External review of ENQA Agency Reviews

Evaluation report prepared by the expert panel

NIFU

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Preface

This report presents the results of an evaluation of the agency reviews that ENQA carries out. The evaluation was commissioned by ENQA's External Review Steering Committee.

The evaluation has been carried out by an expert panel consisting of Bjørn Stensaker, Susanna Karakhanyan, Ian Kimber, Liv Teresa Muth, Maria João Pires da Rosa, and Maiki Udam. Bjørn Stensaker acted as the chair of the panel.

NIFU has acted as the coordinating institution. Mari Elken from NIFU has been the technical secretary for the expert panel and the review manager at NIFU. She has organized the panels work and summarized the panel's inputs at the meetings.

The report presents the views of the external evaluation panel. All panel members have contributed with text and suggestions to the analysis and evaluative statements in the report, as well as the final chapter. Bjørn Stensaker has had main responsibility in writing the text in Chapter 4. Mari Elken contributed to chapter 1, the descriptive sections of this report and carried out and summarized the findings from the user survey. All of the panel members have been involved in revising the final text in several rounds. The draft report has also been through a fact check at ENQA.

The expert panel would like to thank ENQA for the materials provided in a structured and timely manner, and everyone who participated at the interviews during the site visit in September 2019.

Oslo, 20.12.2019

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Summary

This report presents the outcomes of an external review of European Association for Quality Assurance in Higher Education (ENQA) Agency Reviews. ENQA is a membership organisation that is composed of quality assurance (QA) organisations in the European Higher Education Area. In order to become members of (or reconfirm membership in) ENQA, bodies need to show compliance with Parts 2 and 3 of the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG). To assess whether bodies are compliant, an external review process is conducted following a detailed set of guidelines for the process. Since 2011, these external reviews have mostly been coordinated by ENQA, which manages all aspects of this review process, including coordination of the reviews, management of the database of experts, organisation of training for the experts, organisation of the drafting of the contracts and site visits to the applicant. The purpose of the external review has been to:

- Assess how the principles outlined in the standards of the ESG Parts 2 and 3 for QA agencies are reflected in the reviews of agencies (while adapting them to the context and work of ENQA); and

- Examine how ENQA procedures contribute to the improvement of the quality of work in QA agencies and allow for innovative approaches to QA processes.

An international expert panel coordinated by NIFU – the Nordic Institute for Studies in Innovation, Research and Education – carried out the review. Key elements in the review process included a self-evaluation report and other background material provided by ENQA, and a site visit to Brussels by the international expert panel, including meetings with key stakeholders.

In responding to the first purpose of the review, ENQA's Agency Review process was examined against the criteria outlined in the ESG Parts 2 and 3. In sum, the Agency Reviews mostly show substantial or full compliance, and the expert panel's overall assessment is that ENQAs Agency Reviews may be perceived as *substantially compliant* with the ESG. The three areas for further development are

thematic analysis, fitness for purpose and the procedure for appeals and complaints.

Concerning thematic analysis, the expert panel particularly noted that ENQA has a unique position and potential to provide comprehensive analysis of the state of the art of internal and external QA in Europe. Concerning fitness for purpose, the expert panel acknowledged the dual purpose of the review processes as ENQA membership reviews are also used for registration in European Quality Assurance Register for Higher Education (EQAR). As such, the ENQA membership reviews are facing a classic dilemma in external QA: the balancing of accountability and improvement. While accountability seems to be easier to cater to, the enhancement purpose has been more difficult to achieve in a systematic manner. The expert panel has noted throughout that the shared purpose of the process and the reporting to inform decisions by both ENQA and EQAR drive a more compliance-oriented approach.

However, the expert panel would also like to commend ENQA for demonstrating throughout the review process that it is an organisation focused on improving its own practices. Over the years, it is clear that ENQA has tried to improve the way it performs its reviews; changes have occurred, and the interviewees tend to see them as genuinely contributing to more fair, consistent and independent reviews. The expert panel also commends ENQA for having a competent and dedicated staff handling the membership reviews. The fact that there is a dedicated review coordinator for each review is a strength, and the process appears overall to be well structured and well organised. The high level of stakeholder involvement in panels and review processes is also commended. The experts conducting membership reviews obtain training that is coherent and solid.

While the balance between compliance and enhancement remains difficult (as is the case in many QA settings), the introduction of progress visits is something the expert panel appreciates. While the format may need further adjustment, the idea has the potential to provide a stronger enhancement orientation in the future.

In responding to the second purpose of the review – concerning how ENQA procedures contribute to the improvement of the quality of work in QA agencies – a survey among ENQA members was conducted that demonstrated that most of the respondents see value in the membership reviews. Still, there is some variation among the agencies, with some also seeing the process as too bureaucratic and adding less value as agencies are reviewed for the second and third time. Concerning the effects of the membership reviews, most agencies mention that the process had effects on their practices, and most also mention specific lessons learned. In particular, the opportunity to get an external view was emphasised as valuable.

The expert panel perceives the question of innovation and improvement as closely related to the future role and profile of ENQA and provides in the final chapter some scenarios intended to stimulate further discussion within ENQA. However, due to the diversity in the characteristics of the member agencies, an argument can be made for a differentiated innovation approach. For agencies with less experience and in which there is a need to build up systems, routines and consistent practices, innovation may look very different than for more experienced and mature agencies. Benchmarking exercises may provide interesting options for agencies that share key characteristics and contexts and may open up mutual learning possibilities for all involved.

1   Introduction

This report presents the outcomes of an external review of European Association for Quality Assurance in Higher Education (ENQA) Agency Reviews. The purpose of the external review is to:

- Assess how the principles outlined in the standards of the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG) Parts 2 and 3 for quality assurance (QA) agencies are reflected in the reviews of agencies (while adapting them to the context and work of ENQA); and

- Examine how ENQA procedures contribute to the improvement of the quality of work in QA agencies and allow for innovative approaches to QA processes.

ENQA is a membership organisation that is composed of QA organisations in the European Higher Education Area. In order to become members of (or reconfirm membership in) ENQA, bodies need to show compliance with Parts 2 and 3 of the ESG. To assess whether bodies are compliant, an external review process is conducted following a detailed set of guidelines for the process. Since 2011, these external reviews have been coordinated by ENQA, which manages all aspects of this review process, including coordination of the reviews, management of the database of experts, organisation of training for the experts, organisation of the drafting of the contracts and site visits to the applicant. In 2018–2019, ENQA wished to carry out an external review of ENQA Agency Reviews and announced an open call for tenders to carry out the review. As a result, the Nordic Institute for Studies in Innovation, Research and Innovation (NIFU) was assigned as the coordinating body for the review process and assisted a panel of experts in its evaluation work.

1.1 Background of the review and the review process

1.1.1 Background and earlier evaluations

QA is one of the areas with well-established cooperation structures at the European level. Historically, the emergence of European-level cooperation in the area of QA can be traced to the mid-1990s, when newly established agencies started meetings for information exchange with support from the Commission (Ala-Vähälä & Saarinen, 2009). Following an EU Council recommendation from 1998, ENQA was established in March 2000.

An emphasis on QA was also one of the initial action lines in the Bologna Process. While the first two Bologna meetings maintained this action line in a relatively ambiguous manner, in 2003 that emphasis was shifted to the establishment of more focused standards at the European level (Huisman & Westerheijden, 2010). The E4,[1] with ENQA in the lead, was given the task of developing a set of guidelines, which were formally adopted in 2005 in Bergen as the *European Standards and Guidelines for Quality Assurance in the European Higher Education Area*. The ESG are employed to assess fitness for membership in ENQA.

Following the establishment of the ESG, the E4 were also founding members of EQAR, a public register of QA agencies in Europe that was established in 2008. In EQAR, the ESG are used to determine eligibility for registration.

In 2010, an analysis was carried out on the use of the ESG in ENQA Agency Reviews (Stensaker, Harvey, Huisman, Langfeldt & Westerheijden, 2010). The evaluation found that, in the first years of the agency review reports, the review processes had gradually become more similar to one another, but the evaluation also found that there was a range of cases in which similar labels were used for different practices – e.g., how evidence was used in the reviews, how staff competence was assessed and how the various criteria of the ESG were assessed. As a result, the analysis concluded that '*it is debatable whether the external review process is as transparent as it appears in theory*' (Stensaker et al., 2010, p. 585).

Elsewhere, concerns were raised that too much focus had been put on assuring legitimacy of European level coordination of QA on national level. As a result, the focus on compliance had become too strong, making the systems too rigid (Huisman & Westerheijden, 2010). The difficult balance between external and internal QA measures (Kristensen, 2010) and observations of decreasing trust (Amaral & Rosa, 2010) re-emphasised concerns about whether the process of establishing trust was taking place primarily at the macro level (Stensaker et al.,

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[1] Composed of ENQA, European University Association (EUA), European Association of Institutions of Higher Education (EURASHE) and European Student Union (ESU).

2010). These studies refer to a recurring issue in QA: whether (and, if so, how) external QA contributes to the *enhancement* of quality or whether too much emphasis is on *accountability*. Thus, while the use of the ESG has no doubt contributed to making European-level standards more explicit, the question that remains is whether and how the agency reviews contribute to the work of these QA agencies.

In recent years, the agency reviews have been a part of several change processes. ENQA's procedures for the agency reviews were revised in 2011 when ENQA took over the coordinating function. The rationale was to assure greater transparency and coherence across the various evaluations. In addition, the ESG were formally revised in 2015. The revision process included multiple consultation rounds with both stakeholder groups and ministries. The revised ESG were formally adopted during the ministerial conference in Yerevan in 2015. These two changes have thus concerned both the content of the evaluation processes and the structuring of those processes.

Overall, one can argue that, while the ESG are in the form of guidelines, adherence with the ESG appears to be important for QA agencies in Europe, partly driven by the link to EQAR registration. Recent studies have shown that ENQA's suggestions and the ESG can have concrete consequences for agencies at the national level (see, e.g., Kalpazidou Schmidt, 2017 for a discussion of the Swedish system). Thus, a thorough assessment of how ENQA conducts the reviews and of the kind of advice that agencies have received is of high relevance for the further development of the reviews. Not least, it is important to understand whether ENQA's own practices regarding the review processes follow the guidelines set in the ESG. This review thus has both a formative and a summative orientation.

1.1.2 The expert panel

The call for tenders stated that the expert group needed to include at least five members and include:
a) One external QA expert
b) One student
c) One academic
d) At least one expert with a broad understanding of the European higher education policy context

NIFU, as the coordinating body, provided a technical panel secretary who assisted the panel's work. The composition of the panel was proposed by NIFU and formally approved by the steering committee for the external review of ENQA Agency Reviews. Potential conflicts of interest were examined in the process.

NIFU proposed six members, and one of the members was proposed to serve as the panel chair. Three of the members had a practitioner background, two members were academics with relevant expertise in QA and European Higher Education Area (EHEA), and the panel also included one student member. The table below presents the panel members appointed for this task.

Table 1. The composition of the expert panel.

Name	Institution	Role in panel	Criteria	Gender	Country
Bjørn Stensaker	Professor at the University of Oslo	Panel Chair, Member	Academic, European HE expert, QA expert	Male	Norway
Susanna Karakhanyan	President, INQAAHE	Member	EQA expert, practitioner, international	Female	UAE / Armenia
Ian Kimber	Director of Quality Development, QAA	Member	Practitioner, QA expert	Male	UK / Australia
Liv Teresa Muth	QA Student Experts Pool, PhD student at Ghent University	Member	Student, QA expert	Female	Belgium / Germany
Maria João Pires da Rosa	Assistant Professor, University of Aveiro	Member	Academic, European HE expert, QA expert	Female	Portugal
Maiki Udam	Development Manager, Estonian Quality Agency for Higher and Vocational Education	Member	Practitioner, QA expert	Female	Estonia

1.1.3 The external review process

The review has two distinct aims: to examine how the ESG are reflected in ENQA Agency Reviews and to determine whether ENQA procedures contribute to the improvement of the quality of work in the QA agencies and allow for innovative approaches to QA processes.

Concerning the first question, the ESG, with appropriate adaptation, has been used as a starting point to examine ENQA's Agency Review processes. This means that the ESG were rephrased by NIFU for this purpose, having also in mind that the focus of this review was not ENQA as a whole but its management of the agency reviews. The second question implies that the evaluation also needs to take into account how ENQAs Agency Reviews contribute to the work at QA agencies. In order for the review process to be fit for purpose, it is important that the core questions of the evaluation be explicitly addressed and that relevant data be collected for both of the questions.

The review process draws inspiration from the agency review processes that ENQA carries out, yet it does not replicate them entirely given that the purpose and scope of this review is substantially different, as is the object of the review. In

its current form, ENQA is not an agency. As is the case with agency reviews, the evaluation does not evaluate ENQA as a whole but instead is focused specifically on the agency reviews, and the consequences and follow-up of the review process are not comparable with those of ENQA's Agency Reviews. The result of this review is neither membership nor a decision concerning registration. The review has a forward-looking component that brings a strong formative aspect to the review. This is reflected both in the working methods of the panel and in the structure and content of the final report.

1.1.4 Elements of the review process

The review process consisted of the following elements:

Start-up meeting between ENQA and NIFU. During the meeting, NIFU presented the main elements of the review process and the Terms of Reference, and questions and clarifications were discussed. ENQA received a self-assessment report (SAR) template in which the ESG had been rephrased for the purpose of this evaluation.

Preparation of documentation. ENQA carried out a self-evaluation process in which its goal was to produce a SAR. The preparation of the SAR was coordinated by the self-assessment group. The process was multi-layered, with input obtained from several groups. There were several SWOT analyses (identifying strengths, weaknesses, opportunities, threats), which formed the basis of the final report, and the members provided input at ENQA's internal forum. In addition to the SAR, ENQA also delivered additional information as requested by the expert panel.

In addition, NIFU carried out a small-scale user survey among member agencies of ENQA concerning the agency review process. The survey consisted of open-ended questions concerning the review process and the agencies' assessment of the impact of the review process on their practices. A summary of the results of this survey is presented in Chapter 3 (see section 3.1, see also attachment).

Preparation for site visit. The panel met virtually in the beginning of July for a start-up meeting and briefing concerning the task. The meeting was recorded and made available in a secure OneDrive folder for sharing evaluation materials. The panel met virtually at the end of August in another Skype meeting to prepare for the site visit.

Site visit. On 17–18 September 2019, the panel carried out the site visit to ENQA in Brussels. During the site visit, various groups were interviewed. An overview of the groups interviewed and the meeting schedule can be found in the attachment. A set of possible questions for the site visit had been prepared beforehand and distributed to the participating groups to provide an indication of the themes to be addressed during the site visit and to allow the informants to best

prepare for the interviews. During the interviews, a conversational approach was adopted, and the Chair ensured that the main themes were covered. The technical panel secretary took detailed notes of the whole site visit.

Preparation of final report. After the site visit, the panel completed its evaluative work, and it met for another Skype meeting on 15 October to discuss the conclusions of the evaluation. After this, the report went through a round of revisions by panel members. After a draft report was prepared, ENQA was given the opportunity to check it for factual errors.

1.1.5 Evaluation scale

One of the tasks of the review was to evaluate how the use of the ESG is reflected in how ENQA carries out the agency reviews. While the overall evaluation has a formative role, in this part of the evaluation, explicit assessments were made vis-à-vis the adjusted ESG formulations. This kind of assessment was an explicit request of ENQA. The scale adopted was the same that is used in ENQA's Agency Reviews.

- **Fully compliant:** The agency is entirely in accordance with the ESG standard, which is implemented in an effective manner.

- **Substantially compliant:** The agency is to a large extent in accordance with the ESG standard, the principle/spirit of which is followed in practice.

- **Partially compliant:** Some aspects or parts of the ESG standard are met while others are not. The interpretation of the ESG standard is correct, but the manner of implementation is not effective enough.

- **Non-compliant:** The agency fails to comply with the ESG standard.

1.1.6 Overview of the evaluation report

This introductory chapter has provided a description of the evaluation process. In Chapter 2, the evaluation panel presents its assessment of the individual ESG dimensions in this evaluation. This also implies that Chapter 2 adopts a more summative than formative lens at the agency review process and addresses the compliance aspect of each standard. The panel would like to emphasise that this kind of compliance-oriented scrutiny was explicitly called for by ENQA. In Chapter 3, the report looks at the effects of the agency reviews. The main results of the brief user survey are presented along with information from the SAR, and the panel presents its reflections on this topic. In the final chapter, the panel takes a more

formative stance and presents its main conclusions and scenarios for further development of ENQA in the future.

2 The ESG and ENQA Agency Reviews

In this part of the review, ENQA's Agency Review process is examined against the criteria outlined in Parts 2 and 3 of the ESG. Each individual standard is examined, first presenting the evidence used for evaluation and then the analysis and assessment provided by the panel. In this way, the process resembles assessments of compliance carried out in regular agency review processes.

Each of the provided standards and guidelines builds upon ESG formulations. The criteria from Part 3 of the ESG are presented in section 2.1, and the criteria that form Part 2 of the ESG are presented in section 2.2. The original formulations have been altered by the body managing this review process to be suitable for reviewing ENQA's Agency Review processes.

2.1 History, profile and activities of ENQA

> **ENQA should engage in agency reviews on a regular basis. Agency review processes should be part of ENQA's activities and expressed in its mission (building on ESG 3.1)**
>
> It is important that ENQA fosters high levels of trust among participating agencies and the public. The goals and objectives of ENQA should be publicly available, and ENQA's work with agency review processes should be reflected in these.

Evidence: As indicated in Chapter 1 of this report, ENQA is embedded in wider developments in quality assurance in Europe, especially in light of the developments within the Bologna Process. The SAR emphasises that ENQA's primary function is to facilitate improvements of quality assurance in the signatory countries of the Bologna Process. In the user survey, ENQA is described as one of the legitimate European-level bodies (see section 3.1 and the appendix of this report) among the agencies who responded to the survey.

ENQA consists of four bodies and is governed by its main stakeholder groups: QA agencies. In May 2019, ENQA had 53 member agencies from 29 countries in EHEA. According to ENQA website, the main tasks of each body are as follows:

- *The main tasks of the General Assembly include the election of the Board, adoption of the Strategic Plan, endorsement of ENQA membership decisions, and approval of the work plans and annual activity reports*
- *The ENQA Board is the executive body of the association, appointed by the General Assembly to implement its decisions and ensure, together with the Secretariat, effective management of business between the biannual GA meetings*
- *The director is appointed by the ENQA Board to represent the association in line with its aims and objectives.*
- *The Appeals and Complaints Committee hears appeals and complaints about membership decisions and the conduct in procedures.*

In the SAR, ENQA's purpose is to operate as '*an independent, non-profit, membership association that contributes to the maintenance, enhancement and advancement of a quality culture in the European higher education*' (p.8). The SAR distinguishes between the mission, vision and values of ENQA's work. The overall vision is '*to have a European Higher Education Area where students have access to high quality education and can achieve qualifications that are respected world-wide'* (p.9). The mission statement emphasises that transparency, independence, collaboration and integrity are essential values in ENQA's work.

To operationalise these in ENQA's daily work, the SAR defines eight operational goals. While these goals are interlinked, two (goals 2 and 5) are explicitly related to the agency review process. During the site visit, the development of ENQA's new strategic plan was identified as a theme in some of the interviews, and some preliminary ideas for future development were discussed. This evaluation is expected to play a role in the development of the new strategy.

While ENQA's mission statement emphasises both accountability and enhancement, the difficulty of balancing these two factors was a recurring theme in the SAR and many of the interviews during the site visit. The difficulty of balancing these two goals may impact the role of ESG and whether (and if so, how) the agency reviews contribute to an enhancement focus.

Analysis: ENQA performs agency reviews on a regular basis (every five years), and these reviews are part of ENQA's activities, as noted in its mission and goals (in fact, goals 2 and 5 specifically address ENQA's reviews). ENQA organises the conduct of the review and the composition of the expert panel with its internally trained experts. ENQA offers agencies a platform to exchange practices.

Agency review processes are a regular part of ENQA's activities. Agencies consider ENQA's reviews to be important for the credibility of their work at the national—and often international—level, as it allows them to become both a member of ENQA and registered on the EQAR. ENQA's membership works as a 'seal', allowing agencies to demonstrate to higher education institutions and

national governments that they have been reviewed by a European common body and were "approved", as being in compliance with the ESG. The user survey indicates generally positive views about how ENQA carries out the reviews.

However, the panel found that the main focus of agency reviews is the compliance aspect of the ESG and, to a lesser extent, enhancement. As a result, some feel that the ESG interpretation is considered to be too restrictive. First reviews are considered to be much more useful and having a real added value, while subsequent reviews seem to have diminished returns. This theme emerges at several points throughout the remaining of this report.

Assessment: Fully compliant

* * *

> **ENQA's status as a body responsible for coordinating agency review processes is clear and transparent (building on ESG 3.2)**
>
> ENQA's role and status as an organisation at the European level should be clear and transparent.

Evidence: ENQA operates at the European level and thus faces different conditions than a national-level QA agency. The SAR states that ENQA is an international non-profit association under Belgian law ('association internationale sans but lucrative', or 'aisbl'). Information about ENQA's legal status is publicly available on its website. Further, the SAR notes that '*The ENQA Agency Reviews is an activity conducted by ENQA, and is not a separate legal entity. The ENQA Agency Reviews activity is represented by ENQA in legal and contractual matters*' (p.16).

Analysis: ENQA's role is clearly defined and publicly accessible to all relevant stakeholders. In all meetings that took place during the site visit, participants showed a significant level of knowledge regarding ENQA, ENQA's agency reviews and the role of ENQA as a body that is responsible for those reviews, including their processes, standards, criteria and final outcomes (i.e. compliance or lack of compliance with the ESG). The differentiation of ENQA and EQAR regarding how the reviews are conducted and how compliance decisions are made is clear. It should be noted that differences in ESG interpretations by ENQA and EQAR are less clear to the member agencies (see section 4.2 for a discussion).

Assessment: Fully compliant

* * *

> **ENQA should be independent, and agency review processes need to be carried out autonomously, without third-party influence (building on ESG 3.3)**
>
> While carrying out agency review processes, ENQA should demonstrate organisational independence (work is independent of third parties), operational independence (procedures and practices are conducted without third-party influence), independence of outcomes (ENQA retains responsibility for review processes). Experts should be aware that they act in a personal capacity in the review process.

Evidence: Formally, ENQA is an independent non-profit association that has the right to self-determination concerning its structures and ways of working. The SAR emphasises independence from national governments and stakeholders. Yet, it also notes that '*ENQA is logically not organisationally independent from its members. Similarly, the ENQA Board is composed exclusively of elected representatives from ENQA member agencies, which, in turn, are usually reviewed by ENQA*' (p. 16). Regarding the independence of the agency review process and subsequent decisions, the SAR identifies procedures that require board members to abstain from decision-making when conflicts of interest may exist.

Concerning operational independence, the SAR notes that ENQA Agency Reviews operate with '*full operational independence*' (p. 17). Nominations for experts are received from a wide range of stakeholders, including the European University Association (EUA), European Students' Union (ESU), European Association of Institutions in Higher Education (EURASHE) and the Confederation of European Business (BusinessEurope). A key criterion for appointing experts is that '*the members of the panel should be independent from the agency under review and have a sufficient level of knowledge, experience, and expertise to conduct the review*' (p. 17). The SAR highlights that while the review coordinator from ENQA provides practical assistance and follows the panel to ensure consistency between reviews, it is the panel that is responsible for the findings and recommendations presented in the final report.

The relationship between ENQA and EQAR and how reviews are expected to meet the requirements of each were noted both in the SAR and also during the site visit.

Concerning the independence of formal outcomes, the SAR notes that '*the final outcomes of the review processes remain the responsibility of the ENQA board*' (p.19). A four-step decision-making process is employed to ensure impartiality and consistency:

1. Once submitted to ENQA by the review panel chair, the report is distributed by the ENQA Secretariat to an ENQA Review Committee (based on rotation).

2. Each member of the Review Committee fills out a scrutiny form that contains an analysis of the report and provides an assessment of each ESG standard as well as an overall recommendation to the Board.

3. The Board takes a decision based on the ERR and the scrutiny by the Review Committee. The Board is not, however, obliged to follow the recommendations of the review panel nor that of the Review Committee.

4. Should the Board deviate from the recommendations of the panel and/or the recommendation of the Review Committee, the reasons shall be specified in the Board's letter to the agency, which will be published on the ENQA website together with the ERR. (SAR, p. 19)

The SAR argues that the decisions have been independent, an example being that negative decisions have also been taken when the agency under review was represented on the ENQA Board.

Analysis: The review panel observes that ENQA demonstrates operational independence insofar as its review processes are carried out autonomously and without third-party influence. Procedures are respected, and decisions are based on the expertise of the panel members, who act in a personal capacity and follow the Code of Conduct. After the review panel has submitted its report, one of the four ENQA review committees scrutinises the report. ENQA retains the responsibility for the review processes, and the ENQA Board makes the final decision regarding ENQA membership. The interpretation of ESG compliance by ENQA (leading to ENQA membership) may be different from the interpretation used by EQAR when deciding on agencies' registration, indicating that the assessments have different focuses.

The interviewed experts stated that they pay more attention to ENQA's interpretation of the ESG than to that of EQAR during the review process. For them, the agency reviews are ENQA's reviews. Nevertheless, they mentioned that EQAR has developed its own interpretation of the ESG and that they do also follow this interpretation in their assessment. They are aware that EQAR often asks for additional evidence and that the compliance purpose is more central to EQAR's interpretation of the ESG and its decision regarding registration. The relationship with EQAR and the extent to which EQAR approaches and interpretations colour ENQA processes is a fundamental issue for the agency to resolve.

The interviewed review committee members also noted that independence is now adequately addressed in all reports, this has improved over time.

Concerning organisational independence, ENQA cannot operate in an exclusively independent manner due to its nature. As a membership organisation, ENQA conduct reviews of its own members and includes experts from the member agencies. The ENQA Board is fully composed of representatives from ENQA's

members, and not any external stakeholders. The SAR notes even that '*the question has arisen as to how far the Board's decisions on other members are really independent since they are also from ENQA member agencies*' (p. 19). However, these decisions only concern membership. The panel takes this limitation into account and acknowledges ENQA's policies to increase its independence as much as possible. However, even if ENQA has measures in place to safeguard its independence (e.g. board composition, checks for conflicts of interest), it is doubtful that independence has been fully achieved according to the standard. This opinion was even conveyed during the meeting with ENQA Board.

While noting these limitations, the panel would also like to comment that ENQA has put in place a number of mechanisms to improve both the objectivity and consistency of review outcomes and reporting; this was commented on by reviewers, review committees and agencies alike.

Assessment: Substantially Compliant

Panel recommendations: As ENQA will never be able to reach total independence due to its nature as a membership organisation, it is more important to enhance the actions and policies that ensure the independence of decision-making and integrity of processes. Specifically, the independence of ENQA within reviews should be enhanced by (re-)defining the complaint and appeal procedures and promulgating them to all relevant stakeholders. Furthermore, greater externality should be facilitated by involving stakeholders outside the membership organisations.

The panel observed that the relationship between ENQA and EQAR may raise questions about the independence of agency review processes. The panel recommends that ENQA critically evaluate the impact of meeting EQAR requirements on its review processes and take the opportunity presented by its strategic planning exercise to consider the nature of its relationship with EQAR.

In this context, the appropriateness of the current governance arrangements and decision-making process should be further discussed in relation to the strategic decision about the role of agency reviews. If the purpose of ENQA Agency Reviews is solely to determine whether agencies can become ENQA members, then including only members on the board makes sense. However, some stakeholders (e.g. some national-level ministries) perceive ENQA reviews as having a role beyond membership: to promote recognition of qualifications. In the latter case, the composition of the board should be reconsidered. ENQA should clearly state the purpose of the reviews and make this explicit to different stakeholders to avoid misinterpretations.

* * *

> **ENQA should also publish reports that communicate the more general findings of agency review processes (building on ESG 3.4)**
>
> In addition to the agency review reports, ENQA should also publish other forms of publications to disseminate information concerning agency review processes to its users and stakeholders.

Evidence: The SAR highlights two reports and two recently launched initiatives for thematic analysis. While one of the reports is available to the public, the other report, which concerns interpretation and analysis of ESG in self-assessment reports and agency review reports, is available as an internal handbook for the secretariat and the board. The SAR emphasised that this decision was based on a desire to prevent the findings of this report from becoming a parallel set of standards.

In 2018, two new activities were launched: (a) qualitative thematic analysis conducted by an external researcher that focused on three of the ESG standards that are perceived as more complex and (b) an analysis of the key characteristics of ENQA member agencies in the form of a '*member profile sheet*'. In addition, the SAR notes that ENQA collaborates on many projects that '*may result in, but are not limited to, thematic analyses that draw on the outcomes of ENQA agency reviews*' (p.21). The SAR notes that these projects are dependent on external funding and that ENQA has also published several occasional papers and survey results. The SAR emphasises that while ENQA contributes to many projects, studies and reports, it also acknowledges that they have a unique position in providing an overall analysis of what is happening in external QA and that they could provide more frequent and detailed analyses.

In several of the interviews conducted during the site visit, it was noted that this is the criterion for which more could have been done by not only ENQA but also various external actors, including QA agencies.

Analysis: ENQA publishes all assessment reports of agencies that underwent a review against the ESG. Yet, since 2015, ENQA has only published two reports that communicate the more general findings of the agency review processes. Concerning other projects and occasional papers, although not constituting thematic analysis in a strict sense, they draw on the outcomes of the ENQA's Agency Reviews. It is not easy to distinguish what is an occasional paper and what is an '*other paper*'. As such, there does not seem to be an overarching, systematic strategy for how the knowledge accumulated from agency review processes is handled and disseminated.

This topic was discussed in several of the interviews. ENQA collects and follows feedback from agencies, but also in the interviews with ENQA staff, it was pointed

out that this could be more systematic. Given that 2020 will be a '*gap year*' in which fewer agencies will be undergoing a review, the informants from ENQA mentioned that they expected that more time could be allocated for a more systematic analysis. Agency representatives also mentioned that ENQA should do more in terms of systematically analysing the reports produced from the reviews; a thematic analysis could be done regarding consistency of judging standards could also be performed. In the interview with the European stakeholders, it was mentioned that ENQA is uniquely positioned to conduct thematic analysis due to its agency review processes, and in this manner, it can contribute more to systematic knowledge and innovation concerning QA in Europe.

In their assessment, the panel emphasizes that ENQA has not published systematic and comprehensive reports concerning internal or external quality assurance thus far and that the reports and occasional papers seem to cover a rather fragmented set of themes.

Assessment: Partially compliant

Panel recommendations. The panel recommends that ENQA should take a more proactive, strategic and systematic approach to handling the knowledge and information about internal and external QA in Europe that ENQA has acquired over the years.

* * *

ENQA should have adequate and appropriate resources to carry out the review processes (building on ESG 3.5)

An adequate resource base concerns both human and financial resources. Available resources should make it possible to run agency review processes in an effective and efficient manner. There should be resources for improving ENQA's practices concerning the agency review process.

Evidence: ENQA employs six full-time staff members: the director, deputy director, reviews manager, project manager, project officer and administrative officer. In 2015, ENQA specifically hired a member of staff to only work with managing the review process. The reviews manager primarily works with the reviews and related activities, although other members of ENQA secretariat also work with agency reviews. The SAR notes that each staff member, except the administrative officer, acts as a review coordinator two to three times a year. The SAR also mentions the role of the board members for carrying out ENQA activities:

they provide the association with additional capacity, but they are not remunerated by the association for this work.

High workload was mentioned during the site visit. The opportunity to use trainees was also discussed as a possible solution during the site visit. ENQA used trainees previously; indeed, some staff members started as trainees. Thus, this can function as a possible path towards a career at ENQA. The available physical space, however, has made it difficult to have trainees at this point, but the possibility is being considered.

The SAR notes that there is a budgetary allocation for training of staff. In terms of agency reviews, the SAR states that review coordinators are '*always trained on the job, meaning that each review coordinator will observe a site visit coordinated by an experienced review coordinator prior to coordinating one independently*' (p. 24).

ENQA expects at least ten agency reviews every year, and given the cyclical nature of reviews, the income from reviews has been considered rather predictable and stable. The income obtained from agency review processes covers staff costs related to the reviews, fees and travel costs, and it contributes to the training of experts. However, the SAR notes that, currently, '*the reviews are barely covering the related costs of all direct staff costs, training session costs, and costs of thematic analysis*' (p.25), which is suggested to be a consideration when committing to new tasks and roles..

Analysis: ENQA's resourcing is quite lean, and staff are involved in a range of tasks related to the core activities, both reviews and broader services. ENQA relies on a set of qualified and committed staff to manage the operations of the association. These staff are involved in all stages of the coordination of reviews. Most of the staff have tasks as review coordinators and have other tasks related to reviews, such as training experts, hosting seminars for agencies, coordination of thematic analyses and reading panels' reports to identify inconsistencies. This indicates that the number of tasks and responsibilities is significant, which may lead to some activities to be somehow left behind (such as perhaps the thematic analysis, or capacity building projects if the number of reviews increases). ENQA only employs one staff member that is completely dedicated to the coordination of agency reviews. During the on-site visit, the staff stated that they are operating at full capacity, and they seem to occasionally have a very high workload.

The panel notes that it is very positive that staff have the opportunity to participate in and contribute to the full range of ENQA activities, making the organisation less vulnerable to staff turnover and single points of failure. A '*learning by doing*' approach is taken, which according to the involved staff has been productive for ensuring appropriate skills and competencies, and for assuring the quality of service and outcomes. At the same time, a learning by doing

approach may not be most efficient or effective way to do this, and other ways could be considered. According to the SAR, a review coordinator training session is planned for September 2019.

Financial resources are mainly obtained from the fees paid by agencies under review. So far, the financial situation of ENQA is sufficient to ensure its continuation. The review fees cover the review expenses. The membership fees are used to provide other membership services to the agencies. During the interviews, the panel heard that a possible strategic direction for ENQA is to grow more as a membership organisation and expand its paid services. If this is the case, the resourcing model will need to be re-visited. The panel suggests that ENQA could in general consider its future financial sustainability and find alternative sources of financing.

Assessment: Fully compliant

Suggestion: Depending on the future path ENQA chooses, its financial model may have to be revised. If ENQA develops further as a membership organisation, the current financial model may no longer be viable. Staff members' workload might increase drastically when more activities related to evidence-driven innovation are carried out.

* * *

> **ENQA should have internal quality assurance procedures for its own work processes (building on ESG 3.6)**
>
> ENQA should have clear principles for internal quality assurance of its own work processes, to make sure that its practices are continuously improved.
>
> The internal guidelines should make sure that ENQA's work concerning agency reviews is carried out professionally, ethically and without intolerance or discrimination of any kind. Work processes and communication should be appropriate, and any subcontractors should follow the established guidelines and principles.

Evidence: The SAR emphasises the values of collaboration, integrity, independence and transparency in all of ENQA's activities, including agency review processes, and notes that ENQA '*strongly values and carefully monitors its mechanisms for feedback from users and other stakeholders*' (p. 26).

The SAR states that even if there is no summarised policy document on this manner, ENQA has an integrated approach to internal QA involving four steps: "*1) reflecting on the design of quality assurance activities; 2) professionalising the*

implementation of review coordination; 3) enabling feedback channels on the implemented reviews; and 4) acting on the collected feedback in order to support the improvement of quality assurance processes" (p. 26).

However, the comments in SAR also noted that the members have commented that '*they are not informed what happens after their feedback on the review process has been submitted to the Secretariat*' (p. 29). The SAR identifies measures to provide closure to the feedback loop, including '*more regular (annual) feedback reporting to the Board, and the inclusion of a brief report on key feedback and action taken in one of the Notes from the President every 12-24 months*' (p.29). The SAR also notes that self-assessment helped to identify a number of different tools for internal QA, which means that re-examination of all these activities and the relationships between them is warranted.

The SAR mentions that the software tool Organon will be taken into use in 2019 to support the management activities of ENQA, including reviews.

Analysis: The panel observes that ENQA has a number of mechanisms in place to ensure that agency reviews are carried out in a professional and ethical way and without any intolerance or discrimination of any kind (e.g. a code of conduct; a book of precedents; review coordinators and review committees; successive analysis and cross-checks of external review reports before a final decision is reached; an external review panel, review coordinator, review committee or ENQA Board; IQA group). There is a perception that consistency has improved over the years, partly due to the introduction of the review coordinator role. Yet, consistency still seems to be an issue, as some interviewees acknowledged that not all standards are treated in the same way by all panels. They also point out that full consistency is hard to obtain since all reviews are in the end based on qualitative judgments.

The SAR states that improvements have been made regarding how the reviews are prepared and conducted based on feedback received (mainly through surveys of agencies and review panel experts). However, it only provides one example of such an improvement: namely the decision to publish follow-up reports in addition to all the other reports and documents concerning a specific review. Furthermore, it is not clear in the SAR, nor was it clear during the interviews, whether (and how) the results of the surveys (and other feedback mechanisms the agency has in place) and implemented improvements are communicated to ENQA's stakeholders, including agencies, panel experts, other members of the E4 group and EQAR.

According to the SAR, ENQA intends to have in place mechanisms to guarantee that all QA activities performed by the agency are fit for purpose. At this respect, it should be mentioned that during the interviews, much discussion centred around the double purpose of ENQA's reviews (compliance vs. enhancement) and

the fact that a focus on both purposes has not been fully achieved; compliance purpose essentially being the one framing the reviews. ENQA's mechanism for internal QA should be further developed in order to guarantee that the agencies' enhancement is also an outcome of reviews.

Overall, a series of practices and mechanisms are in place to internally assure the quality of ENQA's agency reviews, although a formal, well-structured and end-to-end internal QA system is not yet evident.

Assessment: Substantially compliant

Recommendation: Regarding ENQA's internal QA system, the expert panel sees room for further improvement. ENQA conducts feedback surveys among its members that underwent evaluations processes. Yet, it is not clear through which channel the feedback is analysed and used to inform actions. This is also true for informal and other formal feedback. The expert panel recommends that ENQA implement standardised procedures to catch all feedback received through different channels and analyse it in a comprehensive way.

While the different elements of an internal QA system (e.g. a book of precedents, collection of feedback, training of reviewers) are present, it may be helpful to have a document that describes the whole system in order to present a more formalised and interlinked internal QA system.

* * *

ENQA's agency review processes should be evaluated on a regular basis (building on ESG 3.7)

To assure public legitimacy, ENQA's own management of the agency review process should be evaluated on a regular basis.

Evidence: This is the first time an external review of ENQA's agency reviews has been carried out against the ESG (with adapted formulations).

Analysis: This is the first review of ENQAs Agency Reviews. As long as ENQA decides to keep asking for independent external reviews in the future, and on a regular basis, the association fully complies with this standard.

The panel would also like to commend ENQA for asking for this external review, as it demonstrates transparency.

However, this evaluation should be subsequently checked for its fitness for purpose, to increase its efficacy for future ENQA evaluations. In addition, ENQA should use the recommendations and areas of improvement identified in this

report to inform its actions and provide measures for their implementation during the next evaluation process.

Assessment: Fully compliant *(under the assumption that ENQA will continue to conduct external evaluations on a regular basis)*

2.2 Management of ENQA Agency Reviews[2]

> **ENQA Agency Reviews should be carried out in a manner that uses methodologies that are fit for purpose. Stakeholders should be involved in the design and continuous development of these methodologies (building on ESG 2.2)**
>
> The aim of the external agency review process should be clearly stated. The process should bear in mind the workload and cost that the agency review process for the agencies, it should support the agencies in their work, allow agencies to show improvement, and provide clear information and follow-up procedures.
>
> Stakeholders should be involved in the design and development of the methodology of agency review processes.

Evidence: The SAR emphasises that the agency review processes have a dual purpose of accountability and enhancement: '*ENQA Agency Reviews aim at addressing the two key purposes of an external review: accountability and enhancement*' (p. 31). During the site visit, this balance was discussed and, in some instances, described as difficult to achieve.

Concerning accountability, agencies need to demonstrate compliance with the ESG 2015. The outcomes of agency review processes are used for multiple purposes: ENQA membership, EQAR registration, demonstration of compliance on a national level or trust-building exercises. ENQA notes that some of the consequences may be serious for agencies, and that this means that ENQA reviews methodology '*aims not only to follow the purpose of the reviews, but also to be consistent and trusted, with a constant attention to the quality assurance and improvement of the method itself*' (p. 33). During the site visit, it was also emphasised that agencies need the ESG compliance assessment for EQAR membership. It was also noted during the site visit that ESG compliance functions as a baseline, while different and higher expectations are placed on more mature agencies.

The SAR notes that the enhancement question has been '*more difficult to properly integrate*' (p. 32) in the review processes. The SAR mentions two key developments in this regard: to provide suggestions even if full compliance is noted and to provide enhancement-oriented *progress visits*. Progress visits are voluntary visits by an expert team during which the agencies decide which topics

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[2] This section does not include ESG 2.1. This is one of the examples in which this reviews scope as a 'meta review' differs from that of a regular agency review. As noted in the SAR, agency reviews concern QA agencies rather than institutions directly. This means that part 1 of the ESG is not directly covered by the agency review process and, consequently, criterion 2.1 is not be applicable to the current review. It should be noted that the SAR clearly states that when ENQA carries out agency reviews, agencies are asked to provide an argument for how they address their own standards in regard to part 1 of the ESG using the mapping grid.

they want to address. The aim of the visits is to discuss critical issues in an open context that has no impact on the compliance assessment. Thus far, the feedback concerning progress visits has been mixed, as noted in the SAR. While some state that, in general, the visits meet the agencies' expectations, other claim that the goals and format of the visit are ambiguous. The progress visit and follow-up procedure are separate. While the progress visits are not a mandatory part of the review process, they are offered in conjunction with the review process, so in some sense, they are linked to the agency review process. During the site visit, it was questioned whether this is appropriate, given that the visits are not supposed to be about compliance, they do not have a role in the follow-up of the review results and the results are not considered in the next review.

The SAR claims that, in general, the feedback concerning ENQA's support for the review process has been positive. Similar results were found in the user survey carried out in this evaluation (see the next chapter and the appendix for more details). One issue that the SAR notes is that the template has been described as repetitive. As a result of this feedback from the agencies, there is a plan to revise the self-assessment template.

Analysis: The aim of the reviews is to check agencies' procedures against the ESG, as clearly stated by ENQA. However, the prioritisation between a compliance- or enhancement-led approach is less clear, and this was a topic of discussion in almost all of the interviews conducted during the site visit. While ENQA and the review experts also see it as an enhancement-led exercise, the agencies (and national ministries) perceive it more accountability-oriented (especially from the second review onwards). Moreover, EQAR requires even greater focus on compliance. Thus, it was clear that a balance between compliance and enhancement has not been achieved this far. The review processes appear to focus much more on assessing QA agencies' compliance with the ESG than on the mechanisms that would contribute to enhancement of QA agencies' practices. This is particularly true for the second and subsequent reviews, as by that time, agencies have often obtained some level of maturity and sophistication regarding the way in which they embed the ESG in practice.

The panel acknowledges that tension between the dual purposes of compliance and enhancement is one that also many agencies face and QA systems grapple with, so it is no surprise that it also features in ENQA's thinking about its current and future practices and directions.

ENQA has introduced two innovations in the agency review process intended to strengthen the enhancement purpose: (1) encouragement of experts to provide suggestions for further improvements in their external review report and (2) enhancement-focused progress visits. Despite the fact that these two developments are considered to align with an enhancement-led purpose, in

general, the panel has not observed significant evidence that they have actually contributed to this goal. Progress visits, in particular, do not seem to have been entirely appropriated by all agencies as beneficial for their further development. This could be due to their voluntary nature and to the fact that, after the visit, no public report of the topics under analysis is created.

The tension between ENQA and EQAR requirements also appears here. Agencies criticise the different interpretation of the ESG by ENQA and EQAR, and feel that the use of review results by EQAR to make a decision about agency registration drives a compliance emphasis. Thus, the impact of the need for the review to show compliance with the membership criteria of ENQA and the requirements for admission to the EQAR register should be considered. In this regard, the methodology by which ENQA interprets the ESG and sets its membership criteria should be revised to include opportunities to combine both enhancement- and compliance-led approaches and fulfil the aims of both ENQA and EQAR. However, the membership criteria could be also revised in a way that distinguish them from or go beyond the ESG. The choice concerning these criteria is a strategic decision for ENQA (see the discussion in chapter 4).

Concerning fitness for purpose of the review methodology, the evidence in this evaluation suggests that it is not fit in every circumstance, particularly in the third cycle of reviews, when the scope of ESG can be problematic and challenges may arise in situations where a specific national or operational context is particularly important.

First, when it comes to the second and third review, the general perception expressed by the interviewees is that the added value of the second and third reviews is clearly lower than that of the first review. The reports are considered to be only moderately useful since they are basically an account of ESG compliance. Here, the next thematic analysis could focus in particular on this area in order to evaluate the fitness of purpose of multiple rounds of reviews. Second, given that the reviews are totally focused on the ESG, while the remit of the agencies under evaluation are typically broader, the reviews do not exactly focus on the agencies' full set of activities and, as such, do not contribute that much to their enhancement and promoting innovation in the way agencies operate.

In terms of specific contexts, this can be an issue for professional agencies. The ESG is not always applicable to these agencies because they often need to follow strict legislative rules, which may contradict some standards, requirements and recommendations. Another issue is national contexts; some agencies complained about the fact that the reviews are based on a one-size-fits-all model, which makes it difficult to address specific national factors—and thus to contribute to enhancement of the agencies' operations in the particular countries in which they are located.

ENQA's stakeholders were involved in designing the methodology. However, the collected information does not provide sufficient evidence that ENQA's stakeholders were involved in the development of the agency review process. The only examples are the participation of agencies in the ENQA board (a number of which participated on a rotating basis) and in the General Assembly and the eventual inclusion of feedback provided by agencies and experts through surveys.

In this evaluation, the panel has taken as a starting point the fact that the purpose of the review processes is both accountability and enhancement. The complexity of integrating the enhancement purpose was noted both in the SAR and during the site visit. The panel has observed that the relationship to EQAR and the need to provide reports that are also appropriate for the EQAR registration process adds to this complexity.

The panel argues that overall, ENQA methodologies currently adequately fulfil the accountability purpose, but they are less effective when it comes to the enhancement purpose. This emphasis has also been a rationale for the panel's assessment. ENQA needs to reflect on ways to further improve its methodologies in order to make a significant contribution to improvement and innovation in the agencies' work. ENQA should also consider how to adapt to future developments in QA and anticipate—or even drive—those developments.

Assessment: Partially compliant

Recommendation: The panel recommends that ENQA revise and diversify its methodology so that the agency review processes are more meaningful for all agencies who undergo subsequent rounds of evaluations and for professionally oriented agencies.

A recommendation put forward in different interviewees was that ENQA should increase focus on *all* the work the agencies do, beyond only ESG compliance. The panel echoes this recommendation. The ESG should be read and interpreted in a more flexible manner in order to address each individual case from an enhancement-led perspective. The review could start from what has changed since the last review and ways to move forward. A better balance between recommendations and suggestions for improvement should be achieved.

To strengthen the contextual relevance, one improvement would be the introduction of a national expert could be introduced as an observer on the panel when none of the panel members is acquainted with that particular national context and/or language of the agency.

* * *

ENQA's Agency Review process should be reliable, useful, pre-defined and consistently implemented. The process should include:

- self-assessment or an equivalent,
- external assessment that would normally include a site visit,
- a report that is based on the external assessment
- consistent follow-up procedures (building on ESG 2.3)

Agency review processes should be carried out professionally, consistently and transparently. The process should not end with a report by external experts; a follow-up procedure is necessary. This follow-up procedure should be transparently described.

Evidence: The agency review process consists of four predefined steps that follow the ESG 2.3: self-assessment, external evaluation, external review report and follow-up. The SAR provides the following overview of the agency review process:

The SAR emphasises that these steps are systematically applied to all reviews, including both full and partial reviews. The SAR provides a detailed description of each of these steps (p. 36 – 40), which are published as explicit guidelines for the agency review process. The description in the SAR can be summarized as the following key steps:

- The process is initiated by a request submitted by an agency. The SAR notes that while this is mostly done to obtain membership, other purposes are also possible. Upon initiation, the review process is assigned a review coordinator from the ENQA staff, and terms of reference are established. For agencies that will undergo an initial external review, a seminar is held.
- Self-assessment is described as the first main stage of the review process. For ENQA to accept and process the SAR, it needs to follow 'a guide of content'. The SAR is expected to provide both factual information and analytical/critical reflections. ENQA conducts a pre-screening of the SAR to make sure that all the necessary elements are present.
- External evaluation is conducted by a panel of independent reviewers who are commissioned by the ENQA Board. The panel reviews the SAR and additional material and then conducts a site visit to meet various groups within the agency and stakeholders.

- The external report is based on documentation and a site visit, and each of the criteria is assessed for compliance. The report is sent to the ENQA secretariat, which checks the technical aspects of the report before sending it to be fact-checked by the agency. After the fact-checking, the panel finalises the report and submits it to ENQA. Together with the review report, the agency submits a letter of motivation for ENQA membership.
- During the approval and decision-making stage, the ENQA Board is described to have two roles: approving the reports and making decisions about ESG compliance and membership. These steps can be combined or separate. The review committee conducts an initial examination of the reports, which will inform the decision by the board (but not determine it). Both ENQA Board and EQAR can ask for further clarification and explanations. In the SAR, ENQA notes concern regarding differences in the scope of requests: '*ENQA considers this a cause for concern, as it clearly indicates that the two organisations have a different understanding of the requirements of the ESG. This may also cause tension in the review panels that feel the need to balance between the two approaches. All requests by the ENQA Board are for the panels, whereas for EQAR this is the case in approximately three-quarters of cases. The rest of EQAR requests are for the agency under the review or for the coordinator*' (p. 39).
- Agencies that undergo a full review need to provide a follow-up report two years after the board's decision. These follow-up reports are published. The SAR notes that the follow-up is a formal procedure, yet with no consequences. While the board can provide additional recommendations, no monitoring is currently undertaken on the usefulness of this procedure.

In addition, the SAR describes a number of specific details about full and partial reviews, the main difference of which is that partial reviews do not necessarily include a site visit.

Progress visits are a voluntary addition to full reviews. The SAR notes that there is a mixed response to these visits. Of the 12 agencies that have been eligible for progress visits since 2015, three decided to opt out.

The SAR notes that there is, in general, a high level of satisfaction with the various steps of the processes based on the collected feedback. The user survey revealed generally positive views on the process, but it was noted that the process was rather time-consuming for agencies. Some of the agencies also noted the need to balance ENQA's and EQAR's demands during the process.

Analysis: ENQA's Agency Reviews are carried out professionally and transparently. The procedures for the reviews are reliable, pre-defined and consistently implemented. The expert panel has received mixed feedback

regarding the usefulness of the procedures, mainly depending on the maturity of the agency.

Nevertheless, there are still some issues concerning consistency between review reports: not all panels give the same level of importance to all standards; some panels seem to pay more attention to EQAR requirements than others and, as such, tend to interpret the ESG more restrictively; and judgments are qualitative and of course this means that, in the end, each report is unique. ENQA has made some improvements to its implementation processes and methodologies in order to improve consistency, such as ensuring that a review coordinator is present during the site visit and the reading of the first draft of the report, establishing a book of precedents and review committees' scrutiny of the reports.

The site visits are short and efficient. However, some experts think that 45 minutes for interviews with each panel during the site visits is too short. They also think that there should be more uniformity between the level of documentation provided by the agencies (in terms of the type and number of documents).

The review format itself remains the same throughout the evaluation cycles. As has been mentioned several times, the more reviews that agencies have undergone, the less added value they perceive when they are solely assessed against the ESG. For some, the report is just an account of the agency's compliance with the ESG and does not add anything substantial by way of enhancement to its way of operation more broadly or of innovation regarding external QA activities. ENQA is aware of the need for improvement and has already implemented actions to strengthen its enhancement focus (e.g. progress visits).

The progress visit gives agencies the freedom to decide on a focus area in which they seek advice for improvement and is thereby an enhancement-led approach. It is worth noting that not all agencies make use of this additional visit due to its voluntary nature and the effort that it takes to prepare the data needed to work on a specific topic. While the progress visits still need to be clarified and adjusted to find an appropriate form and place in ENQA's portfolio, the idea of them is to be commended.

The follow-up report is directly linked to assessment of the ESG and the work that the agency has done after the expert panel's report. The report is analysed by the ENQA Board, and an answer from the board is sent to the agency, but there are no formal consequences deriving from this process. So, overall, it is consistently applied, but its usefulness as an enhancement-led mechanism is disputable.

Assessment: Substantially compliant

Recommendation: The panel recommends that ENQA considers how second and third reviews could provide stronger enhancement value. Moreover, both the

progress visits and follow-up procedure need further clarification in order to function as effective enhancement tools.

* * *

> **ENQA's Agency Review should be carried out by groups of external experts that include relevant stakeholders (building on ESG 2.4)**
>
> The network of experts should bring relevant perspectives to the assessment process: this includes students and other relevant stakeholders.
>
> The procedures for selecting experts have to be clear and consistent. The experts should be carefully selected, have appropriate skills and competencies, and they should receive training concerning the task.
>
> There should be clear procedures to assure the independence of the experts. The group of experts should, between themselves, be able to provide an external view on the agencies as well as possess local knowledge of the higher education system.

Evidence: The ENQA pool of trained reviewers currently consists of 227 experts from 34 countries. Among the trained experts, 165 were nominated by ENQA, 30 by EUA, 21 by ESU, 9 by EURASHE and 2 by BusinessEurope. In addition, a number of experts were nominated for training. The experts undergo training before participating in a review, and ENQA regularly organises seminars for experienced experts. In general, the SAR indicates that the feedback on training of new experts has been positive, which the panel finds as a strength. However, the training sessions for experienced reviewers received mixed reviews. The SAR notes that, in general, many positive comments were provided, but the session on EQAR's expectations raised questions about the consistency of judgements, which could have been discussed more.

Each review panel consists of at least four external reviewers. Two of these should be QA professionals, and the other two should be (an) academic(s) at a higher education institution, and (a) student member(s). Other members may also be considered when relevant to the agency's profile. The agency under review can comment on the proposed panel members to avoid conflicts of interest. The roles and tasks of each panel member are described in the guidelines that are made available for the review process.

The SAR notes that the feedback from some agencies indicated that the panels are considered too small. However, the interviews indicated that the number of experts was perceived as sufficient, as only one informant expressed a desire for the panel to be larger. The user survey revealed generally positive views on panel

composition, with about four out of five agency representatives agreeing that the panel was competent and had relevant training. Critical comments concerned the panel's ability to take into account specific aspects of the national context or professional field in cases of professional agencies.

The SAR further emphasises the importance of the panel members' expertise and the necessity of including a senior QA expert from an agency on a panel.

Analysis: The panel notes that reviews are undertaken by teams of external experts that include relevant stakeholders. The experts are selected by nominations from the E4 group plus BusinessEurope. However, information about the selection procedures could be made available to increase transparency. The panel also notes that the experts are adequately trained and act in a personal capacity.

When selecting the panel members, ENQA takes into account all potential conflicts of interest by using its Code of Conduct. The experts are already experienced in European QA processes and undergo specific training organised by ENQA to prepare them for the purpose of agency reviews. However, the reviewers mentioned that there is lack of diversity in expert profiles: there were too many 'QA people', and even academics were often from the QA field. The fact professional agencies create additional demands for expert profiles was also noted.

Regarding the performance of the experts, ENQA could seek to comprehensively analyse feedback from its panel members and discuss this feedback with the nominating parties in order to take action when necessary.

Overall, in the interviews, it became clear that the role of the secretary and the panel chair could be further refined. The name 'panel secretary' could be revised to reflect the importance of this role. The panel would argue that as a preventative measure, the review coordinator could monitor the contributions of the secretary within the panel, as this expert is commonly occupied with taking notes. This is particularly important if this expert is the only panel member representing a certain stakeholder. Nevertheless, the overall perception is that this would not warrant including a fifth person on the panel.

Another question was whether some of the report writing could be done by ENQA staff. None of the interviewed stakeholders agreed that the report should be written by the coordinator (ENQA staff member), as it may detach the panel members from the report-writing and finally also from the outcomes.

The interviewed experts perceived that there has been an improvement in the panel's work over the years. The review coordinator is considered by the experts as very useful to the panel's work, for achieving a high level of consistency. They point out that the panels could include more people with no professional roles in

QA since this will increase the number of perspectives from the panel on the QA agency work.

Assessment: Fully compliant

Suggestion: ENQA could provide more systematic feedback on experts' performance to the nominating stakeholders in order to inform future selection and nomination processes. In the evaluation, the panel also notes that the formulation of the standard in this evaluation leaves room for interpretation, given that it emphasises the composition of the panel rather than panel members' qualifications. This is particularly important when assessing the profiles of experts who evaluate professional agencies.

* * *

ENQA's Agency Reviews should be based on criteria that are explicit and consistent (building on ESG 2.5)

Becoming a member of ENQA and EQAR can have important consequences for agencies. The ESG represent the main criteria for assessment in these processes. The ESG should be used consistently and in a manner that is evidence-based. Any additional criteria should be explicit and transparent.

There should be also clear set of procedures concerning the outcomes of the agency review process.

Evidence: The ESG are the basis for evaluation, and the reviews use a scale that is publicly available. The results of the user survey showed that there was agreement that the criteria were understandable and that the ESG was perceived as explicit in the process. The interpretation of the scale and consistency of evaluation were themes in the training of experts, and additional consistency was provided by the presence of the review coordinator and the existence of a book of precedents. The latter is not shared with the panel members but is used by the coordinator as a reference material. The SAR emphasises that the final judgement on the criteria does not have a specific formula and that full consistency may be hard to obtain in the context of human evaluations. Yet, the SAR also notes that consistency has been improving since 2015.

Analysis: The reviews are based on the ESG, which serves as criteria for assessment of agencies' work. The criteria are explicit and consistent, and on the whole, the ESG is used consistently by ENQA.

Nevertheless, and because the assessment is qualitative, the criteria are not always interpreted in the same exact way by all panels, which may lead to some problems with consistency. In order to ensure transparency and consistency between various review procedures, ENQA successively introduced different gatekeeping mechanisms. There is now a clear set of procedures for ensuring the consistency of outcomes: trained experts, assistance from the review coordinator, the Review Committee (that is not exactly 'a committee' but three people who give their independent opinions about the clarity of the report and independent judgements of each standard) and the board. This way ENQA has different mechanisms implemented that reduce the likelihood that review panels will make biased decisions. The effectiveness of the introduction of these mechanisms was underlined in the feedback provided by agencies, which stated that consistency had increased. However, the review panel is aware of the limitations regarding absolute consistency and acknowledges ENQA's way of introducing and subsequently evaluating tools to promote consistency.

The main 'problem' regarding this standard may be linked to the fact that both ENQA and EQAR use the results of agency reviews, and how the agencies perceive the difference of ESG interpretation by ENQA and EQAR. The panel is aware that this has already led to one case in which different final decisions were made regarding ENQA membership and EAQR registration. The fact that two different decisions can be made based on the results of the same review is problematic.

Assessment: Fully compliant

Suggestion: The panel notes that it could be beneficial to have a document that would provide more detailed information about interpretation of the ESG. The panel also noted that the ENQA-IQA working group conducted an analysis of ESG interpretation that resulted in an internal handbook at ENQA, used by the secretariat and the board. The SAR states that this handbook is not made available to agencies or panels, and argues, '*This choice was made to reduce the perceived risk that the report might be used by the panels or the agencies as a checklist, or a parallel set of standards to the ESG*' (p. 20). The panel would suggest that it could be reconsidered whether this could in some way be made available for the agencies and panels, to further clarify how the ESG are interpreted. At the same time, the panel would also like to emphasise the need for coordination with EQAR in such a process. As long as agency reviews continue to be used to determine both ENQA membership and EQAR registration, it is also important that there is a shared interpretation of standards.

* * *

> **ENQA's Agency Review reports should be published, clear and accessible for all interested parties, and decisions should be published with the reports (building on ESG 2.6)**
>
> The reports should be published and accessible. The reports should be clear and concise in their structure and language. The report should include context description, procedures and experts involved, evidence analysis and findings, conclusions and recommendations for follow up.
>
> Institutions should have an option to fact check the report.

Evidence: Reports are published on ENQA's website, including those for which a negative decision was reached. The reports are published together with a decision letter and link to the SAR, and when the follow-up report is completed, it is also published with the board letter. In addition to the final documents, information is published on ENQA's website throughout the process, including the terms of reference, external QA activities, the panel composition and the review coordinator.

To ensure consistency, the reports follow a similar structure and a standardised template.

Analysis: Reports are concise and clear, and they mainly focus on compliance with the ESG. There should be more balance between recommendations and suggestions for improvement in order to increase the reports' added value as enhancement-led mechanisms.

The review reports, membership letters and other related documents are published in an accessible way. The availability of the EQAR database contributes to the accessibility to all interested parties.

The panel would particularly like to commend ENQA for this transparency, as its practices here are example of good practice which should be followed worldwide.

Assessment: Fully compliant

* * *

> **ENQAs Agency Review should include a clear process for complaints and appeals that is part of the design and communicated to participants. (building on ESG 2.7)**
>
> As a part of the procedure, agencies should have an opportunity to voice their concerns and dissatisfaction with the process. This includes a procedure to voice concerns and complaints with how the agency review process is organized. Moreover, there should be a way for the agencies to appeal the outcomes of the agency review process.

Evidence: Complaints were included in the ESG in 2015. The SAR notes that ENQA has two processes for addressing complaints and appeals:

1) An appeals and complaints procedure for agencies that have applied for membership in ENQA (through a full or partial review). This can be submitted by the agency (but not when they receive a positive decision) within two months of ENQA Board's decision. This is handled by the Appeals and Complaints Committee (and the final decision is made by ENQA Board).

2) A complaints policy for any concerned (third) party that is concerned about a member agency's compliance with the ESG or the integrity of the external review process. This can be submitted by any organisation at any time, and they are handled by the ENQA Board.

Each of these has a formal procedure and is described in more detail in the SAR. Yet, during the interviews, it was also noted that until this self-evaluation process, two different structures for complaints policies had been operating with overlapping labels. It was emphasized that the processes have since been revised.

The procedure for appeals and complaints concerning the agency review process is handled by the Appeals and Complaints Committee. The Committee is composed of four members from member agencies who are appointed for a three-year term. One of them is an alternate member who is used only when the ordinary member has been previously involved with the appellant, which does not always happen. Members do not obtain any special training for this function, but they are usually experienced reviewers. One of the committee members is a board member, and there is a practice to include someone with a legal background on the committee. Procedurally, the complaints and appeals process is described as a sequence of steps to handle the appeal. When the appeal is carried out, the assessment is handled separately by the three members of the committee, each of whom assess all individual standards. Based on this, a report is developed which is communicated back to the board. Most times, the assessment is based on information that is present in the report, although additional information can be requested. When the committee does not agree, a simple majority can be used. It

was emphasised during the interview that the assessment from the committee is a recommendation, and the board can decide differently.

The SAR notes that, since 2015, five appeals of decisions have been submitted, and in two of the cases, the ENQA board overturned its initial decision. In the interviews, it was noted that there were no cases in 2016 but some in 2017, so there is variation in how many cases come up. Overall, the number of cases in the committee has handled is not large and thus far, the cases have only concerned appeals, not complaints.

There was one instance of a procedural case in which an agency felt that the panel was inconsistent and focused on the wrong issues and thus wanted to appeal the decision. However, this did not result in a formal complaint process, as the agency was informed that only those that received a negative result could appeal. Thus, the agency ended up sending a letter instead, and a dialogue was initiated rather than a formal complaint procedure.

Analysis: ENQA has an Appeals and Complaints Committee, so formally, there is a system in place. However, during the on-site visit, it became clear that the way rights and obligations are interpreted in different cases may result in inconsistent practices. The panel would argue that the two different meanings for 'complaints' outlined above makes the system seem complicated.

While the system is formally in place, communication about the system has not been entirely effective for all participants. For example, it is not entirely clear for all agencies when it is possible to appeal a process, as evident in the example provided above. While this resulted in a letter instead of an appeal, as it is not possible to appeal a positive decision, the case illustrates that, at the outset, the appeals and complaints system was not clearly communicated.

Thus, the panel notes that while a system is formally in place, the procedures may need further refinement in practice and reporting pathways and decision-making procedures should be looked into. Overall, there is a disconnect in the appeals and complaint procedures, with a lack of clarity about the roles of the ENQA Board and the Appeals and Complaints Committee.

While currently the panel composition includes members with substantial experience as reviewers, it is unclear to what extent sufficient training or professional development is granted for those involved in such functions. Additionally, the current practice is to include someone with legal expertise, but it is uncertain whether this can always be achieved.

Assessment: Partially Compliant

Recommendation: While the system exists, it is important that all participants in agency review processes are aware of the system in place and what can be appealed. The different roles and processes related to appeals and complaints in

the process should be further clarified, and a detailed description of cases in which the agency can appeal should be stated and communicated to all participants.

While the case load for the committee is low, training/introduction should be provided to the committee, to ensure that both the panel members and alternate members have the same starting point when cases arise.

Beyond the narrower interpretation of this standard here, the panel also suggests that complaints from those who have participated in the process (e.g. panel members) should be taken into account.

2.3   Summary of compliance and examples of good practice

In sum, the agency reviews mostly show substantial or full compliance, and the panel's overall assessment is that the agency review process can be perceived as *substantially compliant.* The three areas that require further development are thematic analysis, fitness for purpose and the procedure for appeals and complaints.

Concerning thematic analysis, the panel particularly noted that ENQA has a unique position and the potential to provide comprehensive analysis of the state of the art regarding internal and external QA in Europe. However, at this point, this potential is not sufficiently utilised and the various publications appear somewhat fragmented. Thus, the approach to thematic analysis should be more systematic and purposeful. Concerning fitness for purpose, the panel's evaluation was primarily based on the dual purpose of the review processes. While accountability seems to be more easy to cater to, the enhancement purpose has been more difficult to achieve in a systematic manner. The panel has noted that the fact that the process and reporting to inform the decisions of both ENQA and EQAR drives a more compliance-oriented approach. In addition, some agencies undergo the agency review process multiple times, but the added value seems to be reduced after multiple reviews. The goal for ENQA should thus be to put focus on a better integration of the enhancement orientation and to make the reviews more relevant for mature agencies that are beyond the basic threshold criteria. Finally, while ENQA has a formal appeals and complaints procedure, the panel felt that there was some ambiguity concerning communication of this system, the decision-making procedures and role division between the various actors. Also here, further clarification are beneficiary.

While this part of the report necessarily (and by request) had to adopt a more compliance-oriented approach and follow a set of criteria, the panel would like to emphasise that the evaluation revealed a wide range of very good practices.

First, the panel would like to commend ENQA for an excellent self-assessment report that shows transparency and a reflective approach to its own work. The

report is well-written, provides relevant evidence regarding the agency review process and includes a very honest discussion of the strengths and weaknesses of the agency review process as well as the challenges that ENQA is currently facing. In addition, a number of critical reflections were expressed during the site visit. The panel appreciates this mode of working, as it shows that ENQA, as an organisation, is focused on improving its own practices. It is clear that, over the years, ENQA has tried to improve the way it performs its reviews: changes have been made, and the interviewees tended to see these changes as truly contributing to fairer, more consistent and more independent reviews. As such the call for this evaluation is an example of ENQA's improvement-oriented focus.

Moreover, the panel would also like to commend ENQA for its competent and dedicated staff and the way in which this staff engages in a variety of tasks at ENQA. The fact that there is a dedicated review coordinator for each review is a strength, and the overall process appears to be well-structured and well-organised.

Furthermore, ENQA's review panels have a diverse composition. There is a high level of stakeholder involvement in the panels and review processes, which also cannot be taken for granted. It is a strength that stakeholders can nominate members, and the involvement of students in the panels is also something that, on a global scale, cannot be taken for granted. Another strength is that the experts obtain coherent and solid training.

While balancing compliance and enhancement remains difficult (as is the case in many QA settings), the panel appreciates the introduction of progress visits. While the format may need further adjustment, the idea has the potential to produce a stronger enhancement orientation in the future.

While transparency, at least in a European context, seems to be taken-for-granted in some instances, there is a need to remember that this practice is not commonplace across the globe and that ENQA's practices here are excellent. This concerns both publishing of reports and the transparency of the review processes, which the panel finds excellent.

ENQA has also shown great concern for and a reflective approach to the issue of consistency. As indicated earlier, full consistency when dealing with a very diverse playing field and very different political contexts is extremely difficult to achieve, yet ENQA has taken deliberate steps and introduced mechanisms to make evaluations more consistent. These efforts were noted by reviewers, committees and agencies alike, and it is believed that consistency has been improved over time. As such, these efforts should be recognised.

3 Contribution of ENQA Agency Reviews to innovative practices and QA agency work

In this section, we present some of the relevant findings from the user survey concerning the impact of the agency review process, key evidence from the SAR and the site visit concerning this question. Finally, the panel provides its comments and reflections on this issue.

3.1 Insights from the user survey

In the user survey, the agencies were explicitly asked to comment on value added by the process and whether the process had led to specific improvement. The agencies were also given the opportunity to provide open responses. While some used this opportunity, not all did.

While most of the responses indicate that the respondents saw value in the process, there is some variation in the scale. When asked to reflect about the process, one of the respondents summarised it as: '*Stressful and useful!'".* In a rather similar manner, another respondent elaborated:

> '*Stressful, not being sure of the decision of course, but also the work that goes into the self-evaluation process and logistics of the site visit. Also, rewarding, hearing the findings of the expert panel and reading their views and recommendations.'*

Nevertheless, the comments in the survey also suggest that some would note the bureaucratisation of the process and the balance between an accountability-oriented and enhancement-oriented emphasis. In one of the responses, the respondent noted that they felt the overall lesson learned was that in the process, the ESG is central, and other activities of the agency that do not concern ESG would not be in focus. In another response, one respondent noted that it felt more like a test rather than a membership application. Another mentioned that although the process was well organized, the only real outcome was renewed membership.

Concerning effects, most agencies mention that the process affected their practices, and most also mention specific lessons learned. In particular, the opportunity to get an external view of their own agency was emphasized as valuable. As described in one of the open responses, the review process gives '*the opportunity to look at yourself from the other side*'. Another said, '*it was, after all, a useful exercise and an opportunity to 'stop and think'.*' Another agency noted the necessity to have an honest and reflective self-assessment report as an important ingredient.

Most also mention that there have been specific changes in practices and that the reports and suggestions have been followed-up internally. Examples of these include changes in management, introducing students to the councils and committees, expanding policies and practices concerning appeals, changes in internal processes, thematic analysis, discussions with stakeholders on weak points, training, communication, establishment of new expert bodies, etc. As such, it would seem that there are impacts concerning the main points emphasized in the ESG.

However, it would seem that this is sometimes experienced as a compliance-oriented process. One agency noted: '*It was rather compliance procedure than enhancement-oriented experience from the perspective of my agency*'. Moreover, the changes may also be viewed as minor and a result of EQAR demands: '*Mostly, we will have to change minor practices in order to comply with EQAR's interpretation of ESG. Not very helpful*'. The agencies who had gone through the process multiple times also noted that the value was reduced over time. Regarding the question of impact, one agency noted: '*Not so much the third time*'. Others made similar points:

> '*The review process is implemented in an efficient manner. However, the value of this approach (focused on ESG compliance) could be questioned for established agencies who have already had several reviews and have not had significant changes in their structure/approach in the meantime. That said, the panel made some insightful comments and suggestions that will be of use to our further development.*'

> '*The added value from second reviews on[ward] is not all that clear. It seems that the agency as a whole is reviewed again.*'

Moreover, while the user survey indicated that in broad terms, the ESG are viewed as a relevant set of criteria, in some of the responses, the role of the ESG was also questioned, as it does not cover the full range of agencies' activities:

> '*As a national agency that has a broad legal mandate, we have to accept that the ENQA-review—necessarily—focuses solely on ESG, which means that relevant parts of the agency's remit (that impact on the activities governed by ESG) are*

disregarded. That raises questions regarding appropriateness and also regarding efficiency.'

'A main problem is that the review process is so focused on ESG. The result is that activities where the concept of QA is developed or done through different Connected operations are left out. (…) This means that the review process says something of the operations that are close to ESG, but other parts of our activity (that we ourselves think is more important) is left out.'

'The ESG are being interpreted in a far too prescriptive way, not only regarding the standards themselves, but also the associated guidelines. It is questionable if a one-fits-all model to be applied to all agencies regardless of remit and context is really possible or advisable through all the EHEA. (…) The new ENQA guidelines improved the streamlining, but became terribly bureaucratic in relation to the concern to cover every possible angle of each individual standard. (….) One feels that the review process could be more enhancement-led if it was not required to cover the present double objective (ENQA membership and registration in EQAR).'

Thus, how can ENQA's Agency Review process contribute to the QA agencies' work and innovative approaches to QA? One could argue that the very existence of standards and guidelines (whether ESG or something different) would, per definition, not facilitate innovation in isolation, but instead emphasize standardization. As such, the fact that the reviews need to check for compliance with ESG likely would not contribute to innovative practices per se; they would contribute to practices that are more in line with ESG. This is particularly the case when reviews are conducted in a manner that emphasizes compliance with a predetermined standard—where consistency with the standard is an important focus.

The lack of innovative approaches would not mean that the process could or would not lead to any changes or contribute to the QA agencies' work. As indicated by the responses here, changes do in fact take place as a result of the process. These changes can represent new ways of doing QA for that particular agency, especially if the agency is not mature at that point. Yet, it is doubtful whether an ESG-centred review process would contribute to innovation in the form of entirely new modes of doing QA.

In the quotes above, it is also indicated that the ESG in some instances do not cover the whole range of agencies' activities. As such, one could also wonder whether innovative practices could be found in other parts of the agencies' portfolio. In that case, it is not clear that the agency review process would or even could contribute to this, as it just does not cover these aspects of agencies' work.

3.2 Insights from SAR and site visit

As indicated above, innovation can be perceived in many different ways. One could argue that contributing to novel practices in an agency could represent innovation for this agency. During the site visits, the discussion frequently addressed the issue of compliance versus enhancement; this has also been discussed in detail in the previous chapter. Yet, ENQA's own mission distinguishes between contribution to enhancement and innovation as two different things (Goal 8), and it further noted that ENQA should contribute to innovation of QA as such. Having in mind the standard-oriented approach of QA in European higher education, one could question whether this is possible. In the SAR, innovation was explicitly mentioned as a weakness, phrased as follows:

> *'The added value of the second and subsequent reviews decreases due to a focus on compliance rather than enhancement. The processes are sometimes perceived as not supporting innovation and not challenging mature agencies.'* (p. 60)

As such, it is clear that ENQA is well aware of the limitations of the current approach to the reviews, particularly for the second and subsequent reviews of agencies that are more mature. For such agencies, even if the review process can lead to some adjustments of practices, it is clear that this would become more and more limited over time.

Another recurring theme is the different demands of ENQA and EQAR. This was also noted in the user survey in the previous section, in several portions of the SAR and in the interviews. The SWOT analysis noted a weakness:

> '*The current ENQA-EQAR double decision-making process on ESG compliance is complex to explain both to the agencies and other stakeholders. It adds time and other constraints to the process that are out of ENQA's control and can make the work of the agencies and reviewers more complicated*.' (p. 61)

Moreover, a threat to ENQA is discussed below:

> '*Differences in ENQA and EQAR interpretation of the ESG and inconsistency between the ENQA and EQAR decisions may diminish the credibility of the process. In addition, EQAR is in a position to steer the review process and shape its methodologies in a direction that is not in line with ENQA members' needs. It currently impacts the review process to an extent that is noticeable to both agencies and review panels*.' (p. 61)

This balance was also a recurring theme in the interviews. While it was noted that the working relationship between ENQA and EQAR has improved considerably in the last years, there is an underlying tension between the two different functions

of the review processes and the types of needs and demands EQAR has as a register.

In one of the interviews, it was questioned whether QA in fact is an innovative practice. It was noted that QA is to some extent always reactive and responds to the types of innovation that take place in the higher education sector. Yet, it was further noted that there may be more or less innovative ways to do this. For ENQA, the question is on which path to choose for the future and whether ENQA's Agency Review process itself could also engage in more innovative practices.

3.3   Views from the expert panel

The question of how ENQA could and should innovate is closely related to the future role and profile of the association. If the profile and activities are to change, this will likely have implications involving the areas where innovation is needed. In the final chapter, we will address these overarching issues in more detail. Hence, the question related to innovation is discussed in a more confined way in this section, although we would also argue that possibilities for further innovation may be found in the recommendations and suggestions offered in Chapter 2.

As a starting point, the panel would argue for the advantages of a differentiated innovation approach. This approach is based on the fact that ENQA members are very different, and they may have different expectations regarding innovation. For those agencies with less experience and a need to build up systems, routines and consistent practices, innovation may look very different than for more experienced and mature agencies. Benchmarking exercises may provide interesting options for agencies that share key characteristics and contexts, and they may open up mutual learning possibilities for all involved. Benchmarking exercises can be applied for different purposes, and they can be seen as something which could be an integrated part in regular external reviews; or as enhancement tools for agencies which are in the midst of strategic development processes. Benchmarking exercises could, for example, be used as part of the development of self-assessment reports, or they could even be used as part of external reviews of agencies facing similar challenges.

Since quality assurance is an integrated part of the national system of governance in many countries, tailoring external reviews more to consider the specific role and position of the agency within the national system of higher education is also an option. Such an approach could address the many tasks that are increasingly delegated to agencies, tasks that may have little bearing on traditional QA. One possible innovation in this area would be to extend the traditional review beyond ESG compliance. Further, ENQA could facilitate such extensions by negotiating mandates and the positioning of the external evaluation

with national authorities. As many governments are involved in constant reform of their higher education system, ENQA may be seen as an attractive evaluator for providing an international outlook into domestic processes.

A third area where the panel sees innovation potential involves ENQA more systematically exploiting and using the huge amount of information in the external reviews. In an era where higher education institutions are looking for ways to analyse "big data", the information gathered through external review processes represents interesting possibilities for organizational learning, even for ENQA and the entire QA area. This approach is still dependent on a more thorough and thought-out strategy for the kind of thematic analyses that are needed and how the capacity for undertaking such analyses could be developed. Using the capacity that exists in member agencies in a systematic way, inviting higher education researchers in and developing inter-active databases that allow inquiry-based projects are some options in this respect. It is also worth noting that the external experts engaged in the external reviews may be a highly valuable information source which could potentially be developed more.

In closing, the panel would also like to note that many European meta-organizations have exploited existing European funding opportunities (e.g. Erasmus+) in ways that have allowed them to expand their capacity. The panel is well aware that ENQA has participated in a number of such projects already, but as quality of higher education continues to be an issue high on the political agenda in Europe, the panel thinks there are possibilities for ENQA to further strengthen its engagement into such projects. This would also create the possibility to further facilitate such innovation through external funding.

4 Future outlook for ENQA Agency Reviews and beyond

4.1 Strategic dilemmas for the future: Scenarios as a means to structure the discussion

Ever since their emergence, European QA agencies have grappled with determining how the balance between the control and the enhancement activities of their work can be found (Rozsnyai 2003, Stensaker 2011, Stensaker et al. 2011). As governmental set-ups, this balance is about making sure that political aims and objectives regarding the quality of the higher education system are met while making sure that the process also benefits the higher education institutions they serve.

Although the existence of national QA agencies has become an established feature of the European Higher Education Area, the constant manoeuvring and re-positioning of agencies has created the implication that the field is in constant flux—always in the process of changing procedures and adding or transforming roles and responsibilities (e.g. ENQA 2008, 2012, 2015). For ENQA—the association where the majority of domestic QA agencies are members—the historical implication has been that the association was also required to take on two different roles. On the one hand, ENQA membership has been a symbol of accountability for members—key membership criterion has been whether agencies are complying with the ESG; on the other hand, ENQA has also been an organization assisting members is in developing and coping with their diverse responsibilities and roles.

The establishment of EQAR in 2008 implied that this register took over the formal responsibility for accountability. Over time, this challenged ENQA's original roles and responsibilities balance. Although ENQA membership is an accountability requirement found in some national laws and regulations, it is EQAR that formally secures regulatory accountability in the wider European context. As such, the field of QA follows development paths similar to other sectors, where, over time, networks become agencies (associations) that could

again foster new meta-regulatory bodies (agencies) (Levi-Faur 2011). The current dynamics in the field of QA also affect the European and global space regarding QA; agencies are increasingly allowed to and do take on assignments and operate in other jurisdictions than the one with which they are formally associated (Gornitzka & Stensaker 2014). As such, a "market" for QA is developing in Europe and beyond—with a range of potential buyers and sellers of QA services.

The evaluation panel would argue that ENQA is well-positioned to adapt to a situation characterized by increased uncertainty (cf. Power 2007), where member agencies are exposed to both competition and involved in various collaborator activities (Westerheijden et al. 2014). Given that ENQA has started work on the future strategy of the association, we believe that the current situation is also an opportunity to think through the future profile and role of ENQA in a more principal way. To assist ENQA in this discussion, the evaluation panel has chosen to formulate our reflections about future roles and activities in the form of three scenarios, with different roles and responsibilities dominating each of the scenarios.

The scenarios sketched are presented in pure forms, and the review panel is fully aware that strategic choices are seldom related to one option only. Looking at the profiles and the roles of ENQA's member agencies reveals many examples of agencies undertaking multiple roles—roles that have very diverse sets of responsibilities. Complexity rather than the simplicity characterize many of the mature QA agencies operations and functions, and indeed also ENQA. The informed reader also will recognize that all scenarios also reflect some activities and roles in which ENQA is already engaged. Hence, the issue is not so much related to choosing between the scenarios offered; rather, it is to find a balance between roles and responsibilities. Our hope is that the scenarios may contribute to a more structured discussion about strategic choices, clarifying options and possible priorities and that they can function as heuristic tools for ENQA when reflecting about its future. The three scenarios are as follows:

- ENQA as gatekeeper
- ENQA as a club for members
- ENQA as an enterprise

4.2   Scenario 1: ENQA as a gatekeeper

The history of ENQA is closely linked to the development of the ESG, and it is considered a facilitator for the diffusion and recognition of the standards and guidelines for QA in the European Higher Education Area. ENQA was a key factor in developing the ESG and during the revision process in 2015. The fact that ENQA membership is seen as mandatory for some national QA agencies, especially in

those countries where such membership requirement is written into national legislation, is basically related to the difficulty many external stakeholders have in separating ENQA and the ESG. That ENQA membership traditionally has eased registration in EQAR is also an indication of the traditional role ENQA has taken as a promotor of the ESG.

However, when EQAR was established in 2008, the field of QA suddenly had two ESG gatekeepers; formally, EQAR had the upper hand due to its official status. Hence, since 2008, one could argue that there has been an implicit competition between ENQA and EQAR with respect to the gatekeeper function: ENQA is associated with the moral ownership of the ESG, while EQAR is the legal guardian. The gatekeeper function of ENQA in relation to the ESG is also intertwined with a key activity of the association: the membership reviews. The membership reviews bring in revenue to the association, although the close connection to the ESG often results in reviews focusing on compliance and much less on the development of the agency in question. Nevertheless, the membership reviews conducted by ENQA are associated with a high degree of legitimacy. As such, the gatekeeper function of ENQA is not solely associated with the ESG. It is also associated with the review process, where the association currently is the dominating operator of agency reviews leading to EQAR registration. Hence, ENQA is currently also a *methodological gatekeeper*, with high credibility and reputation as a review operator. This scenario is built on the premise that this status and position could be strengthened and further developed.

Thus, the logic of ENQA's scenario as gatekeeper is in principle linked to their legitimacy as a credible operator of agency reviews. Thus, ENQA membership may not be directly related to the specific reviews undertaken by the association. Further, membership could be based on other criteria that the ESG. Hence, ENQA reviews could instead be linked to delivering the evidence EQAR needs to make a decision regarding registration.

A possible advantage gained by a stronger focus on being a methodological gatekeeper of reviews is that it would ease the process of agencies wanting to be registered in the EQAR. There is currently a time-lag in the process; the review process delivers the basis for two decisions: ENQA membership and EQAR registration. If review reports instead went directly to EQAR for consideration, the process could be perceived as more streamlined by agencies. Focusing more strongly on the methodological gatekeeper function may also imply that the association can draw upon and benefit from the considerable experience it has in running such reviews.

Strengthening the methodological gatekeeper function may still have some disadvantages. For example, de-coupling membership from the review process may imply a danger that agencies might have less interest in becoming members

of ENQA. This could potentially—at least in the long run—transform the association from being an association to an agency specialized in QA reviews. Such a transformation may also have a potential negative impact on the future legitimacy of ENQA in the QA field, as the current membership profile is a key currency driving the current reputation. Finally, acting as the methodological gatekeeper with a separate decision maker puts significant power in the hands of that decision maker to influence and even dictate the nature of the methodology. This could undermine the expert status of ENQA and diminish its legitimacy.

4.3   Scenario 2: ENQA as a club

As QA is spreading rapidly throughout the world and quickly becoming professionalized, one could argue that there is a strong need for exchanging knowledge and building competence on ways to further develop QA practices. ENQA traditionally has displayed considerable activity related to such professional development by taking on various projects related to European policy ambitions as well as more professional activities initiated by members. Hence, ENQA posits extensive knowledge and may have considerable potential in further exploring a role as a *membership association* or as a *QA club* for professional QA development. Both newly established and more mature and experienced agencies underlined in their feedback to the evaluation panel that they appreciate and value the professional dialog and the interchange of experiences that ENQA enables and facilitates.

However, as much of the ENQA capacity is related to running the current membership reviews, there is less capacity related to professional development and innovation in the area of QA operations. One could argue that this is a function that is also related to the ESGs—standards 3.4 and 3.6, specifically—in the sense that QA agencies should undertake 'thematic analysis' and have processes in place for internal quality assurance 'enhancing the quality and integrity of their activities'. In practice, this may imply that ENQA increasingly facilitates more reflection concerning the understanding and applications of the basic concepts and understandings of current QA activities. This includes the 'general method' of peer review, self-assessment, stakeholder involvement, participation and ownership, just to mention a few. Given the new policy agendas linked to excellence, globalization, student-centred teaching and learning and digitalization, one could argue that many agencies are in need of a renewed look into their basic operations and how accreditation, evaluations and audits are conducted. Not least, this may increase stakeholder involvement in QA, forcing many agencies to re-think their methodological basis. Since agencies are also challenged regarding the resources and time spent on accreditations, evaluations and audits, there is also a

need for the sector to think about ways to deliver QA in a more efficient and cost-effective way. Digital developments—especially in learning analytics—may also have future implications related to the design, scope and process of conducting QA. This scenario is then strongly related to innovation, enhancement and future development of QA.

Thus, the logic of the scenario of ENQA as a QA club is strongly related to members wanting to increase their networking and competence-building activities, and membership in ENQA is grounded in a striving for knowledge enhancement beyond that of just being 'ESG-compliant', where innovation and ambitions of renewal of QA could become central membership criteria.

The advantage of becoming a club is that it may strengthen the profile of ENQA as an interest organization, catering more for the needs of member agencies. It could also foster a drive for more innovation in QA methodology and in further professionalization in the field. Less capacity tied up in membership reviews could also imply an increase in services to member agencies and consequently, an increase in the attractiveness of ENQA as a professional network for actors who are not currently members. The club scenario may potentially also contribute to strengthening the role of ENQA as an agenda-setter for issues related to quality in the European Higher Education Area.

Still, potential disadvantages also exist. Becoming an association focusing more strongly on professionalization and competence-building is very much dependent on the attractiveness of the services developed, and this implies an economic risk—a considerable amount of the ENQA income is currently linked to membership reviews. Since member agencies may be dependent on both ESG-compliance and professional development, there is a risk that membership will drop if the professional development activities are perceived as less relevant.

4.4   Scenario 3: ENQA as an enterprise

The final scenario presented is one where the context surrounding QA as an emerging 'market' is taking centre stage; emphasis is given to the opening up of QA, where countries and institutions of higher education have access to a range of QA operators and services. This scenario is based on the developments witnessed in QA during the last decade, where more and more countries—at least formally—open up for foreign and/or private QA service operators. This scenario also considers that 'quality assurance/enhancement' at the system level can take many forms and may be provided by different types of actors, including private consultancy firms, organizations involved in the ranking industry or global QA providers.

In this emerging market for QA with many buyers and sellers, new roles and activities going beyond being merely an operator of reviews or an association devoted to professional development may be identified for ENQA. The argument here is that increased competition in the QA industry may require agencies to be better positioned in the market to lower their own risks. More activities and new roles will be developed, minimizing risk through diversification and exploiting arising opportunities. If member agencies are exposed to strong domestic competition, this could have implications for ENQA; agencies may start to perceive ENQA as a resource they could draw upon in this changing environment, perhaps even a partner in taking on various assignments. Typical assignments that could be added to the current portfolio of activities are related to consultancy tasks at national and international levels regarding designing QA and establishing systems for governing QA, along with even more global assignments. For example, one could argue that the emerging establishment of a number of 'European Universities'—alliances consisting of universities from a range of countries— would imply a more supra-national approach to QA where ENQA, either alone or in collaboration with members, develops services. Given the reputation of the Bologna process globally, there might also be opportunities to extend current activities beyond Europe.

Thus, the logic of the scenario of ENQA as an enterprise is grounded in an acknowledgement of an environment that is rapidly changing, where the possibility of selecting a niche or focusing on a particular role may be limited. Similar to how the concept of the entrepreneurial university described a more market-based future for a higher education institution, this scenario extends the idea of the 'entrepreneurial' possibilities in QA becoming central.

The advantages of a more flexible and dynamic role for ENQA include the diversification of activities, roles and responsibilities that may secure income from different areas—with the result that the financial basis of the association may be improved. The existing reputation of ENQA would provide the association with considerable gravity if it chose to engage in new areas and roles. If indeed a market for QA is emerging, to actively take on a more visible role as a key player could also prevent other actors/competitors from arising and getting a foothold.

However, there are also risks involved in becoming more of an enterprise and less of an association. One possible negative implication is that ENQA could end up as a potential competitor with its own members; the trust among members would be reduced due to increased competition. Finding a balance between being an association for members and an entrepreneurial enterprise (agency) would be more challenging. For example, a more entrepreneurial and outward looking role might have implications for staff selection and their

profiles and the capacity for ENQA to engage in reflections related to the future QA policy agendas. The latter aspect could also have major organizational implications.

4.5   Balancing the dilemmas

The scenarios sketched out are offered as think-tools to demonstrate the potential strategic room to manoeuvre for ENQA. Other scenarios are indeed possible, and we are not suggesting that our outlooks into the future are the only ones. Still, we do think that they address core strategic issues ENQA needs to deal with in the upcoming strategy. Given the diverse membership and the many different interests found within ENQA, we would like to end this chapter by also providing some pragmatic options to some of the dilemmas brought forward by the scenarios.

One option is to start discussions with EQAR about future collaboration and coordination with respect to ESG compliance. Based on the interviews the evaluation panel had with EQAR and ENQA board, the timing is suitable for re-thinking the relationship between the two bodies and to find practical solutions to the existing and rather time-consuming procedure of EQAR registration.

Another option is to re-think what membership in ENQA might imply; becoming a member could be related to something more than being ESG-compliant. For example, if ENQA wants to strengthen its existing profile and status, it could develop additional criteria beyond the current ESG standards that emphasise enhancement and improvement orientation. This could potentially affect the current balance between being members and affiliates, but it could also boost the reputation of ENQA as an even more exclusive organization.

A third option is to differentiate more between the different rounds of the external reviews undertaken and develop a clearer pathway for how the different rounds of reviews are undertaken. In such a differentiated review approach, ESG compliance could be the key dimension in focus in the first review, while later reviews could have a more distinct focus on sector impact, innovation and enhancement. Such an approach could be an issue that could be discussed with EQAR as a way to streamline current registration and current evaluation practices in Europe. In essence, such an approach would imply a more risk-based move and could perhaps even be combined with the development and regular reporting of certain indicators which could make the compliance part of the external reviews easier, resulting in less bureaucracy and a simplified self-evaluation process.

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5   Attachments

5.1   Attachment 1: Terms of reference

Terms of reference

January 2019

1. Background and context

ENQA is a membership organization that composes of QA organisations in the European Higher Education Area.

Historically, initial ideas of formalized cooperation in the area of quality assurance can be traced back to pilot projects in the early/mid-1990s. ENQA was established in March 2000, following up both on EU Council recommendation concerning quality assurance from 1998 and the establishment of the Bologna Process in 1999. Emphasis on quality assurance was one of the initial action lines in the Bologna Process and during the ministerial conference in Berlin, a call for the development of "mutually shared criteria and methodologies on quality assurance" was included in the communique (Berlin Communiqué, 2003). E4 with ENQA in the lead was given the task to develop the "standards, procedures and guidelines on quality assurance". A result of this work was the European Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG), formally adopted in 2005 in Bergen. Following the establishment of ESG, the E4 were also founding members for EQAR, a public register of agencies that comply with the ESG. In 2012, E4 in cooperation with Education International (EI), BUSINESSEUROPE and the European Quality Assurance Register for Higher Education (EQAR) were called to propose a revised version of ESG. After several rounds of consultations and recommendations, the new ESG were adopted in 2015.

In terms of its organization, ENQA was first established as a network. In November 2004, the ENQA was transformed from a network to the European Association for

Quality Assurance in Higher Education, while retaining its original abbreviation ENQA. This marked that only quality assurance agencies could be members of ENQA, and not ministries. ENQA now consists of three main entities – the General Assembly (GA), the Board and the Secretariat. The General Assembly is the main decision-making body and it includes representatives of ENQA member agencies, whereas representatives from ministries and stakeholder organisations can function as observers. ENQA Board is the executive body of ENQA. It has 9 members, of which one of the members functions as the President, with two vice-presidents and a treasurer. The Secretariat is responsible for the operation of the association, in terms of policy, administration, keeping a record and account management. The Secretariat is led by a Director. In addition to this, ENQA also has an Appeals and Complaints Committee that composes of four ENQA members that are nominated by ENQA Board and appointed by the GA.

ENQA states its mission as to: drive the development of quality assurance by representing agencies internationally, supporting them nationally, and providing them with comprehensive services and networking opportunities. ENQA promotes the enhancement of quality and the development of a quality culture in higher education. ENQA works to contribute to a European Higher Education Area in which students have access to high quality education and can achieve qualifications that are respected world-wide. ENQA is open to the diversity of higher education systems and quality assurance approaches and adheres to the following values:

- Transparency: ENQA publishes its policies, procedures and criteria for decisions and reports.
- Independence: ENQA actively promotes the operational independence of quality assurance agencies and supports the autonomy of higher education institutions.
- Collaboration: ENQA works in a consultative manner with its members and affiliates, European partners and fellow associations.
- Integrity: ENQA operates with integrity and in a fair, equitable, impartial, objective and professional manner.

An important task for ENQA are the agency review processes. It is through these review processes that member agencies can demonstrate their compliance with the ESG. The results of the review determine membership in both ENQA and EQAR and are also perceived as a mark of quality and trustworthiness of the QA agency and approach.

In 2010, an analysis was carried out about the use of ESG in ENQA Agency Review processes (Stensaker, Harvey, Huisman, Langfeldt, & Westerheijden, 2010). The analysis found that in the first years of agency review reports, the structure and review process had become more similar over time. Yet, the evaluation also found that there were a range of cases where similar labels were used for different practices – e.g. how evidence was used in the reviews, how staff competence was assessed or how the

different criteria from the ESG were assessed. As a result, the analysis concluded that "it is debatable whether the external review process is as transparent as it appears in theory" (Stensaker et al., 2010, p. 585). Elsewhere, concerns were raised regarding the European level coordination processes of quality assurance, that too much focus had been put on assuring legitimacy on national level, at the expense of effects on teaching and learning; and that focus on compliance was too strong, making the system too rigid (Huisman & Westerheijden, 2010). ENQA procedures for the agency review process were revised in 2011, when ENQA took over the coordinating function, to assure greater transparency and coherence across the different evaluations. In 2018, ENQA called for a new evaluation of the agency review processes.

2. Purpose and Scope of the Evaluation

The evaluation addresses two questions:
- Q1. Assess how the principles outlined in the standards of ESG Parts 2 and 3 for QA agencies are reflected in the reviews of agencies (while adapting them to the context and work of ENQA); and
- Q2. How ENQA procedures contribute to the improvement of the quality of work in QA agencies and allow for innovative approaches to QA processes.

2.1 Activities within the scope of this evaluation

The evaluation will only assess how the agency review process is carried out and does not extend to other activities carried out by ENQA.

3. The Review Process

Overall, the review process is designed to follow in broad terms ENQAs own agency review processes, with some additions. In sum, the review process consists of the following elements:
- Establishing the terms of reference
- Nomination and appointment of the expert panel
- Documentation:
    - A self-assessment report (SAR) by ENQA, following a prescribed template that takes a starting point in ESG
    - A "user survey" to assess the role of ENQA in the development of the agencies
    - Additional documentation (including also input from EQAR)
- Site visit to ENQA. Includes interviews with different groups of actors in the process[3].
- Preparation and completion of final report by the review panel with assistance from the technical panel secretary
- ENQA will have an opportunity to correct factual errors in the draft report

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[3] Here, we refer to the note in the call which stipulates that travel costs to participate in interviews will be covered by ENQA – page 2.

- Publication of the report.

3.1. Nomination and appointment of the review panel members

The review panel will consist of minimum five members of whom one will function as the panel chair. The panel will include: one external quality assurance expert; one student, one academic, two experts with a broad understanding of the European Higher Education policy context. Of specific concern is to maintain a balance of those with practical experience in the field of quality assurance and preferably also agency review process (e.g. former leaders of QA agencies, board members, or similar), and those who have research expertise regarding the theme. The panel composition also needs to take into account appropriate gender and geographical balance, preferably also including non-European reviewers. Representatives of E4 organisations cannot act as review panel members but can be consulted for suggestions of relevant members.

Suggested experts will be reviewed to avoid conflicts of interests and the experts will have to sign a non-conflict of interest statement regarding the review of ENQA agency review process.

The review manager appointed by NIFU will act as a technical panel secretary. The role of a technical panel secretary is to assist the review panel with their work, facilitate the site visit and preparation of documents, and assist the review panel with writing up the review report. The technical panel secretary does not participate in the evaluation.

When the panel is composed, the panel secretary will go through the evaluation process with them during a preparatory Skype meeting.

3.2. Self-assessment by ENQA

ENQA is responsible to develop its own self-assessment report (SAR). The following criteria is expected to be underpinning the process: it should be a process with a clearly defined schedule where relevant stakeholders and actors are involved; the self-assessment should follow a structured template (main points outlined below); the report should be concise and comprehensive; the report should be submitted to the review manager in a timely manner.

A template for the SAR will be distributed to ENQA in January. Key elements in the template include the following:
- *Development of the SAR.* Describe the process of developing the SAR, include also information who within ENQA was involved with writing, whether, how and what kind of external input was sought, and so forth.

- *Brief description of the history and profile of ENQA*, including major shifts in activities and procedures, and the role of agency review process in ENQAs overall activities. Includes also a description of the staff at ENQA and their competence.
- *Selection and training of experts* – an overview of the pool of experts and how often they are used in the reviews, how they are trained, and how their training is maintained and updated.
- *Detailed description of ENQAs management of the agency review process*. A detailed process description should be provided concerning the review process. In particular, the SAR should include reflections on the relevance and challenges with current practices. Each of the identified standards in the template should be described and document.
- *Stakeholder involvement* – how does ENQA involve stakeholders, including both E4 and the QA agencies. Given that the "users" of ENQA are the QA agencies, this should also include a description of how ENQA collects feedback from the agencies and how such feedback is used for further development of ENQAs work.
- Provide information about the *outcomes of the review processes.* This includes quantitative information about:
    - The number of reviews conducted, per year (first review, subsequent review)
    - The number of successful applications and the number of applications with negative results from the review process, and the number of reviews where ENQA Board has asked for additional information
    - In addition, qualitative description of the decision-making process should be provided and reflected upon.
- *SWOT analysis* concerning the agency review process from ENQA.
- *Key challenges and areas for future development* regarding the agency review process.

3.3. User survey

This user survey will follow a structured template prepared by the team at the coordinating body. To obtain specific information about the agency review process, the user survey will focus both on a more general overview of the agency review process and whether the use of ESG was clear for the agency, and also how it contributed to how the agencies work with quality (with examples). The questions will be both quantitative and qualitative in nature and are expected to provide information about issues such as the clarity of review guidelines, decision-making process and ENQAs management procedures. Given that the agency review processes are already time consuming it is also important to keep this survey reasonably brief to avoid substantial workload for the agencies. Results from this user survey will be summarized for the review panel by the technical panel secretary.

3.4. Other documentation

In addition to the user survey, the panel can also consider other additional data. This includes annual reports of ENQA, synthesis of existing research and evaluation studies, and various public information (e.g. mission statements of ENQA, etc). Feedback from EQAR will also be sought. The technical panel secretary will systematize this information for the panel if the panel requests this.

3.5. Site visit

The draft proposal of a schedule will be submitted to the review panel at least four weeks before site visit. Prior to the site visit, the panel will have a Skype meeting, including also the panel secretary. During this meeting, expectations for the site visit, as well as any initial impressions from the SAR will be clarified. In addition, questions regarding additional documentation by ENQA will be clarified. The meeting will also serve as a basis to assure that there is a shared understanding of the purposes and aims of the review process.

The site visit will include both internal meetings, but also interviews with various respondents who concern the agency review process. The expected duration for the site visit is 1,5-2 days. Relevant respondents to interview during site visit are:
- Staff of ENQA (reviews managers) who has experience with being a coordinator of an agency review
- Leadership at ENQA (director, deputy director) on how they manage the process internally
- ENQA Board members regarding the decision-making procedure and members of the four ENQA review (sub-)committees
- Relevant stakeholders, including E4, EQAR
- Examples of users – that is, QA agencies who have been through an agency review process recently (1 group interview, can be conducted on Skype)

The technical panel secretary of the expert panel will make notes of all of the interviews that will also be used for finalizing the report.

3.6. Preparation and publication of final report

Based on the self-assessment, additional documentation (including user survey) and information obtained during the site visit, the panel will complete its report draft. This includes also an assessment against all of the selected adjusted evaluation criterion (based on ESG). While the panel secretary contributes to the writing of the text (e.g. descriptive sections and making notes during panel discussions), it is the panel experts who are responsible for any reasoning and evaluative statements in the report. The final report should be no longer than 30-40 pages.

When draft is completed, ENQA will have an opportunity to correct any factual errors in the report.

The final version of the report will be publicly available, to make the process transparent and assure legitimacy of the process.

4 Budget

The approximate share of the costs in the evaluation include

Project budget	Share
Coordinator fee, including the running of the secretariat, and briefing and training of experts	Approx 60%
Fees of reviewers and travel costs	Approx 40%
TOTAL	€ 30 000 excl VAT

5 Timeline (planned)

Date	Activity
Beginning of January 2019	Skype meeting between ENQA and the coordinator to establish terms of reference and clarify any questions
January 2019	Draft materials prepared for the evaluation process, internal QA processes at NIFU Revision of SAR template and specifications Distribute SAR template to ENQA
February 2019	Develop user survey
March 2019	Distribute user survey to the QA agencies who have participated in the agency review process
April 2019	Selection of panel of experts
End of April 2019	Deadline for the user survey
May 2019	Summarise results from user survey
May 2019	ENQA External Review Steering Committee approves composition of expert panel
June 2019	First meeting with the expert panel and secretary, training session and clarifications [4]
June 2019	Self-Assessment Report from ENQA
August 2019	Expert panel Skype meeting – discussing impressions from SAR
September 2019	Site visit by external review panel
October-November 2019	Preparation of the external review panel report
November 2019	Fact check of the report draft by ENQA[5]
December 2019	Completion of the report by the external review panel – report needs to be completed by the ENQA External Review Steering Committee

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[4] Comment: was carried out 05.07.2019
[5] The report draft was sent to ENQA 03.12.2019 for fact check and sent to the steering committee on 20.12.2019

5.2   Attachment 2: Interview schedule during site visit - 17-18 September 2019, Brussels

Tentative time		Persons	Themes
Monday 16th of September			
TBC	*Review panel's private meeting, discussion and task allocation for the meetings*		

Tuesday 17th of September			
09.00 – 9.30	*Review panels private meeting, discussion and task allocation for the meetings*		
9.30 - 10.30	ENQA leadership	Christoph Grolimund, President Maria Kelo, Director	Management of ENQA Resources and coordination of agency review processes Role of the reviews in the EHEA ENQA strategy and the role of the reviews
10.30 – 11.30	ENQA self-assessment group	Anne Flierman (via Zoom), ENQA Board member, treasurer Fiona Crozier, external member of ENQA Review Committee (via Zoom) Christina Rozsnyai, ENQA Board member Maria Kelo, Director Goran Dakovic, Reviews Manager	
11.30 - 12.30	Meeting with ENQA staff / review manager and review coordinators	Review manager: Goran Dakovic, Reviews Manager Review coordinators: Paula Ranne, Deputy Director Anaïs Gourdin, Project Manager Milja Homan, Project Officer	Management of ENQA agency review processes Training of experts Follow-up procedures
12.30 – 13.30	*Lunch*		
13.30 – 14.30	(Zoom) meeting with selected experts	Oliver Vettori (QA professional, experienced chair) Doris Herrmann (QA professional, new panel member) Pedro Teixeira (academic, experienced panel member) Hermann Blum (student, experienced panelist, new secretary, engaged in the partial review) Danute Rasimaviciene (academic, EURASHE nominated) Đurđica Dragojevic (QA professional, experienced secretary) Francisco Joaquin Jimenez Gonzalez (student, new panel member)	ENQA's management of the process Training obtained Experiences with review processes
14.30 – 15.30	(Zoom) Meeting with external members of the Review Committees	All via Zoom: Padraig Walsh, QQI (external committee member) Núria Comet Señal, AQU Catalunya (external committee member)	Quality of reports and consistency
15.30 – 15.45	*Short break*		
15.45 – 16.30	Meeting with EQAR	Karl Dittrich, President, EQAR Colin Tück, Director, EQAR	Use of the review outcome for EQAR purposes (and the issue of double

			decision-making on the ESG compliance) General on collaboration with ENQA on ENQA Agency Reviews
_16.30 – 18.00_	_Panel meeting_		
18.00-18.45	(Zoom) Meeting with Appeals and Complaints Committee	All via Zoom: Karena Maguire, Head of Quality Projects, QQI (Chair) Heli Mattisen, Director, EKKA Ruben Topchyan, Director, ANQA (Alternate Member)	Rules and practices concerning appeals and complaints
From 19.30	_Dinner for the panel_		

Wednesday 18th of September			
_09.00 – 09.30_	_Startup meeting for the panel_		
09.30 – 10.30	ENQA Board	Christoph Grolimund, President Caty Duykaerts, Vice-President Eva Ferreira, Vice-President Christina Rozsnyai, Member Cristina Ghitulica, Member Øystein Lund, Member Stefan Handke, Member _Not available:_ _François Pernot, Member_ _Anne Flierman, Treasurer_	Strategy for ENQA decision making on reviews Quality of reports and consistency SWOT and future of the review process
_10.30 – 10.45_	_Break_		
10.45 – 11.45	Zoom meeting with representatives of national / professional agencies	All via Zoom: Cynthia Peterson, Quality Assurance Consultant and Chris Yelverton, Vice President, European Council on Chiropractic Education (ECCE) (professional) Vesna Dodikovic, Deputy Director, Agency for Science and Higher Education (ASHE), Croatia Achim Hopbach, Director, Agency for Quality Assurance and Accreditation Austria (AQ Austria), Austria Martí Casadesús Fa, Director, Catalan University Quality Assurance Agency (AQU Catalunya), Spain Sérgio Machado dos Santos, Executive Member of the Administrative Council, Agency for Evaluation and Accreditation of Higher Education (A3ES), Portugal Erika Soboleva, director General, Agency for Quality Assurance in Higher Education and Career Development (AKKORK), Russia	Experiences with agency review process and follow-up Experience with the appeals
_11.45 – 12.45_	_Lunch_		
12.45 – 13.45	Meeting with European stakeholders (EUA, EURASHE and ESU)	Anna Gover, Programme Manager, EUA Michal Karpíšek, Secretary General, EURASHE Gohar Hovhannisyan, Vice-President, ESU (via Zoom) Susan Flocken, European Director, CSEE-ETUCE	Nomination of experts Trust in the system View on the role of the review process in the EHEA
_13.45 – 14.00_	_Break_		

14.00 – 14.30	*Optional - meeting with ENQA leadership*	*Christoph Grolimund, President* *Maria Kelo, Director*	*Any pending issues that have emerged during other interviews*
14.30 – 15.00	*Panel meeting*		
15.00 – 15.30	Final de-briefing meeting with ENQA Board and Secretariat to inform about preliminary findings		

5.3   Attachment 3: Key results from the user survey[6]

The user feedback survey was carried during in April through May of 2019. The survey was distributed to 61 agencies, and 28 completed the survey (one other agency provided some incomplete answers). Given that this is a small N survey with an emphasis on obtaining qualitative feedback in addition to a few scaled questions, the survey had many open questions where agency representatives were asked to reflect on the agency review process and its outcomes. The participating agencies include first-time participants and those who have carried out several review processes to renew their membership in ENQA and registration in EQAR. The set of agencies primarily includes those where membership has been granted. The responses also include agencies who are currently in a review process. Given the small N, this report primarily builds on the qualitative responses while providing broad references to views expressed in the specified variables.

Motivation to participate in an ENQA Agency Review

When asked about the agencies' motivation to go through an agency review process, most mention membership in ENQA and the registration on EQAR as a key driver, linking this to both national demands and European visibility. In a few of the answers, this is listed as the sole motivation. However, some of the respondents also mention a desire to obtain external panel feedback and thus contribute to quality enhancement of the work done by the agency. One respondent said, '*we value the process of undertaking collective self-evaluation, being tested and challenged as part of the visit*'. Moreover, some of the agencies also mentioned that this was an opportunity to get feedback from national stakeholders, as a site visit would provide engagement with them as well. One response stated the following:

> '*It is always a useful process to undertake a review, as it provid[es] the organisation with an opportunity for self-critical examination and also a chance to get feedback from all of the stakeholders during the site visit.*'

The evaluation process

In general, most agree that **the criteria for the agency review** processes were understandable. About one in six would say that they agreed that the criteria were difficult to understand, while the remaining either did not agree or disagree or disagreed with the statement. Yet almost one third mentioned that it was difficult to compile relevant information for the self-assessment report.

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[6] Note that excerpts of this text can be found in Chapter 3

In general, there are positive views on the guidelines for writing the self-assessment report. Nevertheless, a few of the respondents noted considerable repetition in the self-assessment reports and suggested a better structure:

'Compiling relevant information for the self-evaluation report is difficult in the sense that the structure of introductory chapters and discussion of each standard necessarily leads to the doubling of information for the respective sections. Guidelines for assigning only facts to the introductory part and only analysis to the standards might be helpful, or may not, but is something that could be discussed.'

'The template structure for the self-assessment report results in quite a lot of repetition i.e. many aspects have to be provided in the initial overview and [in] context of the agency, and then [they] have to be repeated under the relevant standard.'

Concerning the expert **panel composition**, there is also a generally positive assessment; about four out of five agree or strongly agree that the panel was competent and had relevant training. There are, however, some responses marked as not relevant concerning the training, and it was noted in the open response that they did not have any information about the training procedure.

Concerning the appropriateness of the expert group, there is also a generally positive view. One of the respondents summarised:

'*The panel [was] very competent and had clearly studied the self-assessment document. The meetings during the panel visit were well chaired and were all completed on time. The panel members all had an opportunity to contribute during the meetings.*" Yet, another agency emphasized the collegial approach of the panel: "*A very positive experience was the dialogue with the panel, that, based on a rather self-critical self-evaluation report managed to get down to really relevant questions and hence to come up with a helpful report. This collegiate approach is one of the most important features.*'

There were also some more critical remarks. A small number of agencies had an experience prompting them to make critical remarks about the expert panel composition. Critical remarks were made in a few of the open comments, and they concerned the expert panel's ability to consider the specific national higher education context and their disciplinary/field profile.

Examining how **the process** has been carried out, most of the responses indicate that this followed the schedule, yet there were also some respondents who indicate that the process is rather time-consuming.

Several responses also note a high workload in completing the self-assessment. However, in one instance, this was also seen to have a relevant impact:

'The self-evaluation produced a very high workload. However, already the self-evaluation had and will have a high impact on the development of the agency. It is also a very good opportunity to engage with stakeholders because they consider the process important'

While one of the respondents would emphasize that the repetition aspect made the process faster, in other responses, it was emphasized how the repetitive nature of the process reduced its usefulness:

'There is a high added value in the first evaluation. Also some value on the second one… but very low added value on the third time. It is mandatory to change the third and further evaluations.'

Similar comments were also made:

'The added value from second reviews on is not all that clear. It seems that the agency as a whole is reviewed again.'

The other tension mentioned by some agencies was the balancing of ENQA and EQAR criteria mentioned above, as the two seemed to have a varying underlying logic and there was a lack of clarity concerning the terms of reference between ENQA and EQAR.

There are also practical concerns raised considering the organization of the process, e.g. the necessity to translate documents when the request comes last-minute and language being a factor when gathering participants for interviews.

In general, there seem to be positive views of **ENQA's management of the process,** and many of the open responses also suggest that this is the case (e.g. emphasizing that the process is well-organized). Yet, a small number of respondents would disagree that ENQAs management of the process was fit for its purpose. Overall, the comments also suggest more principal questions concerning the agency review process and its purpose.

The responses concerning **follow-up routines** suggest that there are several who did not respond to this question. Of those who did, most seem to agree that they were appropriate, or they have a neutral view.

The use of ESG

In general, there seems to be considerable agreement regarding how **ESG** includes a relevant set of criteria for the agencies. There is even stronger agreement that the use of ESG was clearly visible in the process. Only a few respondents disagreed with these statements. While the general outlook is positive, emphasis on ESG can sometimes also come across as not covering the whole spectrum of the agencies' work. One of the respondents noted:

'A main problem is that the review process is so focused on ESG. The result is that activities where the concept of QA is developed or done through different Connected operations are left out. Risk based approach was left out – knowledge-based operations were put in the shadow. This means that the review process says something of the operations that are Close to ESG, but other parts of our activity (that we ourselves think is more important) is left out.'

Moreover, some critical remarks were made concerning how the interpretation of ESG has made the process too rigid and one-size-fits-all, contributing to a bureaucratic rather than enhancement-oriented process. As indicated by one of the informants:

'The ESG are being interpreted in a far too prescriptive way, not only regarding the standards themselves, but also the associated guidelines. It is questionable if a one-fits-all model, to be applied to all agencies regardless of remit and context, is really possible or advisable through all the EHEA. There are aspects that cannot be applied in the same way in an agency doing a few institutional assessments every year or in another one doing hundreds of programme assessments. (…) The new ENQA guidelines improved the streamlining, but became terribly bureaucratic in relation to the concern to cover every possible angle of each individual standard. (….) One feels that the review process could be more enhancement-led if it was nor required to cover the present double objective (ENQA membership and registration in EQAR).'

Overall value and effects

While most of the responses indicate that the respondents saw value in the process, there is some variation in the scale. When asked to reflect about the process, one of the respondents summarized it as: "*Stressful and useful!*". In a rather similar manner, another respondent elaborated:

'Stressful, not being sure of the decision of course, but also the work that goes into the self-evaluation process and logistics of the site visit. Also, rewarding, hearing the findings of the expert panel and reading their views and recommendations.'

Nevertheless, the earlier comments also suggest that some would note the bureaucratization of the process and the balance between an accountability-oriented and enhancement-oriented process. In another response, one respondent noted that it felt like more of a test rather than a membership application. Another mentioned that while the process was well organized, the only real outcome was renewed membership.

Concerning effects, most agencies mention that the process had effects on their practices and most mention lessons learned. In particular, the opportunity to get an external view on their own agency was emphasized as valuable. Most also

mention specific changes in practices and that the reports and suggestions have been followed-up internally. However, it would seem that some also experienced this as a compliance-oriented process. The agencies who had gone through the process multiple times also noted that the value was reduced over time.

> *'The review process is implemented in an efficient manner. However, the value of this approach (focused on ESG compliance) could be questioned for established agencies who have already had several reviews and have not had significant changes in their structure/approach in the meantime. That said, the panel made some insightful comments and suggestions that will be of use to our further development.'*

Suggestions for improvement in the user survey

The respondents were asked to provide suggestions for improvement. These can largely be grouped into the following points:

- A more diverse understanding of agencies' work
- New formats for those who have undergone multiple reviews
- Better training of experts concerning the national policy context
- Making sure that self-evaluation reports remain available after the review process is completed
- More clarity concerning decision-making
- Clarification of the EQAR and ENQA relationship
- Simplification of the process
- Self-evaluation template that reduces repetition
- Cost reduction
- Consistency across multiple evaluations