The Quality Assurance Agency for Higher Education, UK

Self-Assessment Report for Review by ENQA

December 2022
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Foreword

This report has been prepared for QAA’s fourth review, and the third coordinated by the European Association for Quality Assurance in Higher Education (ENQA).

QAA has devoted considerable time and effort to the process of developing the report, but it has been no mere bureaucratic exercise: as on previous occasions, we have found the process to be valuable - both in holding the Agency accountable to itself (ahead of the external scrutiny to come) and also in contributing to the Agency’s development. The report itself will serve as a useful reference source and guide to QAA’s quality assurance work.

The policy environment in which QAA operates remains dynamic in each of the four nations of the UK. In Scotland and Wales, where QAA works closely with the governments and funding bodies, there is a focus on tertiary reform that is bringing the higher education and further education sectors closer together, and the respective approaches to quality assurance and enhancement continue to evolve. In Northern Ireland, there is progress towards a new quality framework, although political issues have caused repeated delays.

In July 2022, the Agency took the difficult decision that it can no longer consent to remain the Designated Quality Body (DQB) reporting to the English regulator (the Office for Students), because the policy and regulatory approach in England made it impossible to comply with the Standards and Guidelines for Quality Assurance in the European Higher Education Area. QAA’s work as DQB will stop in March 2023, therefore, and is out of scope for this review, although our other quality assurance work in England, of course, remains in scope. Compliance with the ESG is fundamental, not only to enable all of QAA’s work outside the DQB through its membership model, but also to the fundamental philosophy of collaborative, peer-led quality assurance that underpins QAA’s core purpose.

Finally, QAA has continued to develop its international role since the last ENQA review in 2018. In particular, take-up of our International Quality Review, through which QAA benchmarks institutions’ processes against the ESG, has grown substantially. Sector confidence, both on a national and international level, in our expertise in quality assurance is evidenced in the overwhelming take-up of that voluntary membership, and the service provided to members goes from strength to strength.

We commend this report to the ENQA Board and the review panel, and hope that it provides a clear and comprehensive picture of QAA’s work, as well as evidence of its continued compliance with the ESG.

Vicki Stott
Chief Executive

Professor Simon Gaskell
Chair of the Board of Directors
Introduction

Context

1. The Quality Assurance Agency for Higher Education (QAA) is the independent quality body for UK higher education. QAA is trusted by higher education providers and regulatory bodies to maintain and enhance quality and standards. QAA works with its members and with institutions and bodies throughout the UK and internationally to deliver their shared commitment to the promotion and maintenance of quality and standards. This includes the identification, promotion and enhancement of innovation and good practice in teaching and learning. As a membership organisation, QAA supports around 300 university and college members working together to enhance the quality of their provision, and to protect and promote UK higher education. QAA's Chief Executive has articulated her vision for QAA to be the settled authority for quality and standards in the UK.

QAA’s purpose and mission: The purpose of QAA is to safeguard academic standards and ensure the quality and global reputation of UK higher education. It does this by working with higher education providers, regulatory bodies and student bodies with the shared objective of supporting students to succeed.

2. QAA delivers quality assurance and enhancement across the UK within a higher education system where policy is devolved. This means that higher education policy is determined separately by each nation:

- in England, through the UK Government
- in Northern Ireland, usually through the Northern Ireland Executive
- in Scotland, through the Scottish Government
- in Wales, through the Welsh Government.

3. The UK has one of Europe's largest and most diverse higher education sectors. QAA works with a range of higher education providers, including universities, specialist higher education institutions, alternative providers and further education colleges offering higher education programmes. The diversity of needs and interests in different parts of the UK higher education system is reflected in the range of different external review methods operated by QAA.

Changes since the last review

4. Since the last ENQA review in 2018, there has been significant internal and external change impacting on QAA. Externally, the most significant change has been in the way the regulation of quality and standards is undertaken in England. A new statutory regulator - the Office for Students (OfS) - established through an Act of Parliament, came into existence in 2018. The Act allows for a body to be designated to undertake assessments of the quality and standards of English higher education providers to inform the OfS regulatory decisions, and to advise the OfS on degree awarding powers. QAA was appointed as Designated Quality Body (DQB) in 2018 to perform these functions. In July 2022, QAA announced its withdrawal of consent to act as Designated Quality Body in England and will cease to be the DQB in March 2023. The work undertaken as DQB was different in nature to the other activity of QAA in the UK and internationally (further detail has been included in ‘Key

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1 Higher Education and Research Act 2017 (HERA)
2 QAA demits DQB status announcement
challenges and areas for future development’ solely to provide context to other areas of QAA’s work).

5 As outlined in the ‘Development of the self-assessment report (SAR)’, QAA undertook review method SWOTs which confirmed the principles and synergies between its review methods outside of the DQB. This resulted in QAA identifying the opportunity to consolidate and articulate its approaches more consistently, as reflected in the Internal Quality Assurance (IQA) Manual and in line with QAA’s vision to be the settled authority for quality and standards in the UK as outlined in ‘ESG Standard 3.6: Internal quality assurance and professional conduct’, ‘ESG Standard 2.2: Designing methodologies fit for purpose’ and ‘ESG Standard 2.3: Implementing processes’. The review process reaffirmed that outside of the DQB function, QAA continued to work to common features and principles, as outlined in ‘Higher education quality assurance activities of the agency’ and the analysis supported the decision to withdraw consent to act as DQB.

6 The changing external context in England also impacted on internal QAA structures when in 2018 QAA moved from being in receipt of funding from the Higher Education Funding Council for England to deriving income through membership and other sources. Funding arrangements are outlined in ‘ESG Standard 3.5: Resources’. The changes to funding arrangements have seen QAA staff reduce from 192 full-time equivalent (FTE) in 2016 to 85 FTE in September 2022. QAA had to review and revise its internal structure, including its leadership team, to ensure it had access to a wide range of diverse skills, knowledge and experiences in the context of reduced available resource. Some central functions were either reduced in size or outsourced as part of that process. The restructure also provided opportunities to make efficiencies and develop into new areas of work. Furthermore, the decision to withdraw consent to act as DQB provides additional opportunities to expand into new areas of work as outlined in ‘Key challenges and areas for future development’.

7 The change in regulatory approach in England led to QAA supporting a more diverse range of review methods. There was a period of embedding new structures and approaches which led to reduced coordination of approach across the Agency. Since 2020, the new leadership team has sought to improve efficiency by adopting more standardised approaches and principles to QAA’s review work, including internal quality assurance, reviewer training and the response to COVID-19. Much of this coordination has been done through the strategic Assessments and Reviews Group (ARG), which brings together senior managers responsible for all review methods and is chaired by the Deputy CEO. Reporting to ARG is the Assessment and Reviews Operational Group (AROG), consisting of operational leads for review methods which supports cross-method operational implementation. In addition to the Agency-wide groups there are also local method operational groups (such as the Review Methods Delivery Group covering Scotland, Wales and Northern Ireland) with representatives from each on the Agency groups. So, while diversity in review methods continues, to respond to the devolved nature of HE in the UK, QAA now has a more standardised approach, and an organisational structure in place to respond to changing needs and circumstances.

8 QAA has submitted a number of substantive change reports to the European Quality Assurance Register for Higher Education (EQAR) since the last ENQA review. The first, in 2019, concerned the restructuring of QAA in response to a reduction in funding and changes to review methodologies in England, Wales and Northern Ireland. The follow-up in 2020 included the new Gateway Review method in Wales but primarily focused on the further changes that had occurred to QAA’s role in England after the formation of the OfS. As a result of that report, the EQAR Register Committee voiced concerns about ESG Standard 2.4 and 2.6 as they applied to work undertaken for OfS. QAA made significant efforts to resolve the matters identified with the OfS, but the Memorandum of Understanding
with OfS did not provide QAA with the scope to enact change without the explicit agreement of the OfS. The EQAR Register Committee in June 2022 decided to suspend QAA temporarily from the Register as a result of non-compliance with standards 2.4 and 2.6 in QAA’s work as DQB. QAA acted to address this issue by announcing the inclusion of students on DQB review teams and publishing reports, which was enabled by the decision to withdraw consent to act as the DQB. EQAR noted QAA’s commitment to resolving the matters and that their concerns only related to the activities carried out as DQB in England. EQAR had no concerns on the external QA processes undertaken by QAA in line with the ESG in Wales, Scotland and Northern Ireland nor the international external activities of QAA. QAA’s registration was restored in August 2022. Lastly, change reports were submitted in May 2022 on the new method for the evaluation of UK transnational education and in August 2022 on the International Programme Accreditation method.

9 In 2020, QAA published a new strategy which enabled it to reflect its strategic response to change. The external factors that shaped the strategy included the evolution of the policy environment across the UK, the continuing internationalisation of higher education, and the COVID-19 pandemic, which had driven a rapid shift towards online and hybrid teaching and learning. The strategy set out the three strategic priorities that would guide QAA’s work as outlined in the ‘History, profile and activities of the agency’.

Approach to the Self-Assessment Report

10 QAA has used the development of the SAR as an opportunity for self-reflection on both its range of quality activities and working practices. An overarching analysis has been provided in the SWOT analysis that outlines the constraints on QAA practices due to parameters set by regulators which has impacted on QAA activity since the last review, but also key strengths relating to expertise, partnership working, student engagement and enhancement approaches, as well as developing opportunities arising from sector changes. In addition to the Agency-wide SWOT, there has been great value in reflecting on individual ESG standards which has helped QAA to identify both strengths and weaknesses at both a method and Agency level and has been used as a learning tool for our methods. This is presented in each section on the individual ESG standards through:

- reference to QAA overarching principles and approach
- provision of links to Agency-wide evidence or evidence that demonstrates the application of the overarching principles or approach in respect of a particular activity (the evidence is also available by the SAR section on the ENQA reviewer site)
- reflection on enhancement activities which include action taken or proposed as a result of the SWOT analysis at method and Agency level.

11 Throughout these sections QAA refers largely to methods in scope but may provide examples where it additionally uses ESG to inform other areas of its work. The SWOT, however, refers to QAA’s broader work as an agency as this was a significant component of its sector consultation and enabled Agency-wide reflection. Reference to DQB activity has not been included as such activity will cease in March 2023.

12 QAA also has methods in development for the next Quality Enhancement Review method in Wales and the cyclical review method in Scotland. Where feasible, information on those methods has been included as part of the self-assessment report (SAR). In addition, reference has also been made to the recently developed International Programme Accreditation method.

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3 QAA announcement committing to transparency and student reviewers
4 QAA’s registration on European Quality Register restored following QAA action
13 QAA has sought to outline, throughout this SAR, those overarching and common principles that apply to all of its work, the scope of each of its activities, and to state clearly any exceptions.

**Development of the Self-Assessment Report (SAR)**

14 In accordance with the QAA projects framework, a project team was established to develop the self-assessment report (SAR). The Core team consisted of the project sponsor (Chief Executive), senior responsible officer (Executive Director of Operations and Deputy CEO), project lead (Quality Enhancement Manager, QAA Scotland), project manager (Continuous Improvement Manager, Quality Assessment England) and two project members (lead Policy Officer, Nations and Europe; and Quality Manager Lead, International and Professional Services). The Core team was supported by a working group which included representatives of external quality assurance activity across the Agency.

15 Due to the range of quality activity across the Agency, QAA used the expertise of the working group to support workshops to explore strengths, weaknesses, opportunities and threats for each ESG standard and by each activity. This approach then informed the development of the initial overarching Agency SWOT analysis. It also enabled reflection at both review method and Agency level and provided an opportunity to share and enhance practice and also informed the development of an IQA Manual (for more information, see 'ESG Standard 3.6: Internal quality assurance and professional conduct'). In addition, the development of the SWOT included internal and external consultation and workshops as outlined in the 'Opinion of stakeholders' and 'SWOT analysis'.

16 The project communication plan ensured engagement in the development of the SAR, both internally and externally, as outlined in the 'Opinion of stakeholders'. The project team drew on colleagues across QAA to support the drafting of the document, and a process providing feedback through 'section readers' was established. In addition, all Agency staff and Board members were offered the opportunity to comment. Following revisions, the SAR was signed off by QAA's Board and the Chief Executive before being submitted.
Higher education and QA of higher education in the context of the agency

UK higher education providers

17 The term ‘higher education provider’ is widely used in the UK to describe any institution or organisation that delivers or contributes to all or part of a higher education (HE) programme. Providers fall into three main groups:

Universities: There are 168 universities in the UK. University title is a term protected by law and may only be used by those providers that have been granted the title by government or national regulator. Some older universities operate under a Royal Charter, but to gain UK university title today a provider must meet certain criteria, such as having been granted powers to award taught degrees by the Privy Council (a formal body of advisers on certain national matters) on the recommendation of the relevant government and meeting thresholds in relation to the number of higher education students. Since 2019, only in England, the Office for Students (OfS) has powers to grant degree awarding powers and university title, that have in practice replaced the previous arrangements that utilised the Privy Council’s previous powers.5

Colleges, university colleges or smaller specialist institutions: Not all of these providers have degree awarding powers (DAPs); some have taught DAPs but not research DAPs. Generally, these bodies offer more further education awards than higher education, however there are more than 200 further education colleges that provide higher education programmes. Some of these have the power to award their own degrees, but the majority provide programmes leading to an award from a separate degree-awarding body (normally a university). Alongside fees, most further education colleges that provide higher education receive grant funding from the relevant UK higher education funding body, hence they are also known as ‘publicly funded’.

Alternative providers: These are providers that do not receive grant funding from one of the UK higher education funding bodies and may be operating for profit or have charitable status.6 Some alternative providers are universities and hold their own DAPs but, like further education colleges, the majority provide programmes leading to an award from a separate degree-awarding body which they work in partnership with.

Requirements to undergo external quality assurance

18 Higher education providers are obliged to undergo external quality assurance for different reasons. The bodies that allocate public funding are required to ensure that provision is made for the assessment of the quality of the education at providers they fund, or in England that are registered with the regulator. The bodies providing public funding are the Office for Students (OfS) in England,7 the Scottish Funding Council (SFC),8 the Higher Education Funding Council for Wales (HEFCW)9 and the Department for the Economy in Northern Ireland (DfE(NI)).10 As seen in ‘Annex 1: QA activities and responsibilities in UK nations’, each funding body has different requirements for quality assessment, which is

5 University title - Office for Students
6 In England, an alternative provider can be registered with the OfS in the Approved (Fee Cap category) and receive grant funding.
7 Office for Students
8 Scottish Funding Council
9 HEFCW
10 Department for the Economy
reflected in QAA review methods. For example, publicly funded providers must undergo cyclical external quality assurance or assessment in Scotland and Wales.

19 Alternative providers in Scotland, Wales and Northern Ireland (and some providers in England who are not on the OfS register) who require educational oversight for the recruitment of international students and/or course designation to access public funds are obliged to take part in external quality assurance by QAA. In England, the OfS provides educational oversight for providers on the OfS register.

UK degrees and degree awarding powers

20 All valid UK degrees are awarded by a university or other approved degree-awarding body that has overall responsibility for the academic standards and quality of the qualification. Precise arrangements for how degree awarding powers (DAPs) are granted depend on where in the UK the applicant institution is based. The Privy Council is responsible for decisions about DAPs and university title for UK providers, with the exception of those in England that applied after 1 April 2018, for whom this responsibility rests with the OfS.11

21 There are three main types of degree awarding powers:

- foundation degree awarding powers (FDAP) give providers in England and Wales the right to award foundation degrees
- taught degree awarding powers (TDAP) give UK HE providers the right to award bachelor’s degrees with honours, taught master’s degrees and other taught higher education qualifications, but not postgraduate research degrees
- research degree awarding powers (RDAP) give UK HE providers with TDAP the right to award doctoral degrees and master’s degrees where the research component is larger than the taught component when measured by student effort.

22 Authorisation to grant degree awarding powers is in the form of an order from the Privy Council or OfS. The order sets out the type of powers granted, the extent and the period that the authorisation takes effect. Providers are granted full authorisation on an indefinite, time-limited or renewable basis depending on the criteria under which they applied and/or their status in the publicly funded HE sector. Institutions in England can also be granted degree awarding powers on a probationary basis, which are subject to certain restrictions. All providers that have degree awarding powers must undergo quality assurance review activity required by the relevant regulator or funder. The OfS has express powers to revoke degree awarding powers for providers in England if compliance with conditions of registration are not maintained.12

Students and staff

23 According to data from the national Higher Education Statistics Agency (HESA), UK student and staff numbers for the 2020-21 academic year were:

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11 Degree awarding powers and university title
12 The Right to Award UK Degrees - QAA Guidance, August 2018
Table 1: Student and staff numbers by provider UK region 2020-21

<table>
<thead>
<tr>
<th>Provider UK nation</th>
<th>Student numbers</th>
<th>Academic staff</th>
<th>Non-academic staff</th>
</tr>
</thead>
<tbody>
<tr>
<td>England</td>
<td>2,230,690</td>
<td>185,965</td>
<td>151,605</td>
</tr>
<tr>
<td>Northern Ireland</td>
<td>66,245</td>
<td>3,585</td>
<td>2,415</td>
</tr>
<tr>
<td>Scotland</td>
<td>282,875</td>
<td>24,940</td>
<td>27,060</td>
</tr>
<tr>
<td>Wales</td>
<td>145,170</td>
<td>10,045</td>
<td>13,345</td>
</tr>
<tr>
<td><strong>UK total</strong></td>
<td><strong>2,724,980</strong></td>
<td><strong>224,535</strong></td>
<td><strong>194,425</strong></td>
</tr>
</tbody>
</table>

24 In all four UK nations, there has been a growth in student numbers since the 2018 self-assessment report to ENQA, with an addition of almost 450,000 on those statistics.

25 Of the student numbers provided above, a notable percentage were international students studying in the UK:

Table 2: International students studying in the UK by domicile EU/non-EU 2020-21

<table>
<thead>
<tr>
<th>Domicile</th>
<th>Provider UK nation</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>England</td>
</tr>
<tr>
<td>EU</td>
<td>123,245</td>
</tr>
<tr>
<td>Non-EU</td>
<td>366,910</td>
</tr>
</tbody>
</table>

26 Students studying wholly outside the UK with a UK provider in 2020-21 (transnational education) were:

- 82,370 within the European Union
- 428,485 outside of the European Union.

Qualifications frameworks

27 QAA maintains and publishes the qualifications frameworks for UK higher education on behalf of the higher education sector. The frameworks describe the achievement represented by higher education qualifications. They apply to degrees, diplomas, certificates and other academic awards granted by a higher education provider with DAPs.

28 There is one qualification framework for higher education in England, Wales and Northern Ireland (The Framework for Higher Education Qualifications in England, Wales and Northern Ireland - FHEQ), and a separate one for Scotland (The Framework for Qualifications of Higher Education Institutions in Scotland - FQHEIS). Since 2014, both are combined in the single qualifications frameworks publication.14 In England, the OfS has adapted elements of the FHEQ to form its own publication of ‘sector-recognised standards’.

29 Compatibility with the Qualifications Frameworks in the European Higher Education Area (QF-EHEA) was verified by QAA in 2006 for the FQHEIS and 2008 for the FHEQ.15 In addition, to enable student mobility and to provide information for employers, QAA has

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13 Reporting of non-academic staff information in the HESA Staff return for providers in England was made optional from the 2020-21 academic year.
14 The Frameworks for Higher Education Qualifications of UK Degree-Awarding Bodies
15 The Frameworks for Higher Education Qualifications of UK Degree-Awarding Bodies (page 11)
worked with a number of partner organisations to publish *Qualifications can Cross Boundaries: A guide to comparing qualifications in the UK and Ireland.*

### Recent UK higher education policy developments

#### UK

30. At a UK-wide level, the UK Standing Committee for Quality Assessment (UKSCQA), has continued to provide a platform for discussion and oversight of quality matters that affect all of the UK. The Committee has proven to be an important area for discussing shared quality matters at a time where policies, practices and regulation around higher education have continued to diverge across the four UK nations. The Committee has complemented the UK-wide activity of QAA.

31. The COVID-19 pandemic had a serious impact on higher education institutions and organisations across the UK, and QAA worked with the sector to develop detailed support and guidance for the UK sector. The support and guidance were made publicly available, rather than just to QAA Members, in recognition of the extraordinary pressures arising from the pandemic. The guidance included international comparisons and case studies.

32. QAA has worked with sector agencies, government departments, regulators, students, politicians and academics with expertise in academic misconduct to protect academic integrity and prevent cheating and fraud as outlined in 'ESG Standard 3.4: Thematic analysis'.

33. Since it began in 2016-17, the Teaching Excellence and Student Outcomes Framework (TEF) has been used as a way of assessing excellence in teaching at higher education providers and how they ensure excellent outcomes for their students in terms of graduate-level employment or further study. While participation in the exercise remains voluntary in Scotland, Wales and Northern Ireland, it became an integral element of compliance in England as part of the regulatory framework introduced in England from 2018.

#### England

34. From 2020, the Office for Students has consulted on its future approach to the regulation of quality and standards. A notable element of this process has been the decision no longer to refer to the UK Quality Code for Higher Education (Quality Code) within the regulatory requirements for the English higher education sector. Other UK nations have expressed their desire to continue to use the Quality Code, and it remains a fundamental reference point for the sector in England. The Quality Code no longer being used as a reference point in England’s regulatory requirements has been identified in ‘Key challenges and areas for future development’.

#### Northern Ireland

35. QAA undertook two research projects in mid-2021, in consultation with QAA Members in Northern Ireland, to explore higher education providers’ current approaches to quality enhancement and understand how QAA can develop its support to members in Northern Ireland including the two universities as well as the university colleges and FE colleges. QAA subsequently submitted a proposal to the Department for the Economy.

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16. *Qualifications can Cross Boundaries: Guide to comparing qualifications in the UK and Ireland*
17. UKSCQA - UK Standing Committee for Quality Assessment
18. COVID-19 support and guidance
19. TEF
20. Consultation on quality and standards conditions - outcomes
(DfE(NI)) for the development of the next review method for Northern Ireland. QAA used the outcomes of the projects undertaken to develop the proposal. The projects demonstrated an appetite for an approach based on quality enhancement, similar to Scotland and Wales, on a cyclical basis in line with the ESG.

36 Due to the ongoing political situation in Northern Ireland, efforts to develop a new quality approach have taken longer than expected. Discussions with the acting Northern Ireland Executive are ongoing with finance having been set aside by the department for the project. We are awaiting final approval by their procurement team. In the meantime, the Department for the Economy continues its Annual Provider Review scheme in Northern Ireland.21

Scotland

37 In June 2020, Scottish Government Ministers asked SFC to review how it could best fulfil its mission of securing coherent, good quality, sustainable tertiary education and research. The review was developed involving consultation with the sector, with the final report being published in July 2021.22 The report recommends that the Government sets out more clearly its strategic intent for tertiary education (colleges and universities) and research. Overall, the report recommended developing a single quality assurance and enhancement framework for tertiary education, to uphold academic standards, and enhance the learning experience of all students.

38 In their response to the review,23 the Scottish Government stated that they are reassured by the SFC's commitment to build on the feedback from stakeholders and are content for SFC to explore options for a single quality assurance and enhancement framework for tertiary education. The Scottish Government articulated to SFC that it was expected to work in consultation with all interested parties, and to strike the appropriate balance between assuring and enhancing the quality of tertiary provision.

39 QAA has been working with SFC, Education Scotland (a Scottish Government executive agency supporting quality and improvement in Scottish education outside of HE) and other stakeholders across the tertiary sector to consider the best ways of working in the future. QAA has established an advisory group to consider ways it can continue to provide adequate assurance and enhancement for the HE sector in the period following the conclusion of the fourth Enhancement-led Institutional Review (ELIR) cycle. SFC has been clear that it supports continued ESG compliance as the next method develops.

40 In 2019, the Scottish higher education sector decided to establish a new sector-wide group to act as a forum to discuss quality matters. Quality Arrangements for Scottish Higher Education (QASHE), with QAA acting as secretariat, has proven to be a valued arena for discussion on quality matters, particularly with regard to how or whether the Scottish sector should respond to developments in the English sector. QASHE includes a wide membership, with representatives from different types of institution from the Scottish higher education sector, students, SFC and the Scottish Government.

Wales

41 Following the 2016 Hazelkorn Review,24 which considered how Wales could achieve a world-class, post-compulsory education system, the Welsh Government published

21 Higher education quality assurance | Department for the Economy
22 Coherence and Sustainability: A Review of Tertiary Education and Research
23 Scottish Funding Council review: Scottish Government response
24 Welsh Government: A framework for building a world-class post-compulsory education system for Wales
its Tertiary Education and Research Bill in 2021. The Bill proposed establishing the Commission for Tertiary Education and Research (CTER) and dissolving HEFCW. The Commission will be established in 2023. It will have a Board including representatives from learners and practitioners. The Bill was passed by the Welsh Parliament in June 2022 and received Royal assent as the first legislation approved by King Charles III.

42 The designated inspectorate Estyn will continue to hold a duty to inspect post-16 education and training providers, except HE. The Commission will have a duty to ensure that assessments are made of the quality of HE by registered providers. The Commission may designate a body to exercise its assessment functions, which may also charge fees to institutions in relation to the assessment functions it performs. The Commission may publish quality assurance frameworks in consultation with persons the Commission considers appropriate. The Commission must also establish a Quality Committee for the purpose of advising the Commission on the quality of all tertiary education it funds. QAA has been engaging proactively with the Welsh Government and Parliament as the legislation developed.

43 In December 2018, QAA, in partnership with the Welsh HE sector, established the Wales Quality Network as a forum to discuss sector issues and engage with other institutions in Wales, which was important given the ongoing developments in other UK nations and issues related to quality assurance being in the spotlight. The membership includes members from across Wales's HE providers.

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25 Written Statement: Introduction of Tertiary Education and Research (Wales) Bill
26 Estyn: What we inspect
History, profile and activities of the agency

Origins

QAA was established in 1997 as a single quality assurance service for providers of HE in the UK. QAA brought together the Higher Education Quality Council (HEQC) and the quality assessment divisions of the Higher Education Funding Council for England (HEFCE) (which had previously also had responsibility for external quality assurance in Northern Ireland), and of the Higher Education Funding Council for Wales (HEFCW). The Scottish Higher Education Funding Council (SFC) agreed to contract its quality assurance activities to QAA soon afterwards, completing full UK coverage.

In 2022, QAA celebrates its 25th anniversary of operation in the UK. In those 25 years, there have been significant policy developments in the UK - most notably, the increased devolution of powers from Westminster to Scotland, Wales and Northern Ireland as their devolved legislatures were established. These powers include higher education, which has seen different approaches to the funding, delivery and quality assurance of HE being adopted across the UK. QAA has continued to operate effectively as an agency supporting the UK, considering the policy differences in each nation.

Strategy

QAA’s current strategy was launched in 2020. At the heart of the strategy is a commitment to continued collaboration with institutions and stakeholders across the higher education sector. The strategy outlined the three strategic priorities that would guide QAA until 2025:

1. To be the trusted expert independent body supporting the enhancement and regulation of higher education across a diverse UK.
2. To provide expert advice that secures standards and supports quality enhancement.
3. To strengthen the global reputation of UK higher education.

Context

In England, following the cessation of work as the DQB, QAA provides services and advice to its member institutions, including support with quality enhancement activities. In Scotland, Wales and Northern Ireland, QAA’s quality enhancement work is provided in concert with, and informed by, its quality assurance activities. QAA works closely with all higher education providers and the respective funders and regulators, in line with the policy and regulatory approach of each nation. QAA’s approach across the UK nations is summarised in the graphic in ‘Annex 1: QA activities and responsibilities in UK nations’. QAA’s UK-wide responsibilities include delivering Higher Education Review for Alternative Providers (HER AP). QAA is also the regulator of the Access to HE Diploma, which transforms lives by offering students from non-traditional backgrounds access to higher education. The Agency also works internationally on behalf of its members and the wider UK HE sector.

In 2019, QAA launched its membership programme, replacing a subscription model. QAA moved to a membership model to reflect the enhanced partnership that QAA has with UK HE providers that enables member universities and colleges to work together.

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27 QAA Strategy 2020-2025
28 QAA: About us
29 QAA launches new Membership programme
Through membership, QAA works with the sector to develop solutions to shared, sector-wide issues, including developing advice and guidance associated with the UK Quality Code, Subject Benchmark Statements, and advice on degree standards, as seen in ‘Higher education quality assurance activities of the agency’. QAA Members have exclusive access to events and resources, including case studies and webinars. As a result of regulatory and funding reform, membership in England is voluntary, while providers in Scotland, Wales and Northern Ireland are required to be members as part of the quality arrangements agreed with the funder/regulator. The vast majority of universities in England have subscribed to voluntary membership. In December 2021, QAA launched international membership to support international institutions.30

**Corporate legal status**

49 QAA is an independent body, a registered charity and a company limited by guarantee, across all four countries of the UK. Its Articles of Association, dated 22 April 2021, are published online.31 Additionally, the Agency has a Companies House Certificate of Incorporation. QAA has legal responsibilities (for example, according to the *Charities Act 2011*) to provide benefit to the public and is required to produce an annual report outlining how it is achieving this.

50 The Charity Commission, the regulator for charities in England and Wales, makes it clear that charities must be independent from governmental authorities: '... [a charity] must exist in order to carry out its charitable purposes, and not for the purpose of implementing the policies of a governmental authority, or of carrying out the directions of a governmental authority.' QAA’s key objectives are set out in its official company documentation.32 More information on QAA’s legal independence can be found in ‘ESG Standard 3.3: Independence’.

**Governance**

51 QAA is governed by its Board. The Board’s role is to govern QAA in line with its vision, aims and values, and to ensure that it achieves its charitable objects. Board members are also trustees responsible for the organisation’s compliance with legal and regulatory requirements and provisions as applicable to a charity.

52 In order to discharge this responsibility, the Board:

- provides leadership and direction for QAA within a framework of prudent and effective controls, accountabilities and risk management
- endorses QAA’s strategic aims
- ensures resources are in place for QAA to deliver its objectives and achieve its aims
- reviews management performance
- sets QAA’s values
- determines QAA’s risk appetite and tolerance thresholds.33

53 QAA’s Board members represent a wide range of interests within HE and other areas. Some members are appointed for their experience of industry, commerce, finance or professional practice. The Board currently has 18 members, four members nominated by bodies representing UK HE providers, four members nominated by funding bodies, seven independent members including a student representative appointed by the Board of

30 [QAA launches International Membership Programme](#)
31 [QAA Articles of Association](#)
32 [QAA profile on the Charity Commission for England and Wales](#)
33 [QAA Code of Best Practice for QAA Board Members](#)
Directors, one member nominated by the National Union of Students, one member nominated by UK Colleges, and one member engaged in governance or management of and alternative provider.\textsuperscript{34}

54 Members of the Board are recruited in accordance with good practice. Where external bodies, such as mission groups or funding bodies, nominate members to the Board or subcommittees, the QAA Nomination and Remuneration Committee (NRC) engages in dialogue with nominators. For independent members of the Board, the NRC oversees a process of public recruitment. The NRC also advises the Board on the appointment, terms and conditions, and remuneration of QAA’s Senior Management. Using QAA’s Articles of Association, the Committee makes sure that the Board collectively has the skills, knowledge, expertise and diversity to fulfil its duties.\textsuperscript{35}

55 The Board can establish and dissolve committees as the need arises. It is, at present, supported in its work by eight committees and the Honorary Treasurer. Governance committees include the Audit and Risk Committee (ARC) and the NRC. Committees with a specific remit for safeguarding academic standards and quality include the Advisory Committee for Degree Awarding Powers (ACDAP) and the Access Recognition and Licensing Committee (ARLC). The Scotland Strategic Advisory Committee, Wales Strategic Advisory Committee and Student Strategic Advisory Committee inform the Board’s strategy by giving expert advice on HE matters in the devolved nations, and by providing students’ perspectives on QAA’s work. The committees are made up of members of the Board and other external expert members.\textsuperscript{36}

56 Operationally, to ensure that there is consistent implementation of the principles of internal quality assurance across the Agency, QAA has an Assessment and Reviews Group (ARG), which reports to QAA’s Senior Leadership Team, that has representation from across all of its review methods at a senior level and provides strategic oversight of QAA’s quality assurance work. QAA also has an Assessment and Review Operations Group (AROG) which reports to the ARG. The focus of this Group is to consider the operational delivery of QAA’s quality assurance work, particularly the relationship with expert reviewers.\textsuperscript{37}

**Organisation**

57 In the years following the previous ENQA Agency Review of QAA, there have been changes made to the internal structure, as well as changes in resourcing. In 2019, QAA introduced the new role of Executive Director of Operations (Deputy CEO),\textsuperscript{38} to lead on QAA’s operational delivery, including the new membership services. The role also has oversight of all of QAA’s activity across the UK and Europe, as well as its international and commercial services. Other changes in the organisation structure have included creating a slimmed-down executive of four individuals, supported by a wider team of Directors.

\textsuperscript{34} QAA: Our Board
\textsuperscript{35} QAA: Our Committees
\textsuperscript{36} QAA: Our Committees
\textsuperscript{37} QAA Approach to Internal Quality Assurance of Assessment and Review Activity
\textsuperscript{38} QAA announces Vicki Stott as Executive Director of Operations, 7 August 2019
Senior Leadership

Since 2021, the Chief Executive of QAA has been Vicki Stott. The Chief Executive is appointed by the Board but is not a Board member or Trustee. She leads the Executive Team and is responsible for the management and day-to-day direction of QAA and its programmes of work. The Chief Executive is accountable to the Board for the propriety and regularity of the finances for which QAA is answerable, for keeping proper accounts, for prudent and economical administration, and for the efficient and effective use of resources. The Chief Executive proposes the organisational strategy to the Board, and implements the strategy as decided by the Board.

In addition, QAA has three further executive members:

- **Executive Director of Operations and Deputy CEO** has responsibility for functions including Membership and Quality Enhancement Services; International and Professional Services; and Scotland, Wales and Northern Ireland. They are also the lead for QAA’s European engagement.
- **Finance Director** (25 Headcount (HC), 22.8 Full-time equivalent FTE) is responsible for the strategic management of QAA’s financial resources and planning and has responsibility for Human Resources, Organisational Development, Facilities, Compliance and Projects.
- **Director of Corporate Affairs** (12 HC, 11.8 FTE) leads the Governance team and Executive office, and is QAA’s Company Secretary and also has responsibility for the Policy and Communications, and Marketing and Events teams.

The Executive are supported by four Directors:

- **Director of Membership, Quality Enhancement and Standards** (20 HC, 14.5 FTE) is responsible for the management and delivery of QAA’s Membership experience and services, including the development of the Quality Code and other sector standards.
- **Director of International and Professional Services** (21 HC, 9.7 FTE) leads on the management and delivery of international and professional services activities.

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39 Our Senior Leadership Team
• **Director for Scotland, Wales and Northern Ireland (SWNI)** (16 HC, 12.7 FTE) leads and manages the SWNI team and ensures the operational delivery of work in SWNI.

• **Director of Access, Alternative Providers and Europe** (title to be confirmed - no staff data available) manages a range of quality assurance and regulatory work across UK. This is a new directorate being formed as a result of QAA voluntarily demitting the role of DQB.

• **Director of Quality Assessment England** (20 HC, 12.6 FTE). This post, and the team it manages, will cease to exist on 31 March 2023 as a result of QAA voluntarily demitting the role of DQB in England.

Financial arrangements

61 QAA is currently funded through a number of channels:

• membership fees from higher education providers across the UK and overseas
• fees for work performed as the Designated Quality Body in England chargeable to all providers on the Office for Students register, as set out in the Higher Education and Research Act 2017
• a service-level agreement (SLA) with SFC and Universities Scotland
• grants from HEFCW for services in Wales
• a framework agreement with regulated providers in Wales to pay QER review fees, plus fees paid by providers in Wales for Gateway Review (or expressed as specific course designation and/or educational oversight)
• an annual fee paid by Access Validating Agencies (AVAs) to maintain and manage the scheme for the recognition and quality assurance of Access to HE Diplomas in England, Wales and Northern Ireland
• a fee and an annual maintenance charge paid by providers of higher education seeking educational oversight from QAA
• a fee paid by providers seeking an IQR or QE-TNE, as outlined in 'Higher education quality assurance activities of the agency - review activity'
• other private contracts, consultancy and business development work.

62 The graph below shows the projected income from each channel in 2022-23:

**Figure 1: Projected income 2022-23 (£000s)**

![Income graph](image)

40 Income figures include DQB until the cessation of activities in March 2023.
Further information on how the budget has changed over the past five years can be found in Annual Report and Financial Statements (2020-21) (see ‘ESG 3.3: Independence’). QAA’s financial resources is detailed in ‘ESG Standard 3.5: Resources’.

**Activities of the agency**

The work QAA does supports its mission to safeguard standards and improve the quality of UK higher education wherever it is delivered around the world. QAA’s main areas of work are outlined below and are set out in more detail in ‘Higher education quality assurance activities of the agency’.

- Setting and monitoring the standards of UK HE, including the development of the Quality Code.
- Working with, and for, QAA Members across the UK to deliver services, expertise and guidance on key issues that are important to the sector and students.
- Reviewing higher education providers in Scotland, Wales and Northern Ireland, and wherever UK higher education is delivered in the world.
- Delivering educational oversight for providers not eligible to register with the OfS.
- Providing an accreditation service for international providers against the ESG.
- Advising governments/regulators on applications for DAPs in Scotland, Wales and Northern Ireland and on the right to be called a university across the UK.
- Working in partnership with UK and international governments and sector bodies to provide expert advice and support policy development.
- Regular engagement with providers, students, and professional, statutory and regulatory bodies to support UK higher education.
- Publishing research, analyses, case studies and thematic reports to support enhancement of learning and teaching in higher education.
- Providing training, guidance and events to help UK higher education providers develop and improve their own quality assurance processes.

Areas that sit outside the scope of the ESG include:

- delivery of thematic quality evaluation to support the enhancement of UK transnational education provision
- specific investigations of concerns which do not form part of cyclical review methods
- consultancy, training and international services to develop approaches to higher education quality both in the UK and internationally for professionals, institutions and governments
- setting and monitoring the standards for Access to HE Diploma courses; QAA also licenses the agencies who develop, approve and monitor these courses\(^\text{41}\)
- work originating from QAA’s role as DQB, which will cease on 31 March 2023.

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\(^{41}\) Access to HE website
Higher education quality assurance activities of the agency

QAA uses several different methods to conduct reviews of higher education providers with each method adopted by QAA reflecting the fundamental values of the European Higher Education Area (EHEA). The design, including the aims and objectives, of a review method depends on many factors, including where within the UK the provider is located and the type of higher education provider. However, all in-scope review methodologies share a set of core principles. These include:

- use of reference points such as the Expectations for UK higher education contained in the Quality Code and the ESG
- evidence-based reviews carried out by peers and students, based on a self-evaluation process and resulting in published reports detailing the findings, to provide public assurance on academic standards, quality and the provision of public information
- the enhancement of the student learning experience.

Common features of QAA's approach to quality assurance

Nationally agreed reference points

QAA publishes a number of reference points and guidance to support higher education providers in setting and maintaining academic standards, assuring quality and promoting quality enhancement. These publications are used by UK academic and professional staff responsible for qualifications and student learning opportunities.

The central reference point is the UK Quality Code for Higher Education (Quality Code). The Quality Code aligns with the ESG as set out in 'Annex 3'. This document is also published on the QAA website and demonstrates how the standards set out in the ESG map to the Quality Code and associated reference points.

The Quality Code has a range of supporting reference points:

- The Frameworks for Higher Education Qualifications of UK Degree Awarding Bodies (see also 'Higher education and QA of higher education in the context of the agency - Qualifications frameworks')
- Advice and Guidance currently comprising 12 thematically focused guidance documents that provide practical advice to providers for applying the Quality Code Expectations and practices
- Subject Benchmark Statements which describe the nature and characteristics of awards in a particular subject and expectation about student knowledge and understanding
- Characteristics Statements which express the expectations for different types of qualification.

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42 UK Quality Code for Higher Education
43 A map of the ESG to the UK Quality Code
44 UK Qualifications Frameworks
45 UK Quality Code - Advice and Guidance
46 Subject Benchmark Statements
47 Characteristics Statements
70 In Wales and Scotland, Subject Benchmark Statements and Characteristics Statements are additional regulatory requirements alongside the Quality Code and qualifications frameworks.

71 Higher education providers use the Quality Code to help them set and maintain the academic standards of their programmes and awards, assure and enhance the quality of the learning opportunities they make available, and provide information about higher education. Student representatives and students’ unions may choose to use the Quality Code in their discussions with their higher education provider.

72 Reviewers carrying out QAA reviews in Scotland, Wales and Northern Ireland and alternative providers in England use the Quality Code as a benchmark for determining whether a higher education provider meets the threshold for academic standards and the quality of learning opportunities.

73 QAA undertakes regular reviews and consultations to ensure that all reference points remain relevant and up to date. For instance, in 2022 QAA is part-way through a five-year review of over 60 Subject Benchmark Statements to ensure they remain current and reflect recent changes in higher education in respect of equality, diversity, inclusivity, education for sustainability and employability.

Enhancement

74 A strategic priority for QAA is the enhancement of higher education across the UK and internationally with the role of enhancement included in two of QAA’s strategic priorities. In practice this means QAA supporting the processes by which higher education providers systematically improve the quality of their own provision to the benefit of students. Enhancement can be sector wide or integrated into review methods.

75 Enhancement topics are identified in discussions with member institutions and aligned with sector priorities. The enhancement work takes multiple forms, including commissioning research, for example, on the extent to which institutions use data to inform their decision-making and the impact of digital delivery and assessment on student engagement and performance.

76 Drawing on the advice and guidance linked to the Quality Code, QAA has created toolkits which members use to enhance their policy and practice. Specific examples include the Higher Education Toolkit, aimed at colleges and alternative providers; the Student Engagement Toolkit; and a resource for supporting members in Creating Inclusive Subject Learning Communities. These toolkits and resources are supplemented by training and development opportunities.

77 QAA produces resources that are designed for the direct use of academic staff and students. Examples include the Hallmarks of Success playbooks aimed at supporting four different aspects of digital and hybrid pedagogy; and the Understanding Assessments resources for students. Another example is the programme of professional development courses which include Introduction to Quality; Quality in Practice; Course Design and Development; and Quality in Practice: Monitoring and Evaluation, which are online courses for QAA Members to support professional development. Reference to the ESG and the role it can play in the design and approval of programmes is included.

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48 QAA Strategy 49 Higher Education Toolkit; Student Engagement Toolkit 50 Hallmarks of Success playbooks 51 Understanding Assessments; Student Guide
QAA offers an extensive number of events and conferences throughout the year. Its flagship event is the Quality Insights conference with international and UK-based keynote speakers, panel sessions and a range of parallel workshops and discussion opportunities. The aim is to showcase good practice, stimulate members to consider policy and practice in relation to key topics, and exchange ideas and views with their peers. Since 2020, the Agency has also put in place a selection of networks for colleagues from member institutions to meet with their peers who have similar roles.

In Scotland, an explicit enhancement-led approach is well established. In other parts of the UK, explicit enhancement initiatives have been more recent. For example, in 2021 QAA began offering financial support for groups of QAA Members to work collaboratively on priority topics for them. In 2021, the Agency supported 13 projects led by members based in England and in 2022 another 17 are being supported. They cover topics including post-pandemic pedagogy; equality, diversity and inclusivity; assessment; flexible student pathways; postgraduate research students; Education for Sustainable Development; and academic integrity. In Wales, QAA has been offering financial incentives for collaborative enhancement projects between members since 2020-21.

The Quality Enhancement Framework (QEF) is the enhancement-led approach to quality in Scottish higher education. An integral part of the QEF is the programme of Enhancement Themes managed by QAA Scotland, contributing to the overall approach to the improvement of higher education provision. In June 2022, QAA Scotland's enhancement conference was on 'Resilient Learning Communities - Inclusive, Flexible and Accessible'. In June 2020, as part of a programme of events, QAA hosted an online conference on Learning from disruption: exploring what counts in higher education. Delegates from across the world came together to exchange views and explore how higher education is changing, both as a result of the COVID-19 pandemic and to meet future challenges.

In Scotland, thematic reports on patterns and themes are regularly produced from the outcomes of Enhancement-led Institutional Reviews to help identify Enhancement Themes to improve the learning experience of students studying within the Scottish higher education sector. Within each Theme, institutions, academic staff, support staff and students are encouraged to work together to generate ideas and find innovative ways to enhance the learning experience of students (see also "ESG Standard 3.4: Thematic analysis").

Student engagement

QAA works with students as partners in quality, involving them in governance and review activities. QAA develops resources, guidance and events to support student engagement in quality, and to facilitate the enhancement of student engagement practice in UK higher education. For example, the Agency has produced a suite of short, animated films which help explain the work of QAA Scotland to its stakeholders and includes a film that specifically covers student involvement in QAA Scotland's work.

There are two student seats on QAA’s Board. One of these seats is nominated by the National Union of Students (traditionally the Vice-President for Higher Education), the other is recruited from our student networks following a competitive process. The student members of QAA’s Board also serve as the Co-chairs of the Student Strategic Advisory Committee (SSAC). In addition, students are members of QAA’s Advisory Committee on

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52 Quality Insights Conference - resources
53 Quality Enhancement Framework
54 Enhancement Themes
55 QAA Scotland website
Degree Awarding Powers (ACDAP) and Access Recognition and Licensing Committee (ARLC), and of the Strategic Advisory Committees for Scotland and Wales.

Each of QAA’s main advisory or working groups has at least one student member (usually two) who is either a current student, recent graduate or student representative from the subject community. Examples of recent advisory or working groups include the Academic Integrity Advisory Group, Advisory Groups for Subject Benchmark Statement Reviews, External Examining Advisory Group, Education for Sustainable Development Advisory Group, Credit Framework for England Advisory Group, Membership Advisory Group. Student members actively contribute towards the drafting or redrafting of advice, guidance and statements.

In Scotland, students are members of the Scottish Higher Education Enhancement Committee (SHEEC), a strategic-level sector group which ensures that higher education is at the forefront of developing and enhancing the student learning experience in Scotland. QAA liaises closely with the group and played a key role in increasing the number of student representatives on SHEEC from two to four.

QAA has trained over 300 student reviewers since the last ENQA review and there are currently about 50 trained student reviewers available to take part in review activities (see ‘ESG Standard 2.4: Peer-review experts’). In ELIR, institutions are required to ensure there is student engagement in the institution’s preparations for the review, including being involved in the development of the institution’s Reflective Analysis. In QER and GQR (Wales), students can nominate a Lead Student Representative (LSR) who will lead on student engagement in the review. Students on IQR might be based in or outside the UK. The Accreditation Panel for IQR/IQR for ACE Impact includes one student member. QE-TNE reviews will include an evaluation of the student experience in each country that is selected as part of the schedule.

Quality Matters is an annual student engagement conference delivered in the autumn and aimed at newly appointed student officers and those new to higher education quality and/or student engagement. The conference introduces quality and standards, raising awareness of QAA and the relevance of the wider membership themes and topics.

In Scotland, QAA actively promotes its Scottish Enhancement Conferences to students, encouraging them to attend both as delegates and as contributors, presenting papers and taking part in other sessions such as panel debates. ‘Evolving Student Engagement’ is delivered each summer, aimed at students’ union staff, institutional staff working in student engagement, and experienced student representatives or elected officers. This event focuses on enhancements and innovations in student engagement.

QAA regularly produces resources and events for a student audience. This has included:

- Unpacking Assessments: Student Guide
- COVID-19 guidance for student unions and students
- Digital assessment security
- Understanding Learning Outcomes and Assessment

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56 Student Guide for QAA Reviews in Wales
57 Student Engagement Conference 2022
58 Unpacking Assessments: Student Guide
59 COVID-19 support and guidance
60 What is digital assessment security? - YouTube
61 Helping students to understand how assessment can help learning
• Blogs written by students/student representatives - for example, The Future of Blended Learning: A Student Perspective, Lessons from a Decade of Student Engagement, Driving Change for Inclusivity with Students as Partners, Students' Questions About Quality and Value in COVID Times
• The Student Engagement Toolkit: Planning an Enhancement Activity - a practical resource to support members to plan quality enhancement activities that engage students
• A newsletter: Engaging Students in Quality and Standards, is published termly and currently has over 200 subscribers
• Working closely with sparqs (Student Partnership in Quality Scotland) which supports student engagement in the quality of the learning experience. For example, the guidance developed jointly between sparqs and QAA to support student engagement with the ELIR 4 cycle of reviews
• Supporting students' involvement in Enhancement Themes such as the project on Digital Student Communities which was a student-led project.

90 QAA has also continued to champion the student voice within the sector and has pushed for more student representation - for example, QAA suggested strengthening the role of the student voice in the Welsh Government’s proposals as part of its Tertiary Education and Research (Wales) Bill. In particular, it was argued that there should be greater specific references to including student representation from the tertiary sector within the Commission Board, and the Commission's proposed Quality Committee.

Peer review
91 QAA is committed to using peers as reviewers in all its processes and review methodologies. Details of how reviewers are recruited, selected, trained and monitored can be found in ‘ESG Standard 2.4: Peer-review experts’.

Working in partnership
92 QAA works in partnership with a wide range of stakeholder groups in the UK and internationally to provide expert advice and support policy development for the assurance and enhancement of academic quality. These include:

• students and their representatives
• governments, government bodies and politicians from across the UK
• higher education funding bodies and other regulators
• representative bodies and mission groups for higher education
• membership organisations and their staff
• professional, statutory and regulatory bodies (PSRBs), representative groups and employers
• policy and practice networks.

93 QAA has used these partnerships to support and reinforce its governance structures to enable stakeholders to make meaningful contributions to QAA activities and

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62 The Future of Blended Learning - A Student Perspective
63 Conference blog - Student engagement, where do we go next?
64 Conference blog - Driving change for inclusivity with students as partners
65 Students’ Questions about Quality and Value in COVID times
66 Toolkit - supporting student engagement
67 QAA newsletters
68 Digital Student Communities
69 Paper submitted to Welsh Government
further development. More information can be found in ‘ESG Standard 3.1: Activities, policy and processes for quality assurance’ and ‘Opinion of stakeholders’.

94 In addition to partnerships in the UK, QAA has maintained and developed relationships with international quality assurance agencies and higher education organisations. More information about these international partnerships can be found in the section on QAA's International activities.

Review activity

95 Higher education policy and regulation is devolved among the four nations of the UK (see Table 3). The statutory responsibility for the registration and regulation of higher education providers sits with the respective national funders and regulators.

Table 3: Responsibility for higher education regulation across the UK

<table>
<thead>
<tr>
<th>Country</th>
<th>Regulator/funding body</th>
</tr>
</thead>
<tbody>
<tr>
<td>England</td>
<td>Office for Students (OfS)</td>
</tr>
<tr>
<td>Scotland</td>
<td>Scottish Funding Council (SFC)</td>
</tr>
<tr>
<td>Wales</td>
<td>Higher Education Funding Council for Wales (HEFCW)</td>
</tr>
<tr>
<td>Northern Ireland</td>
<td>Department for the Economy (DfE)</td>
</tr>
</tbody>
</table>

96 QAA is officially recognised by regulators and funding bodies to undertake independent assessments and evaluations, which are in turn used to inform regulatory decision-making. QAA also works with the representative bodies of UK higher education providers and its individual member institutions.
### Review methods

#### Table 4: Summary of review methods

<table>
<thead>
<tr>
<th>In-scope review activity</th>
<th></th>
</tr>
</thead>
</table>
| **UK-wide** | • Higher Education Review (Alternative Providers)/(Foreign Providers) (cyclical review method)  
• Review Scheme for Educational Oversight (cyclical review method)  
• Educational Oversight-Exceptional Arrangements (cyclical review method) |
| **Nation-specific (Scotland, Wales and NI)** | • Enhancement-led Institutional Review (Scotland) (cyclical review method)  
• Degree Awarding Powers (Wales/Scotland) (elective specific purpose review method)  
• Quality Enhancement Review (Wales) (cyclical review method)  
• Gateway Quality Review (Wales) (elective specific purpose review method) |
| **International** | • International Quality Review (cyclical review method)  
• International Programme Accreditation (programme review method) |

<table>
<thead>
<tr>
<th>Out-of-scope activity</th>
<th></th>
</tr>
</thead>
</table>
| **UK-wide** | • Investigatory schemes (Scotland - Scottish Concerns Scheme; Wales - Concerns Investigation Process; Northern Ireland - Concerns Scheme)  
• Quality Enhancement of UK Transnational Higher Education (thematic enhancement programme) |
| **Nation-specific** | • Access scheme (England/Wales) (non-HE provision) |

**Enhancement-led Institutional Review (ELIR)**

QAA’s review method for higher education providers in Scotland is Enhancement-led Institutional Review (ELIR). It is a five-year cyclical review method and has a focus on the institution’s strategic approach to enhancement, placing a particular emphasis on the arrangements for improving the quality of the student learning experience and the institution’s ability to secure the academic standards of its awards.

The fourth cycle of ELIR (ELIR 4) covered the period 2017-22. ELIR 4 built on previous versions of the review method which had been running in Scotland since 2003. ELIR is a distinctive approach to institutional review, developed to address the context of the Scottish higher education sector while, at the same time, including the common features identified. In ELIR 4, each review team had between four and six external reviewers, including senior academics, a student reviewer and a coordinating reviewer. ELIR not only involves cyclical review but also incorporates an annual discussion with each institution.

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70 [ELIR handbook](#)
As outlined in ‘Higher education and QA of higher education in the context of the agency - Recent UK higher education policy developments’ and ‘Key challenges and areas for future development’, in the context of the developing tertiary quality arrangements the new cyclical review method in Scotland will be implemented in full in 2024-25 (referred to as phase 2) and a commitment to ESG adherence has been provided by SFC. In support of the implementation of the tertiary quality arrangements, the new cyclical review method in Scotland will be informed by activity over 2022-24 which is referred to as phase 1. Phase 1 considers the ongoing progress of an institution in continuing to monitor, review and enhance its higher education provision and comprises both a one-day peer-led Quality Enhancement and Standards Review (QESR) and a QAA Officer-led Institutional Liaison meeting (ILM). The phase 1 approach takes into account the ESG and applies ESG in its operation where appropriate. Phase 1 should be understood as a progress review, bridging to the implementation of phase 2 which will encompass in full all aspects of the ESG.

**Higher Education Review: Alternative Providers (HER (AP))**

Higher Education Review (Alternative Providers) (HER (AP)) is QAA’s review method for alternative providers who require educational oversight or course designation and who are not eligible to register with the OfS. The four-year cyclical method operates UK-wide to include alternative providers in Scotland, Wales and Northern Ireland. Since 2018, the number of reviews by QAA of alternative providers for educational oversight and course designation has decreased significantly (see Table 5 in ‘ESG Standard 3.1: Activities, policy and processes for quality assurance’).

HER (AP) is an external quality assurance review to confirm that the provider meets UK expectations for academic standards and quality, as found in the UK Quality Code.

There are a number of related methods all derived from the HER (AP) method with similar processes and outcomes. The related review methods are:

- **Educational Oversight-Exceptional Arrangements (EOEA)** which applies to colleges operating as autonomous providers with close links to a single higher education institution (normally a university).

- **Higher Education Review Foreign Providers (HER (FP))** covers overseas providers offering full courses in the UK leading to non-UK awards.

- **Review Scheme for Educational Oversight (RSEO)** applies to third-party providers of short-term study-abroad programmes in the UK, which form part of degree courses offered by providers based in the United States of America.

**Annual monitoring**

All alternative providers, irrespective of review method, are subject to the same annual monitoring process. The annual monitoring process is a follow-up to a full review and serves as a short check on the provider’s continuing management of academic standards and the management and enhancement of the quality of learning opportunities. Monitoring visits are undertaken by one trained peer reviewer supported by a QAA officer. The visit normally lasts for one day and the review process culminates in the publication of a report on QAA’s website. Following a successful review, providers may be subject to a desk-based monitoring with a monitoring visit the following year.

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71 Handbook for Scottish Quality Enhancement Arrangements (Phase 1: 2022-24)
72 Higher Education Review handbooks
International Quality Review (IQR)

104 International Quality Review (IQR) offers providers outside the UK the opportunity to have an independent peer review which may lead to accreditation by QAA. Re-accreditation depends on undergoing a five-year cyclical review. IQR is designed to analyse and reflect on the provider’s own quality assurance approaches, to challenge and benchmark their existing processes against the European Standards and Guidelines, and to support them to drive improvement and excellence in their own quality assurance approach.

105 Following an invitation for QAA to join the ACE Impact event in Nigeria in 2020, the global IQR process was reviewed and modified to include the ACE Impact programme requirements. Accordingly, International Quality Review for ACE Impact (IQR for ACE Impact) was specially developed to provide institutions taking part in ACE Impact with an independent peer review leading to international institutional accreditation by QAA. It is fully aligned to the existing IQR model.

106 IQR/IQR for ACE Impact are made up of five stages, consisting of application, scoping/gap analysis, review, accreditation and the mid-cycle review.

Quality Enhancement Review (QER)

107 QAA’s six-year cyclical review method for regulated providers in Wales is Quality Enhancement Review (QER). Under HEFCW’s Quality Assessment Framework (QAF), the governing bodies of regulated providers must commission a review from an EQAR registered body to demonstrate that they meet baseline regulatory requirements.

108 As an enhancement-oriented method, it provides a review structured around the strategic priorities of the provider and the nature of its student body - and how the two interrelate to define the provider’s priorities for enhancing the student learning experience. For the academic year 2021-22, in response to the burden on institutions responding to COVID-19, the method has been adapted to report on the requirements for HEFCW to provide assurance on the quality of education with some streamlining of the process.

109 The QER cycle came to completion in 2021-22 and QAA has been commissioned by HEFCW to design the review method for the next cycle. This development work will take place in 2022-23 with the first review in 2023-24. Enhancement will continue to be a key focus of the external review process in Wales and links made to joint enhancement activities across Wales, Scotland and Northern Ireland.

Gateway Quality Review Wales (GQR (Wales))

110 This method was introduced in Wales in 2018 as a method for providers as new entrants to publicly funded taught programmes. Its purpose is to test providers against the baseline regulatory requirements in Wales (HEFCW’s Quality Assessment Framework), thereby establishing that academic standards are secure and a high-quality student academic experience is being delivered.

111 The method works on a four-year cycle to provide HEFCW with assurance that providers are continuing to uphold the baseline regulatory requirements. A Quality Review Visit is carried out by teams of trained peer and student reviewers. The method applies to all existing providers wishing to continue specific programme designation in Wales so that Welsh domiciled students can access student funding, including at providers located outside Wales. The outcomes of the Gateway Quality Review are considered by HEFCW in reaching

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73 IQR Handbook
74 Quality Enhancement Review
75 Gateway Quality Review: Wales
their broader judgement about the provider’s readiness to be designated for student support, or to continue to be designated. Providers that have successfully completed two reviews may apply to become a regulated provider and would then be reviewed under the QER method.

**Degree awarding powers scrutiny (DAP SWNI)**

112 QAA’s Advisory Committee on Degree Awarding Powers (ACDAP) receives and considers applications for degree awarding powers from providers in Scotland, Wales and Northern Ireland. If ACDAP decides that an application should proceed, QAA carries out a scrutiny for the specific purpose of determining whether the applicant meets the criteria for degree awarding powers, which differ according to where the applicant is based and for what level of powers it is applying. At the end of the scrutiny process, the scrutiny team submits a final report to ACDAP on which ACDAP bases its recommendation to the QAA Board. The QAA Board then provides advice to the relevant government for consideration by the Privy Council, which has the authority to grant degree awarding powers. The scrutiny process is carried out by a team of specially trained peer reviewers, including a student reviewer. The process takes place over 12-18 months. This is to allow the scrutineers to observe a range of meetings and other events through a complete academic cycle.

**International Programme Accreditation (IPA)**

113 International Programme Accreditation (IPA) offers institutions outside the UK the opportunity to have an independent peer review of its curriculum development and quality assurance process. The review includes looking at the systematic monitoring and evaluation of learning and teaching, and the processes that support them, to make sure that the standards of academic awards meet the required level and that the quality of the student learning experience is being safeguarded and continually improved. This will be combined with a specific review of individual programmes of study and may lead to International Programme Accreditation by QAA.

114 IPA assesses the standards and quality of individual programmes of study against the European Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG). IPA takes place in four stages, including application, review, accreditation and the mid-cycle review. Re-accreditation depends on undergoing a five-year cyclical review.

**Activities outside the scope of the ENQA review**

**Investigatory Schemes: Scotland/Wales/Northern Ireland/England (for providers not on OfS register)**

115 QAA operates schemes to investigate concerns about academic standards and quality raised by students, staff and other parties. Where such concerns indicate serious systemic or procedural problems, a detailed investigation will be conducted. The schemes operate across the UK with some differences in operations and terminology between the countries; however, they all share the same purpose - to offer responsive means for exploring cases that are brought to QAA’s attention outside the regular review arrangements.

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76 DAP Handbook - Scotland  
77 International Programme Accreditation Handbook  
78 Concerns Scheme guidance  
79 Concerns Scheme - Scotland
Quality Enhancement of UK Transnational Higher Education (QE-TNE)\(^80\)

116 Quality Enhancement of UK Transnational Higher Education (QE-TNE) was commissioned by Universities UK and GuildHE to deliver a country-based scheme to demonstrate the commitment of UK higher education to deliver high-quality TNE experiences for students. Participation is voluntary. The objectives and process for QE-TNE are clearly set out in the QE-TNE handbook. For more information about TNE outputs, see 'ESG Standard 3.4: Thematic analysis'.

Access to Higher Education Diploma (AHE)\(^81\)

117 The Access to Higher Education Diploma (the Diploma) is a nationally recognised Level 3 qualification designed to prepare adults to study in higher education and is taken by 40,000 adults every year. In accordance with a specification\(^82\) developed by QAA, the Diploma has been designed to give students relevant academic skills, knowledge and behaviours to help them succeed in higher education. The Diploma is available at over 300 colleges, alternative providers and universities across England, Wales and Northern Ireland, in a wide range of subjects\(^83\) designed to meet local and national skills needs.

118 Since 1997, QAA has been responsible for assuring the quality of recognised Access to HE Diplomas through the management of the Recognition Scheme\(^84\) for Access to HE. To meet these responsibilities, QAA licenses Access Validating Agencies (AVAs),\(^85\) authorising them to recognise Access to HE programmes and to award Access to HE Diplomas to students. In addition, QAA provides advice to relevant governments across the UK on the Access to HE programme, as required.

119 Through collaboration with AVAs, providers, the UK Government's Department for Education, Ofqual and other external stakeholders, QAA has undertaken the necessary development activities to design, implement and evaluate an extraordinary regulatory framework (ERF)\(^86\) to manage the assessment and award of QAA-recognised Access to HE Diplomas for each of the academic years of the COVID pandemic. These activities included the introduction of risk-based monitoring activity to assess AVAs' quality assurance processes under the ERF.

Capacity-building services

120 QAA offers several specially designed services aimed at supporting the development of quality assurance and quality assurance professionals worldwide. This includes capacity-building programmes, training and consultancy for universities, governments and quality assurance agencies - this can include training reviewers or supporting the establishment of review programmes and evaluations. For example, QAA was contracted by the British Council in Ukraine, Tunisia, Egypt and Morocco to carry out bespoke training programmes for the national quality assurance agencies. The purpose was to support the development of approaches to quality assurance and institutional and programme-level reviews with a view to building capacity in both the institutions and the national quality assurance agencies, as well as increasing public trust in the national higher education systems.

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\(^80\) QE-TNE Scheme
\(^81\) Access to HE website
\(^82\) Access to Higher Education Diploma Specification
\(^83\) Access to HE course subjects
\(^84\) Access to HE Recognition Scheme
\(^85\) Access Validating Agencies
\(^86\) Awards and Assessment of the Access to HE Diploma
In 2021, QAA introduced an International Membership for higher education providers who have achieved QAA Accreditation through International Quality Review, and, in 2022, International Associate Membership for higher education providers located outside of the UK who have not yet achieved QAA Accreditation. This initiative was introduced to help support International Members and Associate Members develop their approach to quality assurance by accessing a broad range of QAA UK Member resources, engage with international member networks, and contribute to the development of new resources and projects.

**International activities**

QAA and the UK higher education sector continue to benefit from engagement with European and wider international quality assurance and enhancement developments.

QAA takes a proactive role in international developments in standards and quality, driven by strand 3 of its strategy - *Strengthening the global reputation of UK higher education* - which has goals including:

- provide confidence in the quality of UK transnational education
- expand partnership with overseas quality agencies and governments to build trust and confidence in UK higher education
- advance UK interests in the policy agenda in the European Higher Education Area and in wider quality assurance debates
- grow participation in QAA’s capacity-building programmes for overseas higher education systems
- build QAA’s international accreditation programme and open membership to credible international institutions.

The main types of international engagement activities QAA carries out to achieve these strategic goals include:

- engaging with international stakeholders, including ministries, quality assurance bodies and higher education providers, to improve their understanding of the UK quality and standards systems for higher education
- delivering accreditation services benchmarking providers against the ESG through International Quality Review (IQR) and International Programme Accreditation (IPA) (see ‘Higher education quality assurance activities of the agency - Review activity’)
- the review of collaborative provision, including TNE within QER and ELIR review methods for institutions in Wales and Scotland, respectively (see ‘ESG Standard 3.1: Activities, policy and processes for quality assurance’)
- carrying out an evaluation of UK TNE, through a quality-enhancement scheme commissioned by sector-representative bodies (Universities UK and GuildHE) (see ‘Higher education quality assurance activities of the agency - Review activity’)
- providing expert advice to UK higher education providers and sector bodies about the local operating environments of key countries of interest for UK TNE and international developments in quality assurance and quality enhancement
- contributing to the shaping of international and national policy in quality assurance and enhancement - for example, QAA’s work on Academic Integrity (see ‘ESG Standard 3.4: Thematic analysis’)
- supporting overseas governments, agencies and providers in developing internal, external and international quality assurance and enhancement mechanisms.

This work contributes to the promotion and maintenance of quality and standards in higher education in the UK and around the world, by promoting good practice and supporting
the enhancement of the student learning experience and the management of academic quality more broadly. QAA's international engagement also supports the development and enhancement of international collaborations with UK institutions and promotes UK higher education by sharing its knowledge and experience.

Working in partnership

Membership of networks and organisations

126 QAA is a founder member of the European Association for Quality Assurance in Higher Education (ENQA) and has undergone successful ENQA reviews in 2013 and 2018. QAA is also a member of the International Network for Quality Assurance Agencies in Higher Education (INQAAHE) and has representation on the Board through the appointment of QAA's Chief Executive in 2021. QAA is one of a small number of agencies who are aligned with the INQAAHE Guidelines of Good Practice. QAA has observer status on the Asia-Pacific Quality Network (APQN) and is a member of the Council for Higher Education Accreditation (CHEA) International Quality Group (CIQG). In addition, QAA is a founder member of the Quality Beyond Boundaries Group (QBBG) and the Cross-Border Quality Assurance Network (CBQAN).

127 Membership of these networks and organisations is essential for QAA's own development and involvement in global debates, the outcomes of which may impact on the UK higher education sector. Examples include QAA chairing an ENQA working group on academic integrity; membership of INQAAHE's Recognition Committee International Standards which recognises quality assurance body alignment with the INQAAHE Guidelines of Good Practice; and the INQAAHE working group developing a new set of International Standards and Guidelines.

Memorandum of understanding with key strategic partners

128 QAA continues to strategically engage on a regular basis with partner agencies. QAA has established bilateral Memoranda of Understanding (MoUs), Memoranda of Cooperation (MoCs) and Letters of Intent (LoIs) with 20 overseas agencies, which aim at sharing information, enhancing mutual understanding, exploring and facilitating cooperation in the quality assurance and enhancement of cross-border provision, and engaging in specific joint projects. One example is where QAA worked closely with HKCAAVQ to undertake a joint approach to the evaluation of UK provision in Hong Kong. QAA has also worked with the Knowledge and Human Development Authority (KHDA) in Dubai for joint review activity during the QE-TNE review of UK TNE provision in the UAE in 2021-22.

Relevant UK organisations

129 Working with other UK organisations, such as Universities UK International (UUKi) and the British Council (BC), allows for a coherent approach to the international work carried out across the various bodies in the name of the UK sector. The BC and Department for International Trade assists QAA in the production of Country guides which are part of QAA Membership resources. The Country guides are intended to provide the UK higher education sector with up-to-date and useful information on key TNE host countries, including those with the potential to develop TNE opportunities, but also to support general internationalisation agendas and collaboration. While QAA takes the lead on the report, many organisations, including those in the country which is the subject of the report,
contribute their local expertise. Therefore, the reports are more rounded and provide detailed
information from various points of view. The organisations also contribute to a webinar
programme associated with the development of each report. QAA publishes a programme of
Country report\textsuperscript{91} publications each year as part of the membership calendar as well as
additional Country reports that are published as part of QE-TNE review activities. Access to
the Country guides is linked to a provider's membership status and/or participation in the
QE-TNE review programme.

Capacity-building services overseas

130 Capacity-building services and consultancy that QAA provides internationally play
an important function in cementing the UK as one of the leading countries in higher
education and quality assurance/enhancement. Activities include:

• system-to-system contracted work to help with developing and/or implementing
  quality assurance reference points and processes
• external quality assurance services to non-UK higher education providers and
  agencies. This includes specific commissions by overseas agencies to deliver their
  review methods, for example in Hong Kong and Macau
• capacity-building training to non-UK quality assurance practitioners - either in
  institutions or agencies.

131 This work cannot be funded by UK income and so must be charged at a commercial
rate. QAA views all such work as a learning process either through learning from
engagement with new international partners or through gaining new information that may be
of use to the UK sector in its international endeavours. It also enables QAA to raise
awareness about UK higher education and quality assurance and enhancement processes.

\textsuperscript{91} Country reports
Profile, functioning and EQA activities of the agency.
Compliance with European Standards and Guidelines (Part 3)

ESG Standard 3.1: Activities, policy and processes for quality assurance

132 QAA meets this Standard by ensuring that all its external quality assurance activities (in scope) are fit for purpose and have clear explicit aims, include self-assessment, a visit, a report and follow-up. They involve peer-review experts, have explicit and published outcomes, lead to published reports, and have effective complaints and appeals processes. For more detail, see ‘Higher education quality assurance activities of the agency - Review activity’ and ‘Annex 2: Alignment of key principles with the methods in scope for the QAA review by ENQA 2023’.

Supporting evidence

- **Strategic plan** - setting out QAA’s strategic priorities
- Transparent and accessible UK method handbooks and criteria and international institutional method handbooks and international programme handbooks setting out the review methodology
- **Board and committee membership** - demonstrates the involvement in QAA’s governance and work
- QAA Consultative board distribution list - sets out a list of key stakeholders consulted on all major developments
- Stakeholder grid Jan 2022 - a list of QAA’s main contacts at key UK stakeholder organisations, broken down by QAA team
- Annual planning timetable - setting out the planning process
- Annual Plan 2021-22
- Performance Dashboard - December 21.xlsx - provides a quarterly update to the Board
- Operational delivery plan (2021-22) - SWNI: Planning and Performance Dashboard SWNI.xlsx - example of delivery plan
- **Membership of International Networks and Associations**

133 The **mission** of QAA is to safeguard academic standards and ensure the quality and global reputation of UK higher education. It does this by working with higher education providers, regulatory bodies and student bodies with the shared objective of supporting students to succeed. For more information, see ‘Introduction’.

134 QAA’s mission and strategy are translated into priorities that provide the basis for the annual work plans, which are approved and monitored by the senior leadership team. The annual plans are then converted into operational plans that cover review and resource planning, time and allocation of staff to ensure that the overall mission can be delivered. Progress against the annual work plan is reported to the Board and progress is monitored through a performance dashboard on a monthly basis.

135 The planning process each year is started by the Senior Leadership Team. The draft annual plan is then discussed with the Board. Once agreed, the financial parameters are set, the plans are developed with budgets set to detailed operational plans for each area
and the process is completed by sign-off from the Board. See also ‘ESG Standard 3.5: Resources’ and ‘ESG Standard 3.6: Internal quality assurance and professional conduct’.

136 The goals and objectives derived from the mission feed into the design, operation and outcomes of QAA’s external quality assurance activity. Table 5 sets out QAA’s in-scope external cyclical quality assurance activities (see glossary) since 2018.

**Table 5: Review activity in scope**

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137 All the review methods in Table 5 align with Part 2 of the ESG, demonstrating consistency in the application of the ESG standards. For more details on review method compliance with standards, see ’Design and implementation of the agency’s EQA activities. Compliance with European Standards and Guidelines (Part 2)’ and ‘Annex 2: Alignment of key principles with the methods in scope for the QAA review by ENQA 2023’.

138 QAA’s primary stakeholders are governments, funders, regulators, members, students, PSRBs and reviewers. The structures in place enable stakeholders to make meaningful contributions to QAA activities and further development. QAA involves international experts with experience of the ESG through the following mechanisms: membership of IQR accreditation panel; use of international reviewers; and inviting international speakers to QAA events. There are many opportunities for stakeholders to get involved in contributing to QAA’s activities. For more information see ‘Opinion of stakeholders’.

**Enhancement and reflection**

139 Since the 2018 ENQA review QAA has been through a period of change, responding to developments in the regulatory environment in England. This change has provided both opportunities and challenges for QAA, which are set out in QAA’s SWOT analysis and ‘Key challenges and areas for future development’. The SWOT analysis identifies the opportunity to develop new international partnerships and initiatives, such as the QE-TNE scheme and International Programme Accreditation as well as the challenge of changes to the regulatory framework in England.
The 2018 ENQA report included a recommendation to: ‘intensify its activity with respect to TNE reviews overseas and to strengthen its oversight of collaborative provision arrangements, in order to better protect students’ interests to receive quality higher education and at the same time to safeguard the reputation of UK provision overseas’. In response to the recommendation, QAA has developed a new TNE Scheme to meet the needs of the sector and reflect the regulatory environment in the UK. The QE-TNE Scheme is an enhancement activity designed to support improvements in the student learning experience and help safeguard the reputation of UK provision overseas.

The QE-TNE scheme has thematic-based outcomes with the focus on the enhancement of provision above baseline standards with no formal judgements. As a consequence, the findings from the QE-TNE scheme do not feed directly into QAA’s EQA activity. The scheme is not a cyclical method and its voluntary nature means providers may leave the scheme. To help support the separation between QAA’s cyclical EQA activity and the QE-TNE scheme, reports are branded differently to distinguish thematic activity from EQA activity.

Other mechanisms to strengthen oversight of TNE include the review of UK TNE or collaborative provision within ELIR and QER review methods for institutions in Wales and Scotland. Further support to enhance the practice of UK TNE is the International Insights members’ package for QAA Members. This includes resources and events aimed at enhancing quality and managing risk in TNE. This has included publications and guidance such as *Effective Practice in UK Transnational Education during the COVID-19 Pandemic*.

QAA has close relationships with many quality assurance agencies around the world and has published a directory for members to use to support the management of existing and development of new partnerships or engagement. The directory includes information on QAA’s links with international networks and where QAA has developed close relationships through Memoranda of Understanding and Cooperation (for more information, see ‘International activities’). These relationships provide opportunity for two-way dialogue and joint areas of working to help build capacity to improve the quality and standards of UK HE wherever it is delivered in the world.

A suggestion for further development made by the 2018 ENQA review panel asked QAA to look at the wider inclusion of international experts as well as employers/professional practitioners in its procedures. QAA has responded to this by increasing its number of international reviewers through IQR and appointing international representatives to the IQR accreditation panel. In June 2022, the QAA Board approved the recruitment of an international member to join the Board. This will require changes to QAA’s Articles of Association (see ‘ESG Standard 3.2: Official status’) to be proposed at its October Board meeting, to be approved either before or at the December AGM. Following this process there will be the recruitment and appointment of an International Board member for approval at the March 2023 Board meeting. With regards to employers/professional practitioners, QAA also works with many professional, statutory and regulatory bodies (PSRBs) in the development of its Subject Benchmark Statements and through its consultancy work with bodies such as Health Education England (for more information, see ‘ESG Standard 2.4: Peer-review experts’).
ESG Standard 3.2: Official status

QAA meets this Standard, as it is a company limited by guarantee, a registered charity (charity number 1062746), and an independent body with a recognised status as the quality assurance agency in each of the four nations of the UK.

Supporting evidence

- Articles of Association
- Companies House registration
- Charity Commission for England and Wales registration
- Scottish Charity Regulator registration
- UK Quality Code for Higher Education
- External Quality Assurance Framework for Higher and Further Education Providers in Wales
- Scottish Funding Council Grant letter

QAA has been established as the UK's quality assurance agency since 1997 and provides advice and guidance on quality to the higher education sector across the UK. QAA maintains the UK Quality Code for Higher Education - a key document that provides a cornerstone for quality in UK higher education by articulating fundamental principles that apply to higher education quality across the UK, irrespective of changing national contexts. QAA is recognised as a quality assurance agency by the respective public authorities (governments, funders, regulators). QAA's formal role in the assessment and regulation of higher education varies in each of the nations of the UK, as follows:

- **In Scotland**, its work is enhancement-led, in line with the Quality Enhancement Framework (QEF). The QEF is a tripartite agreement between the Scottish Funding Council, Universities Scotland and QAA that details how quality is assured and enhanced in Scotland. The outcomes of QAA's Enhancement-led Institutional Reviews enable the Scottish Funding Council to discharge its statutory responsibility for quality assessment and quality enhancement.
- **In Wales**, Universities Wales commissioned QAA to be the independent external quality reviewer for the current cycle of Quality Enhancement Review. In addition, QAA undertakes Gateway Quality Reviews as part of HEFCW's external quality assurance framework for higher and further education in Wales which enables providers to apply for programmes to be designated for funding in Wales.
- **In Northern Ireland**, QAA has worked with the Department for the Economy to maintain the quality and academic standards of the higher education sector. The regulatory framework in Northern Ireland is currently under review.
- **In England**, QAA provides services and advice to its member institutions in England, including support with quality enhancement activities. Until 31 March 2023, QAA is the designated Quality Body in England.
- QAA undertakes degree awarding powers assessments when needed to inform decisions by the Government in Scotland, Wales and Northern Ireland.
- QAA is the educational oversight body for those providers not eligible to register with the OfS.

ESG Standard 3.3: Independence

QAA meets this Standard as it is an independent body, governed by its own Board (which includes at least seven independently appointed members). QAA is organisationally
independent from government, regulators, funders and from the higher education sector. This organisational independence is reflected throughout its operations and can be seen in its operational independence from third-party influences when developing and delivering its review activities. This independence has been tested most recently by changes to regulation in England, some of which impacted on the ability of QAA to deliver in line with the ESG.

Supporting evidence

- Articles of Association
- Charity Commission for England and Wales registration
- Scottish Charity Regulator registration
- QAA Board
- Annual Report and Financial Statements (2020-21)

148 QAA's Board is responsible for developing and overseeing the organisation's strategic direction, policy development, finances and performance. Board members represent a wide range of interests, within higher education as well as other areas. All members are appointed by the Board itself in accordance with the Articles of Association. Six members are appointed for their experience of industry, commerce, finance or the practice of a profession including the Chair and Vice-Chair. There are two student members, one of whom is nominated by the National Union of Students. The other by the Board of Directors. Other members are nominated by bodies representing UK higher education institutions and by the higher education funding bodies. The assurance of independence is in the governance structures of QAA. Company members do not have a direct representative on the Board, their nominees are of those working in the sector not company member employees. All four company members must agree the nomination which is a form of assurance here. The total number of nominees by company members does not allow them to command a majority for decision making or passing resolutions, and the quorum is nine.

149 QAA has legal responsibilities (for example, according to the Charities Act 2011) to provide benefit to the public and is required to produce an annual report outlining how it is achieving this.

150 The Charity Commission - the regulator for charities in England and Wales - and the Office of the Scottish Charity Regulator make clear that charities must be independent from governmental authorities. QAA's charitable objects are set out in its Articles of Association.

151 QAA's independence extends to the development of its review methods. QAA consults key stakeholders in the development and review of those methods, but it remains the responsibility of QAA to finalise the review approach and ensure that operational independence is maintained with the final decision on any changes resting with QAA. This involves responsibility for designing and implementing our own methods and procedures for internal and external quality assurance, selecting and appointing reviewers, developing schedules, deciding on the content of reports, and making evidence-based judgements.

152 The work QAA does with its member organisation (see ‘History, profile and activities of the agency’) is not on an individual consultancy basis and does not benefit individual education providers. The benefit is for the sector as a whole through the development of advice and guidance to support the enhancement of the student learning experience.
QAA guards against conflicts of interest in its international capacity building work by ensuring that any reviewer appointed to a review of a provider will have not have previously been involved in any developmental work for that provider. Further details about QAA’s conflict of interest policy can be found in ‘ESG Standard 3.6: Internal quality assurance and professional conduct’.

The independence of outcomes and judgement is delivered through review teams that are responsible for the final judgements and outcomes of the quality assurance processes. The decisions of a review team are made independently of QAA and are based on the findings of the review team at the visit. This means that QAA can report independent of any funding stream without fear or favour and publish all reports regardless of whether the outcome is successful (see example of reports in ‘ESG Standard 2.1: Consideration of internal quality assurance’).

QAA’s selection criteria for reviewers include mechanisms to avoid conflicts of interest as part of the process of reinforcing the independence of the judgements reached (see ‘ESG Standard 2.4: Peer-review experts’).

Enhancement and reflection

The 2018 ENQA review panel noted that the independence of the Agency should be safeguarded as the new regulatory framework was defined in England. QAA recognised the limitations placed on some aspects of its operation in England due to the external parameters of the regulator. The decision to withdraw consent to act as DQB demonstrates QAA's commitment to safeguarding its independence. There is further discussion of the decision in the ‘Introduction’ and ‘Key challenges and areas for future development’.

ESG Standard 3.4: Thematic analysis

QAA meets this Standard through regularly analysing the outcomes of its review work and drawing on the feedback of the sector through its broader sector engagement and the intelligence gained from sector and national priorities. The outcome from this activity is used to produce reports, guidance materials, research, case studies and webinars.

Supporting evidence

- Sections 2.7 and 3.2 of IQA Manual: Policy statement and guidance - Thematic analysis
- Enhancement-led Institutional Review outcomes (knowledge database)
- Enhancement-led Institutional Review Thematic Reports
- Higher Education Review (Alternative Providers) outcomes
- Degree Apprenticeships Review (Wales)
- Review of Digital Learning (Wales)
- Scotland - Focus On projects
- Scotland Enhancement Themes
- Academic integrity
- Collaborative Enhancement Projects
- QER case studies
- Membership themes 2022-23
QAA demonstrates a systemic approach to identifying topics for thematic analysis, through the interrogation of cyclical review outcomes and by involving its membership in the development of case studies and guidance materials. This is codified in QAA's policy statement that sets out its approach to thematic analysis and activity. QAA's IQA Manual includes a section that sets out the approach to thematic analysis in more detail.

QAA has a strong track record in developing ways to support whole-sector learning. There are two main ways in which QAA approaches its thematic work. The first is its strong commitment to working to enable sector-wide learning from its activities. QAA identifies common challenges and areas of effective practice from across all its external quality assurance work, its connections and interactions, nationally and internationally. As a result, each year QAA produces an extensive range of publications and resources, as well as organising events, and facilitating networks and debates around current themes and developments.

On a UK-wide basis, recent themes include areas such as the future of digital and blended delivery; creating inclusive learning communities; and evaluation and data-based decision-making. QAA continues to develop this approach to its thematic work, most recently supporting collaborative sector-led thematic projects.

Secondly, the production of thematic analyses is a routine part of the approach in several of QAA’s external review activities. It is a well-established part of the overall approach involved with ELIR in Scotland, and a planned part of QER in Wales and central to the vision for QE-TNE. Thematic activity involves webinars and other events as well as published reports (see ‘Supporting evidence’).

To look at some of these areas in more detail, the thematic work in Scotland is organised nationally with its Enhancement Themes and Focus On projects. The topics from Focus On are taken from ELIR recommendations and commendations. Focus On ties these outcomes to developmental activities, resources and events in which the whole sector can get involved. For more information about the approach to thematic analysis and quality enhancement in Scotland, see ‘Higher education quality assurance activities of the agency’.

In Wales, there is the QER thematic analysis which takes the form of mini case studies. These are being produced in two parts: Part 1 for reviews 2018-21 and Part 2 for 2021-22. In 2021-22, reviews are focused on the quality assurance requirements of the funding council, whereas up to 2021 QAA also reported on the enhancement of the student academic experience and enhancement of teaching and learning. QAA has identified six themes to date with the purpose of drawing out lessons learned and sharing sector-wide findings to inform enhancement activities for higher education in Wales. For Gateway Review, QAA plans to undertake thematic analysis in 2022-23 on the first four years - that being one complete review cycle.

QE-TNE results in published outcomes that include comparative and thematic analysis. Themes may result from the material itself because they are mentioned frequently, be it as areas for development or examples of effective practice, or they may be selected to focus on a specific topic suggested by the data. For each country visited, the following reports are produced:

• in each selected country, an analysis of the findings on the TNE student experience/students' views and student outcomes
• a country report covering the operating environment for UK higher education. The country report draws on the intelligence and information gained from engagement and review activity on the operating environment.
QAA’s role in supporting academic integrity

165 The 2018 ENQA review team encouraged QAA to expand its work around the theme of academic integrity. QAA has developed an Academic Integrity Charter for UK higher education. It is intended to provide a baseline position upon which UK providers, as autonomous institutions, can build their own policies and practices to ensure that every student's qualification is genuine, verifiable and respected. Since launching the Charter on 21 October 2020, over 200 institutions have signed up. In October 2021, following a sector-wide campaign led by QAA, the Department for Education in England announced that it planned to criminalise essay mills with new legal powers which came into force in summer 2022.

166 QAA chairs a UK Academic Integrity Advisory Group consisting of experts from across the UK, students, and other agencies. Representatives from UK governments, and regulatory and funding bodies sit as observers. QAA also provides the secretariat for the Welsh Integrity and Assessment Network - an initiative by the funding council in Wales. QAA involvement in academic integrity goes beyond the UK, for example QAA chaired an ENQA working group on academic integrity.

167 There is currently a wide-ranging programme of activity underway to support QAA Members to protect academic integrity. This includes analysis of academic integrity in blended delivery, enhanced digital assessment security, and approaches to innovative assessment.

168 QAA has identified some potential new campaign objectives in order to promote good academic practice, enhance student learning experiences and address academic malpractice.

169 These include:

- engaging with the Crown Prosecution Service to offer support on how prosecution might be approached
- targeting online platforms to persuade them not to accept paid-for advertising from essay mills
- raising awareness and engaging with new threats to academic integrity that QAA’s Members and/or the Academic Integrity Advisory Group have identified
- developing the Academic Integrity Charter which represents the collective commitment of the UK higher education sector to promote academic integrity and act against academic misconduct.
Enhancement and reflection

170 Since the 2018 ENQA review, QAA has been developing a more strategic focus to the analysis of review outcomes, looking particularly across a cycle of reviews or over time. Allied with this has been the development and formalisation of a policy statement that has been included in the IQA Manual, Section 2.7 and provides clear guidance about QAA’s approach and differences between methods.

171 QAA has published many thematic reports and has extended its range of events and other outputs drawn from the analysis of review themes. This analysis includes the outcomes of HER (AP) reviews over a 10-year period which was able to identify trends in both areas for development and areas of good practice. The knowledge base gained from the outcomes of ELIR 4 covers a five-year period and identifies areas for improvement and good practice which can then be used to identify topics for further thematic analysis. Similarly, the work in Wales draws on reviews from the current review cycle and the QE-TNE activity will also provide analysis each year and across the five years of the scheme. As set out in the IQA Manual, Section 2.1, QAA is also looking to enhance its thematic reporting from reviews and is ensuring that thematic analysis is built into the revised approaches to the review of quality assurance that are being developed in Wales, Northern Ireland and Scotland. This will require reviewing the style of reporting to ensure it supports evaluative thematic reporting.

172 In 2021-22, QAA’s Membership offer spanned five interconnected themes. These included UK-wide work to secure standards and quality, as well as enhancement-facing activities, co-created with QAA’s Members to ensure its activities are responsive to the different contexts in which members operate. The themes were:

- Beyond COVID-19: The future of digital and blended learning
- Creating inclusive learning communities
- Global engagement and TNE
- Evaluation and data-based decision-making
- Securing academic standards.

173 These five themes were underpinned by a range of events, networking and training, and development activity. The themes have been updated for 2022-23.

ESG Standard 3.5: Resources

174 QAA meets this Standard as it is adequately and appropriately resourced to undertake its work in an effective manner. Resourcing is made up of both salaried staff and flexible part-time employees which enables QAA to respond to changes in the volume of work.

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92 QAA Membership themes and topics 2022-23
Human Resources

175 Following changes to the external regulatory framework in England in 2018-19, QAA introduced and implemented its QAA Transformation, Capability and Change (TCC) programme. The TCC programme was designed to reflect the need for QAA to become a more commercially focused organisation, while at the same time ensuring it did not change its core mission. TCC considered funding and finance models, expenditure, process and procedures and the underpinning values and behaviours required to develop a culture of continuous improvement in relation to individual performance. The TCC project is how QAA ensured it continued to have the resources it needed through a period of considerable change. On an ongoing basis staff resource is monitored through capacity planning spreadsheets (see ‘ESG Standard 3.6: Internal quality assurance and professional conduct’) and QAA has a number of expert flexible part-time staff with review and enhancement experience who support the activities of the Agency and provide additional flexibility in respect of workloads.

176 QAA is committed to recruiting, selecting and retaining skilled and talented individuals and to their continuing professional development. As of September 22, QAA had 116 employees (85 full-time equivalent). Staff bring experience from a range of different roles, sectors, professional backgrounds and contexts. About 20 employees work on a flexible part-time basis - this is a pool of senior professionals, whose experience can be used in a wide range of QAA's work as and when required to meet the needs and demands of the organisation.

177 In June 2021, QAA launched a Flex+ policy supported by additional guidance. Flex+ introduced greater flexibility to working arrangements, originally introduced due to the pandemic, to reflect changes in working patterns and practices in recent times. Flex+ is designed to ensure that QAA continues to deliver its services in the way that provides the best outcomes for the Agency's stakeholders and customers, and meets their expectations, while also working for QAA, individuals and teams. HR conducted a staff feedback survey on the impact of Flex+ in 2022 and the responses were shared with colleagues in May 2022. Responses were extremely positive. Even so, a Flex+ Forum with representatives from across the Agency at all levels is taking a closer look at the survey responses and considering how QAA can further enhance and improve its approach.

178 QAA recognises the positive benefits of equality, diversity and inclusion. Its aim is to be representative of all sections of society, and for employees to feel respected. QAA values the differences that a variety of backgrounds, experiences, perspectives and skills brings and strongly encourages all suitably qualified applicants to apply and join the Agency.
acknowledges that there is still more it can do to improve its approach to equality, diversity and inclusion and is currently developing its Equality, Diversity and Inclusion Strategy which will include an operational action plan to improve the number of data returns from staff. It is anticipated that work will start in 2022-23.

QAA engages with approximately 270 reviewers who are selected from a rich pool of talent and experience, both in the UK and internationally. QAA currently has 14 international reviewers and about 50 student reviewers. QAA is currently running a reviewer experience improvements project, which aims to deliver the best possible user experience for reviewers, including recruitment, selection, training and performance management (for more information, see 'ESG Standard 2.4: Peer-review experts'). QAA also works with sector experts on a consultancy basis, drawing on expertise within the sector to support its wider work. Examples of the consultancy work include creation of guidance documents such as a micro-credentials glossary; staff guide to using evidence, workshop delivery and facilitation; reviewing and rewriting the Recognition of Prior Learning Framework; and the British Council Quality Assurance Project in partnership with the Ukrainian Agency, National Agency for Higher Education Quality Assurance (NAQA).

In 2020, QAA began moving its staff onboarding/induction online using the new HR system (Cezanne). This provided a more streamlined, accessible and user-friendly onboarding programme for new starters. The new HR system is also used for performance management, including performance reviews. Following feedback from colleagues, the Senior Leadership Team committed to a full evaluation of the performance review process in 2021-22, focusing on better performance and development conversations, real-time feedback and continuous improvement.

QAA is supportive of continuous professional and personal development and believes that effective and relevant training and development benefits the individual and the Agency as a whole, as well as contributing to the achievements of QAA's objectives. Recent examples of QAA supporting personal development include attendance at relevant seminars and workshops such as equality, diversity and inclusion, remote management and wellbeing, Welsh Language training and mandatory online training for employees, reviewers and consultants. Other development opportunities QAA has supported include executive coaching, health and safety training, the ENQA Leadership Development programme, Postgraduate Diploma in Human Resource Management, bid/tender writing, Association of Accounting Technicians (AAT) Level 3 and Event Management. A group of QAA colleagues have been trained as mental health first-aiders, to be a point of contact for individuals who need support. Most development opportunities are cross-Agency, offered to all employees. This includes compulsory courses in equality and diversity, cyber security, health and safety, General Data Protection Regulation (GDPR), fire marshalling and first aid. In 2020-21, QAA also offered a series of six short wellbeing workshops focusing on 'looking after yourself and others' and, more recently, two webinars focusing on employee resilience.

Earlier this calendar year QAA launched its planned leadership development programmes - one for the Senior Leadership Team (SLT) and one for staff who line manage others. The programme, now complete, was structured to cover the three domains of Leading Self, Leading Others and Leading Business. By running the programme in two stages - the first phase for members of the SLT, followed by line managers - the intention was to create one cohesive understanding and for the management programme to be sponsored, championed and supported by the SLT for credibility, engagement and impact.

Financial resources

QAA's funding model continues to evolve along with the quality assessment landscape. Since 2018 there were four main sources of income: membership fees, fees
chargeable as the Designated Quality Body (DQB) in England, the Service Level Agreement (SLA) with the Scottish Funding Council and Universities Scotland, and other fee-based contract work delivered internationally (including IQR and QE-TNE). Figure 2 below shows the changing income profile for the four years from 2018-19 through to the projections for 2022-23.

Figure 2: Income profile 2018-19 to projected 2022-23

QAA’s total income for 2021-22 was £9.6 million, and reserves amounted to £2.5 million. QAA’s funding in England changed significantly in 2018-19. A robust financial planning reporting system ensures that QAA maintains sufficient oversight of its finances. These systems are described in ‘ESG Standard 3.6: Internal quality assurance and professional conduct’.

Other agency resources

To support its activities, QAA has offices in Gloucester and Glasgow.

QAA has taken considerable steps to improve the effectiveness and efficiency with which it uses its resources. Following an organisational restructure in 2019, QAA outsourced its payroll, and in January 2023 will be moving to a smaller and more flexible Gloucester office space.

QAA has dedicated, independent information technology systems to support external quality assurance, in managing review activity to ensure that milestones are achieved, and in facilitating the effective involvement of reviewers and their interaction with the review team. For example, an Agency-wide operational database (known as QMIS) is used to manage reviews. QAA utilises a commercial platform, Salesforce, as an effective customer relationship management database across the organisation. QAA assures itself that these systems are secure, sustainable and accessible to staff and reviewers, as appropriate, through conducting data privacy impact assessments and an internal audit schedule that is managed by Jisc.

QAA is currently certified to ISO 27001 for the management of information security across the whole organisation, ensuring that information management practices are well-
established, regularly audited and follow international best practice (see also ‘ESG Standard 3.6: Internal quality assurance and professional conduct’).

189 QAA is committed to a staff awareness programme for information security through annual refresher training, new starter inductions and a good practice forum.

**Enhancement and reflection**

190 For its effective operation, QAA is always looking to improve the way that it manages its resources. This includes the steps that have been introduced in response to the COVID pandemic where it was recognised that the changes brought on by the pandemic provided the opportunity to move to a more flexible way of working. The benefits of this change include the broadening of the recruitment pool and the available expertise from which QAA can draw. The Flex+ policy takes account of different working locations, working times, and caring responsibilities, which supports QAA’s aspirations to support equality, inclusion and diversity.

191 An important aspect of QAA’s resources is the reviewer pool and QAA is always seeking ways to improve the levels of equality, diversity and inclusion by supporting the reviewer experience from recruitment through to the end of a reviewer’s term of appointment. The Reviewer Experience Improvement (REI) project was initiated to maximise the reviewer’s experience wherever and whoever they work with in QAA, by developing or revising processes and technology solutions, where appropriate, to deliver the best experience for reviewers and QAA staff interacting with reviewers. The REI project will cover improvements to processes, technology and training and be centred on Human Resources and the main review areas. The project is due for completion in July 2023.

**ESG Standard 3.6: Internal quality assurance and professional conduct**

192 QAA meets this Standard as demonstrated by a comprehensive range of internal quality assurance mechanisms as set out in its IQA Manual and internal governance procedures. These procedures include organisational performance management framework, internal audit and control, a proactive approach to risk management, and staff and reviewer performance management. This approach is supported by the steps taken to ensure that professional integrity is maintained and that reflection and continuous development are part of the routine activities of the organisation.

**Supporting evidence**

- IQA Manual (incorporates [Internal quality assurance policy](#))
- Approach to internal audit - Meeting of the Audit and Risk Committee - 26 May 2022
- Annual plan (2021-22)
- Operational delivery plan (2021-22) - SWNI: Planning and Performance Dashboard SWNI - example of delivery
- KPI monitoring reports - Meeting of the Board of Directors - 9 March 2022
- Annual Report and Financial Statements 2019-20
- Risk management framework
In 2020, QAA launched its strategy for the five years to 2025. QAA’s annual operating plans and delivery programmes are framed around the strategy and strategic objectives. QAA’s operating year runs from August to July. QAA measures delivery against its strategy at a number of levels:

- **Annual work plan** - detailed plans, including success criteria, are developed annually from the strategic priorities and analysis of progress to date.
- **Assignment of responsibility** - responsibility for strategic and annual priorities are assigned to, and led by, directors and the Senior Leadership Team.
- **Monthly monitoring of performance** - the Senior Leadership Team undertakes detailed monitoring of operational performance against the annual plan for each operational area. This involves reporting key achievements against agreed performance indicators for each strategic aim and associated priorities, and highlighting any exceptions and risks to planned delivery.
- **Oversight of monthly monitoring** - quarterly monitoring reports are submitted to QAA’s Board.
- **End-of-year reporting** - to inform end-of-year and annual reporting, full-year delivery statements are submitted by directors and senior managers at the end of the operating year on the strategic aims and priorities.
- **Annual reports** - the Annual Report and Consolidated Financial Statements (and other annual reports to partner organisations, funding bodies and/or regulators in each UK nation) are prepared and submitted to QAA’s Senior Leadership Team, Honorary Treasurer, Audit Committee and, finally, the full Board. QAA Scotland also develops its own specific annual report.

**Assurance of internal controls and internal audit**

QAA undertakes a series of regular assurance processes to give the Executive and Board confidence that internal controls are effective. These include:

- **Information security audits** - QAA procures from an external partner a series of internal audits each year covering the information security management system. This programme provides assurance over a wide range of processes and includes cyber security and penetration testing. ISO27001 accreditation is provided by the British Assessment Bureau - effectively an annual audit, which every three years is
undertaken at a more in-depth level to ensure that QAA continues to meet the standards for its information security management systems.

- **Business continuity exercises** - QAA’s business continuity arrangements are tested regularly (normally twice a year). This function is coordinated by an external partner and scenarios have been designed to test the resilience of numerous functions, including facilities, communications, IT and governance.

- **Continuous improvement** - QAA has an Assessment and Reviews Group which approves review methodologies across the Agency. While these mechanisms are internally provided, they are designed to allow for a degree of independence, and act as an internal check. They ensure that QAA’s central task of reviewing higher education provision is regularly checked and improved, and that lessons learned in practice can be embedded in policy and procedure for the future. Another linked development is the introduction of annual monitoring for each review method as set out in the IQA Manual, Section 2.6.

- **External audit** - QAA’s annual programme of external audit covers annual accounts and fraud risk. It also gives assurance (to the agreed level of materiality) over finance processes more generally. The external auditors report directly to the Audit and Risk Committee.

- **Audit and Risk Committee** - provides additional assurance based on consideration of potential operational risks that the Agency faces. When the Audit and Risk Committee identifies a need for internal audit, an external organisation is commissioned to scrutinise the relevant area of the Agency’s work. Each audit results in a report that includes an action plan to address any areas of concern; the Audit and Risk Committee receives audit reports and checks that action plans are implemented. Recent examples of areas scrutinised by internal audit include knowledge management (2021) and key financial systems (2020).

**Approach to risk management**

195 QAA’s approach to risk management is set out in a policy document. Risk assessment is a three-stage process that covers risk identification, risk measurement and risk rating. The policy makes a distinction between strategic risks and operational risks with strategic risks recorded in the QAA Strategic Risk Register.

196 Each identified strategic risk is evaluated by the Audit and Risk Committee in terms of likelihood and impact and these measurements are used to determine the rating of that risk. Metrics are applied to QAA’s measurement of risk, and are reviewed and approved annually by the Board to ensure their ongoing appropriateness. The risk is then rated against the following categories: significant, priority and acceptable; and then managed by the identification and ongoing monitoring of mitigations to address the risk. The risk register goes to every Audit and Risk Committee and Board meeting and is reviewed by SLT on a monthly basis.

197 As an example, a significant risk on the register was ‘QAA is excluded from EQAR register as a result of real or perceived non-compliance with ESG (Ref: S1)’. The risk materialised as a result of reviews and assessments undertaken by QAA (as the Designated Quality Body) on behalf of the Office for Students (OfS). In response to the risk, QAA acted to withdraw consent to act as DQB.

**Staff performance**

198 Following feedback from colleagues and Executive Directors - in conjunction with QAA’s recognised trade union - the Agency committed to a full evaluation of the performance review process in 2021-22, focusing on better performance conversations, real-time feedback and continuous improvement. This will be implemented in 2022-23.
The project will involve colleagues at all levels. Idea-generating sessions with the Senior Leadership Team and focus groups with colleagues from across the Agency have taken place. The aim is to implement a refreshed approach to performance reviews that meets the needs of both the Agency and its employees in the new academic year.

For more information about staff development, see ‘ESG Standard 3.5: Resources’.

Feedback on review team performance

QAA seeks to provide feedback to review teams and QAA officers on performance and to provide continuous development opportunities. Given the nature of peer review and the occasional nature of reviewer involvement, building feedback to individual reviewers into the internal quality assurance of review processes remains a challenge. Peer reviewers are not always comfortable providing feedback on the performance of fellow reviewers, although reviewers have indicated that they are eager to learn and develop, and would value feedback on their own performance. Provider feedback does identify particularly positive experience of a review overall and will identify concerns about individual behaviours. Evaluation by review managers identifies the quality of reviewers' contribution to drafting well evidenced text for reports and the depth of their contribution across a review. QAA is using the reviewer experience improvement project (REI) initiated in 2021-22 to explore ways to improve consistency of feedback, and a more structured approach to quality control sampling. A revised approach will be introduced in 2022-23.

To help support consistency across review methods, QAA's approach to collecting reviewer feedback is set out as part of the internal quality assurance arrangements in the IQA Manual, Appendix 16.

Information security and accessibility

QAA has a number of policies setting out expectations in the handling and storage of information, retention policies and information security. This includes policies on information and record keeping; the classification, handling, storage and distribution of information; information retention; and information security applied to all business functions. QAA also has internal committees and groups, including the Data and Information Governance Group, that meet regularly to discuss information security matters, with each QAA staff team having its own Data Steward to monitor and enhance practice involving data.

QAA maintains an information security management system (ISMS) and has been certified for compliance since 2015 with ISO 27001 - the international standard that sets out the requirements for an information security management system.

Policies and procedures

QAA has a comprehensive set of policies and procedures which set out expectations for staff to follow as part of their employment. There is a central intranet site where staff can access all of QAA's policies, procedures and guidelines, including those on health and safety, human resources, data protection, information and records management, security and technology.

QAA is committed to working in an open and transparent way and publishes a range of corporate and review policies on its website.

Policies are reviewed on a regular basis and any significant changes, or the introduction of a new policy, are communicated to all relevant staff and reviewers via email and the QAA intranet site - Fresh. QAA maintains a schedule covering all policies that identify the document owner, the body responsible for approval, date published, last review
date and next review date. QAA is currently reviewing the number of policies to ensure that obsolete policies are removed.

IQA Policy and Manual

QAA has an Internal quality assurance (IQA) policy in respect of its external quality assurance processes. It was approved by the Assessment and Reviews Group and published in August 2021. The policy outlines QAA’s approach to internal quality assurance of assessment and review activity, and includes the key principles underpinning its approach to IQA, leadership support for IQA, and the operational approach to IQA for review methods.

In summer 2022, QAA introduced an IQA Manual that sets out in detail the approach outlined in the IQA policy statement. The manual sets out the overall approach of QAA to the internal quality assurance of its work as an external quality assurance agency. The manual is owned by the Assessment and Review Group and forms the basis of QAA’s operational activity. It is the main point of reference for QAA staff involved in the development and delivery of external review methods, setting out the expectations for method design and providing guidance on delivery. The manual applies to all new methods and all reviews of existing methods and sets out QAA’s minimum expectations, enables practice to be shared and provides options to meet the needs of a particular review methodology.

In addition, the manual also provides the policy position on areas such as QAA’s approach to thematic analysis or the characteristics expected in all of QAA’s external review methods, and the policies and procedures on complaints, appeals and conflicts of interest.

Managing conflicts of interest

QAA’s policy on conflicts of interest applies to employees, committee members and trustees, assessors, reviewers and consultants who are assigned to undertake work on behalf of the Agency. Individuals are responsible for declaring conflicts of interest as soon as they become aware of them and for following the relevant guidance on considering those conflicts. In addition, when institutions are informed about the composition of the review team, they are given the opportunity to confirm whether they believe there are conflicts of interest. QAA takes its responsibility to behave transparently and with integrity very seriously, and failure to disclose a conflict of interest of which the individual ought reasonably to have been aware may result in disciplinary action as outlined in the Conflicts of interest policy.

QAA also operates an approval process for staff wishing to undertake work outside the Agency (paid or unpaid), to ensure that there is no conflict of interest or risk to QAA’s reputation.

All QAA reviewer contracts include a code of practice, and copies of the Ethical conduct and anti-bribery policy, to prevent conflicts of interest. In order to increase robustness around such conflicts, QAA reviewers’ contracts include clauses to ensure that they do not work for providers that they are reviewing for QAA within 12 months of the end of the review.

Contractors

QAA engages with sector experts on a contractor basis, drawing on expertise within the sector to support the Agency’s wider work. A contractor agreement is used to set out terms and conditions, including services required and performance expectations.
Engagement and feedback mechanisms

QAA actively uses internal and external feedback to inform the continuous development and improvement of its work. Examples of this include:

- **Staff updates**: QAA holds regular staff update sessions online (usually fortnightly) to which all staff are invited. Information is provided about strategic plans, operational changes, new staff and departing staff, good news and new developments. They are also used to talk about the work of different teams. The sessions are recorded and available to all on QAA’s intranet.

- **Team development and planning days**: Planning days take place during the year for reflection, development and strategic planning. For example, in 2021-22 the International team used a strategic planning day to develop its mission statement and establish strategic aims, goals, key priorities and impact for each of the teams’ substantive areas of work.

- **Cross-Agency working groups**: These are established as required to look at particular topics. Recent groups and areas of focus include assessment and reviews working group; data stewards working group; performance reviews; and Flex+ - QAA’s flexible working philosophy. Cross-Agency working is a key part of QAA’s operation, providing opportunities to share and develop skills and knowledge within the Agency.

- **Membership feedback**: QAA regularly seeks feedback from member representatives, including senior leaders, quality leads, academics and students. These conversations take place through individual meetings with institutions, networks and focus groups. In 2021-22, QAA held over 90 meetings with individual members, 18 network meetings attended by a total of 876 member representatives and a further five focus groups. This programme provides critical feedback and information, and opportunities to understand what members value about QAA, what the Agency could do differently, and how it can support members' needs and challenges in the future. In addition, QAA seeks feedback on specific areas of development, such as its round-table events to discuss future requirements for external examining, which were attended by 139 senior leaders, quality experts and academics.

- **Annual conference**: Feedback is actively gathered from all delegates who attend the event via a short questionnaire, with ideas and improvements identified being built into the planning for the following year.

- **PSRBs**: QAA brings professional, statutory and regulatory bodies (PSRBs) together with its members to discuss current topics and develop an understanding of the different perspectives and requirements for students to complete accredited courses and move into the professions. As a regular part of the membership programme, QAA hosts two PSRB Forum meetings each year, offering its members and PSRB representatives a space for mutual discussion and exploration. The value of QAA’s relationship with PSRBs was highlighted during the disruption caused by COVID-19 when QAA was able to convene groups of PSRBs to agree how best to deal with issues relating to assessment and student fitness-to-practise.

- **QAA events, including training**: Almost all events are followed up by a short online survey. The results from these are fed back to the teams responsible for the events.

- **Monitoring and evaluation of review**: QAA collects data from review teams, providers and QAA officers following reviews. This supports continuous improvement and enables QAA to learn from effective practice and address any operational shortcomings (see IQA Manual, Section 2.6 for more details).

- **Focus groups**: QAA uses small groups to discuss and provide feedback to help with a wide range of its work, including review work. An example of this was the
focus groups convened to provide feedback on the ELIR 4 method which included reviewers and institutional staff. The contribution from the focus group fed into the final report which is available on the QAA Scotland website.

- **QAA Board and subcommittees:** QAA's Board and its subcommittees, as referred to in 'History, profile and activities of the agency - Governance', in addition to their formal role in the governance of the Agency, are also an important source of feedback on its work and advice on its future direction.

**Enhancement and reflection**

216 This section presents QAA's approach to the effective monitoring and evaluation of its activities through its internal quality assurance arrangements. The information generated is used to reflect, learn and improve, drawing on a wide range of internal and external stakeholders. The overriding purpose is to improve organisational effectiveness and assure the quality of QAA's activities.

217 Following changes at QAA in 2019 to its structure and staffing, it was agreed that the development of an IQA Manual would help with ensuring that operational processes are more consistent, fit for purpose and meet the expectation of the ESG. The process started with the publication of the Internal quality assurance policy statement. The IQA Manual was developed to clearly articulate QAA's current practice and to build upon that to provide a guide and framework for future review method development. QAA believes that the development and introduction of the 'IQA Manual' is a significant move to strengthening internal quality assurance arrangements and support staff in sharing information and practice. The initial 'IQA Manual' was published in September 2022 to guide practice in the 2022-23 operational year, following that experience it will be formally reviewed 12 months after publication and revisions made where necessary.

**ESG Standard 3.7: Cyclical external review of agencies**

218 This is QAA's fourth review, and the third coordinated by ENQA, the others being in 2008, 2013 and 2018 respectively. QAA welcomes this regular opportunity to reflect upon and evaluate the impact of its activities. It does this in relation to the ESG but finds benefit in the exercise beyond demonstrating compliance. The review provides a framework in which to step back and look at the Agency as a whole and to bring together all of its work as it is carried out under the overall mission, values and strategy. It permits staff to work across the Agency to develop the SAR and to involve QAA's external stakeholders in that work.

219 QAA also sees benefit in the action plan developed in line with the recommendations made by the panel and in ENQA's follow-up process. For more information, see section on Recommendations and main findings from previous review.
Design and implementation of the agency's EQA activities.
Compliance with European Standards and Guidelines
(Part 2)

220 Throughout this section QAA outlines those overarching and common principles that apply to all its work and indicative supporting evidence. Where there are exceptions in a particular method this is articulated.

ESG Standard 2.1: Consideration of internal quality assurance

221 QAA meets this Standard through the requirement for providers to demonstrate that they meet the expectations for internal quality assurance through their use of external reference points, self-evaluation and the evidence bases specified in each of QAA's review methods. The requirement to meet external reference points (which include or align with ESG Part 1) is considered through desk-based analysis and as part of the review visit. The external reference points and their use within review methods support institutional responsibility for quality assurance in the context of UK higher education providers with degree awarding powers being autonomous and, accordingly, ultimately responsible for the quality of their provision.

Supporting evidence

- **UK Quality Code** which is the central reference point for UK cyclical and entry methods (see Table 6 below)
- Degree Awarding Powers (DAPs) criteria for [Scotland](#) and [Wales](#)
- ‘Annex 3: A map of the Standards and Guidelines for Quality Assurance in the European Higher Education Area to the UK Quality Code for Higher Education’ which shows the relationship between the [ESG Part 1 and the Quality Code](#), and demonstrates that the external quality assurance undertaken by QAA takes account of the standards and guidelines for internal quality assurance
- ‘Annex 4: Alignment of ESG Part 1 Standards to review methods’ shows the relationship between the ESG Part 1 and the review methods’ report headings and documentation requirements
- Transparent and accessible [UK method handbooks](#) and criteria, and [international institutional method handbooks](#) and international [programme handbooks](#) for each of QAA’s review methods, which outline reference points for each review method
- Review reports which reflect ESG content as outlined in ‘Annex 4: Alignment of ESG Part 1 Standards to review methods’

222 Methods are designed to assess internal quality assurance in a provider. To reflect the aims of QAA’s review methods, a number of external reference points form part of the methods as outlined in ‘Higher education quality assurance activities of the agency - Nationally agreed reference points’. These reference points are used by providers to inform self-evaluation and by reviewers to inform outcomes. UK reference points have been developed by QAA with the sector and are sector owned. Although the Quality Code, ESG Part 1 and degree awarding powers (DAPs) criteria form the central reference points in respect of this Standard, they are supported by a range of additional external reference points, including the qualifications statements and Subject Benchmark Statements.
Table 6: Central reference points cited in QAA's review methods

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223 Some of QAA's review methods (see glossary), including IQR and QER, align directly to the ESG Part 1 which form an explicit part of the judgements. Other methods, such as ELIR, identify ESG Part 1 as a reference point and methods are designed to meet the ESG. The Quality Code (see also ‘Higher education quality assurance activities of the agency - Nationally agreed reference points’) is cited as a central reference point for UK cyclical and entry methods and sets out the expectations that providers are required to meet. The Quality Code is based on a number of elements that together provide a key reference point for UK higher education and supports effective quality assurance by enabling providers to understand what is expected of them. Following the revision of the Code in 2018, the emphasis remains on higher education providers with degree awarding powers having responsibility for setting and maintaining standards, and managing the quality of their provision, and QAA's review methods consider the effectiveness of this.

224 Until May 2022, the Quality Code was an element of UK-wide regulation. However, following a change to the OfS regulatory framework, the Quality Code no longer forms part of the OfS regulatory framework in England as outlined in ‘Key challenges and areas for future development’. The Expectations, Core and Common practices remain requirements in Scotland, Wales and Northern Ireland. The decoupling of the Quality Code from the OfS regulatory framework provides an opportunity for QAA to consider the future development of the Code to further meet the needs of the sector and a sector conversation on the structure and scope of the Quality Code is planned for 2022-23.

225 Copyright for the current version of the Code is held jointly by QAA and the UK Standing Committee for Quality Assessment (UKSCQA). Throughout 2022-23, QAA is engaging members and the wider sector in a discussion about the scope and continuing role for the Quality Code and its associated advice and guidance - for example, to ensure the sector at large benefits from a shared understanding of principles of practice in key areas affecting the student learning experience. QAA has also developed resources so providers can ensure they are embedding the Expectations of the Code in their own policies and processes, including the HE toolkit which is structured around the Quality Code Advice and Guidance, as well as the professional development QAA offers on different aspects of the advice and guidance (for example, course design, and course evaluation and review). QAA also has published toolkits and resources on creating inclusive subject learning communities which explicitly promotes engagement with the Code as outlined in ‘Higher education quality assurance activities of the agency’.

226 In 2022, QAA published the mapping of the Code to ESG Part 1 contained in ‘Annex 3: A map of the Standards and Guidelines for Quality Assurance in the European Higher Education Area to the UK Quality Code for Higher Education’. The mapping includes links to sector reference points, including the advice and guidance which support the sector in outlining how the Quality Code Expectations and practices may be met.
As acknowledged by the panel in the 2013 and 2018 ENQA reviews, and recognised by QAA, the Quality Code is not prescriptive and allows for flexibility in judgement in the review process to meet the needs of a diverse sector and the different contexts of the nations in the UK by focusing on the outcomes. Consistency is achieved by the approach outlined in ‘ESG Standard 2.5: Criteria for outcomes’. Although expressed primarily as outcomes, the Code and the Advice and Guidance provide a clear context for the established quality culture in the UK. The supporting mapping in ‘Annex 4: Alignment of ESG Part 1 Standards to review methods’ further emphasises the link between internal and external quality assurance and demonstrates how ESG Part 1 is covered in respect of the detailed operation of the review methods. Analysis has demonstrated that, although 1.8 is not covered by a specific report section or documentation request in the majority of the review methods it is covered by the method, as review teams triangulate all information, including publicly available information, to inform the findings of the review.

QAA is committed to supporting the embedding of quality cultures within the autonomous institutions of the UK. QAA’s activities outlined in ‘Higher education quality assurance activities of the agency’ in relation to enhancement and engagement are a strong part of its approach beyond regulatory baselines.

**Enhancement and reflection**

Following the previous review, the advice to ensure that institutional practices reflect the principles of the Lisbon Recognition Convention - including higher education qualifications, periods of study and recognition of prior learning - will be taken into account in the upcoming review of the UK Quality Code through inclusion in the supporting reference points.

As outlined in the SWOT, QAA has identified a need to ensure references to the ESG and EHEA principles are explicit rather than implicit for external quality assurance. As such, QAA also identified the opportunity to emphasise the direct links between ESG Part 1 and the Quality Code, resulting in the publication of Annex 3. In addition, QAA has strengthened through its IQA Manual, Section 2.1 and Appendices 4, 5, 20 its requirements for ESG Part 1 to be explicitly referenced in its methods at the point when that method is next revised. QAA’s evaluation of methods will also consider how alignment with Part 1 is best evidenced. In addition, our sector discussions about the future scope and role of the Quality Code will take into account the links between the Code and the ESG.

**ESG Standard 2.2: Designing methodologies fit for purpose**

QAA meets this Standard through the use of common principles in the design of all review methods, including nationally agreed reference points, enhancement, student engagement, peer review and working in partnership as outlined in ‘Higher education quality assurance activities of the agency’ and in the IQA Manual Section 2.1 and Appendices 3 and 4. Designing methodologies fit for purpose is achieved through stakeholder engagement, continual improvement and evaluation, and is supported by events and guidance to prepare institutions and reviewers for reviews as outlined in ‘ESG Standard 2.4: Peer-review experts’ and ‘ESG Standard 2.5: Criteria for outcomes’.
232 QAA’s approach to designing methodologies is outlined in the IQA Manual, Part 1, Section 2.1 and Appendices 2, 16 which is intended to support the development of review methods. Methods are developed independently by QAA but may be framed by the requirements of a regulator or funder and to align with the national context. All review methods have clearly described aims and a context. The QAA approach to keeping review methods fit for purpose is that they are developed through a consultative process, implemented, and then feedback from providers and reviews is sought and reflected on, and methods are amended as appropriate. Consultation is undertaken to ensure that the method is fit for purpose and operationalised in this context as outlined in the IQA Manual, Section 2.1 and Appendix 2.

233 Elements such as aims, proportionality (including options to vary the length of review visits depending on desk-based exercises and planning visits), means of supporting quality improvement, outcomes and follow-up are included as part of the method development. Consultations are held in respect of the approach and/or the handbook. QAA has also established, as appropriate, informal advisory groups to provide specialist advice and guidance on the development of methods. This approach is being used for the development of the next review method in Scotland and has been supported by the evaluation of the current method and briefings on international approaches and the ESG as well as higher education and further education comparisons. Following publication of handbooks, supplementary guidelines and briefings are produced for providers as outlined in ‘ESG Standard 2.5: Criteria for outcomes’. QAA’s approach to continuous improvement and evaluation of methods is fundamental to ensuring methods are fit for purpose and is outlined in the IQA Manual, Section 2.6 and Appendix 16.

234 QAA has a commitment to engagement with and from the sector which underpins an embedded quality culture and it has strong, established partnerships with sector bodies and agencies as well as international links and activities outlined in ‘International activities’. QAA’s approach to external and stakeholder engagement is outlined in ‘Higher education
quality assurance activities of the agency’ and ‘ESG Standard 3.1: Activities, policy and processes for quality assurance’ and means that it is well placed to work in partnership with stakeholders to explore contemporary challenges. Examples of engagement include networks such as the PSRB Forum, Wales Quality Network and The Quality Forum in Scotland (a network of quality professionals which meets three times a year and has an online discussion group on the platform Yammer), as well as stakeholder engagement in the drafting of sector reference points such as the Quality Code and Subject Benchmark Statements.

Enhancement and reflection

235 Arising from the SWOT activities undertaken in preparation for the ENQA review, QAA identified that common principles in respect of method design underpin its approach and are consistently applied across all review methods, but that the articulation of these principles in the form of a manual to support review method development would further enhance its practice. As such, the Agency developed the IQA Manual, as outlined in ‘ESG Standard 3.6: Internal quality assurance and professional conduct’, to articulate its practice and to provide a guide and framework for future review method development. The manual is intended both as a framework to articulate the existing common principles and to identify enhancement areas for consideration when developing methods (noting that this may not apply across all methods but would provide a toolkit to consider options to ensure that methods are designed to be fit for the individual purpose).

236 Since the last review, QAA has established and formalised the role of the Assessment and Reviews Group (ARG) to provide strategic oversight and consideration of new methods, as well as improvements. This group provides the opportunity for cross-Agency expertise and oversight to support the development and change of methods. ARG has oversight of all methods (including those out of scope of the ENQA review). An example of method development has been provided in the supporting evidence. Similarly, the example outlining proposed changes to QER in the context of the pandemic was developed in discussion with the funder who conducted a consultation with the sector. The approach was mindful of the burden to the sector. The changes also brought the approach more in line with Scotland where there is an expectation that institutions engage in enhancement rather than there being a separate judgement, and the method expertise across the group helped to inform the changes.

237 Following the 2018 ENQA review suggestion for further improvement, in respect of issues of engagement with the broader higher education community and beyond as part of its methodologies, QAA has conducted a number of consultations on review methodologies as well as on the quality framework in the UK as outlined in ‘Recommendations and main findings from previous review(s) and agency’s resulting follow-up’.
ESG Standard 2.3: Implementing processes

238 QAA meets this Standard and the components of the four-stage model are articulated in the IQA Manual, Section 2.1 which informs the development of review methods. Review processes are published in handbooks. The evidence base for a review includes a self-evaluation (and includes the opportunity for student voice either in the self-evaluation or through a separate submission). Desk-based analysis is undertaken by the members of the review team and supported by a team preparatory meeting in advance of a site visit. Reports are published and follow-up monitoring activity takes place in accordance with the method.

Supporting evidence

- Transparent and accessible UK method handbooks and criteria, and international institutional method handbooks and international programme handbooks where the components of the four-stage model are outlined
- Published reports and follow-up, which include positive and negative judgements as evidenced by the ELIR example
- Online review guidance for reviewers, providers and QAA officers developed to support online site visits in the context of the pandemic; QAA’s ongoing approach to online reviews is outlined in the Principles and feasibility of undertaking online review visits and operationalised in the example QER and GQR (Wales) provider and reviewer guidance
- Example - annual monitoring template from HER (AP) of annual monitoring decisions and moderation process

239 QAA’s approach to assuring the reliability of reviews is outlined in the IQA Manual (including in Sections 2.1, 2.2, 2.6, and Appendices 13, 14, 16). Key components are as follows.

- The recruitment of reviewers with considerable experience and expertise in higher education who are supported through training as outlined in ‘ESG Standard 2.4: Peer-review experts’. The training includes the exploration and evaluation of evidence and the approach to triangulation for judgements.
- Ensuring review teams make judgements according to decision-making frameworks set out in review handbooks and through testing and challenge by the QAA Officer as outlined in ‘ESG Standard 2.5: Criteria for outcomes’.
- Evidence-based reports whereby report content is supported by evidence references in the draft report to enable triangulation.
- Sharing draft reports with providers for comments on factual accuracy.
- Checking review outcomes before they are confirmed through a moderation or second-reader process as outlined in ‘ESG Standard 2.5: Criteria for outcomes’. Such checks ensure that the wording of outcomes is clear and that criteria have been consistently applied.
- In some methods, moderation of decisions as to how the method is applied - for example, in the annual monitoring of alternative providers, decisions as to whether providers should have a visit, extended visit, partial review or full review - are subject to moderation.
- Evaluating all reviews to check that they are fit for purpose as outlined in ‘ESG Standard 2.2: Designing methodologies fit for purpose’.
- Application of a lessons-learned approach for appeals and complaints as outlined in ‘ESG Standard 2.5: Criteria for outcomes’ and ‘ESG Standard 2.7: Complaints and appeals’.
As outlined in ‘Annex 2: Alignment of key principles with the methods in scope for the QAA review by ENQA 2023’ and in the review method handbooks, all of QAA’s review methods include self-assessments, external assessment and reports. QAA’s published reports clearly state the outcomes of each review. Most methods require higher education providers to produce an action plan or follow-up report setting out their planned action against each of the recommendations. The action plan or follow-up report may be published or monitored by QAA. A range of follow-up activity is used by the Agency to reflect the diversity and aims of the review methods. Approaches include additional forms of dialogue and activity; in ELIR the published follow-up report is supported by annual institutional liaison visits where the outcomes from ELIR are considered as well as expected institutional participation in Focus On activities that explore topics arising from ELIR; HER (AP) and its derivatives include an annual monitoring approach; and IQR and IPA include a mid-cycle review for successful outcomes. Other methods, such as GQR (Wales) and DAPs SWNI, are entry or elective-specific purpose processes and, as such, follow-up is through the relevant cyclical review method process. All methods include follow-up where there is need for improvement to meet the threshold standard and that could include a partial or full re-review.

Enhancement continues to be central to QAA’s review methodologies. In Scotland, there is a searchable database linked to ELIR (see ‘ESG Standard 3.4: Thematic analysis’). QAA’s approach to ongoing forms of dialogue and enhancement approaches enable mutual learning opportunities and a wider impact for reviews beyond immediate provider action. QAA’s approach to thematic reporting and enhancement activities as outlined in ‘ESG Standard 3.4: Thematic analysis’ further supports this.

In addition to QAA’s commitment to enhancement, student involvement in review methods is a key component of its approach, as outlined in ‘Higher education quality assurance activities of the agency’, and QAA continues to find ways to strengthen and deepen student partnership each time a review method is revised or developed, for example through the development of the role of Lead Student Representative (see ‘Student engagement’).
Enhancement and reflection

QAA has endeavoured to ensure that its review processes are built on the principles enshrined in the ESG and believes that the evidence above demonstrates that it has strong safeguards in place to ensure the effective implementation of review processes which has also been supported by the annual monitoring process outlined in the IQA Manual, Section 2.6. The development of the IQA Manual, Section 2.1 and Appendices 4, 5, 20 has supported this and has also provided an opportunity to make the ESG and EHEA principles more prominent.

QAA has identified that, in some areas, formal follow-up processes would benefit from further development in the next iteration of the method, such as QER whereby at present follow-up consists of production of an action plan and additional follow-up for an unsatisfactory outcome. This has been identified in the ‘SWOT analysis’ and will inform future development of the method. Additionally, QAA has developed an Agency-wide approach to follow-up guidance in the IQA Manual, Appendix 15. The manual refers to different types of provision - for example, new providers and entry review methods. Means of follow-up, including dialogue, action planning, annual monitoring and mid-cycle approaches, are also outlined to support the revision or development of future methods.

As outlined in the ‘SWOT analysis’, the Agency’s review methods are well established yet adaptable and QAA has demonstrated a flexible and responsive approach in both the policy and delivery environment and, as such, it developed online review guidance for providers, reviewers and QAA Officers to support reviews in the context of the pandemic. All QAA reviews normally include an in-person visit by a team of peer reviewers. However, taking account of government and public health advice, QAA made some adjustments to the operation of the visit to include the option of visits being conducted online. The methods as set out for the respective reviews were followed to complete the reviews online. This guidance has been supplemented by cross-Agency principles for consideration and online review visits for the remainder of 2021-22. The principles include considering the potential for disruption, considerations for hybrid meetings and hybrid visits, as well as guiding principles for exceptions where an onsite visit will be required.

ESG Standard 2.4: Peer-review experts

QAA meets this Standard through the design and composition of teams in its review methods developed since the last ENQA review. Reviews are conducted by independent, external peer reviewers, including student reviewers, as a matter of standard practice. The constitution of review panels is outlined in published handbooks. The expertise of reviewers is assessed and ensured through application, selection, training and evaluation. Impartiality is ensured through the conflict of interest process.
Supporting evidence

- Transparent and accessible UK method handbooks and criteria, international institutional method handbooks and international programme handbooks for each method where review teams and the role descriptions of reviewers (including criteria for appointment) are outlined; the constitution of teams is confirmed in review reports.
- Conflict of interest policy, IQA Manual, Section 2.3 - Code of Conduct for those involved in QAA reviews and reviewer contract or example international consultancy agreement (separate agreements exist to reflect in-country requirements) demonstrating the approach and contractual requirements to ensure impartiality and ethical conduct.
- Examples of IQR online reviewer training and ELIR reviewer training and student reviewer briefing information.
- Example of evaluation form from HER (AP), including consideration of performance.
- Examples of QAA Reviewer Newsletter, providing ongoing updates and development for reviewers.
- 2021 Reviewer diversity paper to Assessment and Reviews Group.
- Assessment and Reviews Group policy position on student reviewers taken to strengthen the position since the last review.
- UK Quality Code Advice and Guidance on External Expertise demonstrating guidance to the sector in respect of external expertise.

Reviewer recruitment, appointment, training and evaluation

QAA’s reviewers are valued for their expertise and competence. This is assured through recruitment processes, comprehensive training, and ongoing support as outlined in the IQA Manual, Sections 2.3, 2.4, 2.9 and Appendix 11. Reviewers are normally appointed through an application process and prospective reviewers are assessed against criteria specified in the review methods. Through the ongoing Reviewer Experience Improvement project due to complete in July 2023, QAA will be developing centralised processes to enhance consistency whereby reviewers are appointed through an online application process and assessed against person specification criteria. There are detailed requirements for the experience, competences and qualities of peer reviewers; these are publicly available when QAA is recruiting and included in review method handbooks. In addition to generic requirements, there are specific requirements for student reviewers and international reviewers and for where particular expertise may be required for specific review methods.

Reviewers are generally staff or former staff from higher education institutions in the UK or internationally with recent senior-level expertise in administration, management or teaching, or consultants with current higher education expertise. Student reviewers are generally current undergraduate or postgraduate students, sabbatical officers or recent graduates with experience of representing student interests. QAA screens all applications, and appoints, assigns and trains its reviewers.

QAA has an internal policy on conflicts of interest covering its staff, reviewers and contractors/consultants as outlined in ‘ESG Standard 3.6: Internal quality assurance and professional conduct’. All those employed by QAA for any purpose involved in external quality assurance activities are required to declare any conflicts of interest and advise QAA immediately should any conflict arise.
All reviewers must complete a training programme as part of the method continuing professional development (CPD). Review training consists of a combination of pre-preparation, presentations, individual and group exercises that reflect the activities undertaken in an actual review. Students are full members of review teams and complete the same training, although this may be supplemented by an additional student briefing. Ongoing support is provided to reviewers by the QAA officer and additional guidance is provided on areas such as report writing.

Every review ends in an evaluation phase where reviewers, QAA staff and the provider can provide feedback on the review process and the professional conduct of those involved as outlined in the IQA Manual, Sections 2.6 and 2.3. In addition to the specific review method CPD, QAA has developed a reviewer network supported by the Agency’s Reviewer Newsletters which highlights opportunities for CPD, including focus groups, evaluation and advisory group participation (see examples in ‘ESG Standard 2.2: Designing methodologies fit for purpose’). The Reviewer Newsletter was introduced in 2021 and is circulated to reviewers on a quarterly basis. The Newsletter is a core means of communicating with QAA reviewers and comprises information and updates from across the Agency, including important operational updates as well as information on review activity and key QAA events and publications. The newsletter is offered in English and Welsh.

**Diversity and composition of reviewer pool**

QAA’s approach to equality, diversity and inclusivity is outlined in ‘ESG Standard 3.5: Resources’. QAA seeks to ensure that its reviewer pool reflects the range of the higher education sector and the diversity of the population. QAA’s reviewer recruitment and selection processes demonstrate a commitment to equality, diversity and inclusivity and are designed to enable a wide reach. Legally QAA cannot enforce the collection of diversity data but has encouraged reviewers to share diversity data to further enhance practice. As such, QAA has routinely collected equality and diversity data for reviewers for the past two years through an online survey and the data is considered by the Assessment and Reviews Group (ARG) and the QAA Board.

As standard practice, review methods include student reviewers and QAA is committed to this principle. Following the last ENQA review, QAA has more clearly articulated its stance in relation to student reviewers as outlined in ‘Recommendations and main findings from previous review(s) and agency’s resulting follow-up’ and reflected in the ARG minutes. Students are equal members of review teams, participate in decision-making and outcomes and draft sections of the reports. In addition, QAA has extended its commitment to including student reviewers beyond the review methods in scope of the ENQA review, and student reviewers have been included in the investigatory methods of the Concerns Investigations in Wales and in the Scottish Quality Concerns Scheme. The ELIR method had the provision for an additional student reviewer on the review team.

QAA always includes international reviewers in IQR and IPA review methods and they can be appointed on request for QER and ELIR. QAA currently engages with 14 reviewers who are based internationally. International reviewers have been included on four ELIR 4s and all IQRs but have not been used on other methods to date. International reviewers are included on the International Programme Accreditation method launched in July 2022.

QAA is mindful of the external dimension that can be provided by international reviewers and has also considered the ways in which this can be achieved, and has committed to ensuring that composition of review teams - including consideration of inclusion of international and employer reviewers - is a feature of consultations on future methods as outlined in the IQA Manual, Appendix 2. As QAA operates across the UK’s four home...
nations, there are distinct differences in educational policy and systems, as well as in the approaches by regulators and funders. Many QAA review teams do, therefore, reflect more than one national perspective. Teams for ELIR in Scotland and QER in Wales will comprise members from outside as well as from the home nation and this may also apply to HER (AP) and DAPs. Overall, the UK higher education sector is highly international; many QAA reviewers have direct experience of working internationally or have been involved with collaborative provision outside the UK. Therefore, the distinction between 'home' and 'international' reviewers is increasingly blurred. QAA focuses on creating review teams that meet the needs and expectations of the review method and the institution under review, as outlined in 'ESG Standard 2.2: Designing methodologies fit for purpose'. QAA is committed to ensuring that it is an outward-looking agency and that its work is informed by views and practices external to the UK through engagement with European and international networks and agencies, as outlined in 'Higher education quality assurance activities of the agency' and 'International activities'.

255 QAA is committed to employer and professional engagement (including PSRBs) and has taken a number of steps to extend this since the 2018 ENQA review, including the development of the Quality Code Advice and Guidance to include a section on external expertise to enable employer engagement and perspective at a subject level within an institution. This is in the context of the extensive engagement of UK providers with industry and the professions.

256 In respect of employer or professional practice reviewers on methods, QAA has focused on ensuring that expertise is appropriate for the type of review, as QAA primarily undertakes reviews at institutional level. Due to the range of provision in UK HE providers, efforts have concentrated on advice to incorporate professional expertise at the subject level to enable tailored enhancement opportunities. The use of external expertise by providers and the support for students to achieve professional outcomes are Core practices of the Quality Code (see 'ESG Standard 2.1: Consideration of internal quality assurance') and are therefore considered as part of QAA's review methods particularly in relation to external examiners and evidence relating to advisory groups and external advisers.

257 QAA has taken an approach in respect of international and professional practitioner roles on review teams to consult with the sector as methods are developed, as outlined in the IQA Manual, Appendix 2. In the recent ELIR 4 evaluation (see 'ESG Standard 2.2: Designing methodologies fit for purpose'), a recommendation in respect of employer and professional practitioner roles on review teams was made and accordingly will form part of consultation for the next method as this is developed. QAA is conscious of changes in the sector in respect of work-based learning and accordingly is committed to consulting on this matter as methods are developed to identify the most appropriate use of employer engagement.
Enhancement and reflection

258 Arising from the SWOT activities undertaken in preparation for the ENQA review, QAA identified that, although student reviewers are included in review teams as a matter of standard practice, there have been instances where students may not have been included on specific teams due to the small scale of the provision. QAA has reflected on this practice and strengthened its position as articulated at Assessment and Reviews Group, thereby ensuring that student reviewers will be on all teams regardless of size from September 2022.

259 Although QAA’s training of reviewers is a noted strength, it also identified opportunities to make more explicit references to the ESG across its training, which has been reflected in the IQA Manual, Appendix 11. QAA has also added into the manual the use of advisory groups to support method development - recognising the opportunity to broaden the approaches to using expert advice.

260 QAA’s continuous improvement approach is reflected in its ongoing Reviewer Experience Improvement project which is intended to continue to develop and enhance the reviewer experience in respect of processes, including recruitment and allocation, training and reviewer performance and is supported through a centralised reviewer support function. The project is due to complete in July 2023 and includes developing a standardised reviewer web application process and workflow, centralised reviewer database, division of training stages into induction and method-specific training, as well as systemised payment and leaver processes. As part of the project, an inconsistent approach to reviewer performance was identified across methods and QAA is developing an organisation-wide consistent approach to reviewer performance which will involve consideration of peer and provider feedback.

261 Although QAA has begun to collect and consider diversity data, it is aware that there are further opportunities to analyse trends and to use this information to inform future recruitment to the reviewer pool. QAA is aware of the limitations of the voluntary survey approach in providing a sufficient basis upon which action can be taken and is continuing to encourage completion and to explore further opportunities in the context of EDI data collection not being enforceable. Consideration of recruitment and the diversity of the reviewer pool is also part of the Reviewer Experience Improvement project and will inform future reviewer recruitment campaigns.

ESG Standard 2.5: Criteria for outcomes

262 QAA meets this Standard by ensuring that judgements are made with reference to explicit criteria and reference points which are published in handbooks. Consistent application of the criteria is supported by training of reviewers which includes specific sessions relating to making judgements as well as reviews being supported by QAA staff expertise and oversight.
Supporting evidence

- Transparent and accessible UK method handbooks and criteria, and international institutional method handbooks and international programme handbooks for each of QAA’s review methods. Judgements and criteria are outlined in the handbooks. In some methods these are supported by guides to judgements, as in QER handbook, Annex 2, or examples of practice, as in IQR handbook, Annex 3.
- Example of reviewer training (slides 59-73) and exercises from ELIR related to judgements to support reviewers (further examples of training are included in ‘ESG Standard 2.4: Peer-review experts’).
- Example of a provider briefing from GQR (Wales) and IQR with slides related to judgements to support providers.
- Example moderation form from QER and IQR to support internal consistency.

263 QAA’s approach to judgements and criteria is described in the IQA Manual, Section 2.2 and Appendix 13. For each of QAA’s review methods, the judgement terminology is established to reflect the nature and aims of the method. Where there are differentiated outcomes, they are clearly described within the method handbook. In addition to the published handbooks that outline the review process and judgements, criteria for outcomes for review methodologies are reinforced to providers in a number of ways. QAA review methods are developed in consultation with the higher education sector as described in ‘ESG Standard 2.2: Designing methodologies fit for purpose’ and QAA additionally delivers provider briefings to outline the review methodologies and support providers under review.

264 The criteria for outcomes are similarly reinforced to reviewers through training as described in ‘ESG Standard 2.4: Peer-review experts’ and through oversight and expertise of the QAA Officer who supports each review and ensures the integrity of methods and judgements as outlined in the IQA Manual, Sections 2.3, 2.4, 2.9 and Appendix 11. In all methodologies, a QAA Officer is involved throughout the review process and works with the review team on the final day of the review to ensure that the judgements are evidence-based and consistent. In addition, judgements are subject to internal moderation processes which include a variety of approaches, such as forms, second reader review of the reports, and sharing of outcomes across the review managers for that method. A range of practices are employed to account for the volume and nature of that review method. QAA Officers normally shadow reviews before carrying out their first review and are supported by the moderation processes to ensure reliability.

265 Criteria for outcomes are supported by external reference points which include the UK Quality Code, qualifications frameworks and ESG, as outlined in the section for ‘ESG Standard 2.1: Consideration of internal quality assurance’. As identified by the panel in the 2013 and 2018 ENQA reviews, the Quality Code is not prescriptive and allows for flexibility in judgement in the review process to meet the needs of a diverse sector and different contexts of the nations in the UK by focusing on the outcomes. Consistency is achieved by the approach outlined above. This approach is also a key part of establishing a quality culture within the sector as described in ‘ESG Standard 2.1: Consideration of internal quality assurance’.
Enhancement and reflection

266 Arising from the SWOT activities undertaken in preparation for the review, QAA identified that there was an opportunity to enhance its articulation of the distinct role of the QAA Officer in reviews and, in particular, linked to judgements. QAA handbooks clearly define the roles of those involved in review activity and processes reflect the role of the QAA Officer in supporting and managing reviews, but it was identified that this is an area which could be further developed through articulation of Agency-wide principles in the IQA Manual to reflect practice and inform future iterations of handbooks.

267 A further area for enhancement identified was in respect of how QAA may be able to make further use of guides to judgements as provided in the evidence example above, and again this was incorporated in the IQA Manual, Appendix 13 to inform future development of methods. QAA additionally has identified an opportunity to progress its work in relation to consistency of terminology across methods, where appropriate, and this is an area for development in the IQA Manual, Section 2.2.

268 Although QAA has a small number of appeals and complaints, it also identified an opportunity to formalise its lessons-learned approach and noted that this could additionally support the evaluation approach in this area. Previous practice was that feedback from appeals and complaints was provided to the relevant part of the Agency for consideration. The Governance team has implemented a more structured evaluative approach to monitoring outcomes. Where an appeal is upheld, lessons learned are fed back to the Assessment and Reviews Group, to identify trends and support the consistent application of processes, and to highlight any requirements for streamlining or amendments of these processes. The QAA Board is also informed of the outcome of appeals and any lessons learned.

ESG Standard 2.6: Reporting

269 QAA meets this Standard through the publication of reports for all review methods. Consistency of report writing and consideration of audience is achieved through QAA Officer oversight and supported by guidance and training to reviewers.

Supporting evidence

- Transparent published reports for each method and samples for each method
- Overview information on EQA systems per nation to contextualise reports
- Example of publication of good practice case studies for QER, Focus On projects and the Knowledge Base for ELIR which demonstrate ongoing use and communication of report outcomes across the sector
- Example training as outlined in ‘ESG Standard 2.4: Peer-review experts’ from IQR, including guidance on using reviewer findings templates and from ELIR, including group exercises
- Example report writing guidance from HER (AP) and ELIR to support reviewers
- Example evaluation including sections relating to reporting for ELIR 4
- QAA house style to ensure consistent presentation of reports
- QAA glossary
QAA publishes reports of all of its reviews on its website irrespective of outcome, as outlined in the IQA Manual, Section 2.1 and Appendix 4. All reports are accessible by provider name and some by method. Some reports, including DAPs SWNI, are not published until the Privy Council’s decision has been made public; the publication date is aligned with the announcement of the outcome. The reports include outcomes, features of good practice and recommendations for improvement, where applicable and in accordance with the method. Key findings are included at the start of the report so that they can be located easily. In some methods, such as ELIR and QER, there is a separate ‘outcome’ and ‘technical’ report which are tailored to meet the needs of different audiences. Outcome reports summarise the outcomes of the review and are intended for a broad audience. Technical reports outline the detailed findings of the review and are primarily intended to support the institution and enable thematic reporting and therefore are intended for a more expert audience. Both report types are published on QAA’s website. Where methods have mid-cycle reviews, such as IQR, or monitoring reports, such as HER (AP), these reports are also published on QAA’s website. In addition to method reports, QAA publishes thematic reports on its website as outlined in ‘ESG Standard 3.4: Thematic analysis’, including good practice case studies for QER and overview reports for each TNE country.

QAA’s approach to ensuring the quality and consistency of reports is outlined in the IQA Manual, Sections 2.1, 2.4 and Appendices 5, 13, 14. To support consistency and clarity of reports, standard report templates are developed for all review methods. They outline the context of the higher education institution, brief description of the review method (including reviewer information), evidence, analysis and findings, conclusions and, in accordance with the method, good practice and recommendations. Templates for review reports are used and designed in accordance with the requirements of the IQA Manual, and indicative report structures and mapping to ESG Part 1 are contained in the IQA Manual, Appendix 5. Providers are given the opportunity to comment on matters of factual accuracy in advance of publication.

QAA has continued to train reviewers in respect of report writing to enable clear, evidenced and concise reports. Guides on writing, report templates and the QAA house style are used for all methods. Review teams are supported by QAA Officers who moderate and edit reports to include a quality check to ensure that they provide analysis based on evidence (the role of the QAA Officer is outlined in the IQA Manual, Section 2.4). Although QAA has begun to collect and consider diversity data, it is aware that there are further opportunities to analyse trends and to use this information to inform future recruitment to the reviewer pool. QAA is aware of the limitations of the voluntary survey approach in providing a sufficient basis upon which action can be taken and is continuing to encourage completion and to explore further opportunities in the context of EDI data collection not being enforceable. Consideration of recruitment and the diversity of the reviewer pool is also part of the Reviewer Experience Improvement project and will inform future reviewer recruitment campaigns. QAA’s Marketing and Production team is responsible for the proofreading and publication of reports. QAA also publishes an online glossary of commonly used terms to support report writing.

Review reports for higher education providers in Wales are published in English and Welsh in order to adhere to QAA’s duties as part of the Welsh Language (Wales) Measure 2011, by meeting the Welsh Language Standards set out in QAA’s compliance notice.\(^\text{94}\) Publication of reports in English and Welsh ensures that the underlying principle behind the Standards (that the Welsh language must not be treated less favourably than English when QAA is dealing with organisations and individuals in Wales, carrying out activities in Wales or services for those in Wales) is adhered to. Bilingual publication ensures review reports are

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\(^\text{94}\) QAA is subject to the Welsh Language Standards (No. 2) Regulations 2016, which provide requirements for general public organisations in Wales and the UK. Of the 113 standards in its compliance notice, a number have a clarifying condition to reflect QAA’s organisational context.
accessible and available to a Welsh-speaking audience. The same approach applies to other publications, including social media, related to QAA's work in Wales.

274 As identified in the ‘SWOT analysis’, QAA offers many well-established enhancement services that go beyond baseline regulatory requirements. Reporting does not end with reports and the transparency and accessibility of findings is also facilitated through enhancement activity, which enables dialogue on quality aspects to be discussed across the sector. Examples include good practice case studies, Focus On and networks such as Wales Quality Networks and The Quality Forum where ELIR and QER commendations are shared. The ELIR knowledge base also acts in this way and QAA's thematic reports, as outlined in ‘ESG Standard 3.4: Thematic analysis’, demonstrate an approach to providing accessible information for stakeholders.

275 QAA uses social media to reach the wider public and has an established and well-accessed presence on social media channels, with postings on Twitter and LinkedIn. QAA has over 17,800 followers on its main Twitter account and over 11,400 followers on its main LinkedIn account as of May 2022. Through these channels, QAA is able to engage with key audiences in the higher education sector, including students, students’ unions, institutions, mission groups and PSRBs; as well as connecting internationally with ministries, quality assurance agencies and higher education providers. QAA has separate accounts for its work in Scotland on Twitter to reflect the unique nature of the Scottish higher education landscape and QAA’s work in the nation. As of May 2022, the QAA Scotland and Enhancement Themes Twitter accounts have approximately 1,500 and 1,600 followers respectively. The QAA Scotland LinkedIn page has over 450 followers as of May 2022. Any posts applicable to QAA's work in Wales are published in English and Welsh simultaneously.

276 To engage and reach its target audiences, QAA publishes information in a number of different ways - for example, for students there are student guides providing information in an accessible way. Films on QAA's YouTube channel are used to present content in an easily accessible format. Videos include case studies, webinar recordings, introductory videos and animations, discussions and debates, informative explainers and shorts, and podcasts. QAA offers some with translation into other languages and uses subtitles to increase accessibility for viewers. QAA's main YouTube channel has over 1,300 subscribers, and there is a separate channel for its Enhancement Themes work in Scotland.

277 QAA continues to build relationships with, and link to and from, high-traffic websites and media outlets used by higher education applicants, current students and other public audiences (such as the UK Discover Uni and UCAS websites). The Agency aims to deliver its website content to the AA accessibility standard and improve the usability of its websites through monitoring of use and making content available in different formats and languages.

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95 See the Annual Report on QAA’s engagement with the Welsh Language (Wales) Measure 2011 for further examples, including links to news items, reports and social media, on the QAA website.

96 Twitter account

97 LinkedIn account

98 QAA Scotland and EnhancementThemes and LinkedIn QAA Scotland showcase page

99 Such as with the studentguide on unpacking assessment developed in partnership with QAA's Student Strategic Advisory Committee.

100 QAA YouTube channel and Enhancement Themes YouTube channel
Enhancement and reflection

278 In the context of the suggestion for further improvement at the 2018 ENQA review, QAA has undertaken a review of its website and is considering the approach in respect of report searchability. This will include a review of the way the site is currently used by stakeholders. It is anticipated that a revised search function that will enable users to also search by method and date will be implemented in line with web developer availability. In addition, from January 2023 QAA will begin uploading newly published reports to the Database of External Quality Assurance Results (DEQAR) to reflect its ongoing commitment to European engagement and in order to enhance the accessibility of published reports.

279 As outlined above, QAA has a number of mechanisms in place to ensure the consistency and clarity of reports but has further identified an opportunity to enhance its evaluation processes in respect of reporting. As part of follow-up activity, QAA is aware of the ways in which institutions use review reports to develop action plans for recommendations and commendations but also to identify development areas for the institution, particularly when review teams encourage institutions to progress particular actions. The ELIR evaluation considered the use of reporting and QAA is conscious of the opportunity for this to be more systematically reviewed as part of its evaluation processes to consider usability for the sector.

280 As outlined in the previous review and in ‘History, profile and activities of the agency’, communicating UK quality assurance and enhancement arrangements across the UK and in the context of different regulatory jurisdictions is challenging and, accordingly, QAA has developed its webpages in respect of this to contextualise reports to the nations’ EQA systems.

ESG Standard 2.7: Complaints and appeals

281 QAA meets this Standard through distinct published appeals and complaints processes which are rigorously operated.

Supporting evidence

- Published and transparent complaints and appeals procedures and corresponding definitions and distinctions
- Transparent and accessible UK method handbooks and criteria, and international institutional method handbooks and international programme handbooks for each of QAA’s review methods where complaints and appeals processes are signposted
- Example reviewer guidance for independent reviewers and appeals panel members
- Example staff training to support the appeals and complaints process
- QAA Board annual analysis of trends relating to appeals and complaints
QAA has robust processes in place, including an overarching complaints process and a number of appeals processes, which together cover every review method. These are publicly available on the QAA website and complaints and appeals are referred to separately in each review method handbook. QAA distinguishes between appeals and complaints. An appeal is a challenge by an institution to the unsatisfactory outcome of a QAA review or to another decision made by QAA. A complaint is an expression of an individual’s dissatisfaction with their experience of dealing with QAA and may be made on behalf of the individual’s institution. QAA has published procedures for complaints and for handling appeals. Responsibility for the conduct of appeals and complaints sits with the Governance team.

The majority of QAA review methods are included in the Consolidated Appeals Procedure. However, because QAA works across all four UK nations and internationally, the nature or context of some review methods necessitates their own tailored procedure distinct from the Consolidated Appeals Procedure. There are separate appeals procedures relating to DAPs and Access to HE which reflect process differences that align with the nature of the methods. Irrespective, an institution can appeal the unsatisfactory outcome of any review carried out by QAA, on the basis that procedure was not correctly followed or that the outcome was not based on sound evidence. All appeals are considered independently and overseen by the Governance team.

In the Consolidated Appeals Procedure appeal submissions are screened by one of a small pool of experienced and specially briefed independent reviewers to ensure consistency. The process is managed by two members of the Governance team who considers which methods reviewers have been trained in, how recently they have conducted a review and potential conflicts of interest. Appeal panels are convened by the Governance team and will consist of between two and five members depending on the review method, who are experienced Independent Reviewers, one of whom will be invited to act as Chair. Secretarial support is provided by the Governance team. Appeal panels are supported by an expert adviser, who is a member of QAA staff with no prior involvement in the review, to ensure the consistent application of the relevant review methodology. The decisions of the panel are outlined in the procedure. The overall decision for the appropriateness of action required following the upholding of an appeal is made by the responsible director. All QAA reviewers receive training to ensure that they are confident in their roles and with their responsibilities and appeal reviewers are selected by the Governance team from the pool. Appeals guidance is provided by the Governance team. The processes follow QAA’s Conflict of interest policy and ensure that those with prior involvement are not part of the appeal process.

QAA’s complaints procedure starts with the principle of early and local resolution, where possible, with the formal stages of the process managed by the Governance team and conducted by those with no prior involvement in the matter. QAA is committed to handling complaints with courtesy, respect and fairness, to provide full reasons for the outcome and to use the knowledge gained from complaints to improve how it operates.

QAA analyses appeals and complaints and, following its SWOT analysis, has strengthened its lessons-learned approach in respect of both procedures.
### Table 7: Number of appeals over the last five years

<table>
<thead>
<tr>
<th>Year of review</th>
<th>Providers eligible to appeal</th>
<th>Eligible providers that did appeal</th>
<th>Eligible providers that did not appeal</th>
<th>Appeals upheld</th>
</tr>
</thead>
<tbody>
<tr>
<td>2017-18</td>
<td>17</td>
<td>4</td>
<td>13</td>
<td>0</td>
</tr>
<tr>
<td>2018-19</td>
<td>3</td>
<td>1</td>
<td>2</td>
<td>0</td>
</tr>
<tr>
<td>2019-20</td>
<td>6</td>
<td>2</td>
<td>4</td>
<td>0</td>
</tr>
<tr>
<td>2020-21</td>
<td>13</td>
<td>1</td>
<td>12</td>
<td>0</td>
</tr>
<tr>
<td>2021-22 (to date)</td>
<td>24</td>
<td>5</td>
<td>19</td>
<td>0</td>
</tr>
</tbody>
</table>

101 Providers with unsuccessful outcomes are eligible to appeal.

### Table 8: Number of complaints over the last five years

<table>
<thead>
<tr>
<th>Year</th>
<th>Upheld</th>
<th>Rejected</th>
<th>Total</th>
<th>Unresolved</th>
</tr>
</thead>
<tbody>
<tr>
<td>2017-18</td>
<td>1</td>
<td>6</td>
<td>7</td>
<td></td>
</tr>
<tr>
<td>2018-19</td>
<td>2</td>
<td>7</td>
<td>9</td>
<td></td>
</tr>
<tr>
<td>2019-20</td>
<td>1</td>
<td>3</td>
<td>5</td>
<td>1 in progress from 2019-20</td>
</tr>
<tr>
<td>2020-21</td>
<td>0</td>
<td>7</td>
<td>7</td>
<td></td>
</tr>
<tr>
<td>2021-22 (to date)</td>
<td>0</td>
<td>1</td>
<td>2</td>
<td></td>
</tr>
</tbody>
</table>
Enhancement and reflection

287 Since the last ENQA review in 2018, QAA has conducted a review of its appeals procedures. The changes were primarily made to ensure consistency across the appeals procedures and were underpinned by the development of more structured approaches to lessons learned from appeals, changes to the website and clearer communication for providers. Changes were made to ensure consistency of:

- time for a provider to make an appeal and reference to timescales
- definitions
- reference to the Conflicts of interest policy
- use of secretarial support.

288 To underpin the clearly defined processes for appeals and complaints, the webpages relating to appeals have been refreshed to include clearer signposting for providers.

289 Arising from the SWOT activities undertaken in preparation for the ENQA review, provision has been made for staff and reviewer training on the procedures as a means of ensuring currency, particularly in view of the infrequency of appeals and complaints. Staff briefing sessions on appeals have been undertaken for teams and an annual open session for all staff on the complaints procedure has been developed to ensure currency.

290 Outcomes from complaints and appeals are reported to the QAA Board annually and are monitored for trends. As referenced in ‘ESG Standard 2.5: Criteria for outcomes’, QAA has additionally formalised its approach to lessons learned and the value of appeals in supporting the evaluation of QAA work, and included this in the appeals procedures. In formalising the process, QAA has ensured that records reflect the nature of appeals, include specific standards appealed against and the grounds on which representations have been made. QAA’s process for lessons learned is that recommendations will be fed back to the director responsible for the review method to assist continuous improvement. Complaints investigations are fed back to teams. As the Governance team oversees expressions of dissatisfaction across the Agency, it is in a position to take a holistic view, and reports to the Assessment and Review Group and the Assessment and Reviews Operational Group on an ad hoc basis.
Opinion of stakeholders

Ongoing opportunities for engagement

291 QAA’s primary stakeholders include the HE providers that it works with across the UK and internationally, and the funding bodies and regulators that support and maintain the higher education systems in the UK nations. QAA also works closely with other sector stakeholders in the UK and internationally, including governments, student bodies and mission groups.

292 QAA regularly gathers information and views of its member institutions through a range of webinars, events and other activities. In the 2020-21 academic year, for example, QAA held 40 webinars with 2,275 delegates from 289 organisations, as well as a further 31 events and workshops with delegates from 312 organisations.102

293 QAA has established a series of popular networks, including the Pro-Vice-Chancellor Briefings and Policy and Practitioner groups. QAA also offers fortnightly quality clinics with its specialists and encourages members to get involved with funded Collaborative Enhancement Projects, or collaborative clusters as part of the Enhancement Themes in Scotland. The Agency also manages an International Network of Pro-Vice-Chancellors, College HE Policy and Practice Network and a Policy and Practice Network for QAA International Insights Members.103

294 QAA delivers a range of training programmes,104 such as the five-day International Quality Assurance Programme; conferences and events to support professional development, including its Quality Insights Conference; regular QAA Member Networks; and two annual conferences for students – Quality Matters and Evolving Student Engagement. These events have continued QAA’s role in supporting a quality culture within the UK and internationally. QAA’s International Partners Forum105 in 2020 also served a valuable role in gathering views from international stakeholders, to help shape how QAA could provide support following the COVID-19 pandemic, while learning from international experiences and best practice.

295 As mentioned in ‘ESG Standard 3.6: Internal quality assurance and professional conduct’, QAA also supports regular engagement between its members and professional, statutory and regulatory bodies (PSRBs) by convening regular PSRB Forum meetings which focus on the particular considerations of accredited courses.

296 QAA also highly values the feedback it receives as part of its governance and committee structures, as mentioned in ‘History, profile and activities of the agency’. These committees represent a broad spectrum of the UK HE sector, with representatives from various UK nations, institutions, funding bodies, governments and student officers. The QAA Consultative Board, further detail of which is provided below, is also a central way for QAA to gather the opinions of stakeholders. These allow for opportunities for the aforementioned stakeholder groups to provide support and guidance on how QAA operates and can continue to support the sector. QAA’s Board and staff are key stakeholders in the Agency’s work and are actively involved in its strategic development. Board members take active roles at QAA conferences as speakers, chairs of breakout sessions and contributors, which enable them to engage with core stakeholder groups. They also contribute as critical friends in the development of key publications and strategies. QAA staff actively engage in events

102 QAA Annual Review 2021
103 Overview of QAA International Membership
104 QAA Training and Services
105 QAA International Partners’ Forum - 20 May 2020 - Summary Report
run by representative sector bodies and other related organisations, both in the UK and internationally.

Feedback on the agency as part of this self-assessment process

297 In developing this self-assessment report, QAA also arranged specific consultation opportunities for a broad range of stakeholders to provide feedback on the overarching Agency SWOT analysis. This also allowed for general feedback on the Agency to be provided. QAA arranged discussions with the following groups and stakeholders:

- the QAA Consultative Board, whose membership includes:
  - Office for Students
  - Department for the Economy, Northern Ireland
  - GuildHE
  - HEFCW
  - Universities Scotland
  - Universities Wales
  - Scottish Funding Council
  - Association of Colleges
  - Universities UK
  - Office of the Independent Adjudicator for Higher Education
  - Independent HE
  - National Union of Students

- a joint meeting of the QAA Scotland and QAA Wales Strategic Advisory Committees
- QAA all-staff meeting
- QAA Student Strategic Advisory Committee
- a workshop of QAA reviewers, with UK and international experience.

298 Further to this, QAA’s Senior Leadership Team and the QAA Board were involved in the sign-off process for the SWOT analysis.

299 In addition, these stakeholders were invited to provide further written feedback on the general performance of the Agency and the overarching SWOT via email. The broad feeling from stakeholders on the overarching SWOT was that it fairly represented QAA, although some parts were strengthened and prioritised following feedback.

300 A clear message that emerged from stakeholders’ feedback was that QAA could do more to publicise factual information on European organisations and frameworks (such as the EHEA, ENQA and EQAR) and describe the benefits of these to the higher education sector. There was an appetite from stakeholders to know more, and QAA subsequently worked to provide briefings on European engagement for QAA staff, members and other stakeholders.

301 The role QAA has played in championing the student experience and student representation was repeatedly highlighted by stakeholders as a significant and lasting impact in the higher education sector. QAA strengthened the language used on student representation in its overarching SWOT as a result of this feedback.

302 The fact that QAA operates across the UK nations was recognised by stakeholders as a driver for QAA’s unique strength. Stakeholders stated that this has provided QAA with a broad set of experiences, with staff able to adapt to various types of review methods. This was seen as a reason why QAA has a strong global reputation.
Recommendations and main findings from previous review(s) and agency’s resulting follow-up

The following table summarises the main findings, including **recommendations** and **areas for development** of the ENQA review panel and Board, following QAA’s 2018 review. It also provides details of actions taken by QAA in response. The first two columns consist of text taken directly from the 2018 and 2020 reports.

<table>
<thead>
<tr>
<th>Recommendations</th>
<th>2020 Follow-up Report</th>
<th>Further progress</th>
</tr>
</thead>
</table>
| **ESG 2.4:** External quality assurance should be carried out by groups of external experts that include (a) student member(s).  
*Panel recommendation:* Students should be included in all review methods aligned with the ESG as a standard feature, without reservations and special clauses.  
*ENQA Board request:* Also, highlighted by the ENQA Board. | QAA would always involve and engage students in all review methods in scope of the EQA review.  
Student partnership is built into QAA’s ways of working.  
Where students are not included automatically, it is due to external factors not internal considerations.  
In broad terms, QAA always looks to find ways to strengthen and deepen student partnership each time a method is revised or developed. | There were a very limited number of review methods that, due to specific circumstances, did not include students in all review teams. In response, QAA developed and formalised its position on student members of review teams. From 2021-22, all new review methods planned and introduced will include student members on all review teams. For example, the following new review and assessment methods all include student reviewers: Quality Enhancement and Standards Review (Scotland); Scottish and Wales Concerns Schemes; International Programme Accreditation; QE-TNE.  
However, there may be exceptional circumstances where an exception may be appropriate. The matter was discussed by the Reviews and Assessment Group on 28 February 2022 and the following statement was discussed/agreed:  
‘QAA involves student reviewers on all review teams across all its methods, except in specific circumstances. Explicit approval must be sought from the Assessment and Reviews Group (ARG) for any method that is intending to not use student reviewers on a regular basis. The ARG has approved a set of principles that method owners can use to inform their request for an exception.’  
*For more information* about the involvement of students in review activity, see ‘**ESG Standard 2.4: Peer-review experts**’. |
<table>
<thead>
<tr>
<th><strong>ESG: 3.1:</strong> Agencies should undertake external quality assurance activities as defined in Part 2 of the ESG on a regular basis.</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Panel recommendation:</strong> QAA is recommended to <strong>intensify its activity with respect to TNE reviews overseas</strong> and to strengthen its oversight of collaborative provision arrangements, in order to better protect students' interests to receive quality higher education and, at the same time, to safeguard the reputation of UK provision overseas. For that purpose, additional resources should be allocated.</td>
</tr>
<tr>
<td><strong>ENQA Board request:</strong> Highlighted by the ENQA Board.</td>
</tr>
<tr>
<td>Following a joint consultation by UUK/UUKi, GuildHE and QAA, there was strong support for a UK-wide approach and the principles proposed, and broad support for continuing TNE activity. Initially, it was intended that a revised approach to TNE would begin in 2020-21; however, due to delays caused by COVID-19 implementation will begin in 2021-22.</td>
</tr>
<tr>
<td>QAA has since developed the voluntary Quality Evaluation and Enhancement of UK-TNE Scheme, known as QE-TNE. This thematic enhancement method was commissioned by Universities UK and GuildHE, and has been shaped through consultation with stakeholders in the higher education sector in the UK and worldwide. The scheme intensifies QAA’s TNE activity as it embraces three host nations each year.</td>
</tr>
<tr>
<td>QE-TNE is designed to complement the UK’s internal and external quality processes, providing depth of insight into TNE provision, driving continuous improvement and providing confidence for a wide range of stakeholders, both in the UK and internationally.</td>
</tr>
<tr>
<td>All participating institutions and their overseas TNE partners are able to use the QE-TNE Kitemark – a public statement of their commitment to quality.</td>
</tr>
<tr>
<td>In addition to the QE-TNE scheme, an assessment of individual providers' collaborative provision is included within QER and ELIR.</td>
</tr>
<tr>
<td>All member organisations from England and Northern Ireland, and regulated higher education institutions in Wales and Scotland, have access to the International Insights package of QAA’s Membership – resources and events aimed at enhancing quality and managing risk in TNE. Whether an institution has International Insights access automatically or via an additional subscription depends on the funding arrangements in that UK nation.</td>
</tr>
<tr>
<td>QAA has close relationships with many agencies around the world through memorandums of understanding and cooperation in countries where UK TNE is delivered in significant numbers. This provides opportunity for dialogue between QAA and the respective country quality agency and regulator. These relationships are also key to the delivery of the QE-TNE scheme.</td>
</tr>
<tr>
<td>For more information on QAA’s international and related activity, see ‘ESG Standard 3.1: Activities, policy and processes for quality assurance’, ‘ESG Standard 3.4: Thematic analysis’ and ‘ESG Standard 2.4: Peer-review experts’.</td>
</tr>
<tr>
<td>Other areas for development</td>
</tr>
<tr>
<td>-----------------------------</td>
</tr>
<tr>
<td><strong>ENQA Board</strong> encourages QAA to give more attention to:</td>
</tr>
<tr>
<td>The wider inclusion of international experts as well as employers/professional practitioners in its procedures.</td>
</tr>
<tr>
<td><strong>Related areas for development includes:</strong></td>
</tr>
<tr>
<td>- ESG 2.4: QAA is encouraged to expand its local reviewer pool to better represent the diversity of UK providers and students, also incorporating perspectives from business/industry or professional practitioners and civic society.</td>
</tr>
<tr>
<td>- ESG 2.4: The panel would like to encourage QAA to build upon the positive experiences of ELIR and IQR teams and to</td>
</tr>
<tr>
<td><strong>ESG 3.5</strong></td>
</tr>
<tr>
<td><strong>ESG 3.1</strong></td>
</tr>
</tbody>
</table>

**For more information** about the wider inclusion of international experts on QAA activities, see ‘ESG Standard 3.1: Activities, policy and processes for quality assurance’, ‘ESG Standard 3.5: Resources’ and ‘ESG Standard 2.4: Peer-review experts’. |
representatives on review panels. It is with an understanding that internationals will bring an external dimension to the work of QAA and to review processes, which is not necessarily the same as of locals who have had or continue to have international exposure or internationals who contribute on an ad hoc basis.

In addition, QAA is, for example, extensively connected to business, industry and the professions. QAA’s PSRB Forum shares best practice between professional bodies as well as the latest thinking and challenges in quality assurance. QAA develops and maintains the UK’s Subject Benchmark Statements each of which will involve panels of experts from employers and professions as well as academics.

**ENQA Review Panel:**

**ESG 3.4:** QAA is encouraged to expand work around the theme of academic integrity in HE in order to promote ethical practices, enhance student learning experiences and also to address issues of bogus provision.

| The Academic Integrity Advisory Group was established in June 2018. QAA recently surveyed UK providers to assess the impact of its 2017 guidance on contract cheating. Projects funded by INQAAHE have been completed and the outputs shared; this includes a toolkit to support those addressing plagiarism and | Since 2018, QAA has led the way in highlighting and supporting attempts to criminalise essay mills. It developed the Academic Integrity Charter which has over 200 higher education institutions signed up to it as of May 2022. In October 2021, following extensive campaigning by QAA, there was a commitment of the UK Government to criminalise essay mills in England. QAA has also been working with the governments of the devolved nations to introduce similar legislation in the other UK nations.

Ban on essay mills in England (April 2022):
- QAA welcomes ban on essay mills in England
- QAA briefs members on identifying the potential use of essay mills (Nov 2021)

For more information on QAA’s work on academic integrity, see ‘ESG Standard 3.4: Thematic analysis’ and academic integrity webpage. |
academic fraud and a joint project with TEQSA.

<table>
<thead>
<tr>
<th>ENQA Review Panel:</th>
<th>ENQA Review Panel:</th>
</tr>
</thead>
<tbody>
<tr>
<td>ESG 3.1: QAA is encouraged to develop a more strategic focus to analysis. This would involve systematically undertaking more <strong>thematic studies</strong> across a set of reviews or trends over time. The panel fully supports these improvement-oriented plans by the Agency for the benefit of a wide range of stakeholders at home and abroad.</td>
<td>ESG 2.2: QAA would be advised to consider <strong>issues of engagement with the broader higher education community</strong> and beyond as part of its Consultations conducted on review methodologies as well as on the quality framework in the UK – for example, the UK Quality Code, revisions to FHEQs, as and when needed.</td>
</tr>
<tr>
<td>Suite of resources has been produced on the UK data landscape, in this QAA has worked with those responsible for planning and data analysis within universities. QAA has also been working with institutions, representative and funding bodies on degree outcomes and degree algorithms. This work will be taken forward as part of <strong>membership services</strong> as well as a continuing aspect of ELIR. Now that a number of QERs have taken place in Wales, QAA will be able to start to look across the reports to identify common areas of good practice and areas for development.</td>
<td>QAA continues to consult with a wide range of stakeholders when developing new approaches to review and other areas of work. Examples of consultation include:</td>
</tr>
<tr>
<td>QAA’s approach to thematic analysis and studies is set out in the IQA Manual, Policy 2.7 and ‘<strong>ESG Standard 3.4: Thematic analysis</strong>’. <strong>Some examples are given below:</strong></td>
<td>• Consultation on QE-TNE (2020-21) and IPA (2021-22) • Liaison meetings – Scotland and Wales</td>
</tr>
<tr>
<td>Thematic reports from ELIR 4</td>
<td>Reports on the findings of Focus On projects</td>
</tr>
<tr>
<td>Evaluation of ELIR 4 review method</td>
<td>10-year thematic review of AP work (2020)</td>
</tr>
<tr>
<td>Learning from degree apprenticeships reviews in Wales (October 2021)</td>
<td></td>
</tr>
</tbody>
</table>
Methodologies. Such an approach would be in line with the recently introduced KEF – the new Knowledge Exchange Framework.

- Focus on projects whereby the topic is chosen in liaison with Scottish Higher Education Enhancement Committee (SHEEC) and the project strands scoped with the sector.
- Teaching Quality Forum consultation on the Scottish Quality Concern Scheme.
- QE-TNE liaison with national agency and contribute to the report.
- MOU with QAA agencies and networks.
- Work with higher education sector bodies Advance HE, QQI and Quality Audit Network, student partnerships in quality Scotland (sparqs).
- Stakeholders meeting in Wales.
- Consultation on new Characteristics Statement for International Pathways Courses (October 2021).

For more information about QAA’s approach to consultation, see ‘ESG Standard 3.1: Activities, policy and processes for quality assurance’, ‘Opinion of stakeholders’ and IQA Manual, including Appendix 2.

<table>
<thead>
<tr>
<th>ENQA Review Panel:</th>
<th>The appointment as the designated quality body in England confirmed QAA’s independence as it was a criterion for designation.</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>ESG 3.3:</strong> Care should be taken to safeguard independence of the agency when redefining the new regulatory framework in consultations with the OfS and other relevant bodies.</td>
<td>To safeguard the independence of the Agency, QAA withdrew consent to act as DQB.</td>
</tr>
<tr>
<td><strong>For more information,</strong> see ‘Introduction’, ‘Key challenges and areas for future development’, ‘ESG Standard 3.3: Independence’ and QAA website.</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>ENQA Review Panel:</th>
<th>Experience and time continue to demonstrate that QAA’s approach to managing strategic risks is effective.</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>ESG 3.6:</strong> It should be noted that risks may present challenges as well as opportunities, and any organisation of the significance of QAA should</td>
<td>QAA’s Board actively and assiduously engages with both the challenges and opportunities that risks present.</td>
</tr>
<tr>
<td><strong>For more information,</strong> see ‘ESG Standard 3.6: Internal quality assurance and professional conduct’ about the risk framework and how it has been used to identify and address both strategic challenges and opportunities.</td>
<td></td>
</tr>
</tbody>
</table>
aim to identify potential risks and develop a strategy to deal with them. and change’ – as it moved to a membership organisation. Internal reorganisation has aligned services to delivery needs (explained in more detail in the section on ‘History, profile and activities of the agency’).

**ENQA Review Panel:**

**ESG 2.6:** Currently, reports published on the QAA website are searchable by the title of provider, year and month. The panel suggests the agency could add **more options for search** – for example, by procedure run – and give a one page per provider summary of procedures undergone as this might be helpful for increased transparency.

Each provider (except in the case of IQR) has on the website its own unique page on which there are the latest relevant reports.

In the context of the suggestion for further improvement at the 2018 ENQA review, QAA has undertaken a review of its website and is considering the approach in respect of report searchability. This will include a review of the way the site is currently used by stakeholders. It is anticipated that a revised search function that will enable users to also search by method and date and will be implemented in line with web developer availability.

In addition, from January 2023 QAA will begin uploading newly published reports to the Database of External Quality Assurance Results (DEQAR) to reflect its ongoing commitment to European engagement and in order to enhance the accessibility of published reports.

**For more information** about the website search options, see ‘**ESG Standard 2.6: Reporting**’.

**ENQA Review Panel:**

**ESG 2.6:** ENQA review panel would like to encourage QAA to place on its website overview information on required and optional quality arrangements that different providers are subject to in order to increase QAA has produced an information sheet summarising what is shared across the UK as well as the variations and distinctions in each home nation.

In November 2021, QAA published an updated version of the document: **QAA - Delivering Responsive Quality Assurance Across the UK**. The document highlights the main policy differences in higher education across all four UK nations, while also highlighting the common approaches they share for quality assurance.

**For more information**, see **QAA website** and ‘**Annex 1: QA activities and responsibilities in UK nations**’.
transparency and better appreciation of both what the EQA system per each UK nation is.

**ENQA Review Panel:**

**ESG 3.6:** QAA is encouraged, as planned, to apply the ENQA Quality Assurance Professional Competencies Framework, of which QAA contributed to the development, and use opportunities offered in the ENQA Leadership Programme.

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**ENQA Review Panel:**

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<table>
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<th align="left">Following reorganisation, a whole-agency approach to development is being instituted. QAA draws on the Framework in the ways it supports the development of quality professionals and as a source for reviewer training.</th>
</tr>
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</tr>
</thead>
</table>
| A range of HR processes are being reviewed, including staff development, and QAA's approach to developing the key competencies for staff to undertake EQA effectively.

**For more information,** see ‘**ESG Standard 3.5: Resources**’ and ‘**ESG Standard 3.6: Internal quality assurance and professional conduct**’.

<table>
<thead>
<tr>
<th>On reflection, the work undertaken to take account of the Lisbon Recognition Convention was not as fully developed as we would like. As a consequence, the advice to ensure that institutional practices reflect the principles of the Lisbon Recognition Convention - including higher education qualifications, periods of study and recognition of prior learning - will be further taken into account in the upcoming review of the UK Quality Code through inclusion in the supporting reference points.</th>
</tr>
</thead>
</table>
SWOT analysis

QAA developed individual analyses for each review method in scope of the review - identifying the strengths, weaknesses, opportunities and threats - which were then used as a basis to develop the overarching SWOT analysis of the whole Agency, taking aspects of the Agency into account that have been deemed as out of scope for this review process, as they are still within the Agency’s activity. This analysis was further refined in consultation with QAA staff, before being shared more widely with external stakeholders to help shape the final SWOT as seen below. Stakeholders included student representatives, funding bodies, QAA reviewers and academics from across the UK nations.

The discussions that took place with QAA staff and external stakeholders as part of the development process for the overarching SWOT have shaped the content for the ‘Opinion of stakeholders’ section of this self-assessment report, which includes details on the specific stakeholders involved. The SWOT was updated following the decision to demit as Designated Quality Body in England.

### Strengths

- UK-wide organisation providing a range of quality assurance and enhancement services for all types of HE provider, suited to the needs of each UK nation’s requirements (see ‘ESG Standard 3.1: Activities, policy and processes for quality assurance’, ‘Higher education and QA of higher education in the context of the agency’, ‘Review activity’, ‘Opinion of stakeholders’)
- Excellent national and international reputation (see ‘ESG Standard 3.1: Activities, policy and processes for quality assurance’, ‘International activities’, ‘Opinion of stakeholders’)
- Sector-recognised champion for student partnership and engagement, with student reviewers as equal partners (see ‘Common features of QAA’s approach to quality’, ‘Student engagement’, ‘Opinion of stakeholders’)
- Commitment to engagement with and from the sector, which underpins an embedded quality culture (see ‘ESG Standard 3.1: Activities, policy and processes for quality assurance’, ‘ESG Standard 3.5: Resources’, ‘Opinion of stakeholders’)
- 25 years’ experience delivering quality assurance with excellent staff knowledge base and access to wider expertise through reviewer pool (see ‘History, profile and activities of the agency’, ‘ESG Standard 3.5: Resources’ ‘ESG Standard 3.6: Internal quality assurance and professional conduct’, ‘ESG Standard 2.4: Peer-review experts’)
- Robust approach to staff and reviewer recruitment and training (see ‘ESG Standard 2.4: Peer-review experts’, ‘ESG Standard 3.5: Resources’)
- Excellent established partnerships with sector bodies and agencies (see ‘ESG Standard 3.1: Activities, policy and processes for quality assurance’, ‘Opinion of stakeholders’, ‘Working in partnership’)
- Continued growth in international partnerships with QAA practices adapted worldwide (see ‘International activities’)

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Offers many well-established enhancement services and approaches beyond baseline regulatory requirements (see 'Enhancement', 'ESG Standard 2.6: Reporting')

Flexible and responsive approach - demonstrated by adapting fast to changes in the policy and delivery environment; recognised as a leader in providing support, advice and guidance (see 'Higher education and QA of higher education in the context of the agency', 'Common features of QAA’s approach to quality assurance', 'ESG Standard 2.3: Implementing processes')

Review methods are well-established yet flexible and are tailored to the needs of each type of provider (see 'ESG Standard 2.3: Implementing processes')

A diversity of funding streams secures the sustainability of its varied review methods (see 'History, profile and activities of the agency - Financial arrangements', 'ESG Standard 3.5: Resources')

Self-evaluative and responsive to feedback (see 'ESG Standard 3.4: Thematic analysis', 'ESG Standard 3.5: Resources', 'ESG Standard 3.6: Internal quality assurance and professional conduct', Enhancement and reflection', 'Opinion of stakeholders')

Weaknesses

A need to ensure references to the European Standards and Guidelines (ESG) and EHEA principles are explicit rather than implicit for external quality assurance (see 'ESG Standard 2.1: Consideration of internal quality assurance', 'Activities of the agency')

Reputational risk as a result of temporary suspension from the EQAR register arising from limitations on QAA’s practice in England due to parameters set by the regulator. Challenges identified as part of the SWOT included cyclical review, publication of reports and students on review teams (see 'Introduction', 'Key challenges and areas for future development')

In some limited cases, formal follow-up processes to reviews need further development (see 'ESG Standard 2.3: Implementing processes')

Limitations placed on QAA in its role as DQB in making valuable public interventions on policy developments in England (see 'Key challenges and areas for future development')

Reduction in involvement in quality matters in England following QAA’s decision to discontinue as designated quality body (see 'Key challenges and areas for future development')
Opportunities

- Design and implementation of new quality review approaches in Scotland, Wales and Northern Ireland, subject to appointment by national funding bodies/executives (see ’Higher education and QA of higher education in the context of the agency’, ’Key challenges and areas for future development’)

- New international partnerships and initiatives, such as the QE-TNE scheme and International Quality Review, will continue to broaden expertise and reputation (see ’International activities’)

- Build upon reviewer training processes, including making more explicit references to the ESG (see ’ESG Standard 2.4: Peer-review experts’)

- Opportunities to evaluate methods and refresh their guidance, due to cycles ending, learning from good practice across the Agency and worldwide (see ’ESG Standard 2.2: Designing methodologies fit for purpose’, ’ESG Standard 2.5: Criteria for outcomes’, ’ESG Standard 3.6: Internal quality assurance and professional conduct’)

- Moving to more virtual online environments can allow for more accessible and new ways of engaging with stakeholders and increasing the diversity of QAA’s staff and reviewer pool, while reducing the carbon footprint of the Agency’s work (see ’Key challenges and areas for future development’)

- The move to a more joined-up quality approach between further and higher education in some UK nations is an opportunity to increase collaborative opportunities where QAA can gain knowledge and expertise from the further education sector (see ’Higher education and QA of higher education in the context of the agency’, ’Key challenges and areas for future development’)

- QAA's ongoing Reviewer Experience Improvement project is intended to develop and enhance the reviewer experience (see ’ESG Standard 2.4: Peer-review experts’, ’ESG Standard 3.5: Resources’, ’ESG Standard 3.6: Internal quality assurance and professional conduct’)

- Opportunity to develop the UK Quality Code for Higher Education in the coming years (see ’ESG Standard 2.1: Consideration of internal quality assurance’)

- Opportunity following the decision to withdraw consent to act as DQB to develop new services for members (see ’Key challenges and areas for future development’)

Threats

- Changes in government or regulator policy and legislation that would affect QAA's operation (see ‘Higher education and QA of higher education in the context of the agency’)

- External policy directions impacting on the ability to deliver in line with the ESG in some UK nations (see ‘Key challenges and areas for future development’, ‘Introduction’)

- A change of designated quality role in one or more UK nations (see ‘Higher education and QA of higher education in the context of the agency’)

- Contractual obligations with the regulator may restrict thematic or enhancement opportunities (see ‘Key challenges and areas for future development’, ‘Introduction’)

- Business continuity challenge with regards to delivering a diverse range of review methods with a large reliance on individual staff members in some methods (see ‘Introduction’)

- The move to a more joined-up quality approach between further and higher education in some UK nations could potentially see responsibilities for higher education quality delegated to different agencies (see ‘Higher education and QA of higher education in the context of the agency’)}
Key challenges and areas for future development

306 QAA faces a range of challenges and opportunities over the next five years and beyond. The COVID-19 pandemic resulted in a number of specific challenges in continuing to provide effective quality assurance processes across the UK and internationally - for example, in IQR and QE-TNE. QAA responded by developing, testing and then deploying review methodologies that did not require an onsite visit. Feedback from the online methodologies has been positive, validating this as an approach. Subsequently, the academic year 2021-22 has seen some return to onsite assurance processes. It is anticipated that there will be a more hybrid approach to review methodologies in future, where only review activity that would directly benefit from an onsite visit will be delivered in this way. This not only builds upon the success of the move to online, but also demonstrates QAA’s commitment to reducing its carbon emissions.

307 In the UK context, diverging national approaches among the four countries underline the importance of QAA’s role as a UK-wide body in helping to maintain a UK-wide overview of the quality of higher education. In a UK system with over 600 providers, approaches that assume or expect that all providers are the same, or that the system that they work within is the same, will not work. QAA has to work in a responsive and flexible way to meet the needs of the sectors and funders/regulators across the UK and internationally, while securing the confidence of the providers themselves.

308 At the time of writing, there has been recent change, or change is currently being proposed, in all nations of the UK. Each of these will have an impact on the review methods used.

- In England, there has been extensive consultation proposing changes to the initial approach to the assessment of quality and standards adopted by the OfS. QAA’s decision to demit the role as DQB means that the impact in England will relate to support for members in the regulatory context rather than on review methods delivered by QAA.
- In Scotland, the Scottish Funding Council is undertaking a review of tertiary education and sustainability that is likely to result in new tertiary quality arrangements. The next cyclical review method operated by QAA will have to take this into account.
- In Wales, the Tertiary Education and Research (Wales) Act will see the creation of a new Tertiary Education and Research Commission, replacing HEFCW. The Act also contains proposals for the designation of a body to undertake the assessment of quality and standards at Welsh higher education providers. Again, QAA will have to take full account of these developments in the development of its next cyclical review method.
- In Northern Ireland, the Department for the Economy is considering a QAA proposal for developing a new enhancement-led model of review.

309 QAA works in collaboration with funders and governments with varying roles in each nation. One of the key tools to enable cross-jurisdictional cooperation and commonality has been the UK Quality Code for Higher Education (the Quality Code). The Quality Code has been embedded into regulatory practice across all UK nations, acting as a common reference point. From 1 May 2022 this ceased to be the case, with the OfS removing references to the Quality Code from the English regulatory framework. The Quality Code remains a key reference point for the sector in England, however, and the OfS consultations acknowledged its continuing role in England. The associated sector consultations do, however, say that English providers are free to continue to engage with the Quality Code. From discussions in Scotland, Wales and Northern Ireland, there remains a clear commitment to continuing to use the Quality Code in their requirements. Notwithstanding
this, removal in England from the regulatory framework may present a challenge in maintaining UK-wide approaches to quality and standards. However, it should be noted that all four nations are also working with the UK Standing Committee for Quality Assessment (UKSCQA) to develop a UK-wide statement setting out both the common and the distinct approaches to regulation. This should be available at the time of QAA’s review.

310 Within the individual approaches adopted by UK nations, there is a theme indicating a trajectory towards more holistic and joined-up approaches to tertiary education by, for example, reducing regulatory distinctions between higher and further education. This approach is likely to bring significant benefits, including enabling increased ease of transfer between universities, colleges and work-based learning. It will also allow for increased collaboration and learning opportunities between further and higher education. However, there are also potential challenges. These include the potential to see responsibility for quality and standards assessment delegated to different agencies, without similar organisational awareness of the importance of ESG compliance, and the potential for QAA to be working with new providers with whom it has had limited contact previously.

311 Since the last ENQA review, a number of challenges for QAA have related to the changes in regulatory approach in England and the introduction of a ‘risk-based’ approach to regulation where resources are focused on regulatory compliance for those judged as being at greatest risk of failing to meet regulatory benchmarks. This involved a move away from cyclical reviews of all providers. Along with OfS restrictions on publication of reports and the inclusion of student reviewers on DQB methods, the lack of cyclical reviews, or a valid alternative such as sampling, presented a real tension with requirements of the ESG. QAA fully recognises that this places the status of quality assurance in England in a difficult position, as a full member of the EHEA and signatory to its obligations. The work undertaken as DQB was a risk-based compliance check and was more similar to an audit function than an approach to quality assurance and enhancement and was not in line with what QAA would normally develop and deliver. QAA endeavoured to apply a number of solutions to enable compliance with the ESG during the period of designation but as the matters relating to compliance were not resolved and resulted in the temporary suspension from EQAR (see ‘Introduction’), QAA announced that it would demit its role as DQB. Withdrawal of consent to act as DQB enabled QAA to announce a reaffirmation of QAA’s commitment to the publication of reports and student reviewers to support our compliance with EQAR. QAA was able to act quickly in respect of this due to previous recruitment of student reviewers undertaken to enable compliance. The announcement was also supported by previous compliance discussions that had proposed that reports would be published at the end of conclusion of OfS processes to ensure that there was no breach of confidentiality. The action further demonstrates QAA’s commitment to transparency and to remaining on the EQAR register.

312 The decision to demit as DQB means that QAA will no longer conduct assessment activities on behalf of the Office for Students after March 2023. Other work in England and the rest of the UK is unaffected by the decision and the change in status will allow these portfolios of work to be expanded to support the sector. In addition, the nature of the DQB role had placed restrictions on QAA in making valuable public interventions and helping to shape the sector in areas that could be perceived as conflicting with the DQB function. Such restrictions will no longer be in place after March 2023 and will accordingly provide an opportunity for QAA.

313 These matters, alongside a change in the senior leadership late in 2021, shaped the five-year strategy for the development of QAA. The five-year programme is designed to grow the business, developing QAA’s role in areas that are core business for a quality agency across the UK, and expanding its international portfolio. This programme is costed and contains clear income targets for new business areas.
QAA will continue to develop and evolve in the coming period to adapt to changing circumstances and the opening up of new opportunities. This includes the move to encourage lifelong learning as part of QAA future priorities. In particular, the decision to demit as DQB provides opportunities to develop work areas, including training and development, consultancy opportunities and services to support the regulatory requirements in England, institutional evaluation, voluntary enhancement reviews and other review and evaluation services. It will also take forward the learning from the preparation for this review, seeking to respond positively and actively to the enhancements required.
**Glossary of terms**

For a full glossary of terms, please see the Glossary on the [QAA website](http://www.qaa.ac.uk).

**Review method acronyms** (see ‘[Higher education quality assurance activities of the agency](http://www.qaa.ac.uk)’)

- **DAP SWNI**  Degree awarding powers scrutiny Scotland, Wales and Northern Ireland
- **ELIR**  Enhancement-led Institutional Review
- **EOEA**  Educational Oversight - Exceptional Arrangements
- **GQR (Wales)**  Gateway Quality Review Wales
- **HER (AP)**  Higher Education Review: Alternative Providers
- **HER (FP)**  Higher Education Review: Foreign Providers
- **IPA**  International Programme Accreditation
- **IQR**  International Quality Review
- **RSEO**  Review Scheme for Education Oversight
- **QER**  Quality Enhancement Review
- **QE-TNE**  Quality Evaluation and Enhancement of UK Transnational Higher Education

**Acronyms used frequently within the self-assessment report are:**

- **ARG**  Assessment and Reviews Group
- **AROG**  Assessment and Reviews Operational Group
- **DAPs**  Degree awarding powers
- **DfE(NI)**  Department for the Economy in Northern Ireland
- **DQB**  Designated Quality Body
- **FHEQ**  Framework for Higher Education Qualifications
- **HEFCW**  Higher Education Funding Council for Wales
- **IQA Manual**  Internal Quality Assurance Manual
- **OfS**  Office for Students
- **PSRB**  Professional, statutory and regulatory bodies
- **SFC**  Scottish Funding Council
- **TEF**  Teaching Excellence and Student Outcomes Framework
Annexes

Annex 1: QA activities and responsibilities in UK nations

**Northern Ireland**
- Higher education a devolved matter; political oversight normally by the Northern Ireland Executive and Assembly
- Quality Code
- Advising on degree awarding powers
- Review of methods for alternative providers
- Quality Evaluation and Enhancement of TNE scheme (QE-TNE)
- Teaching Excellence Framework (TEF) (optional)
- Funds for higher education are directly provided by the Department for the Economy in Northern Ireland
- Annual provider reviews

**Scotland**
- Higher education a devolved matter; political oversight by Scottish Government and Parliament
- Quality Code
- Enhancement-led Institutional Review (ELIR)
- Advising on degree awarding powers
- Review of methods for alternative providers
- Quality Evaluation and Enhancement of TNE scheme (QE-TNE)
- Teaching Excellence Framework (TEF) (optional)
- Scottish Funding Council (SFC) is the strategic body responsible for funding teaching and learning provision and research
- Scottish Quality Enhancement Framework (QEF)

**Wales**
- Higher education a devolved matter; political oversight by Welsh Government and Parliament
- Quality Code
- Quality Enhancement Review (QER)
- Advising on degree awarding powers
- Review of methods for alternative providers
- Quality Evaluation and Enhancement of TNE scheme (QE-TNE)
- Access Validating Agency licensing, monitoring and relicensing
- Teaching Excellence Framework (TEF) (optional)
- Higher Education Funding Council for Wales (HEFCW) - responsible for regulating the higher education sector
- Quality Assessment Framework for Wales
- Gateway Quality Review for Wales

**England**
- Political oversight by UK Government and Parliament
  - Quality Code (national reference point; not a regulatory requirement)
  - Review of methods for alternative providers
  - Quality Evaluation and Enhancement of TNE scheme (QE-TNE)
  - Access Validating Agency licensing, monitoring and relicensing
  - Teaching Excellence Framework (TEF)
  - Office for Students (OfS) is the Regulator of HE in England

**International**
- International Quality Review
- International Programme Accreditation
Annex 2: Alignment of key principles with the methods in scope for the QAA review by ENQA 2023

<table>
<thead>
<tr>
<th>Review method</th>
<th>Method includes the following principles:</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Self-assessment</td>
<td>Site visit</td>
</tr>
<tr>
<td>Enhancement-led Institutional Review (Scotland)</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>Higher Education and derivatives UK-wide</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>International Quality Review</td>
<td>✓</td>
<td>✓</td>
</tr>
</tbody>
</table>
| Quality Enhancement Review | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | Published action plan required for all reviews; further follow-up if the review
<table>
<thead>
<tr>
<th>Review method</th>
<th>Method includes the following principles:</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>- Self-assessment</td>
<td></td>
<td>has an unsatisfactory outcome</td>
</tr>
<tr>
<td>- Site visit</td>
<td></td>
<td></td>
</tr>
<tr>
<td>- Published report</td>
<td></td>
<td></td>
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<tr>
<td>- Consistent follow-up</td>
<td></td>
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<tr>
<td>- Peer reviewers</td>
<td></td>
<td></td>
</tr>
<tr>
<td>- Student reviewers</td>
<td></td>
<td></td>
</tr>
<tr>
<td>- Published outcome criteria</td>
<td></td>
<td></td>
</tr>
<tr>
<td>- Complaints and appeals</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Gateway Quality Review (Wales)</strong></td>
<td></td>
<td>Entry method, thus follow-up is participation in the national cyclical method; as an entry method, good practice is not identified</td>
</tr>
<tr>
<td>- Follow-up of unsatisfactory outcomes (see comment)</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Degree Awarding Powers (Scotland, Wales and Northern Ireland)</strong></td>
<td></td>
<td>Elective specific-purpose method and, accordingly, follow-up is through the cyclical method</td>
</tr>
<tr>
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<td>Method includes the following principles:</td>
<td>Comments</td>
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<td>-----------------------------</td>
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</tr>
<tr>
<td>Self-assessment</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Site visit</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Published report</td>
<td></td>
<td></td>
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<tr>
<td>Consistent follow-up</td>
<td></td>
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<tr>
<td>Peer reviewers</td>
<td></td>
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<tr>
<td>Student reviewers</td>
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<td>Published outcome criteria</td>
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<tr>
<td>Complaints and appeals</td>
<td></td>
<td></td>
</tr>
<tr>
<td>International Programme Accreditation</td>
<td>√</td>
<td>√</td>
</tr>
</tbody>
</table>

This document illustrates how the standards set out in the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG 2015) maps to the UK Quality Code for Higher Education (the Quality Code) and associated reference points. Providers can use the table to ensure their processes for quality assurance and enhancement align with the European Standards and Guidelines.

The Quality Code features high-level Expectations which are followed by providers operating in all nations of the UK. The Quality Code articulates these Expectations through Core and Common practices. Core and Common practices are not regulatory requirements in England, but should be demonstrated by providers operating in Wales, Scotland and Northern Ireland. The third column in the table includes short excerpts from other sector reference points which, while non-mandatory, are used by providers in UK higher education (such as the Quality Code Advice and Guidance; and The Frameworks for Higher Education Qualifications of UK Degree Awarding Bodies (FHEQ)). They set out advice on how the Quality Code Expectations and practices may be met.

The Quality Code is expressed primarily as outcomes rather than processes to be followed. Higher education providers use external reviewers as part of periodic review to gain an external perspective on any proposed changes to academic courses, to ensure threshold standards are being achieved and the content is appropriate for the subject. There are separate external quality processes operating in the different parts of the UK taking into account the diverse nations’ contexts and regulatory or quality frameworks. Useful links for further information on those are provided at the end of this document.
1.1 Policy for quality assurance

Institutions should have a policy for quality assurance that is made public and forms part of their strategic management. Internal stakeholders should develop and implement this policy through appropriate structures and processes, while involving external stakeholders.

Core practice 3, standards
Where a provider works in partnership with other organisations, it has in place effective arrangements to ensure that the standards of its awards are credible and secure irrespective of where or how courses are delivered or who delivers them.

Core practice 4, standards
The provider uses external expertise, assessment and classification processes that are reliable, fair and transparent.

Core practice 2, quality
The provider designs and delivers high-quality courses.

Core practice 8, quality
Where a provider works in partnership with other organisations, it has in place effective arrangements to ensure that the academic experience is high-quality irrespective of where or how courses are delivered and who delivers them.

Common practice 1, quality
The provider reviews its Core practices for quality regularly and uses the outcomes to drive improvement and enhancement.

Common practice 2, quality
The provider’s approach to managing quality takes account of external expertise.

Other reference points (such as Quality Code Advice and Guidance, FHEQ)

Advice and Guidance, Course Design and Development
Guiding principle 2 - Accessible and flexible processes for course design, development and approval facilitate continuous improvement of provision and are proportionate to risk.

'Good Practice might include clarity and availability of information about processes, such as handbooks or policy documents, being available to all stakeholders involved.'

Advice and Guidance, Enabling Student Achievement
Guiding principle 2 - Clear, accessible and inclusive policies and procedures to enable students and staff to identify when support mechanisms may be required for academic and personal progression.

Advice and Guidance, Research Degrees
Guiding principle 1 - Provision of information is clear and accessible to research students and staff.

Explicit academic frameworks and regulations, policies, guidance and Codes of practice for research degrees are made available to prospective and current research students and staff.
<table>
<thead>
<tr>
<th>ESG Standard</th>
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<th>Other reference points (such as Quality Code Advice and Guidance, FHEQ)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>1.2 Design and approval of programmes</strong> Institutions should have processes for the design and approval of their programmes. The programmes should be designed so that they meet the objectives set for them, including the intended learning outcomes. The qualification resulting from a programme should be clearly specified and communicated, and refer to the correct level of the national qualifications framework for higher education and, consequently, to the Framework for Qualifications of the European Higher Education Area.</td>
<td><strong>Expectation 1, standards</strong> The academic standards of courses meet the requirements of the relevant national qualifications framework. <strong>Expectation 1, quality</strong> Courses are well-designed, provide a high-quality academic experience for all students and enable a student's achievement to be reliably assessed. <strong>Core practice 1, standards</strong> The provider ensures that the threshold standards for its qualifications are consistent with the relevant national qualifications frameworks. <strong>Core practice 4, standards</strong> The provider uses external expertise, assessment and classification processes that are reliable, fair and transparent.</td>
<td><strong>Advice and Guidance, Course Design and Development</strong> <strong>Guiding principle 2</strong> - Accessible and flexible processes for course design, development and approval facilitate continuous improvement of provision and are proportionate to risk. <strong>Guiding principle 3</strong> - Internal guidance and external reference points are used in course design, development and approval. <strong>Guiding principle 6</strong> - Course design, development and approval processes result in definitive course documents. <strong>Guiding principle 7</strong> - Design, development and approval processes are reviewed and enhanced.</td>
</tr>
<tr>
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<tr>
<td><strong>Common practice 1, standards</strong>&lt;br&gt;The provider reviews its Core practices for standards regularly and uses the outcomes to drive improvement and enhancement.</td>
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<tr>
<td><strong>Core practice 2, quality</strong>&lt;br&gt;The provider designs and/or delivers high-quality courses.</td>
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<tr>
<td><strong>Core practice 7, quality</strong>&lt;br&gt;Where the provider offers research degrees, it delivers these in appropriate and supportive research environments.</td>
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<td></td>
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<tr>
<td><strong>1.3 Student-centred learning, teaching and assessment</strong>&lt;br&gt;Institutions should ensure that the programmes are delivered in a way that encourages students to take an active role in creating the learning process, and that the assessment of students reflects this approach.</td>
<td><strong>Core practice 2, standards</strong>&lt;br&gt;The provider ensures that students who are awarded qualifications have the opportunity to achieve standards beyond the threshold level that are reasonably comparable with those achieved in other UK providers.</td>
<td><strong>Advice and Guidance, Assessment Guiding principle 1</strong> - Assessment methods and criteria are aligned to learning outcomes and teaching activities.</td>
</tr>
<tr>
<td></td>
<td><strong>Core practice 4, standards</strong>&lt;br&gt;The provider uses external expertise, assessment and classification processes that are reliable, fair and transparent.</td>
<td><strong>Guiding principle 2</strong> - Assessment is reliable, consistent, fair and valid.</td>
</tr>
<tr>
<td></td>
<td><strong>Expectation 1, quality</strong>&lt;br&gt;Courses are well-designed, provide a high-quality academic experience for all students and enable a student's achievement to be reliably assessed.</td>
<td><strong>Guiding principle 3</strong> - Assessment design is approached holistically.</td>
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<td><strong>Guiding principle 4</strong> - Assessment is inclusive and equitable.</td>
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<td><strong>Guiding principle 5</strong> - Assessment is explicit and transparent.</td>
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<tr>
<td>ESG Standard</td>
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<tr>
<td>Core practice 5, quality</td>
<td>The provider actively engages students, individually and collectively, in the quality of their educational experience.</td>
<td>Guiding principle 6 - Assessment and feedback is purposeful and supports the learning process.</td>
</tr>
<tr>
<td>Core practice 6, quality</td>
<td>The provider has fair and transparent procedures for handling complaints and appeals which are accessible to all students.</td>
<td>Guiding principle 9 - students are supported and prepared for assessment.</td>
</tr>
<tr>
<td>Core practice 9, quality</td>
<td>The provider supports all students to achieve successful academic and professional outcomes.</td>
<td>Advice and Guidance, Learning and Teaching</td>
</tr>
<tr>
<td>Common practice 3, quality</td>
<td>The provider engages students individually and collectively in the development, assurance and enhancement of the quality of their educational experience.</td>
<td>Guiding principle 2 - Effective learning and teaching is underpinned by a focus on student achievement and outcomes.</td>
</tr>
<tr>
<td>Guiding principle 6 - Assessment and feedback is purposeful and supports the learning process.</td>
<td></td>
<td>Guiding principle 6 - Effective learning and teaching activities, facilities and resources make the learning environment accessible, relevant and engaging to all students.</td>
</tr>
<tr>
<td>Guiding principle 9 - students are supported and prepared for assessment.</td>
<td></td>
<td>Guiding principle 8 - Effective learning and teaching encourages and enables students to take an active role in their studies.</td>
</tr>
<tr>
<td>Advice and Guidance, Learning and Teaching</td>
<td></td>
<td>Guiding principle 9 - Providers encourage and enable students to evaluate and manage their own learning development, supported by opportunities for ongoing dialogue with staff.</td>
</tr>
<tr>
<td>ESG Standard</td>
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</table>
| **1.4 Student admission, progression, recognition and certification**  
Institutions should consistently apply pre-defined and published regulations covering all phases of the student “life cycle,” e.g. student admission, progression, recognition and certification. | **Common practice 1, standards**  
The provider reviews its Core practices for standards regularly and uses the outcomes to drive improvement and enhancement.  
**Expectation 2, quality**  
From admission through to completion, all students are provided with the support that they need to succeed in and benefit from higher education.  
**Core practice 1, quality**  
The provider has a reliable, fair and inclusive admissions system.  
**Common practice 1, quality**  
The provider reviews its Core practices for quality regularly and uses the outcomes to drive improvement and enhancement. | **Advice and Guidance, Research Degrees**  
**Guiding principle 1**  
- Provision of information is clear and accessible to research students and staff.  
Providers that have research degree awarding powers have specific regulations and codes of practice for research degrees that are clear, regularly reviewed and accessible to research students and staff, including examiners. |
| **1.5 Teaching staff**  
Institutions should assure themselves of the competence of their teachers. They should apply fair and transparent processes for the recruitment and development of the staff. | **Core practice 3, quality**  
The provider has sufficient appropriately qualified and skilled staff to deliver a high-quality academic experience. | **Advice and Guidance, Assessment**  
**Practical advice - Professional standards of staff**  
Providers ensure, through recruitment processes and staff development, that everyone involved in the assessment of student work and associated processes is competent to undertake their roles and fulfil their responsibilities. |
<table>
<thead>
<tr>
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<tr>
<td>1.6 Learning resources and student support</td>
<td>Expectation 2, quality From admission through to completion, all students are provided with the support that they need to succeed in and benefit from higher education. <strong>Core practice 4, quality</strong> The provider has sufficient and appropriate facilities, learning resources and student support services to deliver a high-quality academic experience. <strong>Core practice 7, quality</strong> Where the provider offers research degrees, it delivers these in appropriate and supportive research environments. <strong>Core practice 9, quality</strong> The provider supports all students to achieve successful academic and professional outcomes.</td>
<td><strong>Advice and Guidance, Complaints and appeals</strong> Guiding principle 6 - Concerns, complaints and appeals procedures are fair and impartial. Procedures follow principles of procedural fairness and are applied consistently. Decision-makers are properly trained and resourced and have no conflict of interest in the matter. Providers give clear, detailed reasons for their decisions. <strong>Advice and Guidance, Enabling Student Achievement</strong> Guiding principle 3 - Training and resources are allocated to student support services to enable effective delivery, ensure comprehensive evaluation and subsequent development.</td>
</tr>
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<tr>
<td>1.7 Information management</td>
<td>Institutions should ensure that they collect, analyse and use relevant information for the effective management of their programmes and other activities.</td>
<td>Advice and Guidance, Learning and Teaching&lt;br&gt;<strong>Guiding principle 6</strong> - Effective learning and teaching activities, facilities and resources make the learning environment accessible, relevant and engaging to all students. Advice and Guidance, Student Engagement&lt;br&gt;<strong>Guiding principle 6</strong> - Student engagement and representation processes are adequately resourced and supported.</td>
</tr>
<tr>
<td></td>
<td><strong>Expectation 1, quality</strong>&lt;br&gt;Courses are well-designed, provide a high-quality academic experience for all students and enable a student's achievement to be reliably assessed.</td>
<td>Advice and Guidance, Monitoring and Evaluation&lt;br&gt;<strong>Guiding principle 3</strong> - Providers clarify aims, objectives, activities and actions, and identify the key indicators, issues, questions, targets and relevant information/data. Advice and Guidance, Research Degrees&lt;br&gt;<strong>Guiding principle 1</strong> - Provision of information is clear and accessible to research students and staff.</td>
</tr>
<tr>
<td></td>
<td><strong>Core practice 5, quality</strong>&lt;br&gt;The provider actively engages students, individually and collectively, in the quality of their educational experience.</td>
<td><strong>Guiding principle 5</strong> - Providers evaluate, analyse and use the information generated from monitoring to learn and improve. Practical advice - Information and data</td>
</tr>
<tr>
<td>ESG Standard</td>
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</tbody>
</table>
| 1.8 Public Information| Institutions should publish information about their activities, including programmes, which is clear, accurate, objective, up to date and readily accessible. | **Advice and Guidance, Work-Based Learning**  
Practical advice - Information, advice and guidance  
The education provider should ensure that clear information is available for candidates and students to understand the obligations of work-based learning requirements, such as travel to different work settings and mandatory hours, so they can make an informed decision about their choice of course and/or work-based learning opportunity. |
| Expectation 2, quality| From admission through to completion, all students are provided with the support that they need to succeed in and benefit from higher education. | **Core practice 1, quality**  
The provider has a reliable, fair and inclusive admissions system.  
**Guiding principle 7** - Effective learning and teaching ensures that information about, and support for, learning and teaching is clear and accessible to all students and stakeholders. |
<p>| <strong>Guiding principle 3</strong> - Information is clear and transparent. Providers explain key terms clearly, describe processes and time limits accurately, covering all types of course and partnership arrangements. | <strong>Guiding principle 1</strong> - Provision of information is clear and accessible to research students and staff. |</p>
<table>
<thead>
<tr>
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</thead>
</table>
| 1.9 Ongoing monitoring and periodic review of programmes | Institutions should monitor and periodically review their programmes to ensure that they achieve the objectives set for them and respond to the needs of students and society. These reviews should lead to the continuous improvement of the programme. Any action planned should be communicated to all those concerned. | Advice and Guidance, Work-Based Learning Practical advice - Information, advice and guidance  
The education provider should ensure that clear information is available for candidates and students to understand the obligations of work-based learning requirements, such as travel to different work settings and mandatory hours, so they can make an informed decision about their choice of course and/or work-based learning opportunity. |
<p>| Expectation 1, quality | Courses are well-designed, provide a high-quality academic experience for all students and enable a student's achievement to be reliably assessed. | |
| Core practice 2, standards | The provider ensures that students who are awarded qualifications have the opportunity to achieve standards beyond the threshold level that are reasonably comparable with those achieved in other UK providers. | |
| Core practice 3, standards | Where a provider works in partnership with other organisations, it has in place effective arrangements to ensure that the standards of its awards are credible and secure irrespective of where or how courses are delivered or who delivers them. | |
| Advice and Guidance, Monitoring and Evaluation | Guiding principle 1 - Providers agree strategic principles for monitoring and evaluation to ensure processes are applied systematically and operated consistently. | |
| Guiding principle 2 - Providers normalise monitoring and evaluation as well as undertaking routine formal activities. | Guiding principle 3 - Providers clarify aims, objectives, activities and actions, and identify the key indicators, issues, questions, targets and relevant information/data. | |
| Guiding principle 4 - Providers decide whom to involve in the different stages of monitoring and evaluation, clearly defining roles and | |</p>
<table>
<thead>
<tr>
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</thead>
<tbody>
<tr>
<td>Common practice 1, standards</td>
<td>The provider reviews its Core practices for standards regularly and uses the outcomes to drive improvement and enhancement.</td>
<td></td>
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<tr>
<td>Core practice 5, quality</td>
<td>The provider actively engages students, individually and collectively, in the quality of their educational experience.</td>
<td>Guiding principle 5 - Providers evaluate, analyse and use the information generated from monitoring to learn and improve.</td>
</tr>
<tr>
<td>Common practice 2, quality</td>
<td>The provider's approach to managing quality takes account of external expertise.</td>
<td>Guiding principle 6 - Providers communicate outcomes from monitoring and evaluation to staff, students and external stakeholders.</td>
</tr>
<tr>
<td>Common practice 1, quality</td>
<td>The provider reviews its Core practices for quality regularly and uses the outcomes to drive improvement and enhancement.</td>
<td>Guiding principle 7 - Providers take account of ethics and data protection requirements when designing and operating monitoring and evaluation systems.</td>
</tr>
<tr>
<td>1.10 Cyclical external quality assurance</td>
<td>Institutions should undergo external quality assurance in line with the ESG on a cyclical basis.</td>
<td>Common practice 2, quality</td>
</tr>
</tbody>
</table>
Useful links

- Standards and Guidelines for Quality Assurance in the European Higher Education Area
- The UK Quality Code for Higher Education (and Advice and Guidance)
- Relevant qualification and credit frameworks (Qualifications Frameworks, Credit Framework for England, SCQF, CQFW)

Regulatory requirements/guidance

- Office for Students regulatory framework
- Northern Ireland Quality Assurance of Higher Education
- Scottish Funding Council guidance to higher education institutions on quality from August 2017-2022
- Quality Enhancement Framework Scotland
- Quality Assessment Framework for Wales
Annex 4: Alignment of ESG Part 1 Standards to review methods

The table below provides a summary of report headings and/or documentation requested as part of each review method. This demonstrates specific alignment with the ESG Part 1 to support the mapping to the UK Quality Code for Higher Education (the Quality Code). The report headings identify the primary area where the Standard will be addressed in the report for the review method (noting that information may be contained in multiple sections as outlined in the indicative report structure in the IQA Manual, Appendix 5 and the documentation or criteria outline some of the evidence considered as part of the review to address that Standard.

1.1 Policy for Quality Assurance
Institutions should have a policy for quality assurance that is made public and forms part of their strategic management. Internal stakeholders should develop and implement this policy through appropriate structures and processes, while involving external stakeholders.

<table>
<thead>
<tr>
<th>Method</th>
<th>Report headings</th>
<th>Documentation requested/review method criteria</th>
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</table>
| ELIR           | Report section: 4.1 - Key features of the institution's approach to managing quality and setting, maintaining, reviewing and assessing academic standards | • Section 4 of the Reflective Analysis is: Academic standards and quality processes and should include: Key features of the institution's approach to managing quality and setting, maintaining, reviewing and assessing academic standards.  
• Within the Advance Information Set institutions provide details of their policies and links to policies and handbooks for quality assurance.  
• Institutions also include their SFC annual quality return. QAA works with SFC to develop the quality return so that it aligns with the review method. |
| HER (AP) and derivatives | Report section: All the sections in the report covered by the quality of student learning experience will be relevant to this Standard | • Institutions are expected to provide policy, procedures and guidance on quality assurance and enhancement as part of their review self-evaluation submission. |
| IQR            | Report section: Standard 1.1 - Policy for quality assurance                     | • Policies and procedures linked to the ESG standard and evidence demonstrating how effectively these processes and policies work in practice. |
| Report section | Technical report heading: *Academic standards and quality process*; subheadings: Key features of the provider’s approach to managing quality and how students are involved in contributing to the management of the quality of learning; and Key features of the approach to setting, maintaining, reviewing and assessing academic standards | The **Prior Information Pack** requires ‘policy, procedures and guidance on quality assurance and enhancement (this may be in the form of an academic manual or regulations, or code of practice)’.

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### GQR (Wales)

**Report section:** All the sections of the report for the Quality Code will apply

| Scotland - 1999 Criteria | Criterion 1: Institutions should demonstrate that:
| | o policies and systems are developed, implemented and communicated in collaboration with staff and students
| | o its operational policies and systems are monitored, and that it identifies where, when, why and how changes might need to be made.

### DAP (SWNI)

**Report section:** Headings reflect the DAP Criterion

| Wales - 2017 Criteria | Criterion A1:
| | o Its financial planning, quality assurance and resource allocation policies are coherent and relate to its higher education mission, aims and objectives.
| | o Its higher education mission and associated policies and systems are understood and applied consistently both by those connected with the delivery of its higher education programmes and, where appropriate, by students.

### IPA

**Report section:** Standard 1.1 - Policy for quality assurance

| Policies and procedures linked to the ESG standard and evidence demonstrating how effectively these processes and policies work in practice. |
Institutions should have processes for the design and approval of their programmes. The programmes should be designed so that they meet the objectives set for them, including the intended learning outcomes. The qualification resulting from a programme should be clearly specified and communicated, and refer to the correct level of the national qualifications framework for higher education and, consequently, to the Framework for Qualifications of the European Higher Education Area.

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<tr>
<td>ELIR</td>
<td><strong>Report section:</strong> 4.1 - Key features of the institution's approach to managing quality and setting, maintaining, reviewing and assessing academic standards</td>
<td>• Section 4 of the <strong>Reflective Analysis</strong> is: Academic standards and quality processes and should include: Key features of the institution's approach to managing quality and setting, maintaining, reviewing and assessing academic standards.</td>
</tr>
<tr>
<td>HER (AP) and derivatives</td>
<td><strong>Report section:</strong> Core practice (Q2) - The provider designs and/or delivers high-quality courses</td>
<td>• <strong>Core practice Q2</strong> requires providers to demonstrate that they design and deliver high-quality courses. Evidence for this would include a provider's regulations or policies for course design and delivery, and course documentation that indicates that teaching, learning and assessment design enable students to meet learning outcomes.</td>
</tr>
<tr>
<td>IQR</td>
<td><strong>Report section:</strong> Standard 1.2 - Design and approval of programmes</td>
<td>• Policies and procedures linked to the ESG Standard and evidence demonstrating how effectively these processes and policies work in practice.</td>
</tr>
<tr>
<td>QER</td>
<td><strong>Report section:</strong> Technical Report - heading: Academic standards and quality processes; subheadings: Key features of the provider's approach to managing quality and how students are involved in contributing to the management of the quality of learning; and Key features of the approach to setting, maintaining, reviewing and assessing academic standards</td>
<td>• <strong>Prior Information Pack</strong> asks for illustrative examples of quality procedures in practice, including programme approval, annual monitoring and periodic programme review reports from the preceding academic year and any available from the current academic year.</td>
</tr>
<tr>
<td>GQR (Wales)</td>
<td><strong>Report section:</strong> Heading: <em>Reliability and comparability of academic standards</em>; subheadings for FHEQ, and <em>Core practice 1 of the Quality Code for standards</em></td>
<td><strong>Indicative evidence</strong> includes programme approval documentation (Note: Providers undergoing GQR (Wales) are delivery partners, therefore their involvement in programme design and approval is limited.)</td>
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</table>
| DAP (SWNI) | **Report section:** Headings reflect the DAP Criterion | **Scotland - 1999 Criteria**  
**Criterion 3:**  
- The institution seeks to ensure that its programmes of study consistently meet stated objectives and outcomes.  
**Criterion 2:**  
- Its programmes of study are offered at levels that correspond to the levels of the overall qualifications framework for higher education.  
**Wales - 2017 Criteria**  
**Criterion B2:**  
- Its programme approval, monitoring and review arrangements are robust, applied consistently, have at all levels a broadly-based external dimension, and take appropriate account of the specific requirements of different levels of award and different modes of delivery. |
| IPA | **Report section:** *Standard 1.2 - Design and approval of programmes* | Policies and procedures linked to the ESG Standard and evidence demonstrating how effectively these processes and policies work in practice. |
### 1.3 Student-centred learning, teaching and assessment

Institutions should ensure that the programmes are delivered in a way that encourages students to take an active role in creating the learning process, and that the assessment of students reflects this approach.

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<tr>
<td>ELIR</td>
<td><strong>Report section:</strong> 2 - Enhancing the student learning experience</td>
<td>Student Partnership is one of the five pillars of the <a href="#">Quality Enhancement Framework</a> and underpins all the documentation.</td>
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<tr>
<td></td>
<td>2.1 - Student representation and engagement, including responding to student views</td>
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<td></td>
<td>2.2 - Recognising and responding to equality and diversity in the student population, including widening access and mode and location of study</td>
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<td>2.3 - Supporting students in their learning at each stage of the learner journey from pre-admission to post-graduation, including outreach, admissions, articulation, graduate attributes, assessment, employability, and enterprise and entrepreneurship</td>
<td>Section 2 of the <strong>Reflective Analysis</strong> - Enhancing the student learning experience - would contain details on how students take an active role in learning, teaching and assessment.</td>
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<td></td>
<td>2.4 - Postgraduate taught and research student experience</td>
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<td>2.5 - Learning environment, including the use of technology</td>
<td></td>
</tr>
<tr>
<td>HER (AP) and derivatives</td>
<td><strong>Report section:</strong> Core practice (Q5) - The provider actively engages students, individually and collectively, in the quality of their educational experience</td>
<td><strong>Core practice Q5</strong> expects the provider to demonstrate active engagement with students - individually and collectively - in the quality of their educational experience.</td>
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<tr>
<td>IQR</td>
<td><strong>Report section:</strong> Standard 1.3 - Student-centred learning, teaching and assessment</td>
<td>Policies and procedures linked to the ESG Standard and evidence demonstrating how effectively these processes and policies work in practice.</td>
</tr>
<tr>
<td>QER</td>
<td><strong>Report section:</strong> Technical Report, heading: Academic standards and quality processes; subheadings: Key features of the provider’s approach to managing quality and how students are involved in contributing to the management of the quality of learning</td>
<td><strong>Prior information pack</strong> asks for existing documentation in relation to active student roles that are relevant to this Standard. They are: Consideration at institution level of student feedback and views, information on the provider’s relationship with its student body, such as student charters, relationship/partnership agreements and annual student statements (if available), information illustrating the provider’s approaches to student engagement and provision of student support.</td>
</tr>
<tr>
<td>GQR (Wales)</td>
<td><strong>Report section:</strong> Quality of the student academic experience: Quality Code Core practices 2, 5 and 9</td>
<td>Annex 2 of the Handbook - the <strong>provider submission</strong> - should consider the effectiveness of the provider's pedagogical approaches in ensuring that the combined input of teaching staff and students enables students to achieve the learning outcomes of their programmes. Suggested documentation includes examples of student feedback and provider response.</td>
</tr>
</tbody>
</table>
| DAP (SWNI)               | Not covered by a specific criterion | **Scotland - 1999 Criteria**  
**Criterion 5:**  
- The effectiveness of the institution’s learning and teaching infrastructure is carefully monitored.  
**Criterion 8:**  
- Feedback from students, staff and external interest groups is secured and evaluated and clear mechanisms exist to provide feedback to interested stakeholders.  
- Use is made of feedback at departmental, programme or programme-element.  
- Information arising from feedback is disseminated within programmes and across the institution. |
### Wales - 2017 Criteria

**Criterion D:**
- Feedback from students, staff, and (where possible) employers and other institutional stakeholders is obtained and evaluated, and clear mechanisms exist to provide feedback to all such constituencies.

### IPA

| **Report section:** Standard 1.3 - Student-centred learning, teaching and assessment | Policies and procedures linked to the ESG Standard and evidence demonstrating how effectively these processes and policies work in practice. |

### 1.4 Student admission, progression, recognition and certification

Institutions should consistently apply pre-defined and published regulations covering all phases of the student “life cycle”, e.g. student admission, progression, recognition and certification.

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<tr>
<td>ELIR</td>
<td><strong>Report section:</strong> 2.3 - Supporting students in their learning at each stage of the learner journey from pre-admission to post-graduation, including outreach, admissions, articulation, graduate attributes, assessment, employability, and enterprise and entrepreneurship</td>
<td>• Section 2.3 of the Reflective Analysis will contain information on supporting students in their learning at each stage of the learner journey from pre-admission to post-graduation, including outreach, admissions, articulation, graduate attributes, assessment, employability, and enterprise and entrepreneurship.</td>
</tr>
<tr>
<td>HER (AP) and derivatives</td>
<td><strong>Report section:</strong> Core practice (Q1) - The provider has a reliable, fair and inclusive admissions system. Core practice (Q9): The provider supports all students to achieve successful academic and professional outcomes</td>
<td>• <strong>Core practice Q1</strong> expects providers to demonstrate that they have a reliable, fair and inclusive admissions system; <strong>Core practice Q9</strong> expects providers to support all students to achieve successful academic and professional outcomes.</td>
</tr>
<tr>
<td>IQR</td>
<td>Report section: Standard 1.4 - Student admission, progression, recognition and certification</td>
<td>• Policies and procedures linked to the ESG Standard and evidence demonstrating how effectively these processes and policies work in practice.</td>
</tr>
<tr>
<td>QER</td>
<td>Report section: Technical Report, heading: Academic standards and quality processes; subheadings: Key features of the provider's approach to managing quality and how students are involved in contributing to the management of the quality of learning; and Effectiveness of how approaches to quality are used to enhance learning and teaching</td>
<td>• Although not explicit in the list of information to be included in the provider's Prior Information Pack, this would be covered by: policy, procedures and guidance on quality assurance and enhancement (this may be in the form of an academic manual or regulations, or code of practice); illustrative examples of quality procedures in practice, including programme approval, annual monitoring and periodic programme review reports from the preceding academic year and any available from the current academic year; and the provider's mapping of its policies and practices to the ESG.</td>
</tr>
<tr>
<td>GQR (Wales)</td>
<td>Report section: Quality of student academic experience heading: Quality Code Core practice 1</td>
<td>• Admissions policy/procedure • Assessment frameworks regulations</td>
</tr>
</tbody>
</table>
| DAP (Nations) | Report section: Headings reflect the DAP Criterion | Scotland - 1999 Criteria  
Criterion 9: The institution's administrative systems are sufficient to manage its operations now and in the foreseeable future.  
o The institution should be able to demonstrate its administrative support systems are able to monitor student progression and performance, and provide timely and accurate information to satisfy academic and non-academic information needs.  
Wales - 2017 Criteria  
Criterion B1: An organisation granted taught degree awarding powers has in place an appropriate regulatory framework to govern the award of its higher education qualifications.  
o The regulatory framework governing its higher education provision (covering, for example, student admissions, progress, assessment, appeals and complaints) is appropriate to its current status and is implemented fully and consistently. |
| IPA | Report section: Standard 1.4 - Student admission, progression, recognition and certification | Policies and procedures linked to the ESG Standard and evidence demonstrating how effectively these processes and policies work in practice. |
### 1.5 Teaching staff

Institutions should assure themselves of the competence of their teachers. They should apply fair and transparent processes for the recruitment and development of the staff.

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<thead>
<tr>
<th>Method</th>
<th>Report headings</th>
<th>Documentation requested</th>
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<tbody>
<tr>
<td>ELIR</td>
<td><strong>Report section:</strong> 3 - Strategy and practice for enhancing learning and teaching; specifically, 3.4 - Engaging, developing and supporting staff</td>
<td>• Section 3.4 of the <strong>Reflective Analysis</strong> will provide information on engaging, developing and supporting staff.</td>
</tr>
<tr>
<td>HER (AP) and derivatives</td>
<td><strong>Report section:</strong> Core practice (Q3): The provider has sufficient appropriately qualified and skilled staff to deliver a high-quality academic experience</td>
<td>• <strong>Core practice Q3</strong> expects providers to demonstrate that they have sufficient appropriately qualified and skilled staff to deliver a high-quality academic experience.</td>
</tr>
<tr>
<td>IQR</td>
<td><strong>Report section:</strong> Standard 1.5 - Teaching staff</td>
<td>• Policies and procedures linked to the ESG Standard and evidence demonstrating how effectively these processes and policies work in practice.</td>
</tr>
<tr>
<td>QER</td>
<td><strong>Report section:</strong> Technical Report, subheadings: Key features of the provider's approach to managing quality; and Effectiveness of how approaches to quality are used to enhance learning and teaching</td>
<td>• <strong>Prior Information Pack's</strong> requirement for a mapping of the provider's policies and practices to the ESG.</td>
</tr>
</tbody>
</table>
| GQR (Wales)     | **Report section:** Quality of the student academic experience heading, Quality Code Core practice 3 subheading | • Strategies for staff development  
• Communications with staff. |
<table>
<thead>
<tr>
<th>DAP (SWNI)</th>
<th><strong>Report section:</strong> Headings reflect the DAP Criterion</th>
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</thead>
<tbody>
<tr>
<td><strong>Scotland - 1999 Criteria</strong></td>
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<tr>
<td><strong>Criterion 5:</strong> The effectiveness of the institution's learning and teaching infrastructure is carefully monitored.</td>
<td></td>
</tr>
<tr>
<td>o Institutions should be able to demonstrate: the effectiveness of teaching and learning is monitored in relation to stated objectives and learning outcomes.</td>
<td></td>
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<tr>
<td><strong>Criterion 10:</strong> The qualities and competences of staff are appropriate for an institution with taught degree awarding powers.</td>
<td></td>
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<tr>
<td><strong>Criterion 11:</strong> Evidence requirements include:</td>
<td></td>
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<tr>
<td>o there are institutional and local level strategies of staff development designed to establish, develop and enhance staff competences</td>
<td></td>
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<tr>
<td>o an extensive portfolio of teaching development activities has been established.</td>
<td></td>
</tr>
<tr>
<td><strong>Wales - 2017 Criteria</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Criterion C1:</strong> The staff of an organisation granted powers to award taught degrees will be competent to teach, facilitate learning and undertake assessment to the level of the qualifications being awarded.</td>
<td></td>
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<tr>
<td>o Providers should have: staff development and appraisal opportunities aimed at enabling them to develop and enhance their professional competence and scholarship.</td>
<td></td>
</tr>
<tr>
<td><strong>Criterion D:</strong> The staff involved with supporting the delivery of its higher education provision are given adequate opportunities for professional development.</td>
<td></td>
</tr>
<tr>
<td><strong>IPA</strong></td>
<td><strong>Report section:</strong> Standard 1.5 - Teaching staff</td>
</tr>
<tr>
<td>Policies and procedures linked to the ESG Standard and evidence demonstrating how effectively these processes and policies work in practice.</td>
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</table>
### 1.6 Learning resources and student support

Institutions should have appropriate funding for learning and teaching activities and ensure that adequate and readily accessible learning resources and student support are provided.

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<thead>
<tr>
<th>Method</th>
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</table>
| ELIR     | **Report section:** 2.3 - Supporting students in their learning at each stage of the learner journey from pre-admission to post-graduation, including outreach, admissions, articulation, graduate attributes, assessment, employability, and enterprise and entrepreneurship and 2.5 - Learning environment, including the use of technology | • Two sections of the Reflective Analysis will provide information on this:  
  o 2.3 Supporting students in their learning at each stage of the learner journey from pre-admission to post-graduation, including outreach, admissions, articulation, graduate attributes, assessment, employability, and enterprise and entrepreneurship  
  o 2.5 Learning environment, including the use of technology.                                                                                                                                                                                      |
| HER (AP) and derivatives | **Report section:** Core practice (Q4) - The provider has sufficient and appropriate facilities, learning resources and student support services to deliver a high-quality academic experience                                                                                                         | • Core practice Q4 expects providers to demonstrate they have sufficient and appropriate facilities, learning resources and student support services to deliver a high-quality academic experience.                                                                                                                   |
| IQR      | **Report section:** Standard 1.6 - Learning resources and student support                                                                                                                                                                                                                                                                         | • Policies and procedures linked to the ESG Standard and evidence demonstrating how effectively these processes and policies work in practice.                                                                                                                                                               |
| QER      | **Report section:** Technical Report, heading: Academic Standards and quality processes; subheading: Effectiveness of how approaches to quality are used to enhance learning and teaching                                                                                                                                                           | • The Prior Information Pack requires evidence of 'other key strategies relating to the student learning experience and updates on the progress of the strategy' as well as a mapping of the provider's policies and practices to the ESG.                                                                 |
| **GQR (Wales)** | **Report section:** Quality of the student academic experience heading, Quality Code Core practice (Q4) - The provider has sufficient and appropriate facilities, learning resources and student support services to deliver a high-quality academic experience | • Strategies for provision of learning resources and student support. |
| **DAP (SWNI)** | **Report section:** Headings reflect the DAP Criterion | **Scotland - 1999 Criteria**  
**Criterion 5:** The effectiveness of the institution’s learning and teaching infrastructure is carefully monitored.  
**Criterion 9:** The provider should be able to demonstrate that:  
  o it provides access to comprehensive library and computing services, support and demand for which is regularly monitored and, where appropriate, improved  
  o high-quality and confidential support services are provided for students and staff.  
**Wales - 2017 Criteria**  
**Criterion D1:** The teaching and learning infrastructure of an organisation granted taught degree awarding powers, including its student support and administrative support arrangements, is effective and monitored.  
  o Organisations that award their own degrees are expected to have in place mechanisms for monitoring whether their teaching and learning infrastructure is meeting stated objectives and for responding to identified limitations in a timely and effective manner.  
  o The effectiveness of its learning and teaching activities is monitored in relation to stated academic objectives and intended learning outcome.  
  o Available learning support materials are adequate to support students in the achievement of stated purposes of their study programmes.  
  o The effectiveness of any student and staff advisory and counselling services is monitored and any resource needs arising are considered.  
| **IPA** | **Report section:** Standard 1.6 - Learning resources and student support | Policies and procedures linked to the ESG Standard and evidence demonstrating how effectively these processes and policies work in practice. |
1.7 Information management

Institutions should ensure that they collect, analyse and use relevant information for the effective management of their programmes and other activities.

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<tr>
<th>Method</th>
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<tbody>
<tr>
<td>ELIR</td>
<td><strong>Report section</strong>: 4.4 - Approach to using data to inform decision-making and evaluation</td>
<td>• Information will be provided in the Reflective Analysis in 4.4 on Approach to using data to inform decision-making and evaluation.</td>
</tr>
</tbody>
</table>
| HER (AP) and derivatives | **Report section**: Not a dedicated section but expectation that data will feature in the section: Common practice (1): The provider reviews its Core practices for quality regularly and uses the outcomes to drive improvement and enhancement | • Documents requested as part of the self-evaluation include: last three years of student performance data (enrolment, retention, completion and achievement data).  
• Providers are also asked to reference 'evidence that your organisation uses to assure itself that these Core and Common practices are being met and that you are managing the area effectively, as well as any relevant benchmarked datasets'. |
| IQR          | **Report section**: Standard 1.7 - Information management                           | • Policies and procedures linked to the ESG Standard and evidence demonstrating how effectively these processes and policies work in practice. |
| QER          | **Report section**: Two subheadings within the Academic standards and quality processes section of the Technical Report: Approach to using data to inform decision-making and evaluation; and Effectiveness of the approach to self-evaluation, including the effective use of data to inform decision-making. | • The Prior Information Pack requires evidence of 'the consideration at institution level of student feedback and views'. The provider is expected to structure its self-evaluative analysis on the Technical Report headings and the guidance on the SA states it should indicate how the provider has evaluated its policy and practice, including the ways in which it uses data to inform its decision-making and identification of priorities, and current and future plans for development, including how the provider intends to build on good practice and address areas for development. |
| GQR (Wales)  | **Report section**: Quality Code Standards Common practice 1 - The provider reviews its Core practices for Standards regularly and uses the | • Analysis of retention and progression data  
• Examples of student feedback and provider response. |
<table>
<thead>
<tr>
<th><strong>DAP (SWNI)</strong></th>
<th><strong>Report section:</strong> Headings reflect the DAP Criterion</th>
</tr>
</thead>
</table>
| **Scotland - 1999 Criteria** | **Criterion 9:** The institution's administrative systems are sufficient to manage its operations now and in the foreseeable future.  
  o Its administrative support systems are able to monitor student progression and performance and provide timely and accurate information to satisfy academic and non-academic information needs. |
| **Wales - 2017 Criteria** | **Criterion D1:** The teaching and learning infrastructure of an organisation granted taught degree awarding powers, including its student support and administrative support arrangements, is effective and monitored.  
  o Its administrative support systems are able to monitor student progression and performance accurately and provide timely and accurate information to satisfy academic and non-academic management information. |

<table>
<thead>
<tr>
<th><strong>IPA</strong></th>
<th><strong>Report section:</strong> <strong>Standard 1.7 - Information management</strong></th>
</tr>
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<tbody>
<tr>
<td></td>
<td>- Policies and procedures linked to the ESG Standard and evidence demonstrating how effectively these processes and policies work in practice.</td>
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</table>
### 1.8 Public information

Institutions should publish information about their activities, including programmes, which is clear, accurate, objective, up to date and readily accessible.

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<thead>
<tr>
<th>Method</th>
<th>Report headings</th>
<th>Documentation requested</th>
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</thead>
<tbody>
<tr>
<td>ELIR</td>
<td>There is no specific heading in the ELIR report but public information is one pillar of the Quality Enhancement Framework</td>
<td>• Policies and publicly available documentation triangulated as part of the review.</td>
</tr>
</tbody>
</table>
| HER (AP) and derivatives | **Report section:** Encompassed in sections such as Q1 and Q6 | • **Core practice Q1:** Admission system providers are expected to provide information to applicants which is transparent, accessible and fit for purpose.  
  • **Core practice Q6:** Complaints and appeals requires providers to have information that is fair, clear and accessible. |
| IQR         | Report section: *Standard 1.8 - Public information*                                | • Policies and procedures linked to the ESG Standard and evidence demonstrating how effectively these processes and policies work in practice. |
| QER         | Report section: *Encompassed under Key features of the provider’s approach to managing quality, how students are involved in contributing to the management of the quality of learning* | • **Prior Information Pack** requirement for ‘The provider’s mapping of its policies and practices to the ESG’. |
| GQR (Wales) | **Report section:** Encompassed in sections such as Quality Code Q1 and Q6        |                                                                                          |
| DAP (SWNI) | **Report section:** Headings reflect the DAP Criterion | **Scotland - 1999 Criteria**  
**Criterion 3:** The institution seeks to ensure that its programmes of study consistently meet stated objectives and outcomes.  
**Wales - 2017 Criteria**  
**Criterion D1:** The teaching and learning infrastructure of an organisation granted taught degree awarding powers, including its student support and administrative support arrangements, is effective and monitored.  
  o The information that it produces concerning its higher education provision is accurate and complete. |
<table>
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<tbody>
<tr>
<td>IPA</td>
<td><strong>Report section:</strong> <em>Standard 1.8 - Public information</em></td>
<td>Policies and procedures linked to the ESG Standard and evidence demonstrating how effectively these processes and policies work in practice.</td>
</tr>
</tbody>
</table>

### 1.9 Ongoing monitoring and periodic review of programmes

Institutions should monitor and periodically review their programmes to ensure that they achieve the objectives set for them and respond to the needs of students and society. These reviews should lead to continuous improvement of the programme. Any action planned or taken as a result should be communicated to all those concerned.

<table>
<thead>
<tr>
<th>Method</th>
<th>Report headings</th>
<th>Documentation requested</th>
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<tbody>
<tr>
<td>ELIR</td>
<td><strong>Report section:</strong> <em>4.1 - Key features of the institution's approach to managing quality and setting, maintaining, reviewing and assessing academic standards</em></td>
<td>• Section 4 of the Reflective Analysis is: Academic standards and quality processes and should include: Key features of the institution's approach to managing quality, and setting, maintaining, reviewing and assessing academic standards. Within the Advance Information Set, institutions provide details of their policies and links to policies and handbooks for QA. Institutions also include their SFC annual quality return. QAA works with SFC to develop the quality return so that it aligns with the review method. This guidance gives specific details about Institution-led Review.</td>
</tr>
<tr>
<td>HER (AP) and derivatives</td>
<td>Report section: Common practices (Quality) reports include a section on 'The provider reviews its Core practices for quality regularly and uses the outcomes to drive improvement and enhancement'</td>
<td>• Documents requested as part of the self-evaluation include: policy, procedures and guidance on quality assurance and enhancement (this may be in the form of a manual or code of practice); and annual overview reports (for example, on external examining or annual monitoring).</td>
</tr>
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</tr>
<tr>
<td>IQR</td>
<td>Report section: Standard 1.9 - Ongoing monitoring and periodic review of programmes</td>
<td>• Policies and procedures linked to the ESG Standard and evidence demonstrating how effectively these processes and policies work in practice.</td>
</tr>
<tr>
<td>QER</td>
<td>Report section: Technical Report, heading: Academic Standards and quality processes; subheadings: Key features of the provider's approach to managing quality, how students are involved in contributing to the management of the quality of learning; and Key features of the approach to setting, maintaining, reviewing and assessing academic standards.</td>
<td>• Prior Information Pack to provide evidence of policy, procedure and guidance on QA and QE along with illustrative examples of quality procedures in practice, including annual monitoring and periodic programme review reports.</td>
</tr>
<tr>
<td>GQRW</td>
<td>Report section: Common practices (Quality) reports include a section on 'The provider reviews its Core practices for quality regularly and uses the outcomes to drive improvement and enhancement'</td>
<td>• A sample of annual overview reports (for example, on external examining or annual monitoring) where these have a bearing on the assurance of quality and standards for the two years prior to the Gateway Quality Review.</td>
</tr>
</tbody>
</table>
| DAP (SWNI) | Report section: Headings reflect the DAP Criterion | Scotland - 1999 Criteria
Criterion 8: Effective action is taken to address weaknesses, promote strengths and demonstrate accountability. The institution should be able to demonstrate that:
- a rigorous approach is adopted in response to matters raised through self-assessment
- actions are regularly monitored to ensure the maintenance of quality and standards |
<table>
<thead>
<tr>
<th>IPA</th>
<th>Report section: <em>Standard 1.9 - Ongoing monitoring and periodic review of programmes</em></th>
<th>Policies and procedures linked to the ESG Standard and evidence demonstrating how effectively these processes and policies work in practice.</th>
</tr>
</thead>
</table>

**1.10 Cyclical external quality assurance**

Institutions should undergo external quality assurance in line with the ESG on a cyclical basis

ELIR, IQR, HER (AP) and QER are cyclical review methods as outlined in the handbooks. In addition, this will include local regulatory bodies in respect of IQR and IPA. Evidence of relevant cyclical reviews of programmes and how these are incorporated into the institutional approach is considered as part of the review methods. DAP and GQRW are elective specific-purpose review and entry review methods respectively and providers are not part of a cyclical engagement but, following the process, would be subject to the cyclical review method for that nation.