



QAA response to draft ESG 2027 consultation

This document sets out QAA's response to the draft *Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG) 2027* published for public consultation November 2025. As a quality assurance agency operating across multiple jurisdictions, the ESG provides a critical reference point for QAA's work and underpins the design of all QAA review methods. This response is intended to contribute constructively to the ongoing revision of the ESG, ahead of its finalisation and subsequent consideration for adoption within the European Higher Education Area (EHEA).

A comprehensive overview of the mandate for revision, the consultation process and the supporting documentation which outlines the proposed revisions to the ESG is available [here](#) on the ENQA website. This document details our response to the revised ESG per each Standard. Reference is also made to the webinar hosted by ENQA to its members and affiliates on the proposed ESG revision process and changes.

Context, scope, purpose and principles

We strongly support the continuation of the non-prescriptive nature of the ESG, which enables flexibility across varied contexts. We also endorse the explicit reference to the twin purposes of accountability and enhancement, as these underpin a robust quality culture.

We have identified some areas of concern that would benefit from clarification:

- a) While we welcome that the current ESG draft references joint, transnational, and cross-border provision, it is less clear that the ESG applies at both programme and institutional levels. This ambiguity risks inconsistent interpretation and implementation. We recommend making this explicit.
- b) The glossary's definition of 'external quality assurance' as 'a comprehensive set of evaluation activities' is helpful and partially addresses concerns raised in ESG 2.1 regarding links between external quality assurance activities offered by an agency and how for example they may collectively address ESG Part 1 (internal quality assurance). However, further clarification is needed to ensure consistent application of how the definition should be applied across the Standards and to make clear how activities in combination can be applied to each Standard.
- c) The current stakeholder definition in the glossary appears institution-focused, omitting critical stakeholders such as funders, regulators, and governments. This omission could lead to unintended consequences, particularly in ESG 3.2 on independence where this would result in independence only being required from institutions and not from funders, regulators and governments. We do not believe that this is the intent due to the explicit reference to governments in the guidelines of ESG

3.2. We therefore recommend broadening the definition of stakeholders here to acknowledge those beyond institutions.

There may be a need to update the glossary with terminology used in the new ESG. For example, a significant concern is that in ESG 3.5, reference is made to activities that are out of scope of the ESG but nowhere in the proposed document is it defined which activities would be deemed in scope and out of scope. This leads to risks that an agency could be deemed to be non-compliant with the ESG where an activity deemed by the agency as out of scope, is then deemed in scope as part of a review. Reference to 'out of scope' was formerly a guideline but if it is to be included in a Standard this therefore requires a definition. However, under ESG 3.5 we are proposing that the reference to 'out of scope' is removed as it does not align with the recognition of broader agency activities introduced by the inclusion of 'enhancement activities' in the new ESG 3.3 (see ESG 3.5 comments). If the 'out of scope' phrase it is kept in, there should be a sector-wide consultation to develop a shared definition that could then be included in the introduction, the glossary or in an annex. Failure to consult on this would put the credibility of the ESG at risk and would open up for challenge any decisions made on the basis of the wording.

ESG Part 1: Standards and guidelines for internal quality assurance

Standard 1.1 Policy for Quality Assurance

We welcome the emphasis on the students' role in internal quality assurance and the clarity in the guideline that the policy covers subcontracted activities.

As the standard has been broadened to clarify links with other institutional missions and operational management it would be more appropriate to reframe the standard as 'strategic approach for quality assurance' rather than the current focus on a single 'policy'. This would fully reflect the changes intended and articulated in the explanatory notes.

We note there is a drafting error where the standard says 'ensuring thus links' rather than 'ensuring this links'

Standard 1.2 Design, approval, ongoing monitoring and periodic review of programmes

We welcome the merging of design and approval with monitoring and the explicit mention of students.

We recommend clarifying or amending the phrase 'learning outcomes methodology' as this is not an established phrase. An alternative could be: "the programmes should be designed to meet the learning outcomes".

Standard 1.3 Student centred learning, teaching and assessment

We welcome the focus on how quality assurance processes inform the learning and teaching approach.

We would note that the word 'publish' is used to denote different meanings across the ESG. Sometimes, 'published' is used to imply that a document should be *available* to students

(e.g. ESG 1.3 guideline “the criteria for and method of assessment as well as criteria for marking are published in advance”). In contrast, ‘publish’ is also used to suggest a document is published in the public domain for the general public online (ESG 1.1 standard “Institutions should have a published policy for quality assurance... The policy should be publicly available”). We recommend that uses of the word ‘publish’ are explicit about the extent of availability required.

Standard 1.4 Student admission, progression, recognition and certification

We welcome the changes.

Standard 1.5 Teaching staff

We welcome the broadening of the standard to include support staff as this reflects the integral part they play in delivering high quality education. We would suggest that the title of ESG 1.5 is amended to ‘teaching and support staff’ to reflect this.

We have concerns about clarity in two areas:

- a) Reference to application of the ‘evaluation’ process. While evaluation processes are important, their inclusion in the standard raises practical challenges for assessment during external reviews. Evaluating compliance with this standard could be interpreted as requiring triangulation with individual performance examples, which would involve sensitive personal data. To avoid potential confusion, we recommend the wording is revised to *‘they should have fair and transparent processes for the recruitment, development and evaluation of the staff’*.
- b) The proposed addition that ‘recruitment, development and evaluation’ *“should reflect the institutional mission, its programmes, and the objectives set for them, as well as the evolving role of teaching staff”* makes the meaning unclear. The ‘evolving role of teaching staff’ is subject to interpretation (e.g. reference to societal role was mentioned at the webinar but is not in the ESG). As part of a Standard, this should not be subject to interpretation as it could result in inconsistent review outcomes with different panel interpretations. It is also not clear how processes can reflect the mission of the institution. For example, recruitment processes are based on fairness and objectivity and therefore themselves do not reflect the mission. However, job descriptions, and the need to recruit new roles more accurately reflect mission. Given this challenge, it may be helpful to reword to ‘These processes should, where appropriate, be informed by....’ or to remove this addition as an acknowledgment that evidencing the direct link due to the nature of the processes may be difficult to assess.

Standard 1.6 Learning environment

We welcome the changes but suggest that the term ‘funding’ is replaced by ‘resourcing’ to acknowledge different ways in which this can be achieved and to reflect that quality assurance agencies do not have a remit to require particular funding.

Standard 1.7 Information management

We do not believe the second sentence of the guidelines is necessary, and could be interpreted as meaning institutions need only collect satisfaction data regarding support services, which would then appear to be contradicted by the third sentence which provides greater coverage. We believe the third sentence gives sufficient clarity (as it relates to satisfaction with programmes, support services, and resources) and therefore the second sentence can be deleted for brevity.

Standard 1.8 Public Information

We acknowledge that the addition of references to publishing outcomes of quality assurance processes aims to increase transparency. However, we believe that the addition of “*and the outcomes of quality assurance processes*” in the proposed Standard would place a disproportionate burden on institutions, particularly those with self-accrediting powers. As a result, this revised standard could inadvertently reduce clarity rather than enhance it. Our concerns are that:

- a) The wording places a disproportionate burden. Quality assurance processes encompass a vast range of documentation, including programme approval and monitoring records at multiple levels, surveys, data, external examiner reports, and committee minutes. For institutions with thousands of programmes, publishing all outcomes of the process would be onerous and impractical.
- b) There is a risk of information overload for stakeholders, undermining transparency. Publishing every outcome of a quality assurance process risks overwhelming stakeholders with excessive detail, potentially obscuring the most relevant information. ‘Outputs’ of the quality assurance processes—such as revised programme specifications, updated policies, and changes following complaints—are more meaningful indicators of quality improvement than raw ‘outcomes’ in this scenario. The suggestion made at the ENQA webinar that institutions with self-accrediting powers should publish approval decisions raises the same concerns about transparency because programmes can be modified post-approval. Current programme specifications provide clearer, up-to-date information for students and stakeholders.
- c) Many documents involved in quality assurance contain commercially sensitive information or work in progress. Publishing these could compromise confidentiality and inhibit candid self-evaluation, undermining the quality culture.

It is understood from the webinar that this was intended to mean summaries or overviews of activities rather than all documents or documents that may be commercially sensitive. To remove the potential for misinterpretation, we suggest it is reworded to ‘*Institutions should publish information about their activities, including regular summaries of the outputs of quality assurance processes.*’

Standard 1.9 Cyclical external quality assurance

We welcome the changes.

Further comments on ESG Part 1

The wording of the ESG is considered from an institutional level and not a programme level so reference to how it can be applied at a programme level would be useful in the

introduction.

ESG Part 2: Standards and guidelines for external quality assurance

Standard 2.1 Addressing internal quality assurance

Moving the sentence *'All standards of Part 1 of the ESG should be covered by external quality assurance'* from the guidelines generally aids clarity although there is an unintended consequence of not moving the linked sentence of *'Depending on the type of external quality assurance, the standards included in Part 1 may be addressed differently.'* When they were together in the guideline, it supported the practice of linking external quality assurance processes. For example, where an institution undergoes both institutional and programme methods, the two methods could jointly cover all of Part 1, reducing duplication and burden. The glossary's definition of *'external quality assurance'* as *'a comprehensive set of evaluation activities'* in the introduction reflects this intent.

In the proposed standard, the standalone sentence suggests that all standards should be covered in their entirety in each review method. We would not support this change as it would not enable proportionality as outlined in ESG 2.2. We note that the linked approach forms part of the ENQA reviewer training as common and accepted practice. As the explanatory note does not refer to changing existing practice, it could be that the standard is reworded to *'All standards of Part 1 of the ESG should be covered by the totality of external quality assurance methods conducted at an institution'* or a flexibility statement added to the standard.

We do not support the addition of *'while assuring themselves that the education provision is at the correct level of higher education'*, and recommend its removal due to the following concerns:

- a) The wording implies that agencies must check the levels for all programmes at an institution rather than sampling. This would be disproportionate and impractical for systems that only undertake institutional reviews. The EHEA principles for quality assurance outline that "higher education institutions have primary responsibility for the quality of their provision and its assurance". Therefore, ESG standards that talk about assurance of level of education should exist within Part 1 of the ESG, not Part 2. If the intent is instead about an agency needing to have confidence in an institution's own approach to ensuring correct levels, then this could be encompassed and clarified in ESG 1.2 on the design and approval of programmes.
- b) The addition of this specific area undermines the role of ESG Part 1 which covers all areas of quality assurance of an institution. It would provide a disproportionate focus on compliance and assurance of one component and would accordingly restrict the ability to conduct enhancement-led approaches.
- c) The ESG is intended to be able to be used across a wide variety of institutions. Many institutions deliver both higher and further education and the inclusion of this sentence, which refers only to higher education, potentially constrains the development of quality assurance arrangements that cover higher education and education at other levels.

We would therefore suggest that this sentence is removed as there is already reference to level of education in ESG 1.2 design and approval of programmes. It is wholly appropriate that the review process looks at how an institution ensures the correct levels

are set as part of programme design and approval; keeping reference to it in ESG part 1 would enable the approach to be tested at an institutional level. This suggestion would also reduce duplication in the ESG and align with the guideline that references the institutional responsibility for quality assurance. If the sentence does remain in the revised standard, reference to 'higher' should be removed to ensure it reflects the tertiary education landscape.

Standard 2.2 Designing methodologies fit for purpose

We strongly welcome the inclusion of references to enhancement and relevant regulations as part of the purpose of the method. Though it isn't a proposed change, we recommend that the phrase 'fit for purpose' in the title of the standard is defined somewhere within the standard or guidelines, emphasising the role of flexibility in making a methodology that is 'fit for purpose'.

In defining 'fit for purpose', the recent research undertaken by a group on the [ENQA Leadership Development Programme](#) provides a helpful starting point:

'A clear definition of "fit for purpose" is essential. QA must align with institutional and sectoral missions and contextual realities, maintaining rigor while allowing adaptability. Defining fit for purpose is not about oversimplifying the complexity of quality assurance as a philosophical or educational concept. Instead, it provides a solid foundation for agencies to work from and encourages meaningful engagement with all stakeholders. With this foundation, agencies are better equipped to respond to emerging issues, even those beyond the current scope of the ESGs. Agility, in this sense, is essential for operating in rapidly changing environments: it enables continuous, thoughtful adaptation rather than episodic or superficial change. Agility is not constant change—it is meaningful change.'

A clear reference point offers stability during periods of adjustment. At the same time, a context-sensitive purpose requires ongoing monitoring and reflective mechanisms to ensure that adaptations do not compromise integrity. To conclude: a clearly articulated definition of fit for purpose underpins agility, ensures consistency, enhances transparency, and ultimately strengthens accountability.'

The research provided clear examples of where agencies have had to be flexible to adapt their methodologies to be fit for purpose (for example tailoring the peer experts to meet programme requirements or using different follow up approaches to meet the enhancement focus of the method). The research demonstrated that the flexibility in designing methods did not adversely impact on ESG compliance.

The work also recommended that ESG 2.2 should be moved to Part 3 to demonstrate its overarching impact on the rest of Part 2 and to require clear rationales linked to purpose when enabling flexibility. We would echo that recommendation. This would additionally future proof the ESG through enabling innovation whilst safeguarding the fundamental purpose of the ESG.

If this move is not made, we would suggest including reference to fitness for purpose as a basis of flexibility across all part 2 standards.

Standard 2.3 Implementing processes

We support the revised wording of the main standard especially the removal of generic terms and the link to purpose (including enhancement). We also welcome the reference to specific EQA activities and that they will be undertaken by peer review experts.

We welcome retaining the word ‘normally’ in reference to in-person site visits given that there may be scenarios where online visits are justified. However, we note that the explanatory notes imply that the proposed wording indicates a stricter requirement on in-person site visits. We would caution against prescriptiveness and recommend that there should be flexibility to account for:

- a) proportionality (as in ESG 2.2) and that site visits may not be as necessary for established institutions or when both programme and institutional reviews take place and site visits may not be required for both if covered in full by one assessment,
- b) environmental sustainability which is referenced elsewhere in the ESG and could be seen as contradictory,
- c) changes in the sector with online-learning institutions or those with TNE as a core part of their activities where online or hybrid approaches are beneficial.

The value of an in-person site visit is clear but there is also evidence of how online visits support wider student engagement and in particular students from groups such as students with caring responsibilities that may not have otherwise been able to attend. In this context, we recommend articulating that site visits should be delivered in a manner that is ‘fit for purpose’. The guideline could also be expanded to outline that stakeholder interviews could be facilitated through digital technologies with an explicit reference to how this may support students. The scope to apply this flexibly with justification was noted at the webinar but not included in the text and therefore we suggest this is included.

The deletion of the phrase in the guidance that ‘*Agencies have a consistent follow-up process for considering the action taken by the institution*’ does lose some clarity of the expectation that follow up is action taken by the agency rather than the provider or the next review. We therefore recommend adding ‘*conducted by the agency*’ into the standard that reads “a consistent follow-up”.

Standard 2.4 Peer-review experts

We welcome the acknowledgement that international peer-review experts can be involved in external quality assurance outside of panels and support the revised wording.

Standard 2.5 Processes and criteria for outcomes

Apart from the reference to processes in the title, it is not clear from the explanatory note if this addition was intended to stipulate any additional requirement for processes or simply that they should be evidence-based and formed from explicit and published criteria. If the latter interpretation is correct then we have no additional comment, but if the changes indicate an additional requirement, this should be stipulated.

The final sentence ‘*The agency provides transparent information about the formal recognition of outcomes of its external quality assurance processes*’ is not clear on the requirement without the explanatory text. Further explanation should be included in the guideline to make clear what this is referring to. If the addition is largely in reference to cross border quality assurance for example, where an agency may have different recognised status in different countries, this should be made explicit.

Standard 2.6 Reporting

We do not support the addition that ‘*Any other evidence and documents used in the decision-making should be published with the report written by the peer - review experts.*’ Our concerns are:

- a) That the requirement is disproportionate and impractical. Reviews typically involve hundreds of documents, many of which are commercially sensitive or include work in progress. Publishing all supporting evidence would be onerous and fall outside standard publication schemes.
- b) There is a risk to reflective practice. Sharing institutional documentation could inhibit candid self-evaluation and compromise the quality culture. Peer reviewers rely on open and honest engagement, which could be undermined if institutions fear public disclosure of internal documents.
- c) Ambiguity in intent. The explanatory note does not clarify why this requirement was introduced. From the webinar, we understand the intent relates to publishing any separate decision-making report by the agency alongside the peer-review report rather than all evidence considered during the review.

We therefore suggest that the proposed wording is replaced with: *“Any other decision-making report or outcome should be published with the report written by the peer-review experts.”*

We suggest that the sentence *‘The reports should be useful for the evaluated institution and provide recommendations for improvement’* is reworded to *‘The reports should be useful for the evaluated institution and support improvement’*. The suggestion reflects that on occasion some reports may not have recommendations for improvement.

Standard 2.7 Complaints and Appeals

We agree with the inclusion in the Standard of appeals being considered by those not involved in the decision but question whether the word ‘entity’ is correct and whether that could be interpreted as referring to outside of the agency and therefore could be seen to contradict the reference in the guidance to ‘within their own structures’ which is our understanding of the intent. We suggest that it should be reworded to *‘Appeals should be considered within the agency by people not involved in the decision that is being appealed’*

It is suggested that for clarity the initial sentence is revised to *‘Agencies should have complaints and appeals processes that are defined as part of external quality assurance processes and clearly communicated to the institutions’* to remove reference to ‘design’ to reflect the guidance in ENQA reviewer training that ‘defining’ and ‘communicating’ were the only two components to this standard.

ESG Part 3 Standards and guidelines for quality assurance agencies

Standard 3.1 Activities, policy and processes for quality assurance

The intention to ensure stakeholder involvement is meaningful is welcomed. In order to avoid unintended consequences whereby stakeholder involvement compromises independence, we suggest that the standard should acknowledge context and appropriateness of stakeholder involvement. Alternatively, the sentence about meaningful involvement could be moved to the guidelines to enable flexibility. The primary focus should be on the activities, and although stakeholder engagement is part of that, there is a danger as worded that it becomes the focus of activities and could limit flexibility and agility.

We note that there may be duplication between the guidelines about publishing the goals of quality assurance activities and ESG 2.2. Noting that this could result in non-compliance

adversely affecting an agency across two standards, we would recommend to reduce the duplication or to focus the information on stakeholders as per the revised wording.

Standard 3.2 Independence

We welcome the change from '*without third party influence*' to '*without undue influence from any single party*' which aligns more closely with stakeholder engagement.

We would recommend the following clarifications:

- We suggest making it explicit in the guidelines that agency staff cannot be peer reviewers as they do not meet the definition of peers.
- In the guidelines on independence of formal outcomes we would suggest that it makes it clear that peer reviewers are 'responsible' for the reports, findings and judgements, but that the agency is 'accountable'. The current wording makes it look like an agency could change the outcomes of a peer review process. This is particularly important due to the changes in ESG 2.2 which are more explicit in the role of peers.

Standard 3.3 Activities for enhancement

We strongly welcome the reframing and the recognition of contributions beyond external quality assurance activities and that it includes thematic reports, resources, statistics, training and events that support the higher education system, but are not always directly or exclusively linked to external quality assurance activities. To help codify the intent behind the Standard it is recommended that the following wording is clarified:

- a) that 'outputs' rather than 'results' is used to describe the activity as this more accurately reflects the breadth of activity described.
- b) that the word 'publish' should be replaced with 'disseminate' as in membership bodies not all outputs are 'published' but they are made available to members or the sector, and it would be helpful if the wording reflected this.
- c) For the guidelines to be explicit that the activities may not be linked to external quality assurance activities as outlined in the explanatory notes.

Standard 3.4 Resources

We welcome the reference to digital and sustainable transition in the guidance but refer back to ESG 2.3 and the requirement for an in-person site visit which has the greatest sustainability impact on reviews and recommend that the contradiction is addressed.

We would recommend clarity on the following areas to assist in consistent interpretation of the ESG:

- a) Definitions of sustainability as it is referenced twice but with two potentially different meanings. It is assumed that the first means financial sustainability whilst the other could be societal and environmental. The definition should be refined to make the standard clearer.
- b) It would be helpful to clarify if reference to the 'agencies activities' referred to ESG activities or all activities.

Standard 3.5 Professional conduct and integrity

We do not support the introduction of this new standard as it raises significant concerns regarding its intent, scope and potential duplication with the existing ESG framework. Our concerns are that:

- a) integrity is already a cross-cutting principle across the rest of the ESG standards which themselves provide the framework for integrity of quality assurance operations,
- b) there is overlap with existing standards with competencies addressed in ESG 3.4, conflict of interest covered in 2.4 and integrity of operations embedded in 2.2 and 2.3.
- c) Agencies may struggle to identify distinct additional evidence beyond the evidence required already to meet other ESG standards. As a result, there is a duplication risk that non-compliance in one area could cascade into non-compliance in another, unfairly penalising agencies. It is understood from the webinar that this was advocated by EQAR and that 3.5 would relate to practice and 3.6 to IQA, however it is not clear how these would be separately evidenced.

We would propose that the standard is removed to avoid duplication, reduce ambiguity and ensure agencies are not unfairly penalised for overlapping compliance issues. Instead, the integrity of operations should be referenced as a cross-cutting principle across the standards. If the standard is not removed, unique indicators should be defined to distinguish integrity from other ESG standards.

We additionally do not support the inclusion of the sentence *‘When the agencies also carry out activities that are not in the scope of the ESG, a clear distinction between external quality assurance and other fields of work is needed. This needs to be clearly communicated to the wide public.’* as a Standard for a number of reasons:

- a) ESG 3.5 undermines the welcome changes in ESG 3.3: Although there is a welcome recognition in ESG 3.3 that agencies undertake a range of enhancement activities in addition to their external quality assurance this poses a potential contradiction with ESG 3.5. In the ESG 3.3 explanatory notes, it is recognised that enhancement activities may not always be directly linked to the external quality assurance activity, and therefore are likely to be the sort of activity described as ‘out of scope’. Therefore the statement in ESG 3.5 provides contradiction with ESG 3.3 which explicitly recognises enhancement activities conducted by an agency as part of supporting quality culture. Requiring agencies to separate these activities from external quality assurance undermines this intent and could negate the positive impact of enhancement work.
- b) That the 3.5 requirement would not enable a coherent ESG, as activities that would meet the requirement for ESG 3.3 will also need to be publicly communicated as “out of scope” or “non-ESG activity” which is confusing to the lay person, and indicates an inferiority of that activity despite the ESG highlighting the importance of enhancement.
- c) That introducing “out of scope of the ESG” as a concept in a standard, without a clear agreed definition is problematic. All parameters for compliance should be held within the ESG and not be subject to external interpretation.

We would recommend that the requirement for a clear distinction between external quality assurance and other activities is removed to maintain coherence and avoid contradictions with ESG 3.3.

If the requirement is retained, the Standard should be reworded to:

“Agencies should clearly identify which of their activities constitute external quality assurance and are designed to meet the requirements of ESG Part 2.” This approach focuses on promoting ESG-compliant activities rather than “badging” other enhancement work as non-compliant with a deficit lens.

If “scope” remains part of the Standard, we recommend that a sector-wide definition be agreed through consultation, ideally via a workshop format, to ensure clarity and consistency (see our comments on the introduction).

Standard 3.6 Internal quality assurance

We welcome the standard as proposed but reiterate that the reference to integrity of activity is a direct duplication of proposed ESG 3.5 which has integrity in the title. As noted above, if the system for quality assurance covers integrity, it is not clear what the new 3.5 standard will evaluate and therefore we recommend it is removed to avoid duplication. It is important to remember that the ESG are the framework for agencies who in turn create proportionate and fair frameworks. Duplicating standards and potentially compounding partial compliance areas in these areas would not reflect the system the ESG is intending to protect.

Standard 3.7 Review of agencies

We welcome the changes proposed.

Further comments on ESG Part 3

As referred to in 2.2 it is suggested that ESG 2.2 is moved to part 3 to reflect the overarching nature of the standard to apply across methods as proposed in the [ENQA Leadership Development Programme](#). This proposal would also closely align with the EHEA principle that quality assurance responds to the diversity of higher education systems, institutions, programmes and students.

Final comments

We strongly recommend that ENQA/EQAR develop a transition plan which should be consulted on by agencies to ensure that agencies are given adequate time to become compliant with the new ESG before they are reviewed. It is important to note that:

- a) institutions need to make changes to reflect ESG part 1 and only when these are implemented can agencies conduct reviews on the revised ESG part 1
- b) agencies need to make changes to reflect ESG part 2 which could involve changing review methods which in order to be consulted on to meet ESG 2.2 would also take time
- c) agencies need to make changes to reflect ESG part 3 and should not be penalised for where they sit in the review cycle.

We recommend introducing a transition period to allow for necessary changes. Alternatively, reviewers should consider agencies' transition plans, as historical data on reviews under the

2027 ESG will not exist until the new standards are approved.

The move of a number of the guidelines to the Standards to codify areas that were general existing practice could be perceived as putting a stricter requirement on agencies. We would agree that in most cases, moving the guidelines to Standards codifies existing practice, and would strongly advocate for this negating the need for any organisation to implement a separate uses and interpretation document which in turn damages the role of the ESG in the sector and could divert from the intents of the authors.

Our only exception is the inclusion of 'separation of activity' in a Standard. Not recognising the role that wider enhancement activities (ESG 3.3) of agencies have in achieving the ESG's dual focus of accountability and enhancement would be a missed opportunity which would not enable one of the primary goals of the ESG and EHEA to be realised. As outlined above, we proposed that the new Standard ESG 3.5 is

- a) removed,
- b) if retained, reword the standard to: *"Agencies should clearly identify which of their activities constitute external quality assurance and are designed to meet the requirements of ESG Part 2.."* This approach focuses on promoting ESG-compliant activities rather than "badging" enhancement work as non-compliant.
- c) If "scope" remains part of the standard, develop a sector-wide definition through consultation, ideally via a workshop format, to ensure clarity and consistency (see comments on the introduction)

We strongly believe that the ESG should remain a standalone single source of truth that should reflect the authors' intent and not be subject to external interpretation. Supplementary interpretations risk misalignment with the approved text, as they will not have undergone consultation or, perhaps more significantly, ministerial approval. Such documents could lead to inconsistent outcomes when agencies are reviewed against the ESG and undermine its authority.

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