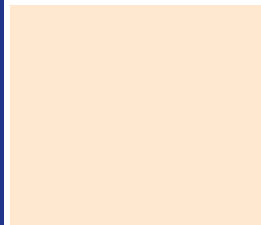


# Renewal of ENQA full membership

## Self-Assessment Report May 2019



BRITISH ACCREDITATION COUNCIL FOR INDEPENDENT FURTHER AND HIGHER EDUCATION



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## 1. Introduction

The British Accreditation Council (BAC) was established as a joint initiative between the British Council and the Department of Education in 1984 to provide oversight for independent further education (FE) and higher education (HE) in the UK.

The BAC offers voluntary institutional accreditation through a series of six accreditation schemes designed to meet a wide range of education and training institution quality assurance needs. Within the context of independent higher education, BAC has a range of institutions in the UK and overseas including universities, FE colleges and alternative providers offering HE programmes.

The BAC is constituted under UK law as a private company ([Registered in England, company no. 1828990](#)), limited by guarantee and is a not-for-profit organisation and registered charity in England ([Charity Commission Registration No: 326652](#)). The BAC receives no government funding and is self-financing through inspection fees and the annual accreditation fees paid by its institutions.

Following BAC's inaugural review from the European Association for Quality Assurance in Higher Education (ENQA), BAC gained ENQA membership in March 2015 and was subsequently listed on the European Quality Assurance Register for Higher Education (EQAR) in June 2015.

In order for BAC to reapply for ENQA membership and for its renewal of registration in EQAR, this Self-Assessment Report (SAR) has been produced to analyse all BAC activities that are within the scope of the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG), i.e. reviews, audits, evaluations or accreditation of HE institutions or programmes that relate to teaching and learning (and their relevant links to research and innovation). This is regardless of whether these activities are carried out within or outside the EHEA, and whether they are obligatory or voluntary.

The SAR is a reflective document which sets out BAC's processes and procedures and considers how the organisation meets the ESGs. In addition, the document identifies actions taken since the previous ENQA review and includes how BAC has addressed the recommendations set by the ENQA panel.

The following activities of BAC are addressed in the external review:

### **Accreditation of higher education institutions (through the Independent Higher Education scheme)**

The BAC is an institutional accrediting body rather than a programme accrediting body, and offers five other accreditation schemes that are not relevant to higher education and do not fall within the 2015 ESGs.

## 2. Development of the Self-Assessment Report (SAR)

The BAC viewed the recommendations and feedback in the 2015 ENQA review resulting in ENQA membership as a positive steer for developing and enhancing its quality assurance processes and services. In 2017, BAC submitted a follow-up report to ENQA and was able to provide an update on the response and progress made since the initial formal review in 2015. Since this time, further related developments to BAC's internal and external quality assurance processes and services have continued to progress as part of BAC's ongoing commitment to continual improvement.

In preparation for the 2019 ENQA review, BAC appointed an internal lead, the Higher Education Manager (HEM), to construct, edit and shape the SAR. It was decided early in the planning stages

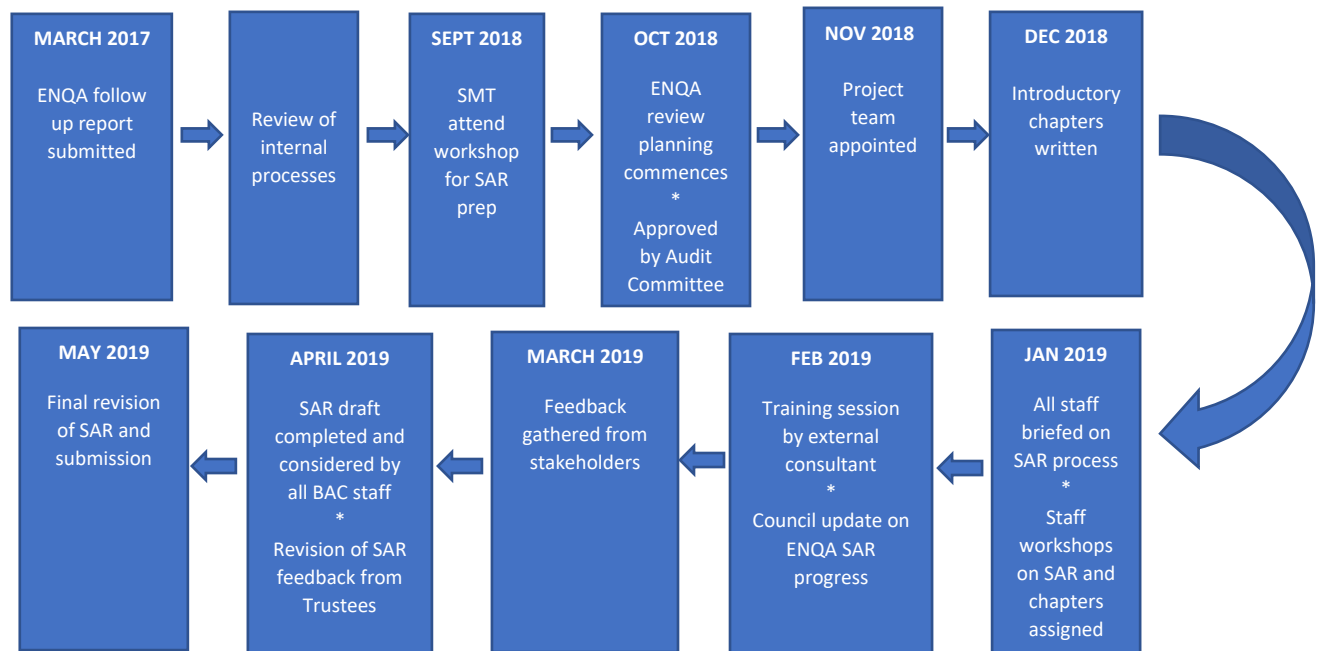
that the self-evaluation process would be collaborative, with contributions from members of the BAC team, particularly those whose roles, responsibilities and activities are linked to the ESG. Having identified the maintaining of ENQA membership in BAC’s overarching strategy, the intention was to create greater connectivity and awareness of the ESG and for BAC to fully incorporate them into daily activity and operational procedures.

It was important that the Senior Management Team (SMT) agreed how the ESG aligned to BAC’s organisational context and to what extent the ESG translated into BAC’s framework. To ensure consistency in the interpretation of the ESG, workshops were held and a review of the meaning of each criteria was shared. This allowed an opening for discussion and clarification amongst the SMT and the rest of the team.

ESG and SAR sections were allocated to members of the team and timelines were established to give sufficient time for review and discussion amongst colleagues. This submission is the output of multiple BAC staff contributions which was then reviewed by the internal lead.

We have appointed a Quality Assurance Manager on a freelance basis to provide guidance and clarification on the ESG and to act as a critical friend throughout the process.

At various stages, while reflecting on how we met the requirements of the ESG, planned feedback and review sessions were held to allow the team to share progress and discuss thoughts. This was a valuable opportunity to raise issues, clarify queries and to encourage contributors to support the wider project. The meetings reinforced awareness of responsibility and the critical links across the organisation and that both co-existence and cross team support were vital during the creation of the SAR to maintain ongoing compliance with the ESG.



### 3. Higher education and QA of higher education in the context of BAC

The HE sector in the UK is a well-developed and mature system. The UK has a broad range of institutions that can award degrees, which include universities, university colleges, FE colleges and alternative providers. Higher education institutions (HEIs) can also enter into a collaborative partnership, such as validating degree programmes, with another educational institution such as a college of further education.

There are 170 recognised bodies which can award degrees in the UK; these recognised bodies are listed on the [UK Government website](#).

In addition to publicly funded HEIs awarding degrees, there are also around 813 independent colleges and other institutions ([Research Paper, Centre for Global Higher Education, April 2019](#)), which do not have their own degree-awarding powers. Many of these provide complete courses leading to recognised UK degrees or other HE awards.

#### **The independent higher education sector**

The majority of independent private institutions of HE in the UK work in partnership with a UK university or awarding body. They offer higher education level programmes following validation and approval by the awarding partner. Where a private institution is working directly in partnership with a UK university, this collaborative provision is included in a university review carried out by the Quality Assurance Agency for Higher Education (QAA). Where a private institution is offering HE level awards through a recognised awarding body, the Office of Qualifications and Examinations Regulation (Ofqual) is the ultimate regulating authority, with awarding bodies having direct oversight of their centres' delivery of their awards.

It is these independent or private institutions that BAC accredits in the UK. It should be noted that due to UK governmental requirements, if an institution offering degrees in the UK wishes to enrol students from outside the European Economic Area for a programme longer than six months they are required to have a Tier 4 licence and are therefore subject to educational oversight by a government-approved agency, specifically the Quality Assurance Agency for Higher Education (QAA). Further information about Tier 4 licenses can be found on page 7.

#### **Quality assurance in the UK**

The designated quality body in the United Kingdom is the QAA. The QAA conducts reviews of HEIs and sets out the governmental expectations of HE provision in the UK through the publication of the UK Quality Code. The expectations and core practices of the UK Quality Code are mandatory for HEIs in all parts of the UK.

#### **Recent changes in the UK higher education sector**

The UK has four nations, so there is some variation in regulation of HE across the UK. In England, HEIs are required to register with the Office for Students (the regulator who replaced the Higher Education and Funding Council for England) following the Higher Education and Research Act, 2017 (HERA, 2017). Registration is a requirement in order to have a Tier 4 licence to recruit international students. The Act also gave the Office for Students the authority to grant degree-awarding powers and university titles.

In Wales, Scotland and Northern Ireland, the authority to award degrees is granted through the Privy Council. The Privy Council refers to the respective devolved governments for advice who then utilise an Advisory Committee on Degree Awarding Powers (ACDAP) to conduct a detailed scrutiny of the application to formulate the advice to the Privy Council.

### **What motivates institutions to seek BAC accreditation**

In the UK, BAC accreditation allows institutions to recruit students under a Short-Term Study Visa and gives them an additional way of differentiating themselves from their competitors. As gaining and maintaining accreditation can be costly, and is not a requirement for UK HEIs, the number of HEIs that BAC accredits in the UK is relatively low.

The BAC accredits HEIs under the IHE scheme. Further information is available on page 10.

An inspection team is assembled and inspects the institution against seven inspection areas. The standards have been reviewed against the ESGs (2015) rather than against the UK Quality Code, as BAC did not wish to make the standards too UK-centric but rather would incorporate the best practice and expectations that BAC has of an institution delivering HE.

This is discussed further in Chapter 10.1.

Internationally, institutions seek accreditation to differentiate themselves from their competitors, add an additional layer of external quality assurance for their institution and as a method of providing reassurance to their stakeholders.

## **4. History, profile and activities of BAC**

### **History of BAC**

In 1982 the UK Government withdrew the Department of Education and Science (DES) inspection and accreditation of independent further and HE colleges and at approximately the same time increased fees for overseas students attending publicly funded colleges and universities in the UK. These actions placed the independent education sector in a position of opportunity as it was able to compete with the public sector on price and offer HE courses at a much lower cost, thereby providing attractive educational offers and value to international students.

At this time, the UK saw a rapid growth in the independent further and HE market, and with it the increased risk of a lack of quality assurance within the sector. The opportunities for profitable operation drew in unscrupulous operators and UK educational bodies became concerned that this could damage the reputation of education in the UK. Furthermore, institutions that held reputable positions were keen to establish a route that would allow them the means to differentiate their institutions and gain formal recognition of the quality of their offer.

Recognising a need for formal recognition and oversight of independent institutions, a working party led by the British Council consisting of representatives from the Department for Education and the further and higher education sector was formed to address concerns and develop a solution. The group recommended that a national body be set up to run a voluntary system of accreditation, and on 29 June 1984 the British Accreditation Council for Further and Higher Education was formally established.

Growth in the early years at BAC was slow. In the first year of operation, BAC awarded accreditation to 35 institutions including tutorial colleges and institutions offering professional education and training at further and HE levels. By the end of 1993 BAC had accredited 82 institutions. At this time, most of the institutions were sixth-form colleges offering business and professional studies and HE courses in addition to colleges catering for students with special educational needs.

By 1992, research showed that there were approximately 3,000 independent colleges in the UK, with just over 500,000 students, of whom approximately half were studying full time. From 1993 to 2005, BAC grew from 82 accredited institutions to 200. Many of these institutions were colleges offering business and computer studies, primarily for the benefit of overseas students.

In 2007, the UK Government approved BAC to provide accreditation associated to new legislation overseeing HEIs. The legislation was known as 'Tier 4', and it required any HE institution to have accreditation by a recognised body to apply for a government licence to admit students onto their courses.

Tier 4 was primarily introduced to control the number of international non-EU students to HE in the UK. Accreditation became a requisite for all IHE institutions wishing to recruit non-EU students. BAC experienced growth during this time reaching 540 accredited institutions in 2010/11.

A legislative review took place in 2011 and the government took the decision that educational oversight should be assigned to QAA. As a result, BAC could no longer offer Tier 4 and consequently experienced a rapid reduction in the number of institutions it accredited. This outcome meant that BAC had to consider its strategy for business development opportunities.

In the years that have followed, BAC has continued to develop and diversify its offers, and further schemes have been developed for international institutions and for online, distance and blended learning to cater for institutions who had differing educational offers.

The BAC consultancy service was established in 2011 to offer a clearly separated service in addition to its accreditation activities.

### **Mission statement**

BAC's mission is to provide respected and rigorous inspection-based accreditation to enhance the standards and quality of independent further and HE and training institutions.

### **Vision**

BAC's vision is to be an established, diverse and leading education charity for the independent further and higher education and training sectors, recognised by UK and overseas governments as an influential voice on standards and quality for the independent education sector.

### **BAC Accreditation Schemes**

BAC provides accreditation services to a range of education and training institutions. To reflect diversity it operates six accreditation schemes:

- [Short Course Provider scheme](#) for UK-based professional training organisations with courses up to 26 weeks in duration. BAC accreditation enables providers to enrol international students on UK student visas for up to six months.

- [Online, Distance and Blended Learning scheme](#) for UK and overseas providers offering flexible and virtual models of delivery.
- [College scheme](#) for a variety of FE and vocational providers offering courses over six months. This was one of the earliest accreditation schemes and encompassed providers offering FE and HE programmes. Therefore, there are some mentions of HE, although after the launch of the Independent Higher Education (IHE) scheme in 2016, HEIs offering degrees were accredited under the IHE scheme.
- [International Centre scheme](#) for established international organisations seeking assessment against UK quality assurance standards.
- [International English Language Provider \(IELP\) scheme](#) designed for overseas English language providers.
- [Independent Higher Education \(IHE\) scheme](#) for UK and overseas HEIs, which is the subject of the external review as defined in ENQA's Terms of Reference and confirmed by EQAR in the Eligibility Confirmation letter.

As of April 2019, BAC accredits 229 education and training institutions with 184 operating in the UK and 45 overseas

- Short Course Provider (112)
- College (62)
- Online, Distance and Blended Learning (11)
- International Centre (8)
- International English Language Provider (0)
- Independent Higher Education UK (13) and overseas (23)

### **Other Activities (not included in the scope of the ESGs)**

#### **Consultancy**

Consultancy is another quality assurance activity that BAC undertakes. However, they are typically short, bespoke projects and are not conducted under the guise of the ESGs. A consultancy project is typically undertaken overseas and involves both a BAC staff member and consultants drawn from the inspectorate.

When a consultancy team is formed, BAC will confirm that there are no conflicts of interest with the team members and the client, as detailed in Chapter 9.6.

The process for consultancy is an initial enquiry, following which a consultancy brief, with timelines and costings, is written by BAC and agreed by the client. The output, typically a report, is submitted to the client at the end of the project. The type of consultancy projects BAC has conducted include subject benchmarking in Hungary and the assessment of an institutional Self-Evaluation Report (SER) against national requirements in Georgia and providing recommendations on areas of improvement.

#### **Capacity building projects**

BAC has also undertaken capacity improvement projects, such as in Bahrain, where BAC worked with the Higher Education Council (HEC) to develop an institutional accreditation framework against which all HEIs would be assessed in order to gain accreditation from the HEC.

The standards included international norms such as quality management, governance, academic and administrative management, as well as teaching, learning and assessment. In addition, the



accreditation framework included country-specific standards such as the contribution to society and the economy of Bahrain.

BAC conducted training for HEC on the accreditation process and has been contracted to conduct inspections of all HEIs using the BAC inspectorate. At each inspection, a staff member from the HEC is an observer to the inspection team to help develop the HEC capacity and as staff development. The Government of Bahrain has set the requirement for all HEIs operating in Bahrain, both private and public, to gain HEC accreditation by 2020.

### **Legal status and constitution**

Under UK law, BAC is constituted as a private company limited by guarantee (not-for-profit) and is also a registered charity.

BAC has a statutory role in the UK and is recognised as one of the accrediting authorities for the acceptance of students wishing to study in the UK under the Short-Term Study Visa regime. A link to the UK Government page confirming this can be found [here](#).

BAC's governing Objects are declared in BACs current Constitution Document, [the Articles of Association](#) and are to advance education for the benefit of the public by:

*'Providing a system of accreditation for educational and training institutions in order to promote public confidence in such institutions and their programmes of study'*  
and

*'Assisting in the improvement and maintenance of the standards of accredited institutions through the offer of advisory and consultancy services principally in the field of further and higher education.'*

BAC Articles of Association 4.1, 4.2 (Annex 1)

### **The Council**

An elected Council of up to 12 members acts both as a Board of Directors as a company, and as a Board of Trustees as a charity. The current Chairman of the Council is Dominic Scott OBE, Chief Executive of the UK Council for International Student Affairs (UKCISA), and the President is Peter Williams CBE, BAC's former Chairman and former Chief Executive of the Quality Assurance Agency for Higher Education (QAA). Peter is also former President of ENQA. Other members of the Council either have or have had leading roles in further and HEIs, awarding organisations, quality assurance agencies and in business.

The Council meet three times a year providing strategic direction and general oversight for the organisation.

### **The committees of the Council**

The Council delegates authority to three committees who direct and monitor BACs' strategic planning and accreditation work:

- The Accreditation Committee (AC) of ten members receives and considers reports of completed inspections and takes decisions to award or withdraw accreditation, making its recommendations based on BAC accreditation policy and procedures.

- The Standing Committee of three members steer the development and implementation of BACs strategy and operations, and provides oversight of ENQA compliance.
- The Audit Committee of three members provides oversight of BAC’s financial reporting and disclosure. It also monitors and reviews the effectiveness of the auditing process.

### BAC Head Office

A central London office team, led and overseen by Paul Fear, the Chief Executive, provides administrative support to the committees and there is a remote team of inspectors, led and overseen by Diana Morriss, the Chief Inspector.

The [office team](#) are responsible for the accreditation operational activities, the day-to-day running of BAC, and the management of inspections and communications with the public and other stakeholders.



## 5. Higher education quality assurance activities of BAC

BAC undertakes quality assurance activities in both the UK and overseas. The type of activities that BAC undertakes can be defined as accreditation activities.

For the purpose of this document, BAC will refer to the accreditation activities which take place under the IHE scheme. This scheme is for institutions who offer full degree programmes, which are awarded through either the institution’s status as a degree-awarding institution in their own right, or through a collaborative partnership they have with another degree-awarding institution.

When a prospective institution applies for BAC accreditation, they submit an application with supporting documentation, and BAC confirms eligibility. In addition, the institution submits a SER, which is a reflective document whereby the institution sets out how they meet, or do not meet, the key indicators of the IHE scheme.

After the documentation is reviewed an inspection team is formed and an inspection is arranged. A full inspection typically takes two days with a team of three inspectors. Following the inspection, the inspection report is considered by the independent AC who then make a decision as to whether accreditation will be awarded.

The process of accreditation under the IHE scheme is the same for institutions regardless of location, so the same activities are undertaken for institutions both inside and outside the UK.

BAC accreditation for the IHE scheme is valid for a period of four years. Once accredited, institutions will have an interim inspection to check the progress of the institution in meeting any action points or recommendations set at the previous inspection and undertaking a spot check across the standards to ensure they are being maintained. Institutions in the first cycle of inspection will receive an interim inspection, typically one day long, within the first 12 months of accreditation. From the second cycle and beyond, institutions will receive an interim inspection between 24–36 months after the previous full inspection.

BAC may also require an inspection to be held if the accredited institution makes any substantive changes to their provision or premises. These inspections are known as supplementary inspections and are typically one day long. As part of BAC’s internal quality assurance processes, BAC may also organise an unannounced spot check inspection, which can either be randomly selected or because BAC has received a complaint against a specific institution that is deemed serious enough to require an inspection.

### Overview of higher education accreditation activities

The table below provides information on the number of inspections that have taken place between 2015 and 2019.

Inspection type	No. of inspections per year			
	1 September 2015 – 31 August 2016	1 September 2016 – 31 August 2017	1 September 2017 – 31 August 2018	1 September 2018 – 28 March 2019
<b>UK Inspections</b>				
Full inspections	0	6	6	0
Interim inspections	0	0	0	0
Other inspections	0	0	4	1
<b>Overseas Inspections</b>				
Full inspections	7	6	5 (1 under updated scheme)	4 (4 under updated scheme)
Interim inspections	0	0	6	1
Other inspections	0	1	2	1
<b>TOTAL</b>	<b>7</b>	<b>13</b>	<b>23</b>	<b>7</b>

Prior to the launch of the IHE scheme, which was for all applications received after 1 September 2015, BAC undertook accreditation activities of international HEIs using the IHE scheme. Once the IHE scheme was launched, these institutions were inspected under the IHE scheme at their re-accreditation inspection.

There are still three institutions who are accredited under the IHE Accreditation Scheme although they will all undergo an inspection by September 2019.

The full list of accredited institutions, their location and the scheme they are accredited under is held on [the BAC website](#), which is available for anyone to view. The website is updated after each AC meeting with the decision of the Committee listed on the institutions inspection report which is uploaded. Each institution has a separate profile page on the BAC website, which holds their inspection reports.

BAC has signed a Memorandum of Understanding with an international quality assurance organisation – the Financial Accreditation Agency, Malaysia (FAA) – to conduct [joint accreditation](#). This offers institutional accreditation as well as programme-specific accreditation for its finance-related programmes. The institutional accreditation would be through BAC's IHE scheme, where the institution would need to meet the scheme's eligibility criteria and provide the same documentation as any standard application. The programme-specific accreditation would be undertaken by the FAA.

The FAA programme processes are largely, though not exclusively, desk based, the relationship between the BAC and FAA process was one where BAC inspectors, would as part of their ongoing inspection activity, verify claims made by the institution. Beyond this degree of collaboration and sharing of information each agency retains complete control over its own processes and full independence of accreditation decisions.

There would be no differences in the process for institutions in the UK or those located outside of the UK.

To date there have been no applications received or inspections undertaken through the BAC-FAA joint accreditation.

## 6. Processes and their methodologies

BAC accredits institutions, not programmes.

By accreditation, BAC means that institutions are assessed against a set of predefined criteria, called minimum standards, largely on a binary choice of either achieving, or not achieving, a minimum standard. Each standard sits within an inspection area. In the IHE scheme there are seven inspection areas:

1. Governance, Strategy and Financial Management consisting of 14 minimum standards.
2. General and Academic Management and Administration consisting of 51 minimum standards.
3. Teaching, Learning and Assessment consisting of 19 minimum standards.
4. Student Support, Guidance and Progression consisting of 33 minimum standards.
5. Premises, facilities and Learning Resources consisting of 32 minimum standards.
6. Quality Management, Assurance and Enhancement consisting of 18 minimum standards.
7. Online, Distance and Blended Learning consisting of five minimum standards.

See Annex 2 for a copy of the IHE scheme.

### **Process of accreditation**

The process of accreditation consists of a number of different stages. These are outlined briefly below. However, further information and a reflection on the effectiveness of BAC processes is discussed in Chapter 10.3.

The accreditation process is the same for institutions regardless of whether the institution is located inside or outside of the UK.

## **Application**

The process is slightly different depending on whether the institution is making an application for the first time or if they are applying for re-accreditation.

**New applications:** An institution will initially lodge an enquiry suggesting they are interested in potentially applying and will complete an enquiry form. Once this is completed, the first stage – due diligence – will take place in order to determine whether the institution meets the BAC eligibility criteria. The institution is then invited to participate in an online meeting to discuss their application and is then sent the application form. The institution submits the application form, with supporting documentation, to BAC.

**Re- Accreditation:** Institutions who are already accredited by BAC are invited to reapply for accreditation six months before the end of the accreditation period. They are required to reapply for accreditation but do not go through the enquiry and interview process that new applicants must face. The rest of the process is the same as for new applicants.

## **Self-evaluation report**

After the submission of the application form, the institution then submits a self-evaluation report (SER). The SER is a reflective document whereby the institution reviews their own institution to consider how they meet the inspection standards with any strengths identified and indicating any areas where further development is required.

## **Appointment of the inspection team**

BAC convenes an inspection team, typically consisting of a lead, team and student inspector who follow the process outlined in Chapter 10.4.

BAC uses the term ‘Inspector’ rather than the more common ‘Reviewer’ because this is a better description of the BAC accreditation process. BAC inspectors are professionals in that they are employed on a contractual basis to undertake inspections on BAC’s behalf.

Inspectors are drawn from the HE peer group and will have extensive experience in HE quality assurance, and in many cases will work with a number of quality assurance agencies.

## **Onsite inspection**

All full inspections (for both new and currently accredited institutions) require an onsite inspection. Once the team is appointed the lead inspector liaises with the institution to create an inspection timetable and confirms the institutional staff that the inspection team will need to meet. The inspection team will undertake a series of meetings, lesson observations and scrutiny of documentation to determine whether the institution meets the inspectors’ standards.

## **Report writing**

The output of the onsite inspection is a report which gives the findings of the inspection team. The report is written by the lead inspector who takes into consideration the findings of the rest of the inspection team. After an internal editing process (to ensure consistency with the BAC Report Writing Guidelines), the report is then sent to the institution for a factual accuracy check.

Once this is complete with any amendments made, the report is then added to the agenda of the next meeting of the AC.

### **Decision of the Accreditation Committee**

The AC is autonomous, with delegated authority from the Council to make decisions on the accreditation status of institutions. The Committee will receive the inspection reports and will use the information contained with the report to decide whether an accreditation is awarded, deferred, refused or withdrawn. Further information on the AC is given in Chapters 9.6 and 10.5.

### **Publication of the report**

After the AC have met, the report is then published on the BAC website. In addition, the report, and a letter confirming the decision of the AC is sent to the institution via email. If the institution is accredited then this will also include the accreditation certificate.

### **Follow-up activities**

If there are any action points or recommendations then the institution will need to address these. This can be done either through the submission of documentation or if there is no timeframe set by the AC these will be addressed at the interim inspection. For new institutions this is within 12 months of accreditation; for institutions who have been accredited previously, this is within 24 months of the continuation of accreditation.

### **Complaints and appeals**

BAC has a clear and transparent complaints and appeal process, which is outlined in the Accreditation Handbook. This is discussed in more detail in Chapter 10.7.

## **7. BAC Internal Quality Assurance**

### **Overview of internal quality assurance**

As a quality assurance agency, BAC has a responsibility to build its own internal quality assurance processes to ensure that the accreditation standards it employs are rigorous and fit for purpose, and that the application of the standards, the reporting of how an institution is applying the standards and the decision on awarding accreditation are consistent. Additionally, the expectations BAC places on accredited institutions should be a reflection of BAC's own practices.

Many of BAC's quality assurance processes rely on multiple review processes separating the function of the executive from committee oversight. A second tier of oversight is provided by external agencies such as ENQA, EQAR and BAC's auditors.

The BAC Internal Quality Assurance processes cover the following areas:

- Ensuring BAC standards are 'Fit for Purpose'
- Governance
- Risk Management
- Auditing

This is discussed in more detail in Chapter 10.6. The full policy is available in Annex 3

Another aspect of internal quality assurance is utilising BAC's feedback mechanisms from our stakeholders and implementing any changes that may be required following the feedback.

These mechanisms include:

- Surveys to institutions
- Feedback forms from inspectors following an inspection
- Feedback forms from institutions following an inspection

The results of the feedback forms are reviewed by the Chief Inspector and the Accreditation and Quality Assurance Manager and an update is given to the Planning and Coordination Group (PCG) which consists of all BAC staff. If the feedback requires any action then the Chief Inspector will liaise with the relevant team in BAC to make any changes required.

This is addressed in more depth in Chapters 10.7 and 11.

BAC has a revision cycle in place to ensure that key stakeholders review each set of standards to provide a more rigorous and transparent process, which sets out to ensure they are fit for purpose and ensures they reflect the needs of stakeholders.

The Chief Inspector is responsible for the BAC standards and it is their responsibility to initiate the review process, although the process is delegated to another member of staff to review and implement. A scheme review will typically take at least eight months and will involve consulting with stakeholder groups when reviewing the standards.

## **Governance**

BAC is committed to good governance and has invested significant time and resources into restructuring its governing structure over the last three years. The role of the committees is set out in Chapter 9.6.

Each Committee member has a tenure of three years with another three-year extension. In exceptional circumstances a Committee member may have their tenure extended beyond six years.

## **Risk management**

BAC holds a Risk Register, which is considered on a regular basis by the Audit Committee to ensure that potential risks are identified on a timely basis. BAC uses a risk dashboard to identify high-level risks by assigning values to the likelihood of a risk occurring and the perceived impact it will have on the organisation.

## **Auditing**

BAC is subject to a number of auditing and independent oversight processes. These include:

- **An Annual Financial and Financial Control Audit**  
The annual audit of BAC financial matters and regulatory compliance is conducted by an external firm. The audits are publicly available and can be downloaded from the [Charities Commission](#) website and [Companies House](#).

- **Trustee review of BAC activities**  
There are three committees providing oversight of BAC activities. The remit and function of the committees is set out in Chapter 10.6.
- **Accreditation Committee oversight of BAC inspection and accreditation activities**  
The AC oversees BAC inspection processes and BAC accreditation standards.

## 8. BAC international activities

The table below lists the international activities outside of the scope of the ESG that BAC has undertaken since the last full ENQA review.

Activity	Location and further information
<b>Accreditation</b>	BAC accredits institutions outside of the UK (and outside of the scope of the ESG) through the International Centre scheme. BAC-accredited institutions are located in the following countries: Nigeria, Hong Kong, UAE, Guernsey, Saudi Arabia, Trinidad and Tobago, Chile From 2018, BAC has also expanded the scope of the Online, Distance and Blended Learning scheme to allow applications from institutions based outside of the UK. There is one institution accredited to date, based in Australia.
<b>Consultancy</b>	Capacity building in Bahrain for the Higher Education Council, Ministry of Education
	Review of institutional self-evaluation report (Georgia)
	Subject benchmarking (Hungary)
<b>Memorandum of Understanding</b>	MOU signed with LanguageCert, an awarding organisation dedicated to language skills assessment and certification. LanguageCert is included in the eligibility criteria for International English language providers seeking accreditation for the BAC International English Language provider (IELP) scheme.
<b>Or Memorandum of Agreement</b>	MOA with the Financial Accreditation Agency, Malaysia (FAA) to conduct joint accreditation activities.

### Membership of international networks

- BAC is a full member of ENQA. A link to confirm this can be found [here](#).
- BAC is a full member of International Network for Quality Assurance Agencies in Higher Education (INQAAHE). A link to confirm this can be found [here](#).
- BAC is listed on EQAR. A link to confirm this can be found [here](#).
- BAC is a signatory to the CHEA International Quality Group Memorandum of Affiliation, affirming our commitment to the CIQG International Quality Principles. A link to confirm this can be found [here](#).



## 9. Compliance with Standards and Guidelines for Quality Assurance in the European Higher Education Area (Part 3)

### 9.1 ESG Standard 3.1 Activities, policy and processes for quality assurance

*Agencies should undertake external quality assurance activities as defined in Part 2 of the ESG on a regular basis. They should have clear and explicit goals and objectives that are part of their publicly available mission statement. These should translate into the daily work of the agency. Agencies should ensure the involvement of stakeholders in their governance and work.*

BAC has two charitable Objects set out in the BAC Articles governing BAC activity.

**BAC's Objects are to advance education for the benefit of the public by:**

*'Providing a system of accreditation for educational and training institutions in order to promote public confidence in such institutions and their programmes of study'*

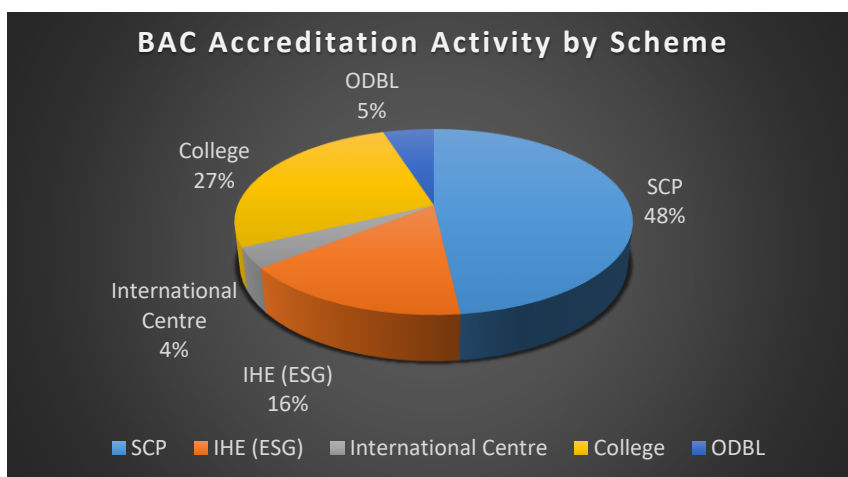
and

*'Assisting in the improvement and maintenance of the standards of accredited institutions through the offer of advisory and consultancy services principally in the field of further and higher education.'*

BAC Articles of Association 4.1, 4.2 (Annex 1)

Each year, BAC conducts approximately 130 accreditation inspections across all of the accreditation schemes.

BAC activities cover a wide range of accreditation activities, many of which do not fall into the scope of the ESG. A total of 16% of BAC accreditation activity concerns HE activities, institutions whose programmes include degree level courses, and which therefore fall into the ESGs.



BAC has a [Vision](#) which is: *to be an established, diverse and leading education charity for the independent further and higher education and training sectors, recognised by UK and overseas governments as an influential voice on standards and quality for the independent education sector.*

BAC also has a [Mission](#) which is: *to provide respected and rigorous inspection-based accreditation to enhance the standards and quality of independent further and higher education and training institutions.*

## Values

BAC's values were developed by the Trustees of the Charity and are threaded throughout its work and through its people, procedures and performance. These values are Respect, Responsibility, Integrity, Transparency, Trust and Ethical Commitment.

More information on the BAC values is available [here](#).

## Involving stakeholders

BAC involves external stakeholders in its governance.

BAC has a governance structure that ensures oversight from external representatives. The governing bodies within BAC are the Council, the AC, the Standing Committee and the Audit Committee. All members of these committees are external. Further information on the role of external stakeholders in governance and of the remit of these committees is given in Chapter 9.6.

BAC involves external stakeholders in its work in several ways:

### a) Inspectors

The BAC inspectorate are heavily involved in BAC activities as inspectors, but also in the way that BAC reviews its standards and the inspection process itself.

The IHE scheme review group, as discussed in more detail in Chapter 10.2, included two very experienced Higher Education Inspectors amongst the group.

The [Inspectors' Handbook](#), which sets out the processes and procedures for conducting inspections, was developed by the Chief Inspector with input from two inspector working groups. One group is based in the south of England and the other is in the north. The draft version was put out to the inspectorate before a final version was produced and distributed.

Each year there is an Inspectors' Conference designed to discuss new initiatives and to share good practice. Information about this event can be found in Chapter 10.5.

### b) Students

Since the last review BAC has taken significant steps to include students in the decision-making process. These include:

- A student representative on the AC (the committee responsible for deciding whether an institution achieves accreditation or not).
- A student inspector being included in BAC IHE inspections since 2015.
- A student representative being included in the 2018 IHE Scheme Review.
- A student representative being appointed to the BAC Council after a significant restructuring of the BAC governance structure. Furthermore, it is now written into the BAC articles that at least one of the 12 trustee positions is reserved for a student representative.
- The IHE scheme placing emphasis on student views, and the gathering of student views is now embedded in the BAC Independent Higher Education inspection process.

Student views and involvement are now embedded in BAC decision-making processes.

### c) Institutions and Higher Education Stakeholders

BAC involves institutions in its decision making through involvement in the review of the IHE Scheme and through feedback given at the end of each inspection. Further feedback is gained from institutions by periodic gathering of institutions views via questionnaire.

We feed the information we receive back in to working groups to review the IHE scheme, to review Inspector Manuals and other processes linked to inspections. In addition, statistics and other feedback is discussed in PCG meetings every month and any anomalies or areas for improvement are identified and plans for improvement are actioned.

## 9.2 ESG Standard 3.2 Official Status

*Agencies should have an established legal basis and should be formally recognised as quality assurance agencies by competent public authorities.*

### Legal basis of BAC

The legal basis of the BAC under UK law is as a 'Company Limited by Guarantee' and a registered charity. The relevant UK laws under which it operates are the Companies Act, 2006 and the Charities Act, 2011. The BAC was incorporated as a registered company on 29 June 1984 (Company No 1828990) and is limited by guarantee without share capital. It is also a UK-registered charity (Charity No 326652). The governing instrument and constituting document under which the company operates is its ['Articles of Association'](#).

Evidence of compliance with the requirements of this legal framework can be demonstrated in the work of the BAC Council, of which the members act as directors and trustees. The Council are responsible for preparing the Trustees Report and the financial statements. The Annual Report and Financial Statements are submitted annually to the Charity Commission and Companies House, which publishes confirmation of compliance on its website.

### Recognition

BAC is recognised by the UK Government as an important contributor to the external quality assurance landscape and for the support that it gives to the independent private sector for further and higher education. Government recognition took a particularly clear and direct form between 2007 and 2011, when BAC successfully applied for formal status as an accrediting body linked to the licensing procedures for recruitment and entry to the UK of non-EU international students.

Following the changes to UK legislation in 2011, BAC accreditation continues to be [recognised by the UK Government's Home Office](#) (via the relevant legislation outlined in the immigration rules) as a qualifying requirement for institutions wishing to enrol students on visitor visas (Student and Business). This means that students from outside the EEA can secure a UK visitor visa if they have a genuine offer from a BAC-accredited institution.

BAC is well regarded in the UK and internationally, and has received many visits from foreign delegations and missions to discuss its accreditation procedures and its work with institutions. BAC has also been recognised by governments and government departments in other countries as a significant contributor to international accreditation and the development of quality assurance frameworks. BAC has been active in recent years in developing and supporting quality assurance and HE through the review of private institutions and assistance with the development of a national quality assurance framework. BAC currently has a contract with the Bahraini Higher Education

Council (HEC), which is part of the Ministry of Education and was signed in October 2013 and continues today. This contract is between BAC and HEC for the procurement of services for the 'development of a system of accreditation'.

### 9.3 ESG Standard 3.3 Independence

*Agencies should be independent and act autonomously. They should have full responsibility for their operations and outcomes of those operations without third party influence.*

BAC is an independent body, a registered charity and a company limited by guarantee. The BAC Council is fully responsible for developing and overseeing BAC strategic direction. Members of the Committee are appointed by the Council members independently from any other source of influence.

BAC must comply with the [Charities Act 2011](#), which sets out the legal framework for decision making within a charity. This is clearly determined to be the responsibility of the trustees who, in the case of BAC, are the Council.

All Council members are required to submit an annual declaration of interest setting out the responsibilities they may hold elsewhere. The BAC auditors check and are required to confirm that there are no conflicts of interest, or if there are that these are recognised and considered by the Council when holding meetings or participating in decision making.

At the start of each meeting all members are asked to declare any conflicts of interest. More information on the conflict of interest policy can be found in Chapter 9.6.

The selection of inspectors for inspections is made independently of any third party input. Further information relating to the selection of inspections is available in Chapter 10.4.

#### **The Accreditation Committee**

The BAC inspection process differs from a review process in that most BAC standards are a binary choice; where either the evidence exists to confirm that the organisation meets the standards or it does not.

The AC, an independent group, has delegated authority from the Council to make the decision, based on the evidence provided in the inspection report, as to whether an individual institution has met the minimum necessary standards to be awarded accreditation.

The AC is independent of the Council and the staff of BAC and is seen by the Council as necessary to ensure the integrity of the awarding or withdrawal of accreditation.

BAC's conflict of interest policy is covered in Chapter 9.6.

#### **Independence of decision making**

Institutions do not influence the outcome of decisions, except through the appeals process. While Parts A and B of the inspection report are sent for factual checking to the inspection prior to submission to the Accreditation Committee they do not see the judgements or the supporting commentary. They will only see the report in full once the AC have made their decision.

## Consultancy

BAC conducts a limited amount of consultancy and has strict rules to ensure that consultancy activity does not conflict with BAC's accreditation activities.

### General consultancy protocols

- 1) BAC does not provide consultants for institutions seeking BAC accreditation but will provide a list of potential consultants whom the institution may contact, on a private basis, to support their application.
- 2) If a BAC inspector acts as a consultant to an institution they will not be able to inspect the institution.
- 3) Any institution seeking consultancy support are informed of this prior to a list of potential consultants being forwarded to them.
- 4) BAC will not enter into any discussions regarding accreditation during the consultancy period.
- 5) BAC will not provide any consultancy services related to BAC accreditation.
- 6) The inspector's views of the organisation will not be considered or taken onto account at any future accreditation inspection.
- 7) Unaccredited institutions are not eligible for BAC accreditation until the consultancy support has been concluded.

### The Bahrain project

BAC has a long running consultancy project to support the Kingdom's HEC. In order to avoid any potential conflict of interest BAC does not conduct any accreditation activity or provide any consultancy to any organisation in Bahrain other than to the HEC.

## 9.4 Standard ESG 3.4 Thematic analysis

*Agencies should regularly publish reports that describe and analyse the general findings of their external quality assurance activities.*

As a small agency, BAC has 36 institutions accredited under the IHE scheme. This therefore means that the amount of information that BAC is able to gather is limited in scope. Due to the number of staff at the agency itself, BAC does not have a dedicated research or marketing department. This does present some constraints on the type of thematic reviews we are able to undertake, and thereafter to be able to disseminate them as widely as we would wish to do.

In 2019, we have undertaken the first in-depth analysis of inspection reports to highlight good practice or to identify emerging trends or areas for improvement. There has not been an in-depth review of the IHE scheme previously, primarily because of the small number of inspections – 59 to date – that had been undertaken under the IHE scheme. We felt that it was timely to conduct the thematic review once the IHE scheme was updated in order to give us a benchmark to be able to compare against in future reviews.

At the meeting of the Audit Committee on 11 October 2018, the Committee approved the recruitment of a researcher to conduct a review of the IHE inspection reports. The use of a consultant was proposed because BAC does not have the analytical expertise or resources available in-house; and by utilising external expertise this strengthens our analytical capacity. The Council approved the cost of the project to be released from the reserves as part of the ENQA budget.

The appointment of a consultant was carried out through a formal tendering process. The consultant was approved by the Standing Committee on 13 December 2018 and the review commenced in January 2019.

The review identified trends within the inspection reports which include areas requiring improvements (e.g. not meeting BAC standards) and identified areas of strength or good practice.

The review quantitatively assessed the number of times inspection standards have action points assigned to them with the results broken down by:

- The inspection standards which are judged to be ‘Met’, ‘Partially Met’ or ‘Not Met’;
- Key indicators – to show which were judged to not be met, indicated as ‘No’ in the inspection report;
- Priority of the action point assigned (option of high, medium or low); and
- Location of the institution (by country).

The review then qualitatively assessed the areas of best practice or strengths of the institutions and recurring areas of non-compliance to identify emerging commonalities or themes emerging within the inspection areas of General Academic Management and Administration (GAMA) and Quality Management Assurance and Enhancement (QMAE).

Headline findings	Description
Good practice	<ul style="list-style-type: none"> <li>• Quality of, and institutional support for, staff.</li> <li>• Robust quality assurance culture that includes externality and systematic monitoring, evaluation and action planning for enhancement</li> <li>• Institutional culture and values characterised by good communications, robust management information systems and processes.</li> <li>• Investment in infrastructure, including technology and governance.</li> </ul>
Challenges, issues or areas for improvement	<ul style="list-style-type: none"> <li>• The capturing of information/data and evaluating it in more formal ways to facilitate more reliable, data-driven QA and management decision making.</li> <li>• The need to formalise, document and publish policies, processes and procedures.</li> <li>• The need to introduce, formalise or implement more consistently institutional arrangements for reviewing and supporting staff.</li> <li>• Improving clarity about lines of responsibility, accessibility of information</li> </ul>

Within the GAMA and GMAE inspection areas, there is little substantive difference between international and UK institutions in the broad themes emerging as good practice or as areas for improvement.

BAC has made the decision that due to the small number of accredited IHE institutions, and therefore the small number of inspection reports available to analyse, a thematic review will be undertaken every four years. This will be included in the budget planning in the preceding year.

The report is available on the BAC website [here](#).

### Methods of disseminating information

Prior to the completion of the review, an action plan was agreed on how to disseminate the results.

The results will be published on the BAC website and sent to all BAC IHE institutions and inspectors. The other stakeholders that we intend to send it to are UK HEIs who have partnership arrangements with BAC-accredited providers and quality assurance networks. BAC has also discussed internally about the feasibility of organising a stakeholder event focusing around some of the findings of the thematic review.

The results identify commonalities in strengths and where institutions frequently do not meet the key indicators in action points. The results will inform BAC where we need to provide additional support for our institutions and the intention is to produce series of guidance notes. These guidance notes will be helpful for current institutions reapplying for BAC accreditation and for non-accredited institutions who want to enhance their provision and quality assurance processes. In addition, we intend to hold a webinar to disseminate the findings of the review.

What may be learned from the thematic review is where there are differences between UK and international institutions and therefore which inspection areas the institutions encountered difficulties with. While the report will be sent to other stakeholders, including other QA agencies, it is not anticipated that it will add much value to their practices as the sample size was small without any one country having a dominant theme, or indeed, having a large enough number of institutions for them to be able to draw conclusions on how it would impact their activities. The fact that the IHE scheme is aligned to the ESG 2015 may allow ENQA agencies to use the results of our report to identify inspection areas to pay close attention to when they undertake their own thematic reviews in order to establish if their institutions are also not meeting standards in those areas.

## 9.5 ESG Standard 3.5 Resources

*Agencies should have adequate and appropriate resources, both human and financial, to carry out their work.*

BAC has the necessary human and financial resources to conduct its work.

While BAC activities cover a wide range of work with a scope extending beyond the ESGs, BAC is also able to make full use of Head Office staff and inspectors to conduct its HE commitments.

### Head Office

The head office refers to the BAC staff at the BAC offices in London. The employed staff are as follows:

Name	Position	Length of service (March 2019)	Full Time Equivalent
<b>Paul Fear</b>	Chief Executive	4 years	100%
<b>Diana Morriss</b>	Chief Inspector	3 years	100%
<b>Rosie Fairfax</b>	Accreditation and Quality Assurance Manager	3 years	100%
<b>Hayley Boyes</b>	Higher Education Manager	2 years	100%
<b>Lucy Fox</b>	Business Manager (previously Accreditation Coordinator)	2 years	100%
<b>Clare Baker</b>	Inspections Coordinator	15 years	100%
<b>Dinesh Thakur</b>	Finance Officer	10 months	80%
<b>Lisa Adkins</b>	Office PA	9 months	60%
<b>Zainab Khan</b>	Accreditation Assistant	New hire (April 2019)	100%
<b>Total FTE</b>			<b>8.4</b>

\*Note: Between 15 August 2016 and 15 March 2019 there was a Deputy CEO. This position has now fallen vacant and no further consideration to fill the position will be considered until the implementation of the 2019–2022 Strategic Plan.

The Head Office is responsible for:

- Internal quality assurance;
- Dealing with enquiries and applications;
- Management of the application process;
- Management of the inspection process;
- Management of the post inspection process and awarding of accreditation;
- Recruitment of the BAC inspectorate;
- Governance;
- Marketing; and
- Finance.

BAC staffing has increased by approximately 25% since the last ENQA review. The investment has effectively taken the form of increasing staffing in the quality assurance processes of the organisation.

A key change has been the appointment of a Higher Education Manager. The HE Manager is responsible for our HE activities and led the review of our IHE standards and ensured they were ESG compliant.

The appointment of an HE Manager demonstrates BAC's commitment to HE, both in the UK and internationally.

As a small agency changes in BAC staffing can have a significant impact on day to day operations. However, BAC has moved to a devolved management style delegating authority throughout the organisation united by a common understanding of the values underpinning our quality assurance activities. Considerable resources have been expended on developing Standard operating Procedures (SOP's) which mean the day to day processes of BAC can easily be passed on to or shared with other members of staff when a member of staff moves to a new position or is absent for a prolonged period of time. The net effect of the changes has been to increase the flexibility and resilience of the organisation to managing change and to embed quality assurance processes throughout the organisation.

### **The BAC inspectorate**

BAC has a self-employed inspectorate of 48 active inspectors, of whom 26 inspectors work on the HE inspections. These include eight active student inspectors who are students studying at HE institutions in the UK. At least one student will be deployed on each HE inspection.

In total, therefore, BAC has 26 HE inspectors. Given the small number of HE inspections that take place per year the pool of inspectors available is sufficient to carry out these activities effectively.

### **Training**

BAC has a staff training induction programme, which is entirely financed by BAC. In addition, all BAC staff have a personal training budget of £600 per annum which staff are encouraged to use for their own personal development.



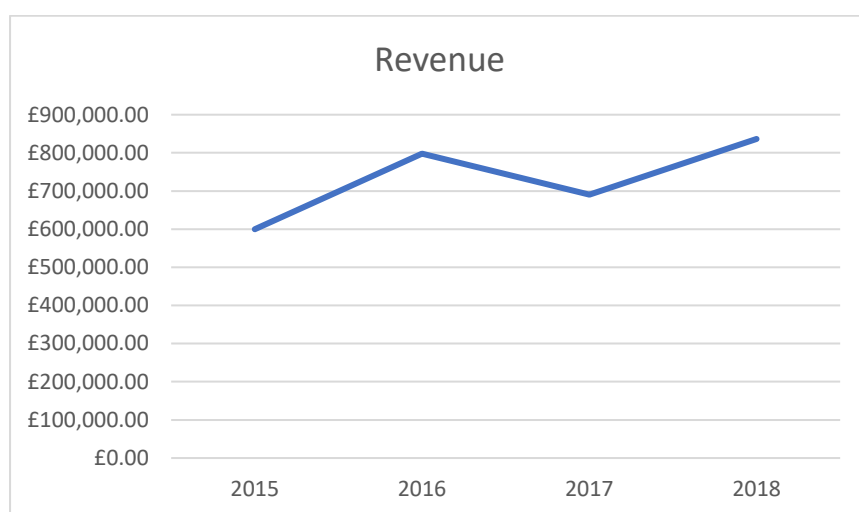
The Chief Inspector runs regular training sessions for inspectors with a view to sharing good practice with funding for training having doubled since 2015.

Every October, an Inspectors Conference is held which not only covers significant changes or decisions made by BAC but is also an opportunity to run workshops, encourage discussion and develop good practice.

### Financial resources

BAC has considerable reserves, in excess of £1 million, and has used these reserves to support the 2015–2018 Strategic Plan, where an operational deficit was recorded for each year.

During this time period BAC revenue has increased considerably from a low in the 2015 financial year.



BAC ran an annual deficit during the above period financed through the allocation of reserves.

Approximately 16% of BAC’s accreditation activities involve higher education, however higher education accreditation activity generates approximately 25% of BAC accreditation income.

### BAC reserves

BAC is fortunate that it has considerable reserves that can be utilised to support its activities. As explained above, this has allowed BAC to invest in staff. Increasing revenue means that BAC will return to achieving an operating surplus, albeit a small one.

The Council are committed to investing reserves into supporting BAC to widen its activities internationally with a new Strategic Plan being developed with a view to its introduction in September 2019.

## 9.6 ESG Standard 3.6 Internal quality assurance and professional conduct

*Agencies should have processes in place for internal quality assurance related to defining, assuring and enhancing the quality and integrity of their activities*

The BAC Internal Quality Assurance processes cover the following areas:

- Internal Quality Assurance
- Ensuring BAC Standards are 'Fit for Purpose'
- The Application and Interpretation of BAC Standards by the BAC Inspectorate
- The Awarding of Accreditation
- Governance
- Risk Management
- Auditing

The internal quality assurance document is provided in Annex 3 for full information.

### **Internal quality assurance**

After each inspection the institution and lead inspector are asked to complete a questionnaire on the inspection process. These figures are collated on a monthly basis and discussed at the PCG. The PCG started as a small group of staff which met to discuss planning and to review feedback statistics. Since February 2019 it has expanded to include all staff.

The PCG considers feedback statistics, monitoring any changes and identifying areas which may cause concerns but primarily seeks ways to reflect on the feedback and to consider ways in which improvements in the inspection planning process and the inspection process itself might be improved.

### **Ensuring standards are 'fit for purpose'**

BAC has a long history of developing accreditation standards dating back to 1984. Ensuring the standards are reflective of the sector that they are designed to serve is key to ensuring they remain relevant and support the BAC mission statement and charitable objectives.

Historically, BAC has developed its standards by utilising the experience of its inspectorate, who have amassed a considerable degree of experience from working within their specialist fields, and by benchmarking BAC standards against other agencies.

Since 2017, BAC has adopted a revision cycle designed to ensure that key stakeholders review each set of standards in order to provide a more rigorous and transparent process, which not only sets out to ensure they are fit for purpose but ensures they reflect the needs of stakeholders. Further information is available in Chapter 10.5.

### **Application and interpretation of standards**

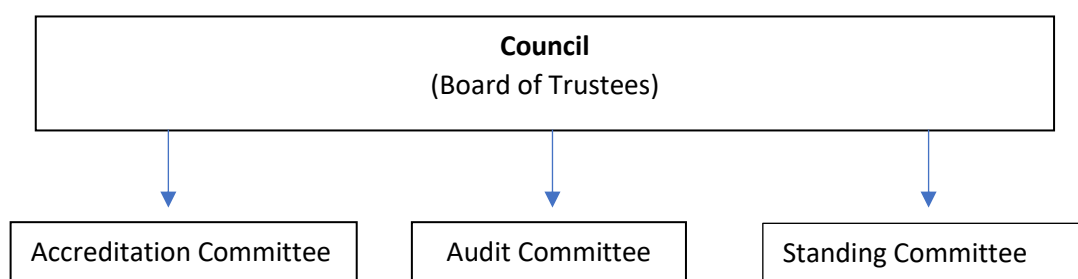
BAC employs a professional inspection body to inspect institutions. Their interpretation and application of the standards are supported by various methods including an annual Inspectors' Conference, induction activities, monitoring inspections and resources such as the Inspectors' Handbook.

## Awarding of accreditation

The Accreditation Committee – an autonomous committee with delegated authority from the Council – is responsible for taking the decision on the awarding or withdrawing of accreditation. The members of the Committee are assisted in their decision making by officers of BAC and meet as a committee between five and eight times per year.

## Governance

In 2018, BAC adopted a new governance structure designed to increase accountability and strengthen oversight by the trustees. The details of the committees are listed below.



### Council

**Membership:** Up to 12

**Membership terms:** Maximum of two three-year terms

**Purpose:** To offer strategic leadership and oversight, ensure BAC is fully compliant with its legal obligations and to receive reports from the Accreditation Committee, Standing Committee and Audit Committee.

#### **Remit:**

- To elect trustees;
- To receive and approve the audited accounts and financial statements;
- To receive and approve the annual budget;
- To approve financial plans and expenditure;
- To monitor BAC's financial performance, including the performance of BAC's investments;
- To develop and approve the BAC's Strategic Plan;
- To appoint the Chief Executive Officer;
- To ensure BAC acts in a way which is consistent with its stated objectives and relevant statutory obligations; and
- To receive and consider reports from the Accreditation Committee, Audit Committee and Standing Committee.

### Accreditation Committee

**Membership:** 10

**Membership terms:** Maximum of two three-year terms

**Purpose:** To award, approve, withhold, renew, withdraw or suspend accreditation. The AC is also responsible for keeping accreditation standards, criteria and procedures under review.

#### **Remit:**

- To keep under review the standards of provision or performance against which institutions seeking accreditation will be inspected and judged and the criteria required for accreditation.
- To make recommendations to the Board of Trustees where changes to these standards and criteria are considered appropriate.
- To make recommendations to the Board of Trustees on the conditions of eligibility for BAC accreditation and for any specific or specialist accreditation scheme that may seem appropriate to the Committee.
- To approve the appointment of inspectors on the recommendation of the Chief Inspector.
- On the basis of inspectors' reports and other evidence formally presented to it, to decide whether an institution has met BAC's minimum standards for accreditation and whether such accreditation should be awarded, withheld, renewed, withdrawn or suspended.
- To receive reports on accredited institutions' performance.

The Chair is appointed by the Trustees from amongst the AC members.

Further information on the recruitment and election of committee members is included in the Internal Quality Assurance Policy in Annex 3.

### **Standing Committee**

**Membership:** Council Chair, Council Deputy Chair, Treasurer

**Purpose:** The Standing Committee will have delegated authority from the Council/ Board of Trustees:

- To consider proposals which require Council/ Board of Trustees approval, as long as the decisions are consistent with the agreed Strategic and Annual Plans.
- To consider and scrutinise budget proposals, Annual and Strategic Plans and 'one off requests' for funding projects requiring use of BAC reserves.
- To deal with any matters requiring urgent consideration and/or decisions that may arise between meetings of the Council/Board of Trustees.
- To provide oversight of BAC compliance with ENQA and EQAR requirements.

### **Audit Committee**

**Membership:** The Committee comprises of the Treasurer, two other trustees, and may include an external nominee to bring particular expertise to the audit process.

**Purpose:** The Audit Committee will have delegated authority from the Council/ Board of Trustees:

- To scrutinise the annual accounts in preparation for their presentation to the Council/Board of Trustees.
- To ensure that financial monitoring and reporting systems are appropriate and effective.
- To review the BAC Risk Register. The Risk Register covers a broad range of risks including regulatory risks, competition and other risks.
- To monitor BAC compliance with health and safety and other legislative and regulatory requirements.
- To monitor and review BAC's economy, efficiency and effectiveness.

## **Conflict of interest policy**

### ***For committees***

At the start of each Committee meeting, all members are asked if they feel they have a conflict of interest regarding any item on the agenda. If so, they will not be allowed to participate in the discussion of that particular agenda item. In particularly sensitive discussions they will be asked to leave the room while the item is discussed. All trustees, inspectors and BAC senior management are asked to sign a conflict of interest declaration setting out any areas of potential conflict of interest.

### ***The BAC inspectorate***

BAC defines a conflict of interest as *'an individual's personal, business or family interests, loyalties and/or involvement with another organisation conflict with those of BAC and this might influence, or be perceived to influence, an inspector's judgement and/or decisions.'* BAC Inspectors Contract (2018-19).

BAC is committed to ensuring that there are no conflicts of interest in its activities. Every year, all inspectors sign a Declaration of Interest form. On this the inspector must declare any institutions with which they have been or are connected with in any way, such that the connection might constitute a conflict of interest for future inspections in that year. The requirement to complete the form is a part of the onboarding process and is linked with the terms under which inspectors are contracted to undertake inspections on BAC's behalf. It includes a requirement that any such issues that arise during the year must also be declared.

Inspectors are allocated to particular inspections on the basis of expertise and availability, with conflicts of interest checked for each inspection. Institutions may, if they have a valid reason, ask for an allocated inspector to be changed, but have no opportunity or mechanism to indicate a preference for one inspector over another.

### ***Consultancy activities***

For consultancy activities, confirmation that there is no conflict of interest is given from both the prospective consultant(s) and also from the institution in writing via email. If there is a conflict, then the consultancy team will be revised.

## **Risk management**

BAC holds a Risk Register, which is reviewed on a timely and regular basis by the Audit Committee. BAC uses a risk dashboard to assess risk and helps to immediately identify high-level risks. This is done by assigning values to the likelihood of a risk occurring and the perceived impact it will have on the organisation. Further information on risk management and calculating risk is available in the Internal Quality Assurance Policy in Annex 3.

## **Auditing**

BAC conducts a number of auditing and independent oversight processes. These include:

### **1) An annual financial and financial control audit**

The annual audit of BAC financial matters and regulatory compliance is conducted by an external firm and voluntarily chooses to be audited to a higher standard of compliance than is required by

both the Charities Commission and Companies House. The audits are publicly available and can be downloaded from the Charities Commission website and from Companies House.

## **2) Trustee review of BAC activities**

There are three committees providing oversight of BAC activities. The remit and function of the committees are set out under the Governance section above.

## **3) Accreditation Committee oversight of BAC inspection and accreditation activities**

The AC oversees BAC inspection processes and BAC accreditation standards.

### **Other policies**

- [Anti-Bribery and Anti-Corruption Policy](#): BAC has a rigorous policy that all staff, inspectors and committee members must abide by. All gifts exceeding the minimum values set out in the policy must be recorded, and in most cases no gifts or other inducements are accepted.
- [Staff Handbook](#): BAC's Staff Handbook sets out a wide range of policies covering equality, bullying, etc.

### **Performance management**

BAC operates according to a three-year Strategic Plan which is implemented through a rolling, one-year Operational Plan. The Strategic Plan is agreed with the trustees, while the one-year Operational Plans are developed internally.

Each member of staff has their own objectives designed to support the Operational Plan. Progress towards meeting their targets are discussed on a regular basis.

At the end of each inspection, BAC requests the completion of a questionnaire by the inspected institution and a separate questionnaire from the inspectors involved in the inspection.

Every month there is a PCG meeting which discusses inspection activity, the results of the questionnaires mentioned above, financial issues and progress towards meeting the Operational Plan. BAC staff collectively discuss organisational performance and any steps that can be taken to improve matters.

## **9.7 ESG Standard 3.7 Cyclical external review of agencies**

*Agencies should undergo an external review at least once every five years in order to demonstrate their compliance with the ESG.*

BAC completed its first ENQA external review in January 2015 culminating in the ENQA Board awarding full membership to BAC in March. BAC's application for inclusion on the European Quality Assurance Register was accepted in June of the same year.

A SAR was produced in July 2014 and provided BAC with a valuable opportunity to reflect on its position, its strengths and areas for development. The review panel provided feedback and recommendations based on their analysis and their findings in the report and during the site visit to BAC.

A follow-up report was completed and submitted to ENQA in March 2017 requiring BAC to reflect further on its development to consider how it had addressed the recommendations made by the panel and the ENQA Board in the 2015 external review.

The process of reflection has helped the team to gain more in-depth insights into BAC's methodologies and processes; and as a result of this reflection and consideration it has created areas of focus for future growth and development.

The review and reflection process has been instrumental in nurturing and steering change at BAC across its operations and activities to the benefit of the organisation and the quality assurance services it offers.

Chapter 12 provides more detailed information of the progress that BAC has made on addressing recommendations arising from the ENQA review process.

## 10. Compliance with Standards and Guidelines for Quality Assurance in the European Higher Education Area (Part 2)

### 10.1 ESG Standard 2.1 Consideration of internal quality assurance

*External quality assurance should address the effective of the internal quality assurance process described in Part 1 of the ESG.*

BAC has outlined below what our processes are and how our accreditation scheme standards are aligned to Part 1 of the ESG 2015.

As an accreditation organisation, BAC undertakes accreditation, which is the defined quality assurance activity, by conducting an onsite inspection of a HE institution. It is at this inspection, and through the review of documentation and meetings with stakeholders (including staff and students), where the inspection team is able to assess if they have met the inspection standards of the IHE scheme.

HE institutions were first accredited under the first HE accreditation scheme in 2016. As BAC conducts regular reviews of its accreditation schemes, the HE scheme was reviewed in 2017. It was subsequently updated and launched in 2018.

Further information about the process of the review can be found in Chapter 10.2.

#### **The Independent Higher Education Scheme**

The updated scheme has seven inspection areas

- 1. Governance, Strategy and Financial Management**  
This area looks at the overall institution, specifically at whether they have effective governance and management structures with a clear strategy, and conducts its financial matters professionally and transparently with external audits.
- 2. General and Academic Management and Administration**  
This area looks at the effective management and administration of the institution including the recruitment and development of staff (both academic and non-academic) and the recruitment of students.
- 3. Teaching, Learning and Assessment**  
This area looks at how effective the teaching, learning and assessment is for the students.
- 4. Student Support, Guidance and Progression**  
This area looks at the type of support students receive and ensures that both the pastoral and academic guidance is effective.
- 5. Premises, Facilities and Learning Resources**  
In this area, the standards assess the premises to ensure that they are sufficient for the type of provision and that sufficient learning resources are available to facilitate learning.
- 6. Quality Management, Assurance and Enhancement**  
In this area, BAC looks at the internal quality assurance systems in place to allow the institution to evaluate their own performance, address any actions required and continue to enhance their provision.
- 7. Online, Distance, and Blended Learning**  
This area is only applicable if the institution offers online, distance or blended learning and it focuses on the suitability of staff to deliver this mode of delivery effectively.

BAC provides a scheme handbook which provides applicants with information on the scheme's eligibility criteria and lists all of the inspection areas, standards and key indicators that the inspection team will be reviewing them against. The process of reviewing the IHE scheme allows BAC to identify



specific areas where some applicants struggle to meet requirements; and therefore, the scheme document also includes guidance notes on these areas.

BAC addresses the effectiveness of the institutions' internal quality assurance in two ways:

1. Does it meet the standards and key indicators of the IHE scheme?
2. Do the procedures and processes work effectively and are they appropriate for the institution?

An institution will complete a SER in advance of the inspection. In this report, the institution considers if they meet, or do not meet, the IHE standards and key indicators, including how effective they think their internal quality assurance processes are. Where there are areas that the inspectors consider effective but could be improved the inspector will make a recommendation so that the institution can enhance their quality assurance processes.

A brief summary is listed below to demonstrate that BAC is able to meet this requirement. BAC provides clear guidelines on what an institution is expected to demonstrate in order to gain accreditation.

An overview is given below to demonstrate which BAC inspection standards and key indicators relate to Part 1 of the ESG.

### **1.1 Policy for quality assurance**

The IHE scheme has inspection standards related to governance and strategy for institutions to demonstrate effective governance (standard 1) and that it has systems in place to review its own standards and assess its own performance (standard 27).

### **1.2 Design and approval of programmes**

BAC has standards stipulating that an institution's publicity material should specify the qualification and awarding body (standard 10). The accreditation requires an institution to have effective academic management, to have procedures in place for the design and approval of their programmes, and to make sure the learning outcomes are available and understood by students (standard 7).

### **1.3 Student-centred learning, teaching and assessment**

The IHE scheme includes standards which assess teaching, learning and assessment. Standard 11 assesses the institution on how academic staff facilitate student learning with key indicators such as *'11.5 academic staff are effective in recognising individual learning needs and preferred learning styles and adapting their delivery to meet these'* and *'11.7 students are encouraged and enabled to develop independent learning skills'*. Standard 12 focuses on assessment and feedback with specific key indicators that relate to plagiarism (12.5) and appeals (12.6).

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

Standard 8 requires institutions to have clear recruitment and admissions processes, including recognition of prior learning. The scheme also includes a review of progression and the institution's internal processes relating to this, specifically standards 15 and 25.

### **1.5 Teaching staff**

BAC has standards which relate specifically to the recruitment and further development of an institution's staff (Standard 6). In addition, the standards will also require institutions to demonstrate that their staff are facilitating effective learning (standard 11). The inspection team will assess this at the inspection and will include lesson observations.

### **1.6 Learning resources and student support**

As BAC takes a holistic approach to accreditation, the IHE scheme includes standards on the facilities and its resources of both staff and learning materials. This is evident in standards 2, 7, 14, 15, 16, 22, 24 and 25.

### **1.7 Information management**

As BAC requires institutions to be able to reflect on their own performance through the collation of various performance metrics, the IHE scheme has specific key indicators on areas such as student outcomes (27.8 and 27.9) and institutional performance (27.4).

### **1.8 Public information**

Institutions are required to publish accurate information about their activities, and the IHE scheme looks at a wide range of areas. For programmes, BAC has specific standards where this is assessed, namely pre-application publicity material about the programme (standard 8), and assessment methods for students currently enrolled on programmes (standard 7, 10 and 12). For wider strategic activities, standard 2 focuses on the institutions' strategy.

### **1.9 Ongoing monitoring and periodic review of programmes**

The review of programmes on a periodic basis is something that is covered within the IHE scheme. BAC has inspection standards on periodic reviews (standard 27) and on the institution's reflection process on gaining feedback from stakeholders (standard 26). In addition, the IHE scheme also assesses the procedures in place to allow for the continual enhancement of an institutions provision (standard 28).

### **1.10 Cyclical external quality assurance**

The IHE scheme looks at cyclical external quality assurance at the institutional level in standard 2 and at the programme level, for example in standard 7 and standard 27, and specifically in '*27.11 review and revalidation of programmes on a regular basis involves external assessors as appropriate*'. Institutions use BAC accreditation as a form of external quality assurance as we look at the institution as a whole.

A mapping table is available in Annex 8.

The process of BAC accreditation is very thorough and the inspection standards that institutions are assessed against are wider than those contained within Part 1 of the ESG 2015.

During the review of the IHE scheme, we streamlined the standards and key indicators to remove duplication and ensured that the standards were fit for purpose.

However, we still have 29 inspection standards and 174 key indicators within the scheme. This means that the scheme is very detailed and could cause some trepidation for any organisation applying for accreditation. BAC ensures that those applying for accreditation are aware that while there are a large number of key indicators not all of them will be applicable to their organisation – for example, the online, distance and blended learning standards will not be applicable if the institution only has face-to-face teaching.

As BAC continues to gather data from the results of inspections we will be able to use this information to identify where additional support and guidance is needed for institutions going through the accreditation process.

In future reviews of the IHE we will continue to look at the inspection areas and standards in order to identify where changes may be required, although we would not be intending to add additional standards and key indicators.

## 10.2 ESG Standard 2.2 Designing methodologies fit for purpose

*External quality assurance should be defined and designed specifically to ensure its fitness to achieve the aims and objectives set for it, while taking into account relevant regulations. Stakeholders should be involved in its design and continuous improvement.*

### **Aims and objectives of the IHE scheme**

The IHE scheme was designed as a voluntary quality assurance scheme for independent institutions who want to demonstrate to students and stakeholders a commitment to quality assurance. Note that 'independent' is a definition that refers to the independence of the organisation – i.e. its ability to make financial and governance decisions independently of the government or other body. In this sense BAC accreditation can cover both private and public universities (if such a distinction can be made).

### **Designing the quality assurance standards**

The original standards were devised by a working group consisting of the Chief Inspector and BAC HE inspectors. The scheme would then have been put to the BAC Accreditation Committee for approval. The AC would then have recommended the approval of the scheme to the Executive Committee (Trustees) and Council (Trustees and other stakeholders). (Note: these two bodies have been abolished and instead BAC now has a 'Council', which is made up exclusively of Trustees).

Since the last ENQA review, BAC has adopted a more inclusive mechanism for reviewing and developing standards as set out below.

### **2017/18 Review of the Independent Higher Education scheme**

After the IHE scheme had been in use for one year, BAC made a decision to review the scheme in 2017 to assess if it was still fit for purpose and if any changes to the inspection standards or eligibility criteria were required.

In light of the recommendations from ENQA, BAC changed the design to include a greater range of stakeholders when the IHE scheme was reviewed.

On March 27 2017, BAC set up a Higher Education Focus Group (HEFG) comprised of the following stakeholders:

- An international BAC-accredited IHE institution;
- A current student;
- Representatives from two UK universities that were not accredited by BAC;
- A representative from a university member organisation for modern universities to get a wider perspective;
- A BAC trustee; and
- Two BAC inspectors.

The remit of the group was to ensure that BAC's standards remain relevant and appropriate for quality assurance purposes in the United Kingdom and internationally.

It is worth noting here that many of BAC's inspections take place overseas. The standards and key indicators in the IHE Accreditation Scheme were specifically designed so that they are applicable either in the UK or in other countries. For example, the key indicator relating to safeguarding young learners uses the words '*effective* safeguarding arrangements are in place....'. As a result, the key indicator can be applied in the same way as in the UK where we would always look at the standards in the overall context of the particular institution being inspected. For example, we are looking at

safeguarding processes that follow best practice and effectively keep all students safe. We do not, however, use words such as ‘follow British legislation’, as this would not always be relevant.

The HEFG worked with BAC in reviewing the IHE Accreditation Scheme, the review was completed in 2018. Consultation with these stakeholders enabled effective testing of the scheme and addressed fitness for purpose with a relevant audience.

As part of its internal quality assurance systems, BAC reviewed the HE scheme to ensure the following:

- The scheme continues to represent best practice in international HE quality assurance.
- The scheme represents the interests of a range of stakeholders in HE.
- The standards and criteria are clear and appropriate.
- The scheme supports BAC’s quality assurance processes in the independent and public sector HEIs both in the UK and internationally.

The HEFG had two face-to-face meetings where the members were asked to review the standards and eligibility criteria of the IHE scheme.

The key outcomes were:

1. A relaunched IHE scheme with updated accreditation criteria to ensure that BAC is only accrediting those institutions who are operating in either a regulated space or have been through a quality assurance process where their degrees have been externally reviewed. The eligibility criteria can be found on page 4 of the IHE scheme [here](#).
2. Updated quality assurance standards, including key indicators, to recognise that HEIs utilise online and distance elements of teaching and inspection areas that include these specific key indicators.
3. Aligning the BAC inspection standards and key indicators to Part 1 of the ESG 2015. Further information is available in Chapter 10.1.

### **Internal approval procedures for approval of the updated IHE scheme**

All accreditation schemes are under the remit of the AC, as per the committee’s terms of reference.

*To keep under review the standards of provision or performance against which institutions which seek accreditation will be inspected and judged and the criteria required for the award of accreditation.*

Accreditation Committee Terms of Reference, 2.1

Therefore, in order for a scheme to be updated or a new scheme to be created, the AC is required to formally approve the scheme. At the meeting of the Committee in December 2017, the AC approved the scheme.

For the scheme to be ratified, the decision of the AC was then communicated to the Council, which is the Committee with overall responsibility for BAC activities.

### **Implementation and publication of the updated IHE scheme**

All accredited institutions were notified of the updated scheme and a copy of the scheme document was sent to them via post and email. All institutions offering full degree programmes at bachelor’s level and above will need to be accredited through the IHE scheme. BAC is implementing this on a phased approach; as institutions go through their re-accreditation inspection, they will need to move from the old IHE scheme to the updated scheme.

While the other accreditation schemes are not within the remit of the ESG 2015, and therefore ENQA, a similar process for involving stakeholders when reviewing the accreditation schemes is now in place.

BAC did not consult the wider group of institutions accredited under the IHE scheme before launching the new scheme. On reflection, this was something that we feel we should have done, and will do in the future when the scheme is reviewed.

### 10.3 ESG Standard 2.3 Implementing processes

*Standard: External quality assurance processes should be reliable, useful, pre-defined, implemented consistently and published. They include: A self-assessment or equivalent; an external assessment normally including a site visit; a report resulting from the external assessment; and a consistent follow-up.*

The BAC accreditation process is the same for all UK and overseas institutions under all accreditation schemes. Each part of the process, listed below, is pre-defined for internal use in Standard Operating Procedures (SOPs) to ensure it is implemented consistently and monitored by line managers. The accreditation process is also pre-defined for institutions and available in clear documentation sent via email or available on the website as well as hard copy. Institutions are also informed at each stage of the process of the next steps.

#### **Accreditation process:**

- Enquiry
- Application
- Inspection planning
- Onsite full inspection
- Report processing
- Accreditation Committee decision
- Notification to institutions
- Publish reports
- Follow-up and monitoring including an interim inspection
- Annual enrolment data survey
- Invitation to apply for re-accreditation

#### **Self-Evaluation Report**

All institutions must complete and submit a Self-Evaluation Report (SER) before any full inspection.

The purpose of the SER is for institutions to identify their strengths and areas to improve or develop against each key indicator and identify the available documentary and other evidence to support this view.

They are provided with a template, guidance notes and a webinar recording to support them. New institutions are sent the SER and guidance via email along with the application form following their enquiry meeting. Existing institutions are sent these documents six months before their accreditation expiry date. If an institution requests further clarification on the expectations for completing this document, they are offered the opportunity to have a meeting or telephone call with the Chief Inspector or other staff member.

The SER is reviewed by the inspection team in preparation for the inspection.

Chapter 10.4 provides further information on inspector training.

## **Inspection**

All institutions have a full, onsite inspection at the beginning of their accreditation cycle. Inspections vary depending on the size and scope of the institution, but an inspection planning process is followed for all institutions, regardless of location, which is outlined in a SOP. An average full inspection takes place over two days with a team of three inspectors; if an institution has multiple campuses, which will require the inspection team to move locations, the inspection could take longer. This ensures that institutions and inspectors receive all relevant and useful information required before the inspection. The Inspections Coordinator, Chief Inspector and Accreditation and Quality Enhancement Manager work together to implement this process.

Full inspections consist of meetings with staff and students, documentation review, and observations of teaching and facilities.

BAC monitors inspections through peer reviews where the Chief Inspector will join an inspection team, announced and unannounced, and encourages the sharing of good practice and adherence to the inspection guidelines. Feedback is sought from every institution after an inspection and from the inspectors themselves.

## **Inspection reports**

A report is produced following all inspections. The reports include three sections. Part A provides an introduction to the institution, including the background, history, a brief description of the current provision and the inspection process itself. Part B includes judgements and comments based on evidence seen by the inspector during the inspection and document review. Each inspection area and key indicator is included. Part C includes a summary of strengths for each inspection area and any action points with a high, medium or low priority rating.

This section also includes recommendations for enhancing the quality of provision and provides comments relating to compliance with statutory requirements if necessary.

The report editing process is overseen by the Accreditation Assistant and the Chief Inspector, who also follow a SOP. Reports are processed and reviewed against the Report Writing Guidelines to ensure the consistency and quality of the reports.

Please see Chapter 10.6 for more information about the processing of reports.

Finalised reports are then submitted to the AC who review the reports and make their decision based on the information supplied.

All reports of institutions who hold accreditation are published on the BAC website following the AC's decision. Each institution on the website has the last two reports published. Institutions are listed under the Accredited Institutions directory section of the website [here](#).

The inspection process and the production of inspection reports is constantly reviewed to ensure consistency but also to identify areas where improvements can be made to the process. The processes to do this are discussed elsewhere in the SAR.

## **Follow-up activities**

BAC notify institutions within ten working days of the AC's decision. The notification is sent as an email with an attached notification letter and electronic version of the inspection report. The notification letter and report are also printed and sent as a hard copy. This is for all types of inspections and institutions.

BAC carries out interim inspections for all accredited institutions. For new institutions, it will be arranged within 12 months of accreditation being awarded and between the second and third year of all subsequent cycles.

The purpose of the interim inspection is to carry out a spot check of the standards to ensure the institution continues to maintain standards as well as to monitor an institution's progress by addressing any action points or recommendations from their last inspection. All action points are expected to be addressed by the interim inspection. Recommendations are made by inspectors to promote best practice and for quality enhancement, but it is the choice of the institution as to whether they implement them or not. The inspection team will discuss the recommendations with the institution and take note of any justifiable reasons for why any recommendations are not being addressed.

If an inspection report identifies a high number of action points, or the action points are of a nature that the AC may feel that closer monitoring is needed, the Committee may request action points to be addressed before the next inspection. Alternatively, they may request the interim inspection be brought forward or for an additional supplementary inspection to be carried out.

BAC monitors an institution's progress on meeting action points by setting deadlines for submission of evidence and by conducting onsite or desk-based inspections.

Action points to be addressed are communicated through the inspection report and high-priority actions are listed in the notification letter. The letter will list any high-priority actions and set a deadline for when the institution must demonstrate that it has met these actions. The notification letter will ask the institution to contact the BAC office if any guidance is required on what the action points mean or how the actions may be met.

An action plan is requested to be submitted within four weeks of notification. This plan is reviewed by BAC, and if there is any feedback or guidance this is sent to the institution with a request for an amended action plan to be submitted.

Evidence must then be submitted by the institution within the set deadline. The deadline set allows time for the institution to make any amendments should the evidence submitted fail to fully meet the action points. BAC monitors the deadline and will follow up with the institution if the deadline has not been met. The institution is contacted first by email and then by telephone if there is no response.

The evidence is reviewed by the lead inspector of the original inspection team or by an alternative HE-experienced inspector if the original lead inspector is unavailable. The evidence is also reviewed by the Chief Inspector through random sampling. The inspector provides feedback for the institution to BAC and confirms whether the action points have been met or not. If the action points have not been sufficiently addressed, then the institution must review and address the feedback from the inspector and resubmit evidence. The same inspector, where possible, will review the second submission of evidence and confirm to BAC if the action points have been met or not.

The Committee may also ask for a supplementary onsite or desk-based inspection as part of the requirement to address the action points. They may ask for this when they first make their decision on accreditation or following the submission of evidence that the institution has addressed the action points. There is a SOP for monitoring an institution's progress with addressing action points and arranging a supplementary inspection.

The inspector's judgements are submitted to the Committee either via the Matters Arising report for the desk-based review of the evidence or by a supplementary inspection report. They are asked to decide whether accreditation is to be continued or full accreditation awarded if the decision had

been deferred. They can withdraw or refuse accreditation if the inspector's assessment determines the action points have not been met.

#### 10.4 ESG Standard 2.4 Peer review experts

*External quality assurance should be carried out by groups of external experts that include (a) student member(s).*

##### **The pool of peer experts (inspectors)**

BAC deploys professional inspectors on a contractual basis to carry out specific inspections on behalf of BAC. The inspectors are chosen from a pool of inspectors, all of whom have undergone a rigorous recruitment, induction and training process. This ensures that they understand the background to the setting up of BAC and the benefits it brings to its accredited institutions, the scope of the IHE Accreditation Scheme and how we organise our inspections. These processes also assist inspectors in keeping their knowledge up to date and facilitates consistency in implementing the inspection process.

There are currently 48 active inspectors, of whom 26 inspectors work on the HE inspections. This includes eight active student inspectors.

The inspectors have a wide range of experience from undertaking various roles in universities – including roles relating to academic management and quality assurance – as well as carrying out quality assurance reviews, including other agencies such as the UK's QAA, and carrying out a wide range of other quality assurance consultancy work. This enables us to put together inspection teams with members who will work well together to carry out successful inspections.

The inspectors bring various levels of expertise to an inspection. Some are actively working in the HE sector and are given specific leave to undertake BAC inspections, often as part of their continuing professional development. Others are self-employed and work as quality assurance professionals undertaking a range of assignments, including inspection activity for other inspection bodies and consultancy work. As a result, they are up-to-date with current issues in the HE sector and are able to bring their own perspectives to an inspection in order to enrich the experience for the institution being inspected.

##### **Student inspectors**

As a result of the previous ENQA review, BAC was asked to consider how to include students in a meaningful and impactful way to provide benefit for its strategy, procedures and standards regarding the HE component of its work.

Since the previous ENQA review, BAC has recruited a larger number of student inspectors. BAC currently has eight student inspectors studying in different types of academic institutions, both privately and publicly owned. In order to maintain the pool of active students, recruitment is carried out on an ongoing basis through recommendations and advertising campaigns.

The student inspectors are deployed on all new and re-accreditation inspections under BAC's IHE scheme, both in the United Kingdom and internationally. Their specific duties on the inspection are allocated to them by the lead inspector. A typical standard area, in which a student inspector will be involved from the outset, relates to student recruitment, support, guidance and progression, where their current experience as a student brings very valuable insights. In general, BAC's student inspectors bring a unique perspective as they are actively studying, and are therefore able to relate well to the students with whom they meet on an inspection. This facilitates the gathering of evidence relating to the student experience at the institution. Their unique focus on the experience



of the students and their ability to relate to the students in student meetings are a key element of the inspection process.

BAC strongly values the views and involvement of students and recognises the importance of including a student voice within its processes. This view is supported by the feedback received from lead inspectors. The student inspectors are regarded as equal partners with the other members of the inspection team and play a full role in making the decisions as to whether the institution meets BAC's standards and any improvements required by being fully involved in all meetings where these decisions are discussed and made.

### **The involvement of international experts in external quality assurance**

As a result of the previous ENQA review, BAC was recommended to consider how to include international experts in a meaningful and impactful way to provide benefit for its strategy, procedures and standards regarding the HE component of its work.

In terms of inspections, this is achieved in the following ways:

1. A number of BAC inspectors work internationally and have carried out inspections for BAC in a wide variety of countries. As a result, they can provide relevant comparisons with quality assurance in other countries.
2. We currently have three student inspectors with an international background and one who is currently based outside the UK. The countries concerned are Cyprus, Georgia, China and Spain. They can bring their international knowledge to the inspections on which they are deployed.
3. To broaden the experience and knowledge base of the decision-making body (the Council), BAC has an international expert from the Republic of Ireland serving on the Committee.

### **Deployment of inspectors**

An experienced inspection team is deployed on inspections based on the length of their experience, their particular quality assurance and subject expertise and their availability to prepare effectively for, conduct, and report on the inspection. For full and re-accreditation inspections, inspection teams will, in the majority of cases, consist of three inspectors. These are a lead inspector, who prepares the inspection with the institution, manages the overall conduct of the inspection and writes the inspection report. The other two inspectors are the team inspector and the student inspector. The team inspector and student inspector follow direction from the lead inspector on the standard areas they will focus on as part of the inspection, and support the lead inspector accordingly during the inspection. They will also keep a written record of their findings as part of the record of evidence.

There is an internal process for deciding on the number and identity of the members of the inspection team to suit the institution being inspected. This process involves members of the accreditation department, who suggest possible inspectors. The Chief Inspector, who knows the inspectors and can take a view on how well they will work together as a team to meet the needs of the inspection, and signs off both the identity of the inspection team members and the length of the inspection.

As a result of the previous review, ENQA recommended that inspection visits for full accreditation are not done with just one inspector. BAC was also asked to address the external quality assurance approach of using only one inspector.

Since the previous ENQA review, there has been a minority of inspections where less than three inspectors have been deployed. Eight of these were small in size and one was due to exceptional

circumstances involving a health-related issue with one of the inspectors, which occurred just before the inspection. Apart from one inspection in October 2015, we have never used only one inspector for HE inspections.

In order to ensure that the inspection teams, whatever their size, work effectively and cover the standards to the appropriate depth, the Chief Inspector monitors inspection visits in order to observe the inspectors' performance and to ensure the effectiveness of the inspection team.

BAC gathers feedback on the approach, content and organisation of inspections from institutions and inspectors after every inspection in order to ensure that its approach meets expectations.

BAC is committed to putting together the best team for each inspection and to ensure that the size of the team enables the inspection to be carried out thoroughly and with suitable discussion between the team members to ensure robust decision making. As mentioned above, this results in the vast majority of inspection teams being made up of three inspectors. In a minority of cases the small size of some institutions means that the best team for the inspection, which still maintains the integrity of the inspection, is a team of two inspectors, consisting of a lead inspector and a student inspector. This decision is based on a robust procedure, which considers the size of the institution based on the numbers of staff, students, courses and locations.

BAC is also committed to including a student inspector in all its inspection teams because of the benefits they bring to the inspection as indicated above. However, this was not possible on two of the inspections. While BAC takes all possible measures to secure a student inspector for all its inspections, there have been occasions when student inspectors may not be available – for example, due to examination periods or other study commitments. Inspections have to be carried out within clear deadlines to ensure that the institution's accreditation remains in place and does not expire and that there is teaching taking place at the institution being inspected. We do not anticipate this being a recurring issue, but one way of addressing this is to recruit additional students, at different levels of study, to the inspectorate.

### **Recruitment and selection of inspectors**

Prospective inspectors are identified either through word of mouth recommendation, often from an existing inspector, or an advertising campaign making use of BAC's website-appropriate social media channels or the methods used for the recruitment of committee members.

All inspectors, including student inspectors, are recruited on the basis of the submission of a CV, a completed application form and an interview to assess the general suitability of the applicant for the role.

If this stage is completed successfully, they are invited to attend an induction programme. The purpose of the induction is to provide the applicant with in-depth information about BAC and its function, the role of an inspector and the IHE Accreditation Scheme and related standards. In addition, the induction includes exercises to identify the applicant's specific skills that will be useful in carrying out successful inspections and/or areas for development. For the student inspectors, it also provides an opportunity to meet with an existing student inspector who can share their experiences of working with BAC and the benefits it brings.

If it is decided that the candidate is suitable, various paperwork is completed to include a fitness to travel declaration, an annual declaration of interest, a GDPR Privacy Policy and a code of conduct.

In order to ensure that newly recruited inspectors are ready to lead their first inspection, they either observe an inspection carried out by the Chief Inspector or an experienced lead inspector, or they act as a team inspector with an experienced lead inspector. The Inspectors' Handbook, which has

been published since the previous ENQA review, contains guidelines for lead inspectors on working with newly recruited inspectors. Once this initial training is completed, the new inspector will lead their first inspection and be monitored by the Chief Inspector or an experienced inspector who will provide support and written feedback to them on their inspection.

For student inspectors, they will usually be deployed with an experienced lead inspector and team inspector on an inspection. The lead inspector will guide the student throughout the inspection process and provide feedback to the Chief Inspector with any recommendations for additional training.

As a result of this process, inspectors and student inspectors are gradually brought on board, so that they build their levels of confidence in working on BAC inspections in order to become effective in the role.

### **Ongoing monitoring of inspectors**

All lead inspectors are subject to ongoing monitoring by the Chief Inspector or an experienced senior inspector to ensure that they are following the newly developed Inspectors' Handbook in order to improve the consistency of the inspection process. There are currently three senior inspectors, who are nominated for the post of senior inspector by the Chief Inspector on the basis of their knowledge, experience and familiarity with BAC and confirmed by the AC. Senior inspectors also provide advice and guidance to the Chief Inspector, as required. For example, the senior inspectors were closely involved in producing the Report Writing Guidelines.

As part of the monitoring process, the inspector is accompanied on an inspection, either by the Chief Inspector or a senior inspector. Feedback and support are provided throughout the process. Inspectors are selected by the Chief Inspector for monitoring on a random basis or based on need – for example, if there has been adverse feedback on an inspector's performance.

A written monitoring report, which provides feedback against a number of criteria, is completed by the monitor and is sent to the inspector for their comments and signature. The reports are stored centrally and may lead to an inspector being removed from the inspector pool if their performance is not of a sufficiently high quality.

Institutions that are inspected provide feedback on the inspection, including work relating to the lead inspector both in preparing for and conducting the inspection. The feedback questionnaires are analysed and presented to BAC staff to look for trends and to identify issues related to the conduct and organisation of inspections, which can then be investigated and resolved as appropriate.

### **Training for inspectors**

#### **Annual training conference**

All inspectors attend an annual training conference event for the inspectorate. The purpose of the event is to provide an update on current BAC activities and to discuss areas such as report writing, preparing for and conducting inspections and the interpretation and application of BAC's standards. The aim is to ensure greater consistency and standardisation in these areas. With this aim in mind and with a renewed focus on practical training exercises to focus the event on developing the inspectors' skills, group work and discussion, as well as case studies, have been used to encourage discussion. Feedback on the annual conference is then collected from the inspectors and is used, if appropriate, in the organisation of the next event.

## **Online training**

Since the previous ENQA review, a series of webinars have been provided for inspectors. The aim of these is to provide easily accessible updates on new developments and advice and guidance on the inspection process with the aim of encouraging consistency. The webinars have included guidance on the application of specific new key indicators, such as preventing radicalisation and extremism, the application of the Inspectors' Handbook, and the application of the Report Writing Guidelines. Some webinars, for example relating to report writing, are mandatory for all inspectors to attend. Webinars are recorded so that if inspectors are unable to attend they can listen to the recorded version. In addition, inspectors are asked to undertake online learning, such as learning relating to safeguarding and preventing radicalisation and extremism.

## **Additional face-to-face training**

It is recognised that webinars are useful as a method of communicating information to a large audience and answering specific questions and are highly accessible. However, the ability for real discussion to take place is limited. Therefore, the Chief Inspector has planned, with an allocated budget, to run additional face-to-face training events mid-year between the annual training conferences for smaller groups of inspectors. The topics for these training sessions will be decided in consultation with the inspectors and are likely to include report writing and further work on standardising the interpretation of standards as well as other identified areas from inspectors' feedback.

## **Other means of keeping inspectors up to date.**

The Chief Inspector is in regular email communication with all members of the inspectorate, providing updates with general information and details of any changes that may affect the inspection process.

## **The Inspectors' Handbook 2018**

The Inspectors' Handbook is available in Annex 4 and has been fundamentally revised since the previous ENQA review. It was sent out to all inspectors and student inspectors in April 2018. It was developed through a consultative process, involving meetings of two focus groups of inspectors held in London and Birmingham. In addition, the draft sections of the handbook, produced through the focus groups, were discussed and agreed at the annual Inspectors' Conference in 2017 by all the inspectors in order to gain buy-in to the final version.

The handbook sets out the procedures for preparing and conducting inspections and includes detailed checklists. For example, the handbook covers how to structure the first communication with the institution to introduce the inspection and the inspection team, as well as how to put the inspection timetable together, through to conducting the final feedback meeting. It also includes additional help and guidelines, such as sample inspection timetables, a sample inspection record, relevant policies and procedures such as the anti-bribery and corruption policy and the travel and expenses guidelines and how to make judgements against the standards and set the priority levels for action points. It also includes guidelines for working with new inspectors including student inspectors.

The Chief Inspector monitors the use of the handbook principally through the monitoring inspectors process, mentioned above. Overall, from the Chief Inspector's observations when monitoring inspections and anecdotal evidence from institutions, it has significantly improved the level of

consistency in how inspectors work with the institutions. As a result, the rigour of inspections has been better standardised and improved.

The handbook has been in use now for almost a year and the Chief Inspector is planning to review it again this year and to improve it in line with changes that have happened since its publication and the feedback received on its use.

### 10.5 ESG Standard 2.5 Criteria for outcomes

*Any outcomes or judgements made as the result of external quality assurance should be based on explicit and published criteria that are applied consistently, irrespective of whether the process leads to a formal decision.*

BAC does not accredit individual academic programmes but instead accredits institutions as a whole. In order to become accredited, institutions are assessed against a set of predefined criteria, called minimum standards. Each standard sits within an inspection area and each standard has a set of specific criteria or key indicators, against which inspectors make judgements as to whether the standards have been met or not. These standards provide a common framework which underpins the institutional self-evaluation, the inspection procedures and the accreditation decision.

Ensuring the standards are reflective of the sector that they are designed to serve is key to ensuring they remain relevant and support the BAC mission statement and charitable objectives. The Chief Inspector is responsible for the BAC standards and it is their responsibility to initiate the process, although the management and delivery of the process is delegated to another member of staff.

The scheme document, with all the standards and key indicators, is published in hard copy and on BAC's website and is sent to the institutions that are seeking accreditation as part of the accreditation and related inspection processes.

It also contains details of the documentation that institutions are expected to provide to the inspection team as part of the evidence base against which inspection judgements are made. This is supported by a list of documents that is used as a checklist to ensure the consistent gathering of evidence during the inspection.

As a result, the standards against which institutions are assessed for accreditation are transparent and in the public domain. An area about which BAC could provide further information in writing to institutions relates to the key principles that are taken into account by the inspection team in making their judgments against the standards and key indicators. This is discussed orally as part of the application process with the provider and there is information relating to this in the accreditation handbook, but we could provide a guidance note focusing on this.

As discussed in Chapter 10.2, the standards and key indicators have been reviewed by a HE focus group since the previous ENQA review, and have been updated to ensure that they are fit for purpose and fully represent the actual reality of the institutions working in the HE sector and are consistent with actual practices. The standards and key indicators have been approved by the independent AC.

#### **Ensuring the consistent application of the criteria**

BAC accreditation requires that the minimum standards within this framework have been achieved and met. An accredited institution must meet all the clearly defined standards and key indicators within all the seven standard areas. To do this, the institution must demonstrate a satisfactory standard of provision overall in each area and demonstrate that the standards are likely to be maintained in the future.

All the standards and key indicators must be assessed and decisions made as to the extent to which they are Met, Partially Met or Not Met based on the evidence gathered during the inspection by the inspection team.

BAC inspections are evidence-based and key indicator referenced. In making their assessment of each individual key indicator, inspectors are required to keep a formal inspection record, which notes the relevant supporting evidence, including all the documentary evidence.

BAC employs a professional inspection body to inspect institutions. The consistency, with which the inspectors interpret and apply the standards is supported in a number of ways. These are:

- An annual Inspectors' Conference where the interpretation and application of standards is discussed. Since the previous ENQA review, the conferences have been more focused on achieving consistency in preparing for and conducting inspections, decision making and report writing.
- Inspectors who are new to BAC undergo a thorough induction, which focuses on the standards of the IHE scheme and includes an exercise to assess what evidence could be collected to make judgements about the various key indicators. There is then an onboarding process, which involves the new inspector observing an inspection or acting as a team inspector and then being monitored when they lead their first inspection to ensure the consistent application of the standards and to aid consistency in decision making. The inspector will receive feedback and support on their preparation and conduct.
- The Inspectors' Handbook 2018 sets out clear procedures for preparing for and conducting inspections to ensure consistency.
- The Chief Inspector carries out random monitoring inspections to review the application of the standards and compliance with inspection processes to provide support and to improve consistency.
- Training webinars on various topics are provided to inspectors, including the consistent application of new key indicators and the application of the Inspectors' Handbook. These webinars have been started since the previous ENQA review and have been identified as a good means to communicate new information to the inspectorate.
- All inspection reports undergo a rigorous editing process carried out by external editors and checked by two members of staff, including the Chief Inspector, all of whom are independent of the inspector who carried out the inspection. This process checks completeness, consistency and a clearly established evidence base. Throughout this process, the editors and the BAC staff will consult with the inspector to check details, query action points and/or ask for clarification with a view to ensuring consistency. Before this rigorous process was instituted, the reports varied considerably in their quality and did not always present a clear evidence-based rationale for the decisions made.
- After each inspection, institutions are asked to give feedback through a questionnaire on the inspection process. The feedback is analysed and presented to BAC staff to look for trends and to identify issues related to the conduct and organisation of the inspections in the event that any action is required to improve consistency.
- Each inspector, at the conclusion of an inspection, is asked to give feedback on the inspection process, the organisation of the inspection and the support they received from the institution in facilitating the inspection. The feedback is analysed and presented to BAC staff to look for trends and identify issues related to the conduct and organisation of the inspections in the event that any action is required to improve consistency.

It is recognised that, with an inspectorate numbering around 40 inspectors, it is a challenge to ensure consistent decision making when they are onsite. While the methods of supporting consistent decision-making listed above contribute towards ensuring consistency, there is more that

can be done in this regard. The inspection record is one of the tools that is used by the Chief Inspector when reviewing the inspection reports to ensure the decisions made are evidence based and consistently applied. BAC is confident in the competence, knowledge and professional experience of the inspectorate, and has been continually improving the training given to the inspectors to ensure this consistency. There is further training that is planned to enhance this, including the planned face-to-face training event discussed in Chapter 10.4.

### **Setting action points and recommendations**

The Inspectors' Handbook contains guidance about making judgements to ensure consistency. This guidance has been strengthened since the previous ENQA review.

Lead inspectors have to ensure that a 'Yes', 'No' or 'Not Applicable' judgement is assigned to every key indicator for each standard. Following on from this, inspectors have to make a judgement on whether the standard has been 'Met', 'Partially Met', 'Not Met' or is 'Not Applicable'. Where a key indicator is not met, the standard can, at best, be only 'Partially Met'. In this case, inspectors must include comments in the comments boxes in the report in support their judgements. These comments must lead to action points to be recorded in the final section of the report. Inspectors should rate these actions as 'H' high, 'M' medium or 'L' low according to their priority.

The AC will refer closely to the list of action points and their priority status when coming to a decision on the award of accreditation. The Committee may make the award of accreditation or the continuation of accreditation subject to immediate action being taken in relation to an action point. All this supports the continuing improvement of the institution.

### **The role of the Accreditation Committee**

The AC has a number of tools to support its decision making and to help ensure the consistency of its decision making:

- The decision summary guide setting out the most recent history and decisions taken on each of the institution's previous inspection reports.
- An extensive summary guide setting out the possible decisions that might be made.
- An extensive and detailed brief on the role and responsibilities of the Accreditation Committee.
- The Chair of the Accreditation Committee has a preliminary meeting with the Accreditation and Quality Enhancement Manager and the Chief Inspector to review the reports prior to the full meeting of the Committee. The purpose of the meeting is to discuss areas of concern that might be raised by the Chair, the BAC officers or the committee members prior to the full committee meeting.

All the reports are reviewed by the BAC Accreditation Committee. In making its decisions on accreditation, the AC gives careful and detailed consideration to each individual inspection report with a view to assessing the quality and relevance of the information, the provision of evidence, and the basis for inspection judgements. The introduction of the summary guide in 2017 has proved to be a helpful tool for the AC in consistent decision making.

Reports are presented to the Committee anonymously, so that any preconceptions regarding authorship are avoided. The Committee may decide on the referral or modification of a report if it is found to be inconsistent or below the expected standard. The Committee may determine that the priority status of action points is changed.

The AC, therefore, oversees consistency in following the published standards and criteria within inspection reports. The outcomes of the Committee's deliberations are communicated in writing to the institution and to the inspection team after the Committee meeting.

### **The Inspectors' Handbook 2018**

Decisions on accreditation are taken on the basis of reports made by the appointed lead inspector, following the inspection visit to the institution. The rationale for the roles and responsibilities of the inspectors, and all aspects of the inspection process are described in detail in the BAC Inspectors' Handbook 2018. The handbook covers the whole inspection process and is accompanied by a range of operational documents such as sample inspection timetables, inspection records and various policies and checklists.

To work towards consistency in the gathering of evidence, the handbook includes details of the inspection activities that should be undertaken as part of the inspection. All inspectors receive the handbook as part of their induction and receive further training on the application of it. This ensures that they are fully briefed on BAC expectations and processes so that they can make consistent judgments. They use the handbook, along with other resources such as the report writing guidelines, to improve the consistency of the inspections and the reports. The handbook will be reviewed on a regular basis and updated when necessary to ensure it remains a useful tool for the inspectorate.

### **10.6 ESG Standard 2.6 Reporting**

*Full reports by the experts should be published, clear and accessible to the academic community, external partners and other interested individuals. If the agency takes any formal decision based on the reports, the decision should be published together with the report.*

Inspection reports are written following all types of inspections that take place for all providers. All members of the inspection team contribute their findings and judgements from the inspection to create the report, which is written primarily by the lead inspector, based on the evidence provided during inspection.

The style of the report is clear. The front page includes the institution's details and visibly states the decision of the AC. All reports follow the same format with three clearly demarcated sections:

#### **a) Part A – Introduction**

This section is broken down into four subsections and must include factual information only. It outlines the background to the provider, the history, the organisation type and its aims; a brief summary of current education provision; and the inspection process itself, including who was interviewed, what facilities were seen, and what teaching was observed. In addition, it will include comments as to how well the institution engaged with the process. Finally, the inspection history is listed including the type of inspection and dates, if applicable.

#### **b) Part B – Judgements and evidence**

For full inspections, this section includes the inspection standards broken down into each key indicator, which is then marked as either Yes (met), No (not met) or Not Applicable by the inspector. For full and interim reports, a judgement for the overall standard is indicated as either Met, Partially Met, Not Met or Not Applicable.



Under each inspection standard, there is an area for comments, which include evaluative judgements from the inspection team based on the evidence seen during the inspection and from documentation provided by the institution.

### **c) Part C – Summary of strengths and action points**

A summary of any key strengths or aspects of best practice are outlined for each of the inspection areas as well as action points related to key indicators that have not been met. This section also includes comment boxes for recommendations to enhance the quality of the provision and to comment on any contrary indicators relating to compliance with statutory requirements.

### **Production of the report**

Reports are written according to the Report Writing Guidelines, and they undergo a consistently applied editorial process to ensure a standardised report style. All BAC inspectors receive the Report Writing Guidelines and must undertake specific training via a webinar. The Chief Inspector will identify individual inspectors that will receive further one-to-one support with report writing. Inspectors have ten working days following an inspection to submit their report to BAC. An editing process then takes place to ensure consistency of the reports, as set out below.

1. The lead inspector submits their report along with accompanying documentation.
2. An Accreditation Assistant checks the report for major errors that may need to be corrected by the inspector. If this is the case, the lead inspector is notified of the errors and is given a deadline to return the report.
3. The Accreditation Assistant emails an editor asking for their availability to edit.
4. The report is emailed to the available editor who reviews the report using an editing checklist, adds editing comments for the inspector and a Tracked Changes document within five working days. The editor will also complete an editing feedback form.
5. The Accreditation Assistant reviews the edited report and adds Tracked Changes and comments where necessary.
6. The Chief Inspector then reviews the edited report and adds Tracked Changes and comments where necessary.
7. The Accreditation Assistant emails the edited report to the lead inspector to review and amend within three working days.
8. The lead inspector returns the amended report and the Accreditation Assistant reviews it alongside the guidelines and checks that all comments have been addressed. If not, the Accreditation Assistant will email the lead inspector with further queries.
9. The Chief Inspector conducts a final review of the report.
10. Before the report is submitted to the AC, the Accreditation and Quality Enhancement Manager will also review the report and identify any final questions for the lead inspector.

Once the report is finalised and before it is submitted to the AC, Parts A and B are sent to the provider for a factual accuracy check. They will be notified that the judgements of the inspector will not be changed, but they will be requested to review and make suggestions to change factual inaccuracies in the report if necessary. The providers are also reminded to note any factual inaccuracies in the report when they are notified of the outcome of the AC meeting.

If a provider disagrees with a judgement made by the inspectors in the report, the lead inspector is asked to review the request and decide whether the report can be changed based on evidence provided by the provider.

During the process of putting the SAR together, BAC have identified that it does not currently request direct feedback regarding the usefulness and clarity of reports for various stakeholder groups including potential students, their parents and the general public. In order to address this, BAC will include questions relating to this on the annual survey for feedback from providers.

### **Accreditation Committee decisions**

The finalised report is submitted to the AC for review. The structure and style of the reports are clear and allow the Committee to make decisions regarding the provider's accreditation. The Committee can request changes to wording and the priority of action points in reports, which are then edited accordingly before being published. The formal decision made by the Committee is marked clearly on the front page of the report.

### **All reports are published**

All inspection reports are published on the BAC website and are available for anyone to view. At the previous ENQA review, BAC received a recommendation related to the navigation of the reports on the BAC website, which stated that it was difficult to find the inspection reports and required going to multiple pages. This has since been revised and finding the reports is much simpler, with interested viewers using one click to get to the accredited providers home page. They can search for a specific provider by name, country or by type of accreditation scheme. Each provider has their own page in the directory, which includes basic information about the provider and downloadable copies of the most recent full and mid-cycle inspection reports.

At the time of the previous ENQA review, BAC did not publish reports showing negative decisions and received a recommendation to consider how this could be presented to the public. This is something BAC discussed internally with our committees. The method we have implemented is listed below.

We firstly defined what we considered as 'negative decisions'. For BAC purposes the following decisions of the AC would be considered negative decisions:

- Award of accreditation refused (for providers who have applied for BAC accreditation for the first time and are not currently holding BAC accreditation);
- Accreditation withdrawn (for providers who are already accredited, or withdrawal of accreditation could be at the request of a provider or the AC makes the decision that accreditation should be withdrawn as the provider was not compliant with BAC terms and conditions); and
- Accreditation suspended (for providers who are currently accredited).

The Committee can also state 'Accreditation Deferred' if they do not feel they have sufficient information available to make a decision. BAC does not consider this to be a negative decision. As the Committee requires more information in order to decide if accreditation could be awarded or refused, the institution is given a time period in order to comply with any action points set and then

undergoes an additional onsite inspection. At this stage, if the institution gained accreditation the report is then available on the BAC website, which has been the case since we started publishing reports on the website. Previously, the report would not be available if accreditation was not awarded; however, this practice has now changed.

In the past, when institutions ceased to be accredited by BAC, they were no longer listed on the BAC website and therefore the report with the negative decision of 'accreditation withdrawn' was not publicly available. It should be noted however, that BAC did always provide the inspection report upon request.

BAC has since made changes to our policy on the publication of inspection reports from institutions who are no longer accredited by BAC or who did not get awarded accreditation. This change of policy was discussed at the Council meeting in February 2019 and was approved at the meeting of the Standing Committee in April 2019.

Two new webpages were launched in April 2019. One of the webpages contains the inspection reports where the provider did not gain accreditation upon their initial application and inspection.

There are no inspections where the institution was refused accreditation since the last ENQA review and we do not anticipate there being any reports being loaded onto this page due to the nature of the application process identifying areas of deficiency. The process of an institution completing the SER and the in-depth review of the documentation submitted with the inspection are all checkpoints, where if there are areas that the institution is not able to meet, then the institution is advised of this and BAC may recommend that the inspection is deferred to allow them time to rectify this.

The second webpage contains a list of previously accredited providers. The most recent full inspection report and any subsequent mid-cycle reports will be available to download. The reports would not be retrospective, so would apply from 1 May 2019 to providers who are withdrawn by BAC or voluntarily withdraw themselves on or after that date. The webpage will be updated after each AC meeting, if required, and will remain on the webpage for a period of two calendar years, after which they will be removed as they are no longer deemed to be recently accredited.

Anyone viewing the page who is seeking an inspection report of a previously accredited provider not shown on the page will be informed of how to contact BAC to request information.

## 10.7 ESG Standard 2.7 Complaints and appeals

*Standard: Complaints and appeals processes should be clearly defined as part of the design of external quality assurance processes and communicated to institutions.*

In addition to students having the right to escalate a complaint against their institution, BAC recognises the need for its own stakeholders to be able to raise concerns or issues with BAC directly.

BAC aims to ensure when responding to a complaint that the BAC objectives and values are maintained. This includes responding promptly and effectively to complaints against institutions by investigating the raised issue thoroughly and, where appropriate and possible, identifying actions to resolve any deficiencies identified. It should be noted that if a student wished to submit a complaint against an IHE institution in the UK, they would be directed to the Office of the Independent Adjudicator (OIA), with whom BAC has signed an MOU, who are the independent student complaints scheme for England and Wales. The OIA can only respond to complaints from a student if the institution is a member of the scheme. There are currently four UK-based IHE providers who are not

members of the OIA and therefore student complaints regarding those institutions would be dealt with by BAC.

## Complaints

All information on submitting a complaint is detailed in the [Accreditation Handbook](#), which institutions receive electronically during the application stage. In addition, the handbook is also available on the BAC website and inside the dedicated area for accredited institutions on the BAC website, the Provider gateway.

The process of submitting a complaint is listed below:

	<b>Type of complaint</b>	<b>Method of submitting complaint</b>	<b>Actions BAC will take</b>	<b>Timeline of complaint resolution</b>
1	Complaints about inspections.	Completion of the inspection feedback from  In writing to the Chief Inspector within 5 working days of the inspection.	Chief Inspector (CI) & Accreditation and Quality Enhancement Manager (AQEM) are notified and meet to discuss action. AQEM will be the point of contact for the institution and keep them up to date with the actions to be taken and the outcome. CI will contact the Lead Inspector to discuss and determine any action if needed. AQEM and CI review internal process and if necessary update to prevent issue arising again.	Acknowledgment of receipt of complaint within 24 hours.  Follow-up with Complainant and contact the lead inspector within 10 working days, with any future response deadline set (this is variable depending on severity and nature of complaint).
2	Complaints about inspectors or staff.	In writing to the Chief Executive.	An investigation is initiated to get both sides of situation and assess if employee or inspector acted against BAC practice or standards. If the complaint is upheld, appropriate disciplinary action in accordance to the Disciplinary Policy is followed and the complainant is informed of action taken. If the complaint is not upheld but weaknesses in processes or staff training are identified, appropriate action to rectify deficiency is taken and complainant is notified.	Acknowledgment of receipt of complaint within 24 hours.  Follow-up to complainant within 10 working days, with any future response deadline set (variable depending on severity and nature of complaint).

			If relating to an inspector CEO will pass investigation to the CI who will investigate and confirm what actions, if any, are required.	
3	Complaints about an accredited institution.	In writing to BAC.	BAC informs the institution and requires them to investigate and submit a report detailing the outcome of its investigation within 10 working days. BAC reviews and asks any follow-up questions to either party if necessary. A report is drawn up with an outcome which is sent to the relevant parties.  If institution is a member of the OIA, the student follows the OIA process.	Acknowledgment of receipt of complaint within 24 hours.  Resolution is variable (depending on severity of complaint and dates of the AC).
4	Complaints about the BAC accreditation schemes.	In writing to the Chief Executive.	The Chief Executive will present the complaint to the Council for consideration at the next Council meeting.	Complainants will be informed of the Council's response to their complaint by its Chair within 10 working days of the meeting.

In addition to submitting a formal complaint, institutions are asked to complete a feedback form following an inspection to provide feedback. If any of the feedback is negative, then a BAC staff member may contact the institution for additional clarification.

Any stakeholder can also raise a concern with BAC by emailing the general office email account listed on the BAC website.

### Appeals

There are two appeal systems: one for institutions to appeal against the decision of the AC, and the other to appeal against the outcome of a complaint.

The appeals processes are detailed in the Accreditation Handbook.

	<b>Type of Appeal</b>	<b>Method of submitting Appeal</b>	<b>Actions BAC will take</b>	<b>Timeline of appeal resolution</b>
1	Appeal against an AC Decision, for example refusal or withdrawal of accreditation.	In writing to BAC within 10 working days of the date of the letter or email which confirms the refusal or withdrawal of accreditation. The institution must also pay an appeal fee, which is refundable if the appeal is upheld.	The institution submits a statement and documentary evidence setting out the grounds for the appeal within 10 working days of the decision letter. This evidence is then considered by the Standing Committee.	Within 35 days of the receipt of the AC decision letter.
2	Appeal against the outcome of a complaint against BAC (Inspection, inspectors and BAC staff).	In writing to the Chief Executive, and if necessary, it will be submitted to the Council.	BAC acknowledges the appeal has been lodged and details the next steps and when the appeal will be submitted to the Council.	10 working days to submit the appeal to BAC.  Submission to the Council is variable as it depends on when the appeal is lodged.
3	Appeal against the outcome of a complaint against an institution.	In writing to BAC within 10 working days of the notification of the complaint's investigation outcome. The investigation report and a timeline are submitted to the AC.	BAC acknowledges the appeal has been lodged and details the next steps and when the appeal will be submitted to the AC.	10 working days to submit the appeal to BAC.  Submission to the AC is variable as it depends on when the appeal is lodged.

BAC has not received any complaints or appeals related to HEIs between 2015 and 2019. However, we are confident that the process is well defined and publicly available.

The process for submitting a complaint against BAC is made available to all institutions and is a transparent process that is efficient and effective. While we have not had any complaints against BAC made by accredited IHE institutions, or complaints made about IHE accredited institutions, BAC follows the same complaints process for the other accreditation schemes (not under the scope of the ESG) and all complaints received were resolved within the timeframes given.

After reflecting on BAC's method of resolving appeals against an AC decision BAC reviewed and then revised the process from what had been listed in the previous version of the Accreditation Handbook. In the previous version of the handbook, it stated that appeals against AC decisions would be heard by an Appeal Committee which is made up of one independent Chair, one layperson and one member of the BAC Council who did not vote in the original decision of the AC. However, this process was not practical to implement. Therefore, BAC reviewed this process and determined that the method above (outlined in appeal 1) will be followed.

This is included in the updated [Accreditation Handbook](#). Until the publication of the updated handbook, institutions were informed by individual email on who will hear the appeal as well as the steps to lodge an appeal. The new handbook will be sent electronically and by hard copy to all accredited organisations.

Having reviewed the full process including the committee which hears appeals regarding AC decisions, BAC is confident the revisions to the whole process which are outlined in the updated Accreditation Handbook are robust and meet requirements. BAC will continue to regularly review and will make any necessary amendments as needed.

## 11. Information and opinions of stakeholders

BAC has a number of stakeholders. The key stakeholders are the accredited institutions and the BAC inspectorate. In addition, BAC consider the following groups to be stakeholders:

- Students studying at accredited institutions;
- Members of the public who may be potential students or parents of students who may enrol with a BAC-accredited institution;
- HEIs who have validation or other forms of academic partnerships with BAC-accredited institutions;
- Other QA agencies and networks including ENQA, INQAAHE and QAA and agencies in the countries where BAC accredits institutions; and
- Governments including the UK Government and other countries where BAC-accredited institutions are located.

BAC has a number of formal mechanisms for collecting feedback. BAC-accredited institutions are asked to complete a feedback form following every inspection. They are provided with the form to complete once the inspection is confirmed. If it is not submitted following an inspection, they are reminded again when they are sent their report for a factual accuracy check or when sent their formal notification following the AC. Reminders are sent in order to increase the response rate.

The feedback form for providers includes nine items, which ask them to indicate their level of satisfaction between 1 (Very Dissatisfied) and 5 (Extremely Satisfied) and to include any relevant comments. The items cover the process from the initial application if applicable, communication with Head Office through to the inspection itself. Item 10 asks for permission for BAC to publish any of their comments and item 11 asks for any additional comments.

Inspectors are also asked to complete an inspection form following every inspection and they must submit it along with the inspection report and accompanying documentation. They must also rate their satisfaction from 1 to 5 for items relating to arranging the inspection, the provider cooperation and communication, the inspection team contribution, and the inspection overall.

Inspectors are also asked to complete evaluation forms following their annual inspectors' event which includes training. They are asked to rate 13 statements from Strongly Agree (5) to Strongly Disagree (1), which relate to preparations for the event, the venue and facilities and the event itself including the clarity of content. There is a section for inspectors to add comments. The Chief Inspector reviews this feedback to reflect on when planning the next event.

A survey is automatically sent out via email to any webinar attendees. BAC offers webinars presented by BAC staff that are open for all as well as institution-only or inspector-only webinars. Any feedback returned is reviewed by the presenter of the webinar to ensure that changes are made to improve the presentation for next time.

Each year, BAC sends out an annual survey to all accredited institutions requesting statistical information about student numbers and course day details in order to calculate the annual accreditation fee. This has been identified as a useful opportunity to contact institutions for more detailed feedback regarding their experience with BAC processes, staff and BAC accreditation overall.

### Informal feedback

Informal feedback is received over the telephone, via email and during inspections from various stakeholders, but in particular from institutions, students, members of the public and inspectors. This feedback is not formally recorded but it may be shared, either verbally or via email, with the Head Office team. This feedback is therefore not analysed in any formal way in order for BAC to reflect on it and make changes.

### What do our stakeholders say?

BAC elicits feedback through the mechanisms listed above. With our accredited institutions the feedback focuses on the application and inspection process (for both new institutions and institutions going through re-accreditation). For inspectors, the feedback focuses on the inspection process and the inspection itself.

The feedback from applications and inspections since 1 September 2018 was collated, and as can be show in the tables below, was positive, showing an average score between extremely satisfied and very satisfied.

<b>INSTITUTION FEEDBACK – AVERAGES</b>								
<i>Key for scores: 5=extremely satisfied, 4=very satisfied, 3=satisfied, 2=dissatisfied, 1=very dissatisfied</i>								
<i>Initial application process</i>	<i>Contact with Head Office</i>	<i>Arrangement of the inspection dates</i>	<i>Contact with the lead inspector</i>	<i>Arrangement of the inspection</i>	<i>Conduct of the inspection</i>	<i>The lead inspector</i>	<i>Final feedback session</i>	<i>Overall inspection process</i>
4.0	4.0	3.8	4.5	4.0	5.0	5.0	4.5	5.0
<b>AVERAGE PROVIDER FEEDBACK 4.4</b>								



<b>INSPECTOR FEEDBACK</b>							
<i>Key for scores: 5=extremely satisfied, 4=very satisfied, 3=satisfied, 2=dissatisfied, 1=very dissatisfied</i>							
<i>Arranging the Inspection with Head Office</i>	<i>Arranging the inspection with the institution</i>	<i>Arrangements made by the institution for the inspection</i>	<i>Availability of documentation</i>	<i>Engagement of institution with the inspection process</i>	<i>Meetings with Senior Management</i>	<i>The final feedback session</i>	<i>The inspection overall</i>
4.2	4.5	4.7	4.2	4.5	4.7	4.5	4.5
<b>AVERAGE INSPECTOR FEEDBACK 4.5</b>							

As shown from the tables above, BAC does elicit feedback on specific subjects relating to the inspection and accreditation process. The feedback is used internally to improve our services and systems. In addition, it is discussed by the PCG and AC, and if appropriate, changes are implemented within the relevant BAC department. However, we have not previously been as effective at gaining feedback from accredited institutions on the quality of BAC services. To rectify this, a survey was circulated to institutions in February 2019. The survey was circulated to 36 institutions accredited through the IHE scheme. There was a response rate of 17% so the findings of the survey, while interesting, cannot be said to be indicative for the accredited institutions.

### Headline results

- The BAC services on which institutions scored most highly was the initial enquiry and application process and the notification of accreditation. The BAC service which scored lowest was ongoing contact with BAC.
- All institutions stated that the BAC Quality Mark and listing on the BAC directory to promote their institution was the most useful benefit of BAC accreditation for their institution.
- When asked about the appropriateness of the quality assurance standards and key indicators in the updated IHE scheme, institutions gave an average ranking of 4.5 (out of 5).
- Institutions were asked what they felt the advantages and disadvantages were of using student inspectors. The main advantage stated was gaining the student perspective as they have a first-hand insight. The main disadvantage stated was that the student might not be aware of all of the quality assurance standards.
- General feedback on what BAC does well was that it gives institutions clear indications concerning accreditation requirements, it is committed to the inspection process being successful and well managed, and that accreditation in general was one of the things that BAC does well. Providing samples of policies was one suggestion of a way that BAC could do better.

BAC has mechanisms to gain detailed feedback on the inspection and application process from the key stakeholders involved in those areas. Going forward, BAC will be seeking to gain further feedback from the accredited institutions on our services and on the quality assurance standards of the IHE scheme, as we do not have enough information at present to draw any overall conclusions from accredited institutions. Anyone can provide feedback or contact BAC using the contact details listed on the website and the feedback is then directed to the relevant team. BAC does not have mechanisms in place to gather feedback from governments and other quality assurance agencies, although we have discussed if a stakeholder event or forum would be a suitable forum.

At this stage, methods of gaining feedback from these groups of stakeholders is something that BAC is aware that we need to address. However, further work needs to be undertaken prior to making any changes to our feedback mechanisms. BAC would need to be clear on what aspects of its organisation and services we would want feedback on.

## 12. Recommendations and main findings from previous reviews and agencies resulting follow up

ENQA conducted its first formal external review of BAC in *December 2014*. The purpose of the review and review visit, conducted by an ENQA panel, was to assess the way in which, and to what extent, BAC fulfilled the criteria for membership and the Standards and Guidelines for Quality Assurance in the Higher Education Area (ESG 2005).

BAC has been an ENQA affiliate member since 2009 and the formal review provided information to the ENQA Board that enabled it to make a judgement regarding full ENQA membership, which it awarded to BAC in March 2015.

The inaugural ENQA review was assessed via the completion of a SER detailing compliance against ESG 2009. The ENQA panel provided BAC with a series of recommendations set out in the Report of the External Review. The overall level of compliance for ENQA membership is substantially compliant, not rigid adherence.

BAC viewed the recommendations and feedback in the report as a positive steer and guidance to reflect upon and to develop and enhance its quality assurance processes, methodologies, resources and services.

In 2017, BAC submitted a follow-up report to ENQA and was able to provide an update providing a narrative on the response and progress made since reflections and related action in response to the review. Since this time, further and more related developments to BAC's internal and external quality assurance mechanisms have continued to grow as part of BAC's ongoing commitment to continual improvement.

An overview of the recommendations made by the ENQA panel 2015 and progress made at BAC is provided in the table below: (note: the table shows both the ESG 2005 standards where recommendations were made and the standard number this relates to in the ESG 2015).

ESG 2005 Standard	ENQA compliance and recommendation	Progress, current status and supporting evidence
<p><b>2.2 Development of external quality assurance processes</b></p> <p>This is Standard 2.2 in the ESG 2015. See pages 35 – 37.</p>	<p><b>Substantially compliant</b></p> <p><b>ENQA recommendation:</b> BAC changes its way of updating its procedures and standards so that it better includes a variety of key stakeholders (students, BAC-accredited institutions, representatives of the sector, government, etc.).</p> <p><b>EQAR recommendation:</b> BAC to involve key stakeholders in the development of its quality assurance processes.</p>	<p>BAC increased stakeholder engagement and consultation during the review of the BAC Independent Higher Education (IHE) standards and accreditation scheme project. BAC approached a range of its accredited and non-accredited HE institutions, sector-based individuals and formed an outline for membership to a Higher Education Focus Group (HEFG). Terms of Reference (ToR) were created so that the remit of the group was clear and individuals were invited by BAC to conduct the review of the IHE scheme standards. The group made recommendations to shape a refreshed scheme and completed a mapping exercise to align it with the ESGs 2015.</p> <p>A proposal was made to the Executive Committee in February 2017 to appoint a student representative to act as a Trustee.</p> <p>Students are now employed as part of the inspectorate and are deployed on all HE inspections. BAC developed a number of supporting resources and documents for inclusion. Onboarding, induction and training sessions have been created to inform students effectively of process and their role. The Student Code of Conduct sets out required behaviour and BAC’s expectation of students. It outlines their responsibilities while deployed on inspections and working for BAC.</p> <p>A contract, confidentiality agreement and annual declaration set out BACs terms of engagement.</p> <p>BAC have a pool of students, and a representative from this inspection group now sits on BAC’s Accreditation Committee. The BAC Council also has an international Trustee and an international student Trustee.</p>
<p><b>2.4 Processes fit for Purpose</b></p> <p>This is standard 2.2 in the ESG 2015. See pages 35 – 37.</p> <p><b>To note:</b> Granted non-compliant by panel</p>	<p><b>ENQA recommendation</b> Include students and international experts in a meaningful and impactful way to provide benefits for BAC strategy, procedures, and standards with reference to the HE component of its work. BAC to use and consult stakeholders. In addition, the panel recommends that</p>	<p>BAC’s Articles of Association and Objects were updated during a governance review in 2017/18. The review resulted in the inclusion of students and international representatives in BAC activities, specifically in its Articles of Association and Objects</p> <p>An international member now sits on the BAC Council and an international HE institution representative was invited to attend the HEFG</p>

<p>changed to partially compliant by ENQA Board in its decision letter.</p>	<p>inspection visits for full accreditation are not done with just one inspector.</p>	<p>during the review of the HE standards. As previously mentioned, BAC includes three inspectors in its full HE inspections, one of whom is a student inspector.</p>
<p><b>2.5 Reporting</b></p> <p>This is Standard 2.6 in the ESG 2015. See pages 48 – 51.</p>	<p><b>Substantially compliant</b></p> <p><b>ENQA recommendation</b> BAC to consider if the structure, style and content of inspection reports are useful for judgement of potential students, their parents and the general public. In addition, navigation of reports should be made clearer and simpler. Furthermore, BAC needs to consider how reports with negative decisions could be presented to the public.</p> <p><b>EQAR recommendation</b> BAC to address the publication of inspection reports for unsuccessful applications</p>	<p>In response to this recommendation, BAC produced Report Writing Guidelines for inspectors, which set out clear requirements for consistency and clarity in report writing. An editor’s checklist has been produced to guide editors and to standardise report checking and amending activity.</p> <p>All inspectors have received guidance and regular standardisation training activities to ensure they are aligned to BAC requirements and editors’ requirements.</p> <p>The Chief Inspector conducts monitoring and report sampling across all inspectors. They complete a monitoring report to provide feedback and support to inspectors. This contributes to maintaining quality and consistency in the production of BAC reports.</p> <p>The BAC Directory provides easy to access public navigation routes to reports and the website holds two new pages, i) for reports of previously accredited institutions whose accreditation was withdrawn, and ii) reports of institutions who were refused accreditation. Further information is available in Chapter 10.6.</p>
<p><b>2.8 System Wide Analysis</b></p> <p>This is Standard 3.4 in the ESG 2015. See pages 21 – 23.</p>	<p><b>Partially compliant</b></p> <p><b>ENQA recommendation</b> BAC to consider how it can contribute to the knowledge base about the independent FE and HE sector in the UK drawing on its rich data and information.</p> <p><b>EQAR recommendation</b> BAC to carry out a system-wide analysis as required by the standard</p>	<p>The appointment of an HE Manager in 2016 provided BAC with the opportunity to develop its service provision to HE institutions and to provide wider engagement with the sector.</p> <p>A thematic review was completed by BAC in February 2019. The review gathered data from a total of 59 inspection reports and identified themes. Further information is available in Chapter 9.4.</p>
<p><b>ESG 3.4 Resources</b></p> <p>This is Standard 3.5 in the ESG 2015. See pages 23 – 25.</p>	<p><b>Substantially compliant</b></p> <p><b>ENQA Recommendation</b></p>	<p>As a not-for-profit charity human resource, workload and physical resources are an ongoing challenge for BAC.</p>

	<p>ENQA asked BAC to strategically consider the sustainability of its small central administration and the appropriate blend of expertise required to meet its objectives.</p> <p><b>EQAR recommendation</b> BAC to address if it has sufficient and sustainable basis of professional staff.</p>	<p>A review of BAC team structure, job descriptions, person specification and technical expertise resulted in the appointment of a Deputy CEO (DCEO), Higher Education Manager and full-time Chief Inspector in 2016.</p> <p>BAC currently operates with seven full-time staff and two part-time members of staff in its Central London office.</p> <p>The development of BAC's 2018/19 (and beyond) strategy will further consider and address how BAC's resources and small team meet BAC's long-term objectives.</p>
<p><b>ESG 3.7 External Quality Assurance Criteria and Processes used by the Members</b></p> <p>This is in Standards 2.3, 2.4, 2.5 and 2.7 of the ESG 2015. See pages 37 – 48 and pages 51 – 55.</p>	<p><b>Substantially compliant</b></p> <p><b>Recommendation</b> as per 2.2. Consider how to include students and international experts in a meaningful and impactful way to provide benefit for its strategy, procedures, and standards and reference to the HE component of its work.</p> <p><b>EQAR recommendation</b> BAC to address if students were/are consistently involved in HE inspections and inspections carried out by at least three inspectors.</p>	<p>As stated in 10.4, BAC includes students as part of its HE inspection teams and student representatives are members of the AC.</p> <p>An international student acts as a Trustee on the BAC Council as well as an additional international Trustee to ensure diversity within this setting.</p> <p>A student inspector is included as part of the inspection team on HE inspections. BAC has addressed the minimum size of the inspection teams and has policies in place to ensure sufficient staffing for inspections.</p>
<p><b>3.8 Accountability Procedures</b></p> <p>This is in Standards 3.6 and 3.7 of the ESG 2015. See pages 26 – 31.</p>	<p><b>Partially compliant</b></p> <p><b>ENQA Recommendation</b> BAC to develop a coherent policy on its own quality assurance and to apply it systematically.</p>	<p>Standard Operational Procedures (SOPs) were implemented in 2016 to track workflow and ownership of various stages of quality assurance processes. Named owners of tasks are recorded in the SOPs, raising accountability and aligning with each phase of implementation.</p> <p>BAC conducted an internal review/self-assessment and created a Governance Working Party in 2017 resulting in a review of BAC's Articles of Association and Objects. A new governance structure was established in 2018 that better serves the organisation and is now in place.</p>

## 13. SWOT analysis

### Analysing Strengths, Weaknesses, Opportunities and Threats

The SWOT analysis has been prepared by the BAC CEO drawing on the experience of BAC staff, feedback from institutions and the regular market analysis that BAC undertakes. The SWOT analysis was drawn up in February 2019.

STRENGTHS	WEAKNESSES
<ul style="list-style-type: none"> <li>- BAC has a strong reputation in its field of external quality assurance.</li> <li>- Significant experience of quality assurance developed over 35 years.</li> <li>- The BAC Council and Committee members can demonstrate strength in their history of activity and their current membership.</li> <li>- BAC has a well-established inspection methodology with highly qualified and experienced inspectors.</li> <li>- BAC has a small but experienced Head Office team able to offer support and advice to BAC stakeholders.</li> <li>- BAC has a secure financial position.</li> <li>- BAC is recognised by the UK Government as an integral element of the UK student visa infrastructure.</li> <li>- BAC accreditation activities extend beyond the confines of the UK offering diversity of income and resilience to exogenous shocks.</li> <li>- BAC is a full member of ENQA and is listed on the EQAR register.</li> </ul>	<ul style="list-style-type: none"> <li>- BAC has sufficient but limited resources which can limit BAC's ability to react promptly to changing circumstances.</li> <li>- BAC accreditation is voluntary, which can mean income can be more volatile than might otherwise be the case in membership or statutory quality assurance bodies.</li> </ul>
OPPORTUNITIES	THREATS
<ul style="list-style-type: none"> <li>- To continue to build on BAC's international presence to further BAC's charitable Objects.</li> <li>- To continue to encourage involvement of external stakeholders in the continued development of BAC's HE scheme standards and other HE activities.</li> <li>- To continue to participate and contribute to national and international quality assurance development.</li> <li>- To continue to contribute and support the UK quality assurance framework.</li> </ul>	<ul style="list-style-type: none"> <li>- Unexpected changes in government policy.</li> <li>- Increasing competition internationally.</li> <li>- Loss of experienced staff.</li> </ul>

## 14. Current challenges and areas for future development

BAC faces a number of challenges:

### **a) Competition**

BAC is a voluntary quality assurance agency, and although we have a statutory function in the UK, we are one of a number of bodies that retain a statutory function and are not a monopoly supplier. Internationally, BAC activities encompass more than 20 countries.

The UK's education environment is highly regulated with a number of statutory bodies whose oversight is mandatory for any organisation wishing to operate in this specific sector. An obvious example is the role that the QAA plays in HE quality assurance. As the designated body to undertake QA work in the UK, it has a monopoly position that significantly reduces BAC activity in the UK. Effectively, any HE institution is required to be overseen by the QAA.

Internationally there are an ever-increasing number of QA bodies, some with regulatory backing and others offering a voluntary service, operating at a national and international level.

BAC, therefore, operates in a highly competitive environment.

### **b) Regulatory**

The regulatory environment in the UK is on occasion subject to change. A significant change to the student visa regime in 2011 negatively impacted BAC and led to a significant fall in accredited institutions in the UK. Ongoing uncertainty around the relationship between the UK and the EU and the impact that any changed relationship may have on international students is of some considerable concern. The level of uncertainty means some providers may delay accreditation decisions until the implications of the UK/EU new relationship are fully understood. From a BAC perspective this impacts on demand for accreditation from UK providers but also from international providers.

### **Areas for Future Development:**

#### **i) International development**

Increasing awareness by governments, students and educational partners means that demand for QA is growing globally. BAC is well placed to support stakeholders in accessing internationally recognised quality assurance to promote trust and raise standards.

#### **ii) Students**

For many student's, QA is often taken for granted. BAC will increase its efforts to communicate with the wider student body to explain QA and how it affects the quality of education they receive.

## Glossary of Terms

### **Accreditation**

For BAC, the process of accreditation involves a formal application, an onsite inspection undertaken by an inspection team who produce a thorough report on the institution by assessing its performance against the IHE scheme and a decision made by the AC.

### **Accredited**

BAC will use the term 'accredited' when the AC awards accreditation because an institution has met the standards of the IHE scheme. Accreditation is held for a period of four years.

### **Articles of association 'articles'**

The objects that set out the charitable purpose of the organisation, i.e. what it is setting out to achieve.

### **Charitable 'objects'**

Articles that set out the legal standing of the organisation and encompass any legislation that might govern internal and external relationships.

### **Independent**

For BAC, this refers to the independence of the organisation, i.e. its ability to make financial and governance decisions independently of the government or any other body. It does not differentiate between public or private institutions.

### **Inspection area**

There are seven inspection areas which make up the IHE scheme, which are each about different operational aspects of an institution. An inspection area is a title used to group the inspection standards and key indicators which are used by the inspection team to examine in detail whether an institution meets, or does not meet BAC standards.

### **Inspection standard/s**

Each inspection standard is a different aspect of the overall inspection area. It is then further broken down into a number of key indicators to examine the standard in detail. Each standard can be 'Met', 'Partially Met', 'Not Met' or be 'Not Applicable'.

### **Inspector**

BAC uses the term 'inspector' rather than 'reviewer'. An inspector is an experienced QA professional who is contracted by BAC to inspect an institution and assess their performance against the standards contained within the IHE scheme.

### **Key indicator/s**

A key indicator is a detailed statement linked to an inspection standard within an inspection area. It has a 'Yes', 'No' or 'Not Applicable' answer, which is used by the inspection team as a quantifiable measure to determine if an institution being inspected meets BAC standards.

### **Re-accreditation**

This is when an accredited institution applies to go through the inspection and accreditation process.



## List of Annexes

**Annex 1 BAC Articles of Association**

**Annex 2 Independent Higher Education scheme**

**Annex 3 BAC Internal Quality Assurance Processes**

**Annex 4 Inspectors' Handbook**

**Annex 5 Independent Higher Education Report Template**

**Annex 6 Accreditation Handbook**

**Annex 7 Survey of Institutions**

**Annex 8 Mapping of IHE Standards aligned to the ESG 2015**