



QAA Educational Oversight Review Concerns Scheme

**How to raise concerns with QAA and
how QAA will respond**

December 2025

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Purpose of the Educational Oversight Review Concerns Scheme

1. The Educational Oversight Review (EOR) Concerns Scheme allows students, staff and other individuals or organisations to raise with the Quality Assurance Agency for Higher Education (QAA) concerns about the academic standards and quality of higher education delivered by independent providers that are reviewed by QAA either for **specific course designation** or **educational oversight**.

Background

2. In the UK, individual universities and colleges (sometimes working in partnership with degree awarding bodies) are primarily responsible for maintaining the academic standards of awards and delivering a high-quality experience for students. Evidence from our reviews shows that most providers discharge these responsibilities effectively. Where issues arise, QAA is committed to addressing them promptly, and in cases indicating serious systemic problems, we will use the Scheme to intervene.

Who this document is for?

3. This guide is meant for those who wish to bring a concern to QAA's attention. Note that 'we' refers to QAA and 'you' to the person or organisation raising concerns throughout. It also describes the process for the benefit of providers about whom concerns are raised.

Which providers are covered by the Scheme?

4. The EOR Concerns Scheme applies only to independent providers of higher education in England, Scotland, Wales and Northern Ireland that are reviewed by QAA under the Educational Oversight Review method either for **specific course designation** or **educational oversight**.
5. Arrangements for other kinds of providers are as follows:
 - Concerns about publicly funded universities¹ in Scotland are covered by the [Scottish Quality Concerns Scheme](#), administered by QAA.
 - Concerns about universities, further education colleges and independent providers registered with the Office for Students (OfS) in England are covered by the [Notification procedure](#) run by the OfS.
 - Concerns about universities and further education colleges in Northern Ireland are covered by the [Notification](#) procedure run by the Department for the Economy in Northern Ireland.
 - Concerns about publicly funded higher education providers in Wales are covered by Medr's [complaints procedure](#). The procedure provides a mechanism through which concerns about academic standards or the quality of the student experience at regulated institutions can be referred to QAA for investigation.

¹ The Scottish Funding Council are currently considering how concerns are managed for publicly funded colleges in Scotland.

6. If you don't know which of these categories the provider you are concerned about falls into, please ask us.

What kinds of issues can the Scheme look at?

7. QAA investigates concerns which indicate serious systemic or procedural problems that present a current or ongoing risk in one of the following areas:
 - the academic standards of the qualification(s) awarded by the provider
 - the quality of students' learning opportunities.
8. By systemic we mean a concern that is affecting, or has the potential to affect, several students, the collective student interest, or the wider public or sector more generally.
9. **We cannot consider** quality concerns linked to:
 - matters of academic judgement, such as assessment results and assessment board decisions, and requests for assessed work to be re-marked
 - individual cases and requests for remedy or tuition fee refunds
 - grievances against individual staff
 - problems that the HEI has already rectified
 - isolated mistakes or occurrences of bad practice
 - historic issues where there is no evidence in relation to ongoing impact or repeat concerns raised by the same individual on the same issue.
10. Where a matter raised as part of a concern is being dealt with by formal legal proceedings, the Concerns process will be suspended pending the outcome of the legal proceedings.
11. **We are unable to provide redress or compensation to anyone submitting a concern to us.**
12. The EOR Concerns Scheme serves to respond to the issue rather than the individual; it is not a complaints process and QAA will not provide detailed responses to individuals about action taken as a result of quality concerns raised. Individual complaints should be raised through the provider's complaints process or if the provider's process has already been exhausted, with the [Office of the Independent Adjudicator \(OIA\)](#), or the [Scottish Public Services Ombudsman \(SPSO\)](#). These processes are in place to enable individual remedy to complaints raised. By contrast, information gained by QAA through this Scheme is used to identify where the issues raised indicate serious systemic or procedural problems. As such, it is not appropriate to share detailed outcomes with those raising quality concerns as the matter will go beyond the individual issue raised. QAA is, however, committed to a transparent approach and accordingly publishes all stage 2 investigation reports as well as publishing an annual summary report of quality concerns. The applicant will be informed as to the action taken at the stages outlined in Figure 1 (see page 6) but for the reasons outlined above, no further details will be provided.

Who can raise concerns?

13. We welcome concerns from anyone, including students, staff, external examiners, members of the public and professional, statutory and regulatory bodies, in the UK or elsewhere. QAA itself can raise concerns where it identifies evidence indicating serious systemic problems in the course of its other activity.

How can I raise a concern?

14. If you are a student or member of staff, you should first raise the issue directly with the provider through its internal procedures before making a submission to QAA. If the provider fails to resolve the issue, and it is one that falls under the scope of the EOR Concerns Scheme, it can be raised with us. Depending on the circumstances, we may make inquiries or investigate before the provider has completed its own investigation.

15. You should raise a concern with QAA by using our [Submission Form](#).

16. If you require us to communicate in a particular way, for example due to a disability, please contact us at Concerns@qaaacuk.onmicrosoft.com or telephone 01452 557000 (voicemail only).

17. QAA cannot investigate wholly unsubstantiated concerns. As such your submission should, where reasonably practical, be accompanied by evidence. This might be in the form of correspondence, committee papers or reports. You may be able to make a request to the provider under the *Freedom of Information Act*, or by means of a Subject Access Request, to obtain information to support your submission. If you cannot obtain copies of documentation that you wish to include as evidence, but can demonstrate a reasonable belief that it exists, please explain this in your application.

What about whistle-blowers?

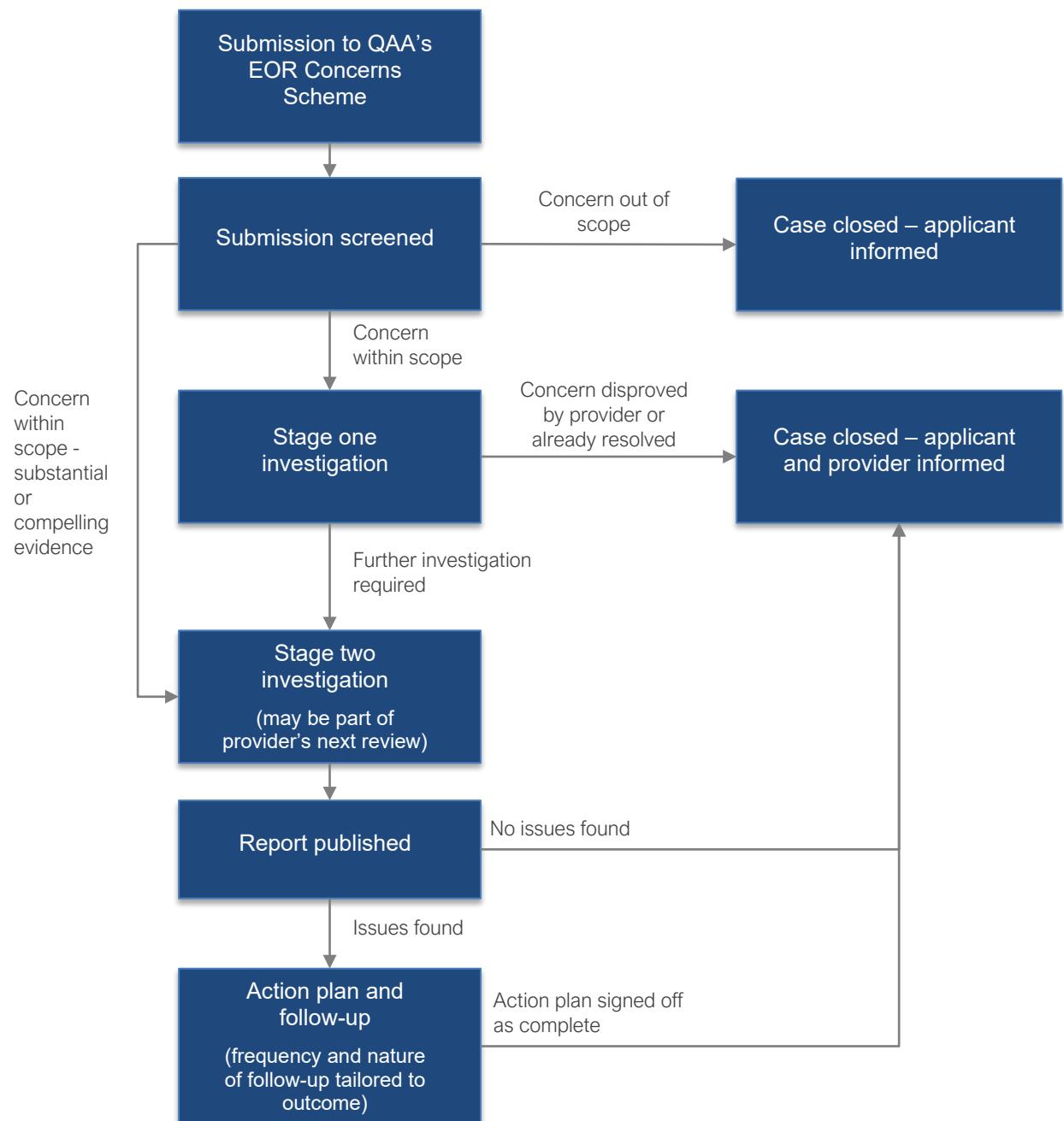
18. We are committed to considering concerns from all sources, including from students or staff who fear that raising concerns may invite some kind of penalty from the provider they are concerned about.

19. If you feel uncomfortable about raising your concerns with the provider before raising it with us, we may be able to approach the provider directly and can ask for evidence about the issue you are concerned about.

20. Please contact us at Concerns@qaaacuk.onmicrosoft.com and we can talk to you about our approach including the things we can do to protect your identity.

How concerns are investigated

Figure 1 - An overview of how we investigate concerns



Screening

21. The purpose of screening is to determine whether the concern falls within the scope of what QAA can investigate. Screening will be conducted by a QAA Officer who will consider:
 - whether the concern is about a provider that can be investigated under EOR Concerns Scheme
 - whether it has gone through and completed all internal procedures operated by the provider - for example, academic appeals and complaints
 - whether it has been submitted on the appropriate form and is accompanied by documentary evidence
 - whether there is enough detail and information in the submission. We may ask you for further information at this stage.
22. Concerns clearly out of scope will be screened out at this stage (see 'What kinds of issues can the Scheme looks at' above). If the concern is screened out, we will explain our decision to the applicant.
23. If the concern falls within the scope of what QAA can investigate, we will inform the provider involved of the matters raised, taking steps to protect the identity of the applicant as appropriate. QAA will conduct EOR concerns cases with courtesy, respect and fairness. Quality concerns will be considered by senior managers at QAA. We may also pass information to other organisations, such as an associated Professional, Statutory or Regulatory Body, if we think it may assist them to discharge their duties.

Investigation

24. If we think the concern is within the scope of what we can investigate, we will proceed to an investigation.

Investigations conducted as part of review activity

25. Where the provider has a QAA review visit scheduled or is due to undertake annual monitoring within the next few months, we will normally investigate the concern as part of that process rather than conduct a separate investigation. If we choose to investigate in this way, we will pass the information and accompanying evidence to the team. We will explain the nature of the concern to the provider and invite them to provide a response to the review team. The team's subsequent view of the seriousness and validity of the concern may affect the review outcome.
26. Further information is available in Annex 2 of the *Educational Oversight Review Guidance for Providers*, available on the [QAA website](#).
27. Where the provider's next scheduled review visit or annual monitoring activity is not due to take place within the next few months, we will normally investigate separately, as follows.
28. We normally investigate concerns in two stages. Where there is substantial and compelling evidence of the existence of a current or ongoing risk to standards, quality

and/or information, we may expedite the investigation by moving directly to a stage two investigation.

Stage one investigation

29. In the case of concerns which appear to fall within the scope of the scheme but for which the evidence base is equivocal or incomplete, we may seek to gather and consider more evidence before proceeding any further. This is likely to involve written correspondence with the provider to determine whether it is aware of the concern and, if it is, how it has dealt, or is dealing, with it. It may also involve correspondence with other organisations, such as associated Professional, Statutory or Regulatory Bodies.
30. At the end of this process we will decide on the basis of the additional evidence we have gathered whether to proceed to a visit to the provider (stage two investigation) or bring the investigation to a close. If the provider can demonstrate that it has dealt with the issue satisfactorily, then that can be a reason for ending the process at this point. If we decide to end the investigation at this stage, we will explain our decision to the applicant.

Stage two investigation

31. If the stage one investigation reveals sufficient evidence of a concern, we will proceed to a stage two investigation which involves a visit to the provider to meet with staff and students. The visit may be conducted either online or onsite.
32. We will explain the nature of the concern to the provider clearly and provide appropriate opportunities for the provider to respond to it.
33. The investigation will be led by a QAA Officer and may also involve QAA reviewers and/or Professional, Statutory and Regulatory Body representatives, depending on the nature of the concern and its complexity. We will check to make sure no one involved in the investigation has a conflict of interest with the provider concerned.
34. An investigation visit will normally last for one or two days depending on the complexity of the issues, the number of programmes affected, and whether other providers (such as degree-awarding bodies) are involved. In some cases, further visits may be required before the investigation team can reach a sound conclusion.

Outcomes

35. The outcome of a stage two investigation will be a report published on QAA's website. The report will describe the concerns raised, the evidence considered, and QAA's findings as to whether the evidence supports the concern.
36. The report may also comment on other issues not directly associated with the original concern, but which emerge during the investigation. If the investigation finds that there is not sufficient evidence to support the concern, or that the concern has already been satisfactorily dealt with by the provider, then no further action will be required. If evidence to support the concern is found, recommendations for action will be made to support the provider to address the identified issues, and an action plan will be requested. Further details about recommendations for action and investigation outcomes are outlined in Annex 1.

37. We will share a draft of the report with the provider so that it can comment on the factual accuracy of the content. We may also share the draft report for information with:

- any awarding bodies and funding organisations for their information
- for EOR Category A providers, the Home Office.

38. We will make it clear to these organisations that the outcomes in the report are not finalised until the report is published.

39. Any penalties or sanctions imposed as a result of a QAA Concerns investigation by the awarding body or Home Office are at the discretion of those organisations and are outside the control or influence of QAA.

40. An investigation may result in QAA withdrawing the provider's license for the use of the QAA Review Graphic.

Action plan and sign-off

41. Where an action plan is requested, it must be agreed with QAA and must fully address the recommendations. The provider must ensure that the action plan is published on its website and that it completes the action plan in a timely manner. QAA will also publish a link to the action plan on its website. QAA will monitor the action plan and require evidence of its completion. When QAA requests an action plan, the procedure is as follows:

- The provider submits an action plan, which is agreed as fit for purpose by QAA, or returned to the provider for further work. The agreed action plan is published by the provider on its website, and a link is provided to QAA and added to the provider's page on the QAA website.
- The QAA Officer maintains contact with the provider to monitor progress.
- When the actions are complete, the QAA Officer may meet with the provider to confirm this.
- The QAA Officer writes an addendum to the published investigation report detailing how the QAA recommendations have been addressed.
- QAA signs off the updated report and it is republished.
- A statement is added to QAA's website confirming that the action plan has been completed.

42. Where appropriate, the provider's next review or monitoring activity may be used to monitor progress with the action plan or to sign off the action plan as complete. If the action plan remains incomplete at the time of the visit, further follow-up will be required. In cases where serious issues are identified, the provider will be required to undergo a full review. Further details can be found in Annex 1.

Concerns about programmes delivered with others

43. Where a concern relates to provision delivered in a partnership between an independent provider which is covered by this scheme and a degree-awarding body which is not, we will normally direct our inquiries to the provider who delivers the provision and notify the awarding body that a concern has been received.

Working with other organisations

44. From time-to-time QAA is made aware of serious concerns which represent risks both to academic standards and quality as well as areas which we are not responsible for investigating, such as student safety, financial impropriety and abuse of the student visa system. In such cases we may share information about our work with other organisations, receive and use information from them and/or undertake joint investigations.

Timescales

45. We strive to investigate concerns quickly and thoroughly and then publish our findings.

46. How long it takes us to investigate depends on a number of factors, including the complexity of the issue and the speed and ease with which we can obtain supporting evidence.

47. The table below gives information on indicative timelines. In some cases, it will be possible for us to complete our work more quickly. In exceptional cases an investigation may take longer, such as when the concerns are about learning opportunities delivered with others, requiring visits to separate delivery and awarding bodies. We are responsible to our Board for completing our work within these timescales.

Time following submission	
0	Information is submitted to QAA and evidenced
1-5 days	QAA acknowledge receipt of the information in writing
2-4 weeks	Within four weeks, QAA screen the submission and inform the person making it whether it is something we can investigate
9-13 weeks	QAA conduct a stage one investigation
13-24 weeks	If required, QAA conduct a stage two investigation and publish the outcomes
24-28 weeks	If required, the provider produces an action plan
28-36 weeks	The action plan is completed by the provider and signed off by QAA
38 weeks	QAA add an addendum to the investigation report and the report is republished

Protecting those raising concerns – Privacy and Data Protection

48. Concerns about academic standards and quality are not regarded as qualifying disclosures under the *Public Interest Disclosure Act 1998*. Those submitting concerns to

us are therefore not offered legal protection under the Act, so if they wish to remain anonymous, they need to make this clear on the concerns submission form. Please bear in mind, however, that although every effort will be made to protect the identity of the person raising the concerns, the provider may be able to identify them from the nature of the issues raised or evidence submitted.

49. We process the personal information of individuals who submit concerns to the Scheme on the basis of legitimate interest: the promotion and maintenance of quality and standards in higher education.
50. Where we share concern information with other bodies (as described above), we will never share personal data (including name and contact details) relating to the person raising the concerns if they have asked to remain anonymous. Where the person has asked to remain anonymous, we will either anonymise or pseudonymise the details we share, making every effort to protect the individual's identity.
51. The personal details provided by individuals who submit concerns will be stored securely on our internal systems, with restricted access permissions applied. We retain information about concern investigations for 10 years, before securely destroying it. After the closure of a case, any personal details held on file are removed, and the information is either anonymised, pseudonymised, or encrypted for the remainder of the retention period. Please refer to Annex 2 for further information.

Representations

52. Higher education providers subject to a stage two investigation are not permitted to appeal against the outcomes, but can make representations on the grounds of flawed procedure on our part. A complaint of this nature should be raised through [QAA's Complaints procedure](#).

Contacting us

53. For further guidance on any aspect of this process, please contact:

Concerns, The Quality Assurance Agency for Higher Education, Southgate House, Southgate Street, Gloucester, GL1 1UB

Email: Concerns@qaaacuk.onmicrosoft.com

Telephone: 01452 557000 (voicemail only)

Annex 1: Outcomes from concerns investigations

The table below sets out the criteria that will be used by investigation teams to decide the outcome of a concerns investigation. The criteria are intended to assist teams in reaching conclusions but should not be considered a definitive list that is used prescriptively. The investigation team's professional judgement will take account of the evidence and specific circumstances.

Issue type			
No issues found	Issues do not indicate systemic problems in the management of academic standards, quality or information.	Issues are partly systemic, in that processes and procedures may not be operating as effectively as they might.	Issues indicate systemic problems in the management of academic standards, quality or information.
Recommendations for action			
There are no recommendations for action.	<p>Typically, recommendations might relate to:</p> <ul style="list-style-type: none"> • minor omissions or oversights • a need to amend or update details in documentation, where the amendment will not require or result in major structural, operational or procedural change • completion of activity already underway in a small number of areas that will allow the provider to meet baseline requirements more fully. 	<p>Typically, recommendations might relate to:</p> <ul style="list-style-type: none"> • weaknesses in the operation of part of the provider's (academic) governance structure or lack of clarity about responsibilities • insufficient emphasis or priority given to assuring standards, quality, or information in the provider's processes • procedures which, while broadly adequate, have some shortcomings in terms of the rigour with which they are applied 	<p>Typically, recommendations might relate to:</p> <ul style="list-style-type: none"> • ineffective operation of parts of the provider's academic governance structure • significant gaps in policy, structures or procedures relating to the provider's academic standards, quality assurance, or the quality of information • breaches by the provider of its own quality assurance management procedures.

		<ul style="list-style-type: none"> • problems which are confined to a small part of the provider's activities. 	
Provider response			
Concerns raised are either not upheld or any concerns have already been resolved.	The need for action to address the concerns identified has been acknowledged by the provider, and it has provided clear evidence of appropriate action being taken within a reasonable timescale.	<p>The provider's plans for addressing the concerns identified are under-developed or not fully embedded in the provider's operational planning.</p> <p>The provider's priorities or recent actions suggest that it may not be fully aware of the significance of certain issues.</p>	<p>The provider has not recognised that it has major problems or has not planned significant action to address the concerns identified.</p> <p>The provider's plans for addressing identified issues are not adequate to rectify the problems, or there is very little or no evidence of progress.</p>
Outcomes			
No further action required.	The provider is required to develop and implement an action plan to address the investigation team's recommendations for action. The implementation of the action plan will be considered as part of the next Annual Monitoring visit.	The provider is required to develop and implement an action plan to address the investigation team's recommendations for action. The implementation of the action plan will be considered as part of the next Annual Monitoring visit, and the investigating team may choose to recommend that the visit is brought forward.	The provider is required to develop and implement an action plan to address the investigation team's recommendations for action and undergo a full review.

Annex 2: Data Protection

QAA complies with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and any other applicable Data Protection legislation in relation to personal data. QAA only processes personal data for the purposes of conducting its review activities and, in this case, ensuring data shall only be accessible to those who require access to carry out the requirements of the Concerns investigation process.

QAA is committed to ensuring and maintaining the security and confidentiality of personal and/or special category data, and all members of staff are responsible for handling data in accordance with QAA's [Data Protection Policy](#) so that personal and special category information is processed compliantly. All QAA staff and reviewers undergo GDPR and information security training on an annual basis. How QAA gathers and processes personal information, the individual's rights and QAA's obligations are set out in QAA's [Privacy Notice](#). There is a Data Protection Incident Reporting Policy and procedure for reporting, assessing and managing incidents.

QAA stores personal data and non-personal data securely and ensures the data is only accessible to those who require access to it to carry out the Concerns investigation process. All data or all copies or extracts made from it will either be returned to the applicant, destroyed on request of the applicant, or destroyed in line with QAA's records retention policy. QAA is ISO 27001 and Cyber Essentials certified for information security management.

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