	80%	2	100%	3	100%

Renewal applications	4		12		4		12		10		1
clarification requested	2	50%	7	58%	1	25%	7	58%	7	70%	n/a

Table 4. Clarification requests per year for initial and renewal applications

The most frequently addressed issues in these clarification requests were related to standards ESG 3.1 (Activities, policy and processes for quality assurance), ESG 2.6 (Reporting) and ESG 2.4 (Peer review experts). On the other hand, the Register Committee has never addressed clarification requests related to ESG 3.2 (Official status) and had only one question of clarification related to ESG 3.5 (Resources) (see table below).

ESG standards	Total number of questions per standard
ESG 2.1 Consideration of internal quality assurance	6
ESG 2.2. Designing methodologies fit for purpose	4
ESG 2.3 Implementing processes	9
ESG 2.4 Peer-review experts	12
ESG 2.5 Criteria for outcomes	7
ESG 2.6 Reporting	14
ESG 2.7 Complaints and appeals	9
ESG 3.1 Activities, policy and processes for quality assurance	23
ESG 3.2 Official status	0
ESG 3.3 Independence	11
ESG 3.4 Thematic analysis	3
ESG 3.5 Resources	1
ESG 3.6 Internal quality assurance and professional conduct	4

Table 5. Clarification questions and related ESG standards

The most common issues that have been raised in clarification requests to panel and quality assurance agencies concerned the following issues:

- Whether and how stakeholders, especially students, are involved in the governance bodies of the agency (ESG 3.1.)
- Which of the activities fall within the scope of the ESG and if they have been addressed by the panel (ESG 3.1);
- Distinction between regular external QA activities and other fields of work (ESG 3.1);
- Publication of (negative) reports (ESG 2.6)
- Involvement of students and other actors in review panels (ESG 2.4)

- Clarity of procedures in regards to selecting panel members (ESG 2.4)
- How the agency ensures the organisational and operational independence (ESG 3.3)

Most clarification requests address more than one standard. On average, the RC addressed two standards per request. The number of standards that are addressed in a clarification request has been higher between 2018 and 2021 while the average number of standards that are addressed per request and the highest number of standards that have been addressed in a request between 2016 and 2021) (see table below).

	2016	2017	2018	2019	2020	2021/09
Average no. of standards addressed per request	1.8	1.3	2	2.4	2.07	2.75
Highest no. of standards addressed in a request	3	4	3	7	5	6

Table 6. Average number of standards addressed per clarification request and its upper margin (2016 and 2021/03)

After a response to the clarification request was received and the case has been further discussed by the RC, the Committee diverged from with panel's conclusions on the standards under clarification in more than one third of the cases in the final decision.

The panel has requested more information about matters related to standards for which the agency was found to be partially compliant 11 times (or 12% of the total number of standards for which the panel concluded partial compliance) between 2018 and 2021. In these cases, the clarification requests led to confirmation of the findings of the panel.

Type of panel conclusion:	No. of panel conclusions for applications with a clarification request	No. of standards for which a clarification requests has been sought	After clarification request, RC decided differently to the panel	After clarification request, RC followed panel's conclusion
Full compliance	403	40 (10%)	15 (37%)	25 (64%)
Substantial compliance	311	52 (16%)	21 (40%)	31 (60%)
Partial compliance	95	11 (12%)	4 (35%)	7 (65%)

Table 8. Panel conclusions and clarification requests

6. Analysis of change reports, mergers and complaints (2015-2021)

All EQAR-registered agencies are expected to inform EQAR about changes to their legal form and status, amendments to their statutes and substantial changes in their process or methodology. Since 2015, the Register Committee has considered 58 substantive change reports. On average, agencies reported two to three distinct changes/adjustments in one report.

Figure 7 showcases the annual number of substantive change reports, as well as complaints and agency mergers received from 2016 to September 2021.

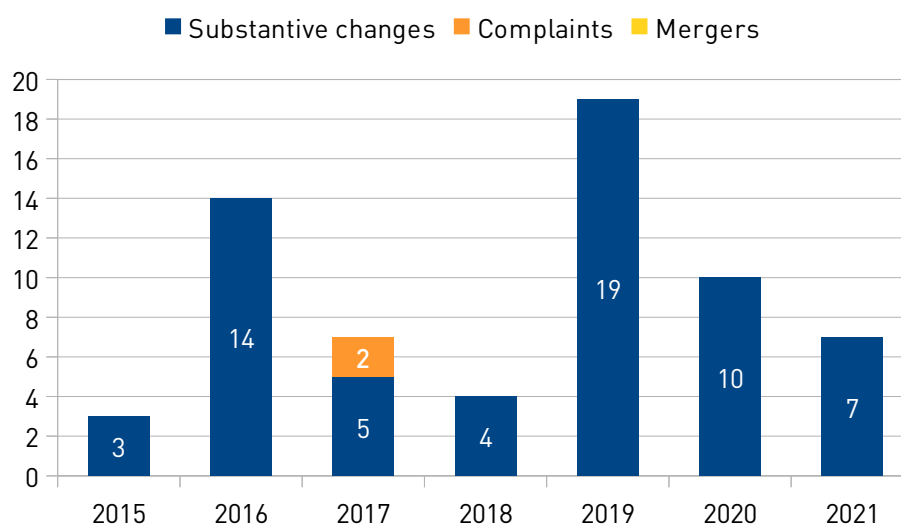


Figure 7: Change reports, mergers and complaints of EQAR-registered agencies between June 2015 and September 2021

The most diverse changes were reported in agencies' activities occurred in 2016, after the adoption of ESG 2015, indicating that agencies have been receptive to the requirements in the new standards and guidelines.

6. Classification of changes reported by registered agencies

The nature of the changes varies. Since the adoption of the ESG 2015, the reported changes mostly refer to the changes or development of new quality assurance activities.

- The highest number of substantive changes was reported in 2019, following the adoption of the Interstate Treaty between the German federal states and the related Specimen Decree. This led all EQAR-registered agencies' that carry out reviews in Germany to report on specific changes in their internal QA procedures⁶.

⁶ Since 2019, agencies in Germany no longer take accreditation decisions, but prepare an assessment report on the basis of which the German Accreditation Council (GAC) takes a decision

- The most wide range of changes were reported in 2016, following the adoption of ESG 2015, indicating that agencies have been receptive to the requirements in the new standards and guidelines.

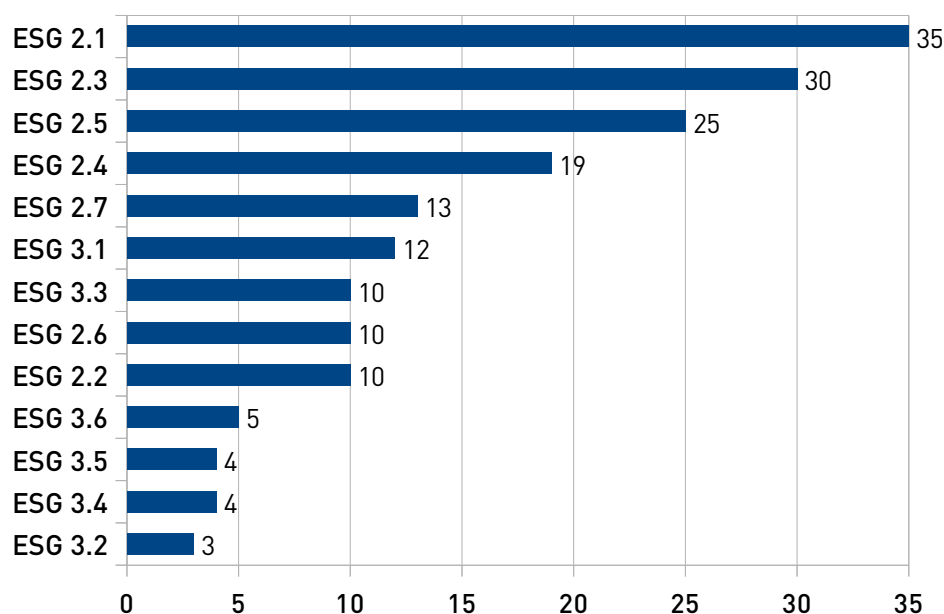


Figure 8: Standards affected by substantive changes (Jul 2015 – September 2021)

The development and the changes in existing external QA activities would entail introduction of new criteria and procedures. Consequently, the most commonly affected standards in reports were ESG 2.1, ESG 2.3 and ESG 2.5; see Figure 8 for a full list. Changes in the organisational structure were also reported to EQAR frequently. Thematically, these changes either related to ESG 3.1 (Activities, policy and processes for quality assurance) or ESG 3.3 (Independence). For example, agencies introduced or merged internal bodies, improved the involvement of stakeholders and opted towards more independent managing of its own staff and resources.

Type of change/Year	2015	2016	2017	2018	2019	2020	2021 ⁷	Total
Changes in existing EQA activities	2 25%	8 31%	3 27%	3 50%	14 46%	6 33%	2 22%	38
Changes in the organisational structure	3 37.5%	8 31%	1 9.09%	1 17%	7 23%	2 11%	1 11%	23
New EQA activities	1 12.5%	5 19%	3 27%	1 17%	7 23%	6 33%	6 66%	29
Discontinuation of existing	1 12.5%	2 7.7%	3 27.3%	0	2 6.6%	4 22%	0	12

⁷ The statistics for the year 2021 cover the decisions made in September 2021.

EQA activities								
Changes in the organisational identity	1 12.5%	3 11.5%	1 9%	1 17%	0	0	0	6

Table 9. Summary of change reports (December 2015 - September 2021)

Changes in agencies have been introduced due to both intrinsic and external factors. Namely, in approximately 40% of the change reports, the adjustments in the agencies' work resulted from changes in national legislation, illustrating the importance of national legal frameworks following the ESG. The agencies have nevertheless also been proactive in innovating and developing new activities without the requirement of an external framework (approximately 35% of all reported changes). In some cases agencies were trying to reduce the repetitiveness of the same external QA process and to respond to specific needs of HEIs.

6. Timely reporting

The reporting of changes has not been very timely (see Figure 9 below). Namely, only 41 % of all substantive changes were reported within 6 months since the change took effect. Agencies have been more attentive to reporting changes on time in 2015, 2016 and 2017: more than two thirds of the changes were reported to EQAR within 6 months. Comparatively, in 2019 and 2020, two thirds of the changes were reported more than half a year later to EQAR.

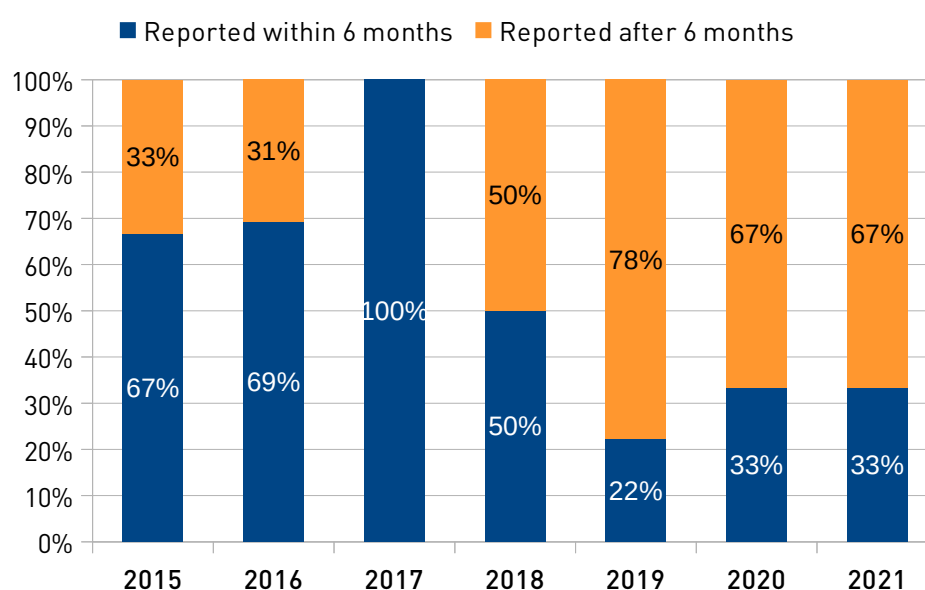


Figure 9: Timeliness in the submission of substantive change reports

The higher rate of timely reporting (within 6 months) between 2015 and 2017 might be due to the recent adoption of the ESG, which kept agencies (and other higher education actors) more focused on the European initiatives in the years when this was one of the prevalent topics of discussion in EHEA.

Attentiveness to ESGs and RC decisions has been demonstrated in the types of changes that agencies introduced: 34% of the change reports tackled at least one ESG standard for which the agency was found to be partially compliant in an earlier registration procedure.

7. Main findings

To improve the process for future applications for registration, the Register Committee has considered and adapted its approaches. In the consideration of eligibility applications, more than half of agencies are now contacted for further clarifications before the start of the review so as to reduce the risk that issues relevant for the application will be unaddressed. Additionally, the introduction of the tripartite terms of reference has allowed the streamlining of the application process and ensured that all relevant issues will be covered for the agency's application to EQAR.

In reviewing the standards for each application, the Register Committee generally followed the analysis and conclusion of the panels, although a number of differences were observed for specific standards i.e. particularly for standards ESG 2.7 (Complaints and appeals), ESG 2.6 (Reporting) and ESG 3.1 (Activities, policy and processes for quality assurance). In most cases where the Register Committee disagrees with the panel or where the information to reach a judgment is missing, a clarification is requested. Following the consideration of the clarification responses, the Register Committee concurs with the panel's judgement in 61% of the cases. Clarifications were more often sought from agencies coming for an initial registration, rather than for the renewal of their registration, which normally raise fewer questions/issues. This is also reflected in the higher success rate of such applications.

The Register Committee has approved most applications for initial inclusion and almost all applications for renewal of registration. However as the external review of agencies has become more standardised and demanding, the approval rate on applications considered under the ESG 2005 (96%) was higher compared to applications considered under the ESG 2015 (80%).

Review reports have brought up situations where the existing legal frameworks make it difficult or impossible for agencies to comply with the ESG, in particular under ESG 3.3 and ESG 2.7, and as such the issues would need to be raised with the responsible authorities/ministries.

Since the adoption of the ESG 2015, agencies most often reported substantive changes addressing amendments to current activities or developments of new quality assurance activities. The development and the changes in existing external QA activities commonly entails the introduction of new criteria and procedures. Consequently, the most commonly affected standards in reports were ESG 2.1, ESG 2.3 and ESG 2.5. As most QA agencies (59%) have reported their changes with a considerable delay (over 6 months), a resolve to the issue is to be further considered by the Register Committee.

8. References

Register Committee decisions: <https://www.eqar.eu/register/decisions/>

European Quality Assurance Register for Higher Education (EQAR), 2015, Use and Interpretation of the ESG for the European Register of Quality Assurance Agencies.

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