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# EXECUTIVE SUMMARY

This external review report analyses how the British Accreditation Council (BAC) meets the expectations of the Standards and Guidelines for Quality Assurance in the European Higher Education Area 2015 (ESG). In addition to the agency itself and its stakeholders within the UK and overseas, the report is intended to inform the ENQA Board's decision on BAC's continued membership and to inform EQAR to support BAC's re-application to the Register. This is a second review of the agency. BAC has been a member of ENQA since March 2015 and listed in EQAR since June 2015.

BAC's mission is to provide globally respected and rigorous inspection-based accreditation to enhance the standards and quality of independent further education, higher education and training institutions. In practice, this is delivered through a series of accreditation schemes which vary in their precise focus, depending on the type of education provider the scheme is aimed at, but all feature a standard inspection model in the way they are delivered. Higher education providers can seek BAC accreditation through the Independent Higher Education (IHE) scheme, which was first established in 2016 and revised in 2017. At the time of the review, 36 higher education providers were accredited through the scheme: 13 in the UK and 23 in other countries.

The review panel concluded that BAC was undertaking valuable work to engage higher education providers in a level of external quality assurance that they might not otherwise benefit from. This has been a feature of BAC's work since its establishment in 1984 and continues today.

Since the last ENQA review in 2015, BAC has made good progress in a number of areas, including through reform of its governance arrangements, the introduction of Student Inspectors and the move to manage higher education accreditation through a distinct scheme that can more easily align with the ESG. This has enabled BAC to demonstrate compliance with a number of the standards in the ESG and to assure the review panel that this practice is embedded and secure.

However, there are a number of areas where further work is still needed. The distinctive inspection-based model has served BAC well for a number of years, but in seeking to align with all of the ESG more closely, it must evolve to more explicitly address the effectiveness of providers' internal quality assurance processes. This is not to suggest that inspections do not consider this at all, but the nature of the process and the format of reports do not make it as transparent as they should.

There are other changes that have been undertaken since the last ENQA review, such as the production of a thematic analysis report and the move to publish negative decisions, which have been implemented far too recently for the review panel to evaluate their impact fully. If the ENQA Board is persuaded to renew BAC's membership, the review panel hopes to see a more robust approach to addressing the recommendations and suggestions for improvement in the report, in order for the next ENQA review to be able to see the impact of any changes as well as their intent.

The panel has reached the judgement that BAC is fully compliant in all ESG, except five where the judgement is substantially compliant (*3.1 Activities, policy and processes for quality assurance; 3.5 Resources; 2.1 Consideration of internal quality assurance; 2.4 Peer-review experts; and 2.6 Reporting*) and one where the judgement is partially compliant (*3.4 Thematic analysis*).

The panel makes commendations to BAC in the following areas:

- The impact of BAC's work to engage higher education providers that would not otherwise benefit from external quality assurance. (ESG 3.1)
- The stability brought to the operational delivery of core business in recent years. (ESG 3.5)

- The successful streamlining of internal processes and the implementation of a robust approach to internally managing the quality of its operations. (ESG 3.6)
- The rigorous approach taken to follow-up after accreditation is awarded. (ESG 2.3)

The panel makes recommendations to BAC in the following areas:

- Strengthen BAC's approach to strategic planning, ensuring that plans are robust, that they explicitly translate into the daily work of the organisation, and that the success of their implementation is routinely considered by the Council. (ESG 3.1)
- Introduce student and international members of the Accreditation Committee who attend every meeting during their term, rather than rotating attendance between a pool of members. (ESG 3.1)
- Develop an approach to thematic reviews which is more analytical in nature with appropriate commentary on the issues identified, more clearly driven by predetermined outcomes, and has an impact on the approach to quality assurance taken by BAC and accredited higher education providers. (ESG 3.4)
- Build capability in the core staff team that better enables it to enhance its understanding of international higher education trends and developments and hence to better reflect on current practice and to inform member institutions and the public about its activities in line with its strategic plan. (ESG 3.5)
- Strengthen the coverage of ESG 1.4 in the inspection process so that the provider's policy on the recognition of qualifications is specifically considered, taking note of most recently available international guidance on the matter. (ESG 2.1)
- Evolve the inspection process and the Accreditation Committee's decision making to more explicitly address the effectiveness of the internal quality assurance processes described in Part 1 of the ESG. (ESG 2.1)
- Clearly separate the functions of staff and inspectors, including the role of the Chief Inspector. (ESG 2.4)
- Further strengthen the transparency of how inspections consider the effectiveness of providers' internal quality assurance processes in the published reports by increasing their analytical content and listing the inspectors involved. (ESG 2.6)

In light of the documentary and oral evidence considered by it, the review panel is satisfied that, in the performance of its functions, BAC is in compliance with the ESG.

# INTRODUCTION

This report analyses the compliance of the British Accreditation Council for Independent Further and Higher Education (BAC) with the *Standards and Guidelines for Quality Assurance in the European Higher Education Area* (ESG). It is based on the self-evaluation process by BAC and its external review conducted between May and December 2019.

## BACKGROUND OF THE REVIEW AND OUTLINE OF THE REVIEW PROCESS

### BACKGROUND OF THE REVIEW

ENQA's regulations require all member agencies to undergo an external cyclical review, at least once every five years, in order to verify that they act in substantial compliance with the ESG as adopted at the Yerevan ministerial conference of the Bologna Process in 2015.

As this is BAC's second review, the panel is expected to provide clear evidence of results in all areas and to acknowledge progress from the previous review. The panel has adopted a developmental approach, as the *Guidelines for ENQA Agency Reviews* aim at constant enhancement of the agencies.

### MAIN FINDINGS OF THE 2015 REVIEW

The first ENQA review of BAC was undertaken in the years immediately following changes to the United Kingdom's immigration legislation which resulted in a dramatic reduction of business, as elaborated later in this report. The organisation had restructured by the time of the review but was still in transition to an operating model fit for its new circumstances. The panel recognised BAC's determination to modernise in what still remained a demanding, volatile context.

Based on the 2005-2015 ESG, the panel found that BAC fully complied with the following ESG: 2.1, 2.3, 2.6, 2.7, 3.1, 3.3, 3.2, 3.5, ESG 3.6, and ENQA criterion 8. It substantially complied the following ESG: E2.2, 2.5, 3.4, and 3.7, partially with: 2.8, and 3.8, and did not comply with the ESG 2.4.

Regarding the serious matter of non-compliance with ESG 2.4 (Processes fit for purpose), the Panel concluded that BAC's approach to engaging students in its governance and accreditation processes needed to mature and become embedded, that BAC did not seriously consider the inclusion of international experts, that stakeholders were not systematically engaged when reviewing the fitness for purpose of processes, and that inspections for full accreditation had the potential for development, because sometimes it was undertaken by just one inspector and this was not seen as a good practice in the previous review report (see page 29). These stemmed from the tension between the well-established professional inspectorate model adopted by BAC and the expectations of the ESG that external quality assurance processes are developed and executed in a way which draws upon the perspectives and expertise of various stakeholders.

The panel made a series of more focused recommendations to inform the continued development of BAC's governance, management and accreditation processes. These included ensuring that negative outcomes were somehow communicated given the public interest, that work underway to enhance the consistency of judgements be continued and built upon, that the sustainability and resilience of its relatively small permanent staff be reviewed, that a more systematic approach to Internal Quality Assurance be adopted, that a long-term strategic plan be developed and adopted and that accordingly the organisation itself be reviewed in terms of its fitness-for-purpose.

In March 2017, BAC submitted a follow-up report to ENQA detailing the progress made towards each of the panel's recommendations. This update has been considered alongside the Self-Assessment Report,

supporting evidence and site visit for this 2019 review to inform the judgements against each of the ESG set out in the later sections of this report.

The panel also took note of areas flagged by the EQAR's Register Committee, which largely coincide with issues needing improvement as in the ENQA panel 2015 report and ENQA Board's decision (mentioned above), namely: designing methodologies fit for purpose, peer-review experts, reporting, thematic analyses, and resources.

## REVIEW PROCESS

The 2019 external review of BAC was conducted in line with the process described in the *Guidelines for ENQA Agency Reviews* and in accordance with the timeline set out in the Terms of Reference. The panel for the external review of BAC was appointed by ENQA and composed of the following members:

- **Aurelija Valeikienė** (Chair), Deputy Director, Centre for Quality Assessment in Higher Education (SKVC), Lithuania (nominee of ENQA, the European Association for Quality Assurance);
- **Dan Derricott** (Secretary), Assistant Registrar (Education Policy and Quality), University of Warwick, United Kingdom (nominee of ENQA, the European Association for Quality Assurance);
- **Professor Ellen Hazelkorn**, Professor Emeritus, Technological University Dublin, Ireland (nominee of EUA, the European Universities Association);
- **Samin Sedghi Zadeh**, Student of the Faculty of Medicine and Surgery, University of Turin, Italy (nominee of ESU, the European Students' Union).

The review panel was grateful for the support it received throughout the review process from Goran Dakovic, ENQA's Reviews Manager and the coordinator for this review.

BAC assigned Hayley Boyes, Higher Education Manager, as its lead staff member for the review and primary point of contact for the review panel. The review panel is grateful for the support it received throughout the process from her and the wider BAC team.

## Self-assessment report

BAC began planning and preparing for the ENQA review in October 2018 and focused much of this time on undertaking a self-assessment against the European Standards and Guidelines (ESG), which was compiled into the Self-Assessment Report (SAR) and signed off in May 2019. The panel had access to the SAR and its supporting evidence, including BAC's 2017 report on progress towards the recommendations of the previous ENQA review, in advance of the site visit to help determine its line of enquiries.

Following internal discussion among the panel, a number of requests for clarification and additional documentation were issued. The agency promptly responded to all of them, either before or during the site visit. The panel confirms having had access to all individuals and documents it wished to consult. For a list of all documentary evidence, supporting the present review, please see [Annex 4](#).

The panel found the SAR and evidence to provide a helpful description of BAC's history, context and current operations. There was limited critical reflection on the strengths and weaknesses of BAC's approach and the extent to which they comply with the ESG. This meant the panel had a clear idea that the BAC inspection-focused approach was distinctive from that typically adopted by other ENQA member agencies, but was not able to develop preliminary judgements about the effectiveness of this approach in advance of the site visit.

## Site visit

A three-day site visit to London took place between September 9<sup>th</sup> and 11<sup>th</sup>, 2019, commencing with a helpful discussion about BAC's operating context with the Higher Education Manager, who project managed the ENQA review for BAC. The site visit consisted of twelve meetings between the panel and:

- BAC's Chief Executive, Chief Inspector and wider staff team;
- Members of BAC's Council and Accreditation Committee;

- BAC Inspectors involved in the IHE scheme, including Student Inspectors;
- Heads and senior quality staff of higher education providers in the UK, Greece and South Africa with BAC accreditation;
- Representatives of the UK's Office of the Independent Adjudicator (OIA) and the Malaysian Financial Accreditation Agency.

Each meeting was chaired by a member of the panel, with all panel members contributing questions that further explored the team's lines of enquiry.

A full schedule of meetings held during the site visit can be found in [Annex 1](#).

The panel was grateful for the candid and reflective nature of the discussions in each of the meetings, which helped to both further understand the specificities of BAC's inspection-led approach. When triangulated with the documentary evidence, the discussions enabled the panel to form a rounded view on BAC's strengths, weaknesses and compliance with the ESG.

## Report

At its final private meeting during the site visit, the review panel agreed on the main issues to be covered by the Secretary in the report. The final review report was drafted by the Secretary in consultation with the panel. The draft report was checked by the ENQA Review Coordinator. BAC was given a possibility to comment on the factual correctness of the draft report. The panel considered all comments received from BAC and then finalised the report for consideration by the ENQA Board.

The report is also then available for consideration by EQAR if BAC makes an application to continue its inclusion on the Register.

To reference the recommendations listed in the previous ENQA review in this report, the panel followed the mapping between ESG 2005 and 2015 from the EQUIP project<sup>1</sup>.

## HIGHER EDUCATION AND QUALITY ASSURANCE SYSTEM OF THE AGENCY

### HIGHER EDUCATION SYSTEM

The higher education system in the United Kingdom (UK) is one of the most established, well-regarded and internationalised globally. In its Education at a Glance 2019 publication, the OECD noted that 'the United Kingdom enrolls the second largest number of international students in the OECD area after the United States. As a destination country, the United Kingdom accounts for 10% of the total international education market share in OECD and partner countries'<sup>2</sup>. Nearly 700,000 students study towards a UK degree in 225 other countries and territories around the world through transnational education (TNE) arrangements<sup>3</sup>. UK universities occupy 28 of the top 200 places in both the QS<sup>4</sup> and Times Higher Education<sup>5</sup> 2020 World University Rankings, including three or four universities in the top ten of each. It is arguably these elite parts of the UK system and its larger, older universities that are best known. However, it has, for a long time, been a more extensive and diverse system.

The UK system is, in fact, four systems. In the UK's model of devolved government, education policy – including higher education, is a devolved matter and therefore the responsibility of the Scottish Government in Scotland, the Welsh Government in Wales and the Northern Irish Executive in Northern Ireland. In England, there is not a devolved administration and as such, English policy continues to be managed by the UK Government (through the Department for Education in the case of higher education

<sup>1</sup> [http://www.equip-project.eu/wp-content/uploads/EQUIP\\_comparative-analysis-ESG-2015-ESG-2005.pdf](http://www.equip-project.eu/wp-content/uploads/EQUIP_comparative-analysis-ESG-2015-ESG-2005.pdf)

<sup>2</sup> <http://gpseducation.oecd.org/CountryProfile?primaryCountry=GBR&treshold=10&topic=EQ>

<sup>3</sup> <https://www.universitiesuk.ac.uk/policy-and-analysis/reports/Pages/Intl-facts-figs-19.aspx>

<sup>4</sup> <https://www.topuniversities.com/university-rankings/world-university-rankings/2020>

<sup>5</sup> <https://www.timeshighereducation.com/world-university-rankings/2020/world-ranking>

and the Department of Business, Energy and Industrial Strategy for science, research and innovation) and legislated on by the parliament in Westminster.

In England, Scotland and Wales, there are dedicated regulators and sector infrastructure to manage higher education. These regulators work independently and pursue strategies in support of the priorities of their respective governments; however, there are areas where they work together to deliver UK-wide initiatives. For example, the delivery of the Research Excellence Framework and the National Student Survey are commissioned jointly across the four nations.

Higher education in each of the four nations is diverse. Each nation's providers include internationally recognised research-intensive universities, younger teaching-focused universities and further education colleges that offer higher education courses as part of a wider portfolio. Additionally in England, there are a significant number of 'alternative providers' that do not receive recurrent public funding in the same way as universities and colleges but can opt to access public funding through student loans and grants by seeking registration with and regulatory oversight by England's higher education regulator, the Office for Students (OfS).

## **QUALITY ASSURANCE**

Successful registration with the Office for Students in England is partly dependent on successfully engaging with an external assessment of educational quality and standards by England's 'Designated Quality Body', which is currently the Quality Assurance Agency for Higher Education (QAA). Given the relatively high cost of higher education in the UK for students, being able to offer courses that are eligible for student loans and grants is a significant factor in the appeal of and potential domestic market for a UK provider.

Whilst education is a devolved policy matter in the UK, immigration is not and remains a UK-wide responsibility of the Home Office. As such, students from outside of the European Union wishing to study at any UK provider must first obtain a visa, specifically a 'Tier 4' general student visa. The UK system requires that in order to obtain a Tier 4 visa, a student needs to be studying a course at an approved educational provider with a license to 'sponsor' their visa and monitor the student's ongoing compliance with the conditions of the visa. To hold a license to sponsor Tier 4 visas, providers must demonstrate that the quality of its education is sufficient through an assessment by an 'educational oversight' body authorised by the Home Office. For higher education providers, this has been the Quality Assurance Agency for Higher Education (QAA) since 2011.

These two mechanisms – access to public funding via student loans and grants, and the ability to sponsor non-EU students seeking Tier 4 visas – are two of the most significant regulatory features of the UK higher education system and control the access to all but a small minority of potential students. Both mechanisms require providers to engage with demanding, comprehensive external quality assurance activities by QAA and therefore leave just a small part of the UK sector that operates outside of this regulated space.

## **THE BRITISH ACCREDITATION COUNCIL**

BAC was established in 1984 through the initiative of the British Council with support from the Department for Education and the sector. It was established with a clear purpose to bring about a voluntary system of quality assurance and accreditation for independent further and higher education in the UK, which had grown rapidly in the previous years, to replace the Department's statutory inspection which had been withdrawn two years prior. This voluntary accreditation would serve to differentiate high-quality providers in the independent sector, and there was steady growth through its first two decades of operation to around 200 providers by 2005, largely comprising colleges.

In 2007, new legislation required educational providers to be subject to 'educational oversight' if they wished to sponsor international students to live and study in the UK through a 'Tier 4 visa'. BAC was



successful in becoming one of a small number of bodies approved by the UK government to provide this educational oversight to providers through its accreditation scheme, which generated a significant amount of new activity. BAC had grown to accrediting 540 providers by 2011. Following a review of the legislation by a new government in 2011, only the Quality Assurance Agency for Higher Education (QAA) was authorised to provide educational oversight for higher education providers recruiting international students. BAC, therefore, lost its place in the more lucrative full-time student market. This change meant that BAC suffered from a significant reduction in the number of providers seeking accreditation in a short amount of time, including colleges that delivered higher education or demonstrated educational oversight through their statutory inspections by Ofsted<sup>6</sup>. This change naturally required BAC to embark upon a review of its shape, size and purpose, given that the domestic market for its services contracted significantly.

Education providers with BAC accreditation continue to be able to sponsor students on short term study visas for courses in the UK for six months or less, which provides a stable demand for accreditation from providers not seeking to access Tier 4 visas.

BAC has since sought to reposition and diversify its offering, particularly in higher education, with a clear focus on working internationally in light of the declining market for its services in the UK. It has identified opportunities in other countries where governments do not accredit the independent sector or for providers seeking an UK-based accreditation. In support of this effort, BAC first applied for membership of ENQA in 2014 and following an external review, was successfully admitted for a period of five years.

As of April 2019, the largest group of BAC's 229 accredited providers are still in the UK (184), but there is a growing number in other countries (45). Of these, 36 are higher education providers with 13 in the UK and 23 overseas. Accreditation by BAC does not necessarily interact with the domestic arrangements for regulating or quality assuring higher education in any of the countries that BAC operates. Despite the iterative change to BAC and its operating context through its 35-year history, it remains engaged in valuable work to bring quality assurance and accreditation to providers in the UK and overseas that might not otherwise benefit from this external scrutiny and support.

### **BAC'S ORGANISATION/STRUCTURE**

BAC is incorporated in England and Wales as a not-for-profit 'private company limited by guarantee' and is also a registered charity, which is a common legal structure for similar organisations in the UK. The Board of Trustees of 11 members, known as the Council within the organisation, is the most senior governing body of the organisation and has clearly defined responsibility and legal accountability for the overall governance of the organisation in support of its charitable objects 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;
- 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.

The Council is supported in its duties by three committees. The Standing Committee – comprising the Chair, Deputy Chair and Treasurer – oversees and steers the implementation of strategy between meetings of Council. The Accreditation Committee, comprising a Trustee as its chair and nine independent members, has full delegated authority on behalf of the Council to make decisions about the granting, suspension and withdrawal of accreditation and recommends the accreditation schemes to Council for approval. The Audit Committee – comprising three Trustees, including the Treasurer as Chair – maintains oversight of financial reporting, audit activity and risk management.

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<sup>6</sup> Ofsted is the Office for Standards in Education, Children's Services and Skills in England. They inspect services providing education and skills for learners of all ages in England, notably including further education colleges that might also deliver higher education.

A small central staff team of eight<sup>7</sup> roles (7.4 FTE) is accountable through the Chief Executive to the Council for the delivery of BAC's day-to-day operations and for the implementation of the approved strategic plan as set out in Figure 1 below. Since the last ENQA review, BAC has invested in a new role dedicated to managing its operations with higher education providers, ensuring compliance with the European Standards and Guidelines, and delivering the work BAC is contracted to undertake as the secretariat to the Council for Validating Universities (CVU)<sup>8</sup> in the UK.

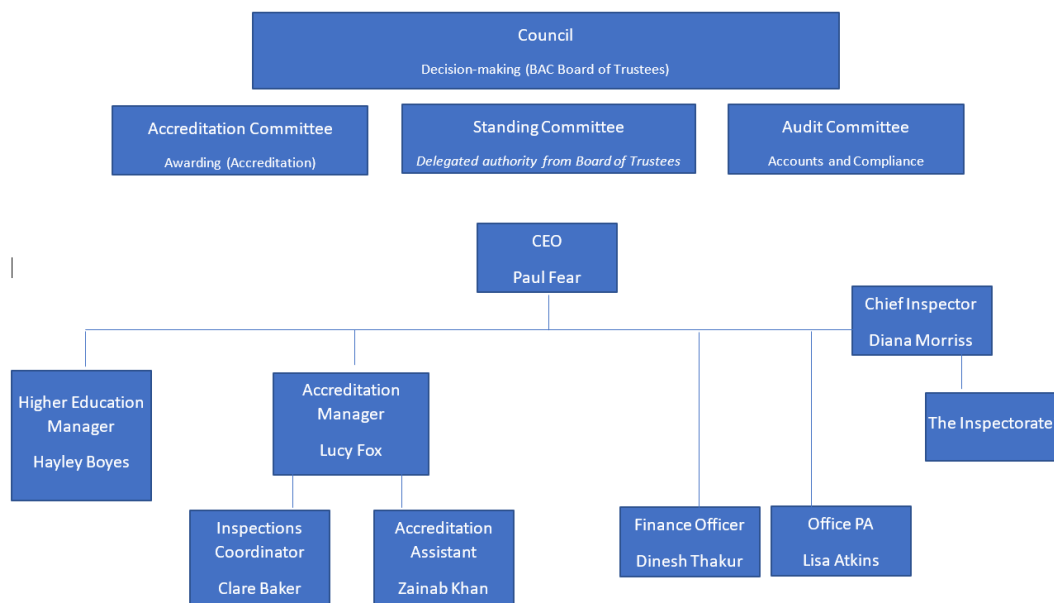


Figure 1: BAC Organisational Chart

The Chief Inspector has significant management responsibility for the maintenance and delivery of the accreditation schemes, including the recruitment and management of BAC's 48 Inspectors, 31 of whom are involved with inspections of higher education providers. The delivery of BAC inspections is initiated by the central staff team and then handed over to the Lead Inspector (the Chair of the inspection team, drawn from the experienced inspectors and appointed by the Chief Inspector) early in the process to plan, organise and report on the inspection team. This means that much of BAC's operational delivery capacity is in the Inspectorate.

At the time of the review, BAC was undergoing a transition between Chief Executives and the review panel met with the outgoing Chief Executive, Paul Fear, during the site visit, in what was his final week with BAC after four years. A new post holder, Dr Janet Bohrer, had been appointed; she was present at the last session of the site visit where the ENQA review panel offered initial feedback to BAC, and she was involved in the final stages of the review as the report was confirmed and considered by the ENQA Board.

### BAC'S FUNCTIONS, ACTIVITIES, PROCEDURES

In its 2019-2022 Strategic Plan, BAC describes its mission to 'provide globally respected and rigorous inspection-based accreditation to enhance the standards and quality of independent further education, higher education and training institutions'. In order to fulfil this mission, it has a long term vision to be 'a leading practitioner in the provision of internationally recognised accreditation and related consultancy services in the field of higher and further education and training'.

<sup>7</sup> There were nine roles (8.4 FTE) at the point of submitting the self-assessment, however this had reduced by the time of the site visit.

<sup>8</sup> The Council for Validating Universities (CVU) is an association of higher education providers that act as awarding bodies for higher education programmes of study delivered by other providers. CVU represents the interests of these awarding bodies and promotes good practice in the management of such arrangements.

This commits BAC to continue its primary operation of delivering inspection-based accreditation as a means for assurance and enhancing quality, as it has done since 1984. In practice, this activity is delivered through a number of ‘accreditation schemes’ which are tailored to different types of providers. Currently, there are six schemes (the number of accredited providers is noted in brackets):

- 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)

While there is some overlap, the schemes vary in their focus as determined by the mixture of minimum standards that are judged to be met or not. In particular, the Independent Higher Education scheme includes minimum standards on a number of areas specific to higher education that do not feature in any of the other schemes. There is commonality across the methods in the approach to inspecting providers and reaching a decision about accreditation, with each method requiring a self-assessment against the standards, a site visit by inspectors, a published inspection report, and a holistic consideration of the application by the Accreditation Committee. However, as the IHE scheme has evolved, particularly as BAC seeks to align this scheme with the expectations of the ESG, there is increasing divergence from other schemes, such as through the inclusion of student inspectors.

BAC’s maximum period of accreditation for higher education providers is four years, after which the provider is required to undergo a reaccreditation inspection. Interim inspections halfway through this cycle allow BAC to be assured that standards continue to be met, and progress is made towards actions and recommendations originating from the initial inspection. Additionally, BAC uses its discretion to pay closer attention to providers with less of a track record – including through probation periods ahead of full accreditation being considered – and to providers where concerns about quality arise – including through unannounced spot-check inspections. Each of these engagements are embedded as part of the IHE Scheme and managed by the same frameworks as full inspections.

All providers offering full degree programmes are required to seek accreditation via the Independent Higher Education (IHE) scheme and it therefore just this scheme that is in the scope of this ENQA review.

Beyond accreditation, BAC offers bespoke consultancy services around the world. These vary in nature depending on the needs of their client and might include capacity building or the development of national accreditation frameworks, as is currently the case through a project with the Higher Education Council in the Kingdom of Bahrain to support the development of their national system of quality assurance and accreditation. The review panel took care to assess that there was an appropriate separation of these activities from BAC’s core accreditation work, as elaborated in ESG 3.1.

BAC works to develop partnerships with other organisations where there is a mutual interest. For example, in the UK, there is a Memorandum of Understanding (MoU) with the Office of the Independent Adjudicator for Higher Education (OIA) to ensure students have a clear, unified route to escalate unresolved complaints when they are studying at providers that are both accredited by BAC and members of OIA complaints scheme. Outside of the UK, BAC has signed an MoU with the Malaysian Financial Accreditation Agency in order to offer a joint accreditation exercise where a provider wishes to seek accreditation from both organisations. This is yet to be operationalised and tested through a joint exercise and, as such, has not been evaluated through this review.

#### **BAC’S FUNDING**

The majority of BAC’s income is earned from its core accreditation services, with providers paying set fees upon application and for each inspection undertaken, along with annual accreditation fees calculated on the basis of student numbers. Where a provider is subject to a spot inspection because of a concern about

quality or is required to undergo additional monitoring through a probation period, additional fees are payable to BAC.

The most recent audited annual accounts for the year ending August 2018 show a total income of £836,395. Accreditation and inspection fees in the UK accounted for 70% of this income, and international fees accounted for 18%. Consultancy work accounted for 5% of revenue. BAC notes in their Self-Assessment Report that 16% of its accreditation activities involve higher education; however, it generates 25% of its accreditation-related income.

At the time of the site visit, the accounts for the year ending August 2019 had not been audited but BAC's expected that this would confirm a favourable net position with a small operational surplus being generated for the first time since 2013/14. A deficit had been reported for four consecutive years since and had been accommodated by BAC's significant reserves (£1.15m in the most recent audited accounts), which continues to be seen by the Council as a resource available for investment in the strategic development of the organisation.

# FINDINGS: COMPLIANCE OF BAC WITH THE STANDARDS AND GUIDELINES FOR QUALITY ASSURANCE IN THE EUROPEAN HIGHER EDUCATION AREA (ESG)

## ESG PART 3: QUALITY ASSURANCE AGENCIES

### ESG 3.1 ACTIVITIES, POLICY, AND PROCESSES FOR QUALITY ASSURANCE

Standard:

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.

#### Evidence

##### *External Quality Assurance Activities*

Since its establishment in 1984, BAC has operated a system of accreditation intended to bring external quality assurance to parts of the independent further and higher education sectors that would not have otherwise benefitted from this, initially in the UK and more recently in other countries too. Since the last ENQA review in 2015, the accreditation of providers offering full higher education degrees has been separated into the focused 'Independent Higher Education' (IHE) scheme. The review panel had access to a comprehensive range of information which documented the development of the scheme including the IHE Scheme Document, the Accreditation Handbook, the Inspectors' Handbook, report writing guidelines, published inspection reports and unpublished records kept by inspectors, all of which was discussed and tested in meetings with BAC staff, inspectors, Accreditation Committee members and accredited providers.

Like BAC's five other schemes, the IHE scheme draws on a number of common principles that underpin all accreditation activity – namely that inspection to judge compliance with a series of minimum standards is used to inform the decisions of an Accreditation Committee. There are, however, some practical elements which are distinct to the IHE scheme and align with the European Standards and Guidelines, such as the inclusion of Student Inspectors. Furthermore, the selection of minimum standards to be met varies by the scheme, which allows the focus of the IHE scheme to be tailored to the higher education context. Since the IHE scheme was established in 2015, 36 providers have been accredited, 13 of which are based in the UK and 23 are in other countries. The merits of the scheme are evaluated in greater depth later in the chapters relating to the ESG Part 2.

The work with higher education providers is just one part of a more diverse portfolio of accreditation activity undertaken by BAC. Colleges and Short Course Providers have and continue to make up the largest groups of providers accredited by BAC, although the market with Colleges in the UK has suffered from the same regulatory changes to the UK's student visa system that its work with higher education providers has. In its Self-Assessment Report, BAC notes that accreditation involving higher education providers accounts for 16% of its activity but generates 25% of its income. This has grown in recent years, predominantly through increased interest in international accreditation and quality kite marks from providers outside of the UK. When discussing this with the review panel, accredited providers confirmed that this helped to differentiate themselves in their domestic market, regardless of whether the external quality assurance arrangements for independent providers in their local context were non-existent or well-developed and demanding. BAC's Council and senior staff confirmed that growing the numbers of

overseas providers in the IHE scheme was an essential part of its strategic ambitions for the coming years, although there was not yet a clear business plan in place for any particular market. In contrast, discussions with various groups and data provided to the review panel on multi-year trends in demand for BAC accreditation clearly signalled that the demand for accreditation from UK higher education providers was limited and very unlikely to grow under the current regulatory regime.

In addition to the primary activity of accreditation, BAC also provides consultancy around the world, which it described in its SAR as typically short, bespoke projects not conducted under the guise of the ESG. This work comprised a mixture of capacity-building activity, such as providing training to inspectors in a particular country, and advisory work, such as the development of a higher education accreditation framework for a national system. Additionally, there were projects to undertake inspections of providers against their domestic framework or standards. The review panel took care to consider how this work related to BAC's accreditation in discussions with senior staff and members of the Council, and by requesting copies of the six contracts for each consultancy since 2015.

The review panel found that there were controls in place to ensure separation between BAC's consultancy and accreditation work. For example, where inspections were undertaken against domestic standards rather than BAC's standards, this would not lead to accreditation by or public association with BAC. In the one case where all providers in one country were inspected, the inspection reports were handed to the national commissioning body to inform their decision-making, and BAC's involvement ended at that point. BAC does not exclude providers that have engaged in consultancy activity from subsequently seeking accreditation; one such case has occurred with a now accredited provider. BAC aims to keep the management of these activities separate within the organisation and, while there was limited evidence to confirm this beyond the assurances given by staff, the review panel found no cause for concern when discussing this with senior staff.

### *Strategic Development*

The review panel was provided with a strategic plan for 2015-2018, which was the first such plan developed and adopted by the organisation under the leadership of the former Chair of Trustees, Peter Williams, and the then newly appointed, and now outgoing, Chief Executive, Paul Fear. In discussing the ways in which the organisation's strategy translates into and drives the daily work of the agency with staff at all levels and with members of the Council, the review panel heard that this was still developing. Upon requesting evidence of the reporting and accountability to Council on the implementation of the strategic plan, the review panel received a document entitled 'End of 2015- 2018 Strategic Plan Review', which reported several objectives as not met or challenging to measure the success of. The document explicitly notes that "targets were set although it would be true to say that they were not grounded in experience and lacked an appreciation of the nature of accreditation, the degree of competition, the drivers for seeking accreditation or the operational and the internal quality assurance demands faced by BAC." The review panel were not provided with any reports made to the Council during the lifespan of the strategy.

In the absence of a new strategic plan in 2018-2019, a number of operational priorities were developed for the year. Subsequently, an interim strategic plan has been developed by the Chief Executive through the first half of 2019 and was agreed by the Council in June 2019, shortly before the review panel's site visit. It was evident from the review panel's discussions with staff and members of the Council that this plan was considered interim ahead of a newly appointed Chief Executive taking up their post and having the scope to review the strategic direction of BAC. The review panel did not see evidence of how the Interim Strategic Plan had been developed in consultation with the full staff team or stakeholders, how it was explicitly driving the work of the organisation. Instead, it appeared from discussions that this was implicit and variable from year to year.

### *Governance*

A number of changes have been made to BAC's governance structures since the last ENQA review in 2015. BAC was previously governed by the former Council – a body comprising representatives nominated by stakeholder organisations that were technically advisory but held some key organisational responsibilities – and the Executive Committee – consisting of the Company Directors / Charity Trustees with legal responsibility and executive control of the organisation. These have since been merged, and the organisation is now governed by a Council comprising up to twelve Company Directors / Charity Trustees fulfilling a more typical Board role. An international member and a student member are now included in the Council's membership.

The Council meets formally three times per year and the minutes of its meetings, together with the audited Annual Accounts and Trustees Report, show that it discharges its functions, including by providing appropriate support and challenge to the Executive. In addition, three members of Council hold the Officer roles of Chair, Deputy Chair and Honorary Treasurer. These officers make up the Standing Committee, a formally constituted committee of the Council, which provides a steer to and support for the Executive in between full meetings of the Council.

The Council is supported by two further committees in discharging its responsibilities, the Audit Committee and the Accreditation Committee, as illustrated in Figure 2 below. The Audit Committee provides oversight for financial, risk and compliance management. The Accreditation Committee has full delegated authority from the Council to take decisions relating to the accreditation of individual providers and to recommend new and revised accreditation schemes to the Council for approval.



Figure 2: Committees of the Council

The Accreditation Committee includes a student place in its membership, but this rotates between the Student Inspectors each time the Committee meets. The review panel discussed the impact of adding a student voice in this way with student inspectors, other members of the Accreditation Committee and BAC staff, and found that this flexible approach helps to maximise the number of meetings with a student member able to attend. However, it was recognised that this does limit the opportunity for a student member to build their confidence and expertise, as would be the case with members who attend all meetings. There is no place reserved on the Accreditation Committee for an international member in the same way as there is on the Council.

In discussions with members of the Council, the Accreditation Committee and the Senior Management Team, it was confirmed that these governance reforms had been some of the most fundamental and high impact changes within the organisation since the last ENQA review. In particular, the streamlined Council was felt to be more effective in ensuring good governance and providing clearer, more strategic leadership to the organisation. The review panel also took time to understand and confirm that, in practice, the delegated authority exercised by the Accreditation Committee worked well and the Council had not felt the need to intervene in its work other than through the consideration of appeals.

## *Stakeholder engagement*

The review panel regularly revisited the topic of how outward-facing BAC was during its site visit, including with staff, accredited providers and two organisations that BAC had memoranda of understanding (MoU) in place with. Throughout these discussions, BAC was characterised as an organisation that was not engaged in national or international developments in quality assurance.

One MoU was with the Office of the Independent Adjudicator (OIA) relating to student complaints from UK providers subscribed to both BAC and the OIA, and the other with the Malaysian Financial Accreditation Agency, however, the provisions in neither MoU has been fully exercised or tested in their first few years of operation before the present site visit and the evidence of their impact was therefore limited. The review panel noted that BAC felt there was not sufficient activity with the Department for Education or the British Council, or indeed any other sector stakeholder, to warrant a meeting with them during the site visit.

In BAC's first five years as a member of ENQA, it has been represented at a number of annual member events. However, staff confirmed that their engagement beyond this in projects or working groups had been limited as staff development appears to be a function of individual decisions rather than an organisational one. The review panel sought evidence of how BAC looked outwards to other agencies and similar bodies, through the ENQA membership or beyond, to inform and benchmark its development. Staff confirmed that no such activity had taken place or was intended to take place. In practice, there was limited evidence to demonstrate that BAC was an outward-facing organisation that engaged its stakeholders in governance beyond membership of the Council and the Accreditation Council, where members are recruited and serve in their individual capacity.

## **Analysis**

### *External Quality Assurance Activities*

BAC prides itself on taking a distinctive inspection-based, rather than review-based, approach to the external quality assurance of higher education providers. As such, BAC assesses a provider's compliance with a large number of specific minimum standards in a binary way ('met' or 'not met'). It seeks to confirm that a threshold for quality has been met by a provider and while the process can and often does facilitate the ongoing enhancement of quality above this threshold, the methodology is principally concerned with ensuring the threshold continues to be met. Other than this, there are many components of the approach which are typical of the approach to external quality assurance found across the European Higher Education Area: a clear framework of expectations is published; a self-evaluation is undertaken early in the process; a site visit is central to triangulating findings with documentary evidence; reports are published that show the outcomes of the process. On balance, the review panel considers that BAC does undertake external quality assurance activity on a regular basis and that these cover the areas defined in Part 2 of the ESG.

Higher education providers represent a small proportion of the overall number of BAC accredited providers. However, it was clear to the review panel that this work in higher education was considered to be distinct from BAC's other work and that there was a recognition of the increasingly separate approach needed to manage it. The introduction of a dedicated Higher Education Manager and the impressive cadre of Council and Accreditation Committee members with senior experience in higher education demonstrated that this was an organisation taking this work seriously. Indeed, given regulatory changes in the UK with respect to international students and hence the redirection to international/overseas higher education providers, it is anticipated that the higher education component of BAC's work will expand in the future. Questions about the capacity and capability of BAC to meet these needs, which are different in substance from the other sectors of attention, were raised during the site visit.



BAC performs an important role within the UK and international higher education landscape. There is a growing number of diverse providers, many of whom are small and niche, which attract domestic and international students to the UK as well as providers in other countries. This growth is an inevitable outcome of demographic growth and massification. Providing quality assurance oversight is an important role, which BAC seeks to offer. It does so in a transactional way, whereby the focus is on specific inspection events and meeting minimum standards, rather than on providers benefitting more deeply from the expertise of an agency, as may be found in other ENQA member agencies. BAC seeks to benefit from its ENQA membership and so how well it performs this function has implications for ENQA and European higher education quality assurance more broadly.

Where BAC undertakes consultancy work, there is appropriate separation from its core accreditation. There is no suggestion that providers engaging with BAC through consultancy work have met the requirements for accreditation or the expectations of the European Standards and Guidelines.

### *Strategic Development*

Overall, the review panel found BAC to be an organisation that had evolved and matured in the period since the last ENQA review. In particular, the moves to manage its higher education operations through a discrete accreditation scheme, to introduce Student Inspectors and to make difficult decisions about governance reform all demonstrate that this is an organisation that is capable of reflecting, listening and learning. However, there were also missed opportunities and, consequently, there are organisational weaknesses, which must be addressed before BAC can be fully compliant with this standard.

The last ENQA review noted that BAC did not have a strategic plan, and both the then Chair and Interim Chief Executive agreed with the review panel that this needed to be addressed. BAC went on to develop its first strategic plan to cover the three-year period between 2015 and 2018, and the review panel was able to infer that through the lifespan of the first strategic plan, there were a number of positive developments which contributed to the achievement of parts of the plan. However, this relied on the review panel making the link rather than being able to see this explicitly through clear operational planning that translated strategic objectives into the work of staff and committee, or through robust reporting of progress to the Council.

BAC recently approved its second three-year strategic plan in principle, subject to it being reviewed by the incoming Chief Executive. The introduction of a second plan is an opportunity for any organisation as it can learn from the experiences of developing and implementing the first plan, which inevitably will have faced teething problems. In practice, the review panel was not convinced that such lessons had been learnt. The strategic plan and its objectives did not feature in the review panel's discussions with BAC staff and Council members except when questions were asked about it specifically. Some views on the new strategic plan went as far as dismissing it given the impending arrival of the new Chief Executive and the anticipated change in direction.

The review panel concluded that there is a need for BAC to more explicitly ensure and demonstrate that the strategy of the organisation does 'translate into the daily work of the agency' as required by the standard before full compliance can be achieved. While the incoming Chief Executive will have responsibility for delivering this, the Council should give serious consideration to its own role in setting appropriate strategy, evaluating the success of the strategy's implementation and aligning its own business and structures in support of the strategy.

### *Governance and stakeholder engagement*

The last ENQA review also noted that stakeholder engagement needed strengthening further at that point, particularly in the development of its procedures and standards. In undertaking this review, the

review panel found the introduction of student and international members of its reformed Council, and the involvement of some external perspectives in the Higher Education Focus Group advising on revisions to the IHE scheme to be positive developments in the right direction. However, in contrast, BAC does not work closely with or learn from other sector organisations since the dissolution of its former representative Council, or from the numerous quality assurance agencies, it has access to. This was most evident to the review panel when it was initially presented with no options for meeting BAC's stakeholder and partner organisations during its site visit, and then only very limited options upon insisting that such a meeting took place. On balance, the review panel is able to conclude that BAC's overall approach to stakeholder engagement has improved in some ways, however, whilst BAC's staff recognised this was an area for development, the review panel could see no firm plans for making this happen and would suggest that such plans are put in place.

Given the centrality of the Accreditation Committee to the external quality assurance activities undertaken by BAC, the review panel considered the meaningful involvement of stakeholders in the Committee to be important in meeting this standard. The rotating nature of the student place on the Committee is well-intentioned, but in practice, it limits the potential for the student voice to have an impact and make a meaningful contribution to the Committee's work. The absence of an international member of the Committee means it is without the rich, objective perspective this can bring in addition to national members. The review panel concluded that these gaps were serious and required attention; a recommendation is therefore made to this effect, and given the straightforward nature of the solution, it should be addressed in good time to report on the impact in the follow-up report to ENQA in two years.

#### **Panel commendations**

The impact of BAC's work to engage higher education providers that would not otherwise benefit from external quality assurance.

#### **Panel recommendations**

Strengthen BAC's approach to strategic planning, ensuring that plans are robust, that they explicitly translate into the daily work of the organisation, and that the success of their implementation is routinely considered by the Council.

Introduce student and international members of the Accreditation Committee who attend every meeting during their term, rather than rotating attendance between a pool of members.

#### **Panel suggestions for further improvement**

Formalise and accelerate the implementation of BAC's plans for enhancing the engagement of stakeholders in its work.

#### **Panel conclusion: Substantially compliant**

### **ESG 3.2 OFFICIAL STATUS**

Standard:

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

#### **Evidence**

BAC has been a registered company (limited by guarantee) and charity in England since it was first established in 1984, which allows it to be formally recognised as a legal entity under UK law. This is a common legal structure in the UK adopted by similar not-for-profit organisations. The review panel had

access to BAC's Articles of Association (effectively the constitution) and audited annual accounts, which it is legally required to file with the appropriate regulators.

BAC continues to be one of several bodies that can accredit an education provider and enable it to sponsor short-term study visas for courses lasting up to six months. This status is granted by the UK's government.<sup>9</sup>

The Higher Education and Research Act 2017 introduced the concept of a Designated Quality Body into the regulation of English higher education. This body is appointed by the government and contracted by the principal regulator, the Office for Students, to undertake quality assessments of regulated higher education providers. BAC does not fulfil the role of the Designated Quality Body and does not contribute to the regulation of higher education providers, other than for the purpose of enabling a provider to sponsor short-term study visas as outlined above. BAC's role is therefore to provide a voluntary quality assurance scheme which is typically taken up by unregulated providers in the UK. Where BAC operates outside of the UK, this accreditation is additional to domestic regulation and quality assurance.

Upon successfully passing an external review against compliance to ESG, BAC has been a member of ENQA and listed on the EQAR register since 2015. In addition, BAC is a full member of INQAAHE (The International Network for Quality Assurance Agencies in Higher Education) and has a signed Memorandum of Affiliation with the CHEA (Council for Higher Education Accreditation, USA) for participation in their International Quality Group (CIQG).

### **Analysis**

BAC continues to hold the same corporate status as it did at the point of the last ENQA review, which provides a valid legal basis for operating under UK law. This status requires there to be transparency in the governance, activity and financial health of the organisation through the publication of annual reports and accounts.

While BAC does not have a role in the regulation of higher education in England, it is recognised by the government as providing the necessary assurance for education providers to sponsor short-term study visas.

The panel concludes that BAC has a clear and common legal basis for operating and that it is recognised as a quality assurance agency by the UK government, and therefore meets the expectations of this standard.

### **Panel conclusion: Fully compliant**

#### **ESG 3.3 INDEPENDENCE**

Standard:

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

### **Evidence**

BAC has been established as a company limited by guarantee and a charity, which under UK law makes it a separate legal entity from the individuals associated with it and from other organisations. Control of the organisation is exercised through and by its Board of Trustees, known as the Council in BAC, in line with its published and easily accessible Articles of Association. Following the governance reforms undertaken

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<sup>9</sup> <https://www.gov.uk/study-visit-visa/eligibility>

by BAC since the last ENQA review, there are no positions on its Council, which are nominated by other organisations. The Council itself has full autonomy and accountability regarding the appointment of its members and the members of its committees. The review panel was able to confirm this position with regards to organisational independence by reviewing BAC's constitutional documents and the terms of reference for various governance bodies, and in discussions with members of the Council and its committees.

By reviewing the IHE scheme documents, minutes of Council and the Accreditation Committee, and terms of reference for the Higher Education Focus Group, the review panel were able to see how BAC had developed its accreditation scheme for higher education in a way which engaged stakeholders but retained decision making responsibility within the organisation. In discussing the approach to their appointment with BAC Inspectors, the review panel found the process itself has evolved and become more formalised in recent years (see ESG 2.4) and that there has consistently been total control within the organisation as to which inspectors are actually appointed.

The various documents setting out BAC's approach to accreditation, including the IHE scheme document, Inspectors' Handbook and Accreditation Handbook, together with the terms of reference and minutes of BAC's various governance bodies, clearly show a distinction between the role of Inspectors in assessing and reporting on a provider's compliance with individual standards and of the Accreditation Committee in using the inspection report to inform a holistic judgement about whether to award, renew or rescind accreditation. The review panel explored the role and independence of the Accreditation Committee in discussions with its members, BAC staff and the Council. It was confirmed that all decisions relating to accreditation are made by the Committee, that the Council did not seek to intervene except when required to do so by an appeal, and that staff only engaged and supported providers in follow-up activity once the Committee had decided on such a course of action. All of the evidence considered by the team confirmed that BAC retained independence in determining the formal outcomes of external quality assurance processes, and it consistently discharged this through its Accreditation Committee without interference.

## **Analysis**

As noted elsewhere in this report, BAC operates outside of any particular regulatory system and engages with only a very small part of any country's higher education system. Therefore, BAC does not have to contend with the same pressures as some other agencies do in terms of the influence of government or sector bodies. The changes to BAC's governance in recent years have further safeguarded against any particular organisation exercising influence over BAC's operations through nominated representatives having membership of governance bodies. There have been less positive effects of this in terms of stakeholder engagement more generally, but the change has certainly brought about greater independence. The organisational independence of BAC is clearly secured.

The review panel concluded that this same high degree of independence also applied to BAC's operations, from determining its methodologies to appointing inspectors, through to making decisions about accreditation. This is demonstrated through a clearly articulated division of responsibilities within the organisation and the way in which this has been operationalised in recent years as the IHE accreditation scheme has been introduced and subsequently revised.

In particular, the review panel concluded that the role of the Accreditation Committee was central to ensuring independent, objective decision making about the outcomes of external quality assurance processes delivered by BAC. The operation of the Committee by its Chair, Deputy Chair and members appears to the review panel to be highly effective and engaged. However, given its centrality, BAC would be well advised to improve the currently limited information about the Accreditation Committee's function, membership and operation on its website for public consumption. Furthermore, ensuring appropriate separation of responsibilities in the role of the Chief Inspector, as recommended in ESG 2.4,

will further mitigate the risk of any potential conflict of interest that could arise when acting as the Accreditation Committee's principal advisor.

### **Panel suggestions for further improvement**

Given the centrality of the Accreditation Committee to the way BAC exercises its independence and fairness in making decisions about accreditation, there could be greater transparency and clarity about the function, membership and operation of the Committee on BAC's website.

### **Panel conclusion: Fully compliant**

#### **ESG 3.4 THEMATIC ANALYSIS**

Standard:

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

### **2015 review recommendation**

That BAC considers 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.

### **Evidence**

In October 2018, BAC agreed to commission an independent researcher to undertake a thematic review of the inspection reports produced through its IHE accreditation scheme. Following a tendering exercise, the review commenced in January 2019 and reported in May 2019, around the same time as the Self-Assessment Report for this review was submitted by BAC to ENQA. The review considered 63 inspection reports relating to 36 higher education providers which were produced between 2015 and 2018. This was the first such review undertaken by BAC.

The thematic review report was available to review panel together with part of the Self-Assessment Report about the intended plans for disseminating the findings. These plans were three-fold: the report would be published online and sent to stakeholders; there would possibly be a stakeholder event to share lessons learnt from the review, and BAC itself would incorporate the learning into its operations. When discussing the dissemination of the report with BAC's senior and operational staff and with representatives of accredited providers, the review panel found that the report had been distributed to BAC's stakeholders and those who the review panel met recall having seen it. The review panel heard consistently, both from those within and outside of BAC, that the sample size informing the review was too small and therefore the usefulness of the report was limited. On occasion, the review panel considered this to feel more like an instant dismissal of the report rather than a practical caveating of its use.

The review panel heard from BAC's staff that a stakeholder event had been discussed but that this had not yet happened and no firm plans were in place to make it happen. Similarly, the review panel heard that there were intentions to take the lessons learnt from the review into BAC's operations, particularly in improving its support for providers, but there was no evidence of this happening so far or what it would look like in the near future.

In the review panel's own consideration of the thematic review report, it was noted the majority of the content was descriptive and simply summarised the content of inspection reports. There was a limited analysis of the causes for or consequences of particular outcomes in inspections; however, the review panel noted that it would be necessary to include more evaluative content in inspection reports (see ESG 2.6) for this to be possible.

## **Analysis**

The review panel concluded that the sample size should be noted when using the findings of the thematic review, as with any research, but that there were sufficient inspection reports in scope to draw useful lessons from them and have an impact. The review panel, therefore, dismisses the argument presented by BAC that the sample size was too small and made no exceptions in assessing compliance with this standard.

There have been positive developments since the last ENQA review, which should be recognised. In particular, the review panel considers the approach of commissioning to be an appropriate and sensible approach given the small scale of the organisation and the difficulty in building such capabilities amongst the staff when they are not needed all of the time.

However, there are still significant weaknesses in BAC's approach to thematic analysis.

The thematic review report produced partly meets the standard in that it describes the general findings of BAC's external quality assurance activities, but the extent to which it analyses those findings is limited. There may need to be a change in the inspection reports, or a future thematic review may need to access the underlying evidence base of reviews in order to achieve this and to improve the potential for thematic reviews to produce richer insights and have an impact.

BAC has not been able to demonstrate that the thematic review has had any impact to date on either its own work or the quality assurance policies and processes of its accredited institutions. Furthermore, no evidence was available to show that firm plans were in place to ensure that such an impact would be had in the near future. The review panel must, therefore, conclude that BAC is still some way from its thematic analysis being able to 'contribute to the reflection on and the improvement of quality assurance policies and processes in institutional, national and international contexts', as suggested in the guidance accompanying standard 3.4.

Overall, the review panel feels that it is still too early to judge the impact of the thematic review report recently published and the lessons that BAC will take into its next such exercise. However, the review panel has not sought to evaluate this report in isolation but rather the evolution of BAC's overall approach to thematic analysis since the last ENQA review. This is done with some expectation that the approach should be much more mature than when BAC underwent its first ENQA review. In taking that perspective, the review panel concludes that BAC is not much further forward and that the judgement regarding compliance still stands.

The panel is aware that many ENQA members struggle to meet the expectations of this standard fully. However, there are examples of the ways in which agencies approach this ESG, and, thus, encourages BAC to be informed by those.

### **Panel recommendations**

Develop an approach to thematic reviews which is more analytical in nature with appropriate commentary on the issues identified, more clearly driven by predetermined outcomes, and has an impact on the approach to quality assurance taken by BAC and accredited higher education providers.

### **Panel suggestions for further improvement**

If BAC is to demonstrate its commitment to complying with all of the European Standards and Guidelines – a trait that it promotes its IHE scheme on – then the review panel would expect to see a robust and accelerated response over the next three years. It is for BAC to decide on how it responds, but the review panel suggests that this includes maximising the impact of the recently published thematic review report,

taking the lessons learnt into a second more comprehensive review by 2022, and considering how inspection reports might evolve to enable a better quality analysis of their findings.

### **Panel conclusion: Partially compliant**

#### **ESG 3.5 RESOURCES**

Standard:

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

#### **2015 review recommendation**

That BAC strategically considers the sustainability of its small central administration and the appropriate blend of expertise required to meet its objectives.

#### **Evidence**

BAC has needed to be responsive and resilient to its changing circumstances over the last decade. After initially adapting to the sudden growth in activity through its designation as an educational oversight body for Tier 4 visas, BAC subsequently was forced to contract in size a rapid pace that would be problematic for any organisation. The last ENQA review took place at a time when staff retention was proving to be a challenge for BAC and was most starkly illustrated by the then-vacant post of Chief Executive having been appointed to the position less than a year prior to the review<sup>10</sup>.

In its Self-Assessment Report for this review, BAC considered the level of financial and human resources to be appropriate to conduct its work.

#### *Human Resources*

At the point of the site visit, the staff team had increased since the last ENQA review with eight roles (7.4 FTE) now established. One of these roles had very recently been appointed to. As such, the review panel met with seven staff during the site visit and discussed BAC's context and compliance with each ESG in one or more of its meetings with staff.

The team found the Chief Executive, and the Chief Inspector, to be effectively supported by managers responsible for delivering the accreditation and higher education operations, and by the wider team of professional staff. The day-to-day work of the organisation appeared to be stable and well-organised, with a clear division of responsibilities between staff. This was confirmed by members of BAC's Council and Accreditation Committee, by BAC inspectors and by representatives of accredited providers who were pleased with the level of support received from the central staff team. The review panel also noted the increase in staff retention during the 2015-18 strategic planning period that had been celebrated in the end of plan review and in discussions with senior staff, which is a marked difference from BAC's position at the time of the last ENQA review.

Through considering the evidence available regarding BAC's strategic development to date (see ESG 3.1) and discussing its future ambitions with members of Council and staff, the review panel found that much of BAC's staffing capacity and capability was focused on operational delivery. While this had been positive in stabilising its core operations, the ability of BAC to deliver on its strategic ambitions is potentially limited by the level of expertise, and the amount of time its most senior staff were able to dedicate to this work.

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<sup>10</sup> As noted in the final review report of the 2015 ENQA review of BAC (page 35): <https://enqa.eu/wp-content/uploads/2015/03/BAC-Final-edit-pdf.pdf>

Quality assurance is not a technical exercise and the panel wishes BAC to be better equipped to fulfil its strategy and further embed the ESG. The Council, Standing Committee and Chief Executive had previously identified that additional expertise and capacity would be needed to deliver on certain aspects of its strategy, which they intended to contract in as needed rather than build this within the existing team on a permanent basis.

### *Financial Resources*

BAC experienced a number of difficult years financially since the last review, with a net deficit reported in the annual accounts for four of those years. The review panel heard from senior staff that this was in part a deliberate strategy to invest, particularly in staffing, and put the organisation on a more stable footing in the long term with a focus on growth in the number of accredited providers. When taken together with a reduction in costs in the last financial year, BAC is expecting to report that it has returned to generating a small operating surplus once its 2018/19 annual accounts are audited, with an overall reduced organisational deficit than the previous years. The review panel heard from BAC's Council that it considered the continued strengthening of the financial position to be one of the most important priorities in the coming years.

There are significant reserves in managed investment funds, which produce a positive financial return of their own each year. In the most recent audited accounts for the financial year ending August 2018, BAC's reserves policy requires that six months operating costs of around £450,000 be held in reserves as a minimum, whereas £1.1m was actually held. This has enabled BAC to manage the operating deficit comfortably in recent years and provides a good degree of resilience for the years to come. The review panel heard from Council members and senior staff alike that they intended to reduce the reliance on reserves to cover operating costs and instead to focus this resource on supporting BAC's strategic development.

### *Facilities*

BAC occupies a floor office space in central London, near to Liverpool Street station and the financial district. This provides a comfortable working space for its central staff team, including a private office for the Chief Executive, and a good-sized meeting room. BAC makes use of the many conference and meeting spaces available nearby to host larger events, such as the annual training event for inspectors.

### **Analysis**

For an organisation that has experienced such volatility in its recent past, the review panel found an organisation that had come through a difficult phase to now operate in a stable, efficient way. The day-to-day work of BAC is well supported by its staff team, which has evolved and become more resilient in recent years under the leadership of the outgoing Chief Executive. This is an achievement worthy of recognition.

If the organisation was aiming to maintain the status quo and operate as it is, the review panel believes it could continue as is with its current staffing. However, the review panel heard on a number of occasions from Council members and staff that BAC is an organisation with bigger ambitions and that it does not wish to stand still. The interim strategic plan and the enthusiasm surrounding the appointment of a new Chief Executive with expertise in higher education point to an intended future based on growth and development. Given the review panel's assessment that BAC needs to strengthen the way its strategic planning translates into the daily work of the agency (see ESG 3.1), it would, therefore, be remiss not to reflect on the implications of these ambitions for the staffing of the organisation.

In particular, the review felt that while BAC could draw upon an impressive wealth of expertise through its Council, Accreditation Committee and most senior staff, there is a critical need to more fully develop the skills and expertise of its staff team so that its strategic plan could be delivered at the appropriate



level and pace. For example, the plan includes clear ambitions to grow international activity which will require increased capabilities in knowledge of international higher education in different education markets as well as business development in order to ensure an approach appropriate to its ambitions. Similarly, the review panel heard throughout the site visit from BAC staff, Council members and accredited providers that it had ambitions to improve its stakeholder engagement activity, which will require expertise in communications and relationship management.

The Council and senior staff have recognised this and considered buying in expertise when it is needed to supplement the capacity in the central staff team. This will work in some areas for short periods, such as contracting in somebody with expertise in particular markets or regions to help develop a business plan for international growth. The review panel concludes that this will work well alongside a strategic approach to recruiting members of its Council with expertise aligned to the organisation's strategy. This will help to develop and refine BAC's operational planning so that it is clear on the action needed to deliver its strategy.

However, the review panel concludes that this is not sufficient by itself and that some sustainable capacity within the core staffing team is needed to complement this and realise BAC's strategic ambitions. For example, stakeholder engagement is not a one-off activity, but rather it requires the gradual building of engagement over time to create long-lasting and meaningful relationships, be that with accredited providers (thereby decreasing the attrition rate) or partner organisations (thereby increasing the value of BAC's offer). Without such capacity and expertise being present in BAC's organisational design to support the Chief Executive and Chief Inspector in delivering on its strategic ambitions, the review panel cannot yet conclude that BAC's resources enable it to improve, to reflect on its practice and to inform the public about its activities.

#### **Panel commendations**

The stability brought to the operational delivery of core business in recent years.

#### **Panel recommendations**

Build capability in the core staff team that better enables it to enhance its understanding of international higher education trends and developments and hence to better reflect on current practice and to inform member institutions and the public about its activities in line with its strategic plan.

#### **Panel conclusion: Substantially compliant**

### **ESG 3.6 INTERNAL QUALITY ASSURANCE AND PROFESSIONAL CONDUCT**

Standard:

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

#### **2015 review recommendation**

That BAC develops a coherent policy on its own quality assurance and applies it systematically.

#### **Evidence**

BAC published an overview of the mechanisms for internal quality assurance on its website and provided the review panel with a more detailed summary of these in an appendix to the Self-Assessment Report. The current approach to the governance, management and operations of BAC is clearly defined in a range of documents, which provide a sound basis from which to review the approach and document any

necessary improvements. This framework of documents, which were available to the review panel, includes:

- Governance and external accountability: Articles of Association; terms of reference for Council and its committees; Handbook for Accreditation Committee members; audited annual accounts.
- Management and operations: Employee Handbook (including employment policies); Standard Operating Procedures.
- Accreditation: Scheme Documents, Accreditation Handbook; Inspectors' Handbook; Report Writing Guidance; Templates; inspectors' Code of Conduct; Monitoring Visit Reports.

BAC undertook a major reform of its governance arrangements in 2017. This began with commissioning an independent external review of the existing arrangements, which informed decisions by the then Council and Executive Committee to replace the two bodies with a single Council (Board of Trustees) and supporting committees. The documentation of these arrangements in revised Articles of Association and terms of reference has provided a clear framework for BAC's governance, which was confirmed in discussions with Council members, committee members and staff, all of whom were enthusiastic about the benefits of the new arrangements.

Following the period of significant staff turnover around the time of the last ENQA review, and in light of the recommendation from that ENQA review, BAC staff have invested considerable time in bringing greater coherence, consistency and resilience to the day-to-day operations of the organisation. The review panel had access to the Employee Handbook and Standard Operating Procedures (SOPs) that had either been developed or evolved in this time. It was clear from BAC staff at all levels that these provided a helpful framework within which to go about their daily work. Furthermore, monthly meetings of all staff as the Planning and Coordination Group (PCG) provide a structured forum for organising as a team, celebrating successes and identifying opportunities for improving BAC's operations. This is complemented by a system of appraisal and performance management whereby individual staff agree and review progress towards their individual objectives.

In 2017, BAC adopted a revision cycle to bring about a more systematic and rigorous approach to maintaining its accreditation standards and schemes. At the beginning of that cycle, BAC undertook a review of its then-new IHE scheme, which had been in operation for one year. This followed a new approach, with the most significant difference being that a Higher Education Focus Group (HEFG) was established with clear terms of reference to advise on the review, thereby enabling stakeholder engagement in the (re)development of the standards and methodology used for accreditation. The review panel considered the HEFG meetings, the new accreditation scheme document and BAC's reflections on the success of this approach in the SAR.

BAC monitors the implementation and effectiveness of its methodologies through monitoring visits undertaken by the Chief Inspector and Senior Inspectors. The Inspectors' Handbook makes clear that Inspectors should expect visits to be undertaken during an inspection and the review panel had access to example feedback reports resulting from these. BAC also makes use of feedback forms after each inspection, whereby inspectors and representatives of the provider are invited to rate and comment on various aspects of the inspection. The review panel had access to a number of completed feedback forms and discussed their impact in meetings with BAC staff. The review panel found that the feedback was summarised and relayed back to inspectors in their annual training conference, which was evident the PowerPoint slides used for the event. It was also evident from discussions that some thought had gone into the timing of requests for feedback from inspectors and providers, and that any issues raised by providers about individual inspectors would be followed up by the Chief Inspector. However, BAC staff did recognise that more could still be done to ensure the feedback gathered was sufficiently in-depth to be useful and that this should be focused on over the coming years.

The review panel considered in-depth the case of accreditation being withdrawn from a provider by the Accreditation Committee – the only such case since the IHE Scheme was established. Ultimately, the accreditation was withdrawn because the provider did not make sufficient progress after initially being on probation. However, the case identified a weakness in the eligibility requirements for the IHE Scheme, whereby the provider’s qualifications were not recognised by their domestic regulator. The review panel found that upon identifying this issue, BAC ensured that it was resolved in the imminent review of the IHE scheme and could not be repeated.

### **Analysis**

For a relatively small organisation, BAC has a clear and well-established operating framework in place, ranging from the constitution of its governing bodies through to the monitoring of how inspectors implement the accreditation scheme’s methodology. This framework has improved and become more robust in the years since the last ENQA review. There is also clear evidence of BAC identifying and remedying gaps in its processes. The present situation starkly contrasts with the instability faced by BAC at the time of the last ENQA review.

In its review of progress made during the last strategic planning period, BAC celebrated the achievements made in strengthening Internal Quality Assurance. The review panel’s conclusions support this and confirm that BAC is in a more stable position as a result, which provides a good basis from which to build further.

### **Panel suggestions for further improvement**

BAC has been developing a more robust approach to Internal Quality Assurance. It should, therefore, consider publishing this approach more comprehensively on its website so that stakeholders can be more fully assured and the public more fully informed.

BAC staff recognise the importance of further work to improve the quality of feedback collected from inspectors and providers, and the way in which that feedback is systematically used to improve BAC’s operations. The review panel would encourage BAC to ensure this is given sufficient attention in the coming years.

### **Panel Commendation**

The successful streamlining of internal processes and the implementation of a robust approach to internally managing the quality of its operations. (ESG 3.6)

### **Panel conclusion: Fully compliant**

#### **ESG 3.7 CYCLICAL EXTERNAL REVIEW OF AGENCIES**

Standard:

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

### **Evidence**

This is the second external review of BAC undertaken by ENQA. The first review was undertaken five years ago, and BAC has been working to address a number of the recommendations arising from that review since. The Self-Assessment Report provided to the panel included a section summarising the progress, current status and supporting evidence for each recommendation.

The review panel discussed each of these areas in detail during the site visit of the current review, usually as part of a wider discussion about BAC's current compliance with the corresponding standard in the 2015 European Standards and Guidelines. The review panel found that the evidence available to demonstrate an active and comprehensive response varied by recommendation.

### **Analysis**

BAC's engagement with a second external review demonstrates that it remains committed to complying with the ESG generally and with this standard specifically. In that sense, BAC is clearly compliant with this standard.

However, the review panel concluded that the seriousness and urgency with which BAC treated all recommendations arising from the last review was too variable. The review panel recognises that significant progress has been made in areas such as Internal Quality Assurance, the systematic review of accreditation processes and student involvement. However, this is not matched by the progress made in response to recommendations about the introduction of international inspectors, the production of thematic analysis and the publication of negative outcomes – each of which has not yet been fully addressed or has been acted upon too recently for the review panel to evaluate the impact.

### **Panel suggestions for further improvement**

The review panel heard throughout the site visit that membership of ENQA, inclusion on EQAR's register and alignment to the ESG were important to BAC. To demonstrate this importance more robustly, it is strongly advised that BAC develop an action plan in response to the recommendations and suggestions for further improvement arising from this review with actions that are SMART (specific, measurable, achievable, realistic and time-bound). As a minimum, annual reports on progress towards these actions should be scrutinised by the Council, used to inform the mid-point progress report to ENQA, and available to the review panel undertaking the next ENQA review. BAC may wish to go a step further and publish these updates alongside this report on its website.

### **Panel conclusion: Fully compliant**

## **ESG PART 2: EXTERNAL QUALITY ASSURANCE**

### **ESG 2.1 CONSIDERATION OF INTERNAL QUALITY ASSURANCE**

Standard:

External quality assurance should address the effectiveness of the internal quality assurance processes described in Part 1 of the ESG.

### **Evidence**

#### *Coverage of ESG Part 1*

BAC operates a number of accreditation schemes which define and provide a structure to its external quality assurance activity. Of the several schemes in operation, higher education providers delivering full degrees can only apply for accreditation via the Independent Higher Education (IHE) Scheme. The scheme is articulated in the IHE Scheme Document, which details eligibility criteria, the accreditation cycle, a high-level summary of the application and inspection process, and the minimum standards that providers must demonstrate compliance with through an inspection in order to achieve accreditation. The minimum standards are organised into seven inspection areas:

1. Governance, Strategy, and Financial Management
2. General and Academic Management and Administration
3. Teaching, Learning, and Assessment
4. Student Support, Guidance and Progression
5. Premises, Facilities, and Learning Resources
6. Quality Management, Assurance and Enhancement
7. Online, Distance, and Blended Learning (if applicable)

The IHE Scheme Document also includes an appendix that maps the minimum standards against part 1 of the European Standards and Guidelines (see Annex 5). This shows coverage of the ESG is principally achieved through BAC's minimum standards relating to governance; general and academic management and administration; teaching, learning and assessment; and quality management, assurance and enhancement.

After streamlining the standards during the review of the IHE Scheme in 2017, there were still 29 minimum standards and 174 key indicators in the revised version that was published. This results in a very broad focus for BAC inspections and sets a demanding expectation for inspectors to narrow the focus of the inspection based on their desk-based consideration of the provider's self-evaluation. In discussing this breadth of coverage with inspectors, providers and staff, the review panel found some consensus that there was still further opportunity to streamline the standards, and to narrow and deepen the focus of the accreditation.

Despite the very comprehensive coverage of the standards, the review panel found that ESG 1.4 (Student Admission, Progression, Recognition and Certification) was only partly considered in BAC inspections. Specifically, the minimum standards do not sufficiently test how the provider ensures fair recognition of periods of study, foreign access qualifications and higher education qualifications in line with the Lisbon Recognition Convention (LRC). While the IHE Scheme Document bears reference to recognition of prior learning, the other three types of recognition cases and LRC itself are not mentioned in any document that was available to the panel, and thus, it is unclear to what extent they are considered as part of the accreditation process. The review panel was not provided with evidence of BAC engaging with UK NARIC or higher education providers, as the standard suggests this trilateral cooperation should take place for the benefit of mobile students.

#### *Effectiveness of internal quality assurance processes*

Whereas the IHE Scheme Document sets out the focus of the accreditation, it is the Accreditation Handbook, the Inspectors' Handbook and their supporting documents that set out how BAC undertakes the accreditation activity in practice. In reviewing these documents and discussing them with staff, inspectors and providers, the review panel found that the accreditation process – namely the inspection – explicitly linked back to the minimum standards and broader criteria set out in the scheme document. Together with the review reports and feedback from providers, the review panel found there to be clear alignment between the intended focus of the process, the execution of the process and the reporting on outcomes afterwards. This is elaborated further in each of the remaining chapters of this report relating to ESG Part 2.

Based on an initial review of inspection reports and guidance for inspectors, the review panel established a line of enquiry from the outset of the site visit that focused on the extent to which BAC's processes addressed the effectiveness of internal quality assurance processes as well as proving a binary assurance that the processes were in place. The review panel requested additional evidence from BAC to inform this, such as the Records of Evidence used by inspectors to capture their findings during the inspection and the Chief Inspector's feedback on inspectors resulting from monitoring visits. This informed discussions with staff, inspectors, Accreditation Committee members and providers about the extent to which

effectiveness was tested during inspections, particularly in relation to quality assurance, teaching and learning as key themes in Part 1 of the ESG.

The review panel found a consensus amongst the various groups it met that BAC's approach was distinctly an inspection-based process and not an enhancement-led or evaluative review as undertaken by other agencies. The defining feature of this approach was that the indicators under each minimum standard could be met or not met in a binary way. This accounts for the number of indicators and for the wording used to describe each one. The assessment of each indicator is then used in a formulaic way to determine whether the minimum standard is met, partially met or not met overall.

The indicators and minimum standards vary in their focus, and a number seek to consider how effective or appropriate a provider's process is. For example:

*11. Academic staff are effective in facilitating student learning*

*27. The institution has effective systems to review its own standards and assess its own performance*

Source: IHE Scheme Document, pages 7-17.

Furthermore, discussions with inspectors and staff confirmed that inspections are intended to focus on the effectiveness of a process, above and beyond simply confirming that it is in place. Inspectors highlighted that the desk-based review of evidence allowed them to undertake this more basic check and that they could then focus their time during the inspection visit on triangulating this to test how embedded and effective the process was.

However, when reviewing a range of inspection reports and discussing these with inspectors and providers, the review panel found the primary emphasis to be on a tick-box approach of stating whether the indicators and standards were met. The report template required some commentary after each minimum standard and BAC had worked to improve the quality and consistency of this commentary in recent years. However, it did not always explicitly evaluate the effectiveness of the provider's approach, provide a rationale for that evaluation or detail the evidence informing the judgement.

In talking to the Accreditation Committee about their approach to making a holistic decision on awarding accreditation, the review panel found that they only had the inspection report available to them, meaning that they too have limited sight of evidence about the effectiveness of processes.

## **Analysis**

The granular nature of the minimum standards raises questions about the extent to which an inspection can sufficiently cover and evaluate the full breadth of issues in sufficient and appropriate depth, although it does provide a high level of clarity on the coverage and focus of BAC's accreditation. As such, the report is easy to read and understand. Accordingly, BAC does consider the majority of Part 1 of the ESG through its IHE Scheme. The one exception to this relates to the recognition of qualifications, which will need to be added into the minimum standards or eligibility criteria before full compliance with this standard can be achieved.

Based on the published focus of BAC inspections and on discussions with inspectors, the review panel concludes that the process does, to some extent, evaluate the effectiveness of providers' internal quality assurance processes. However, the review panel cannot conclude that this is yet wholly sufficient to enable this standard to be met. The limited analysis and evidence included in the inspection reports, and therefore the limited information available to the Accreditation Committee, mean that this evaluation is not explicit enough in the process and cannot, therefore, be guaranteed to be happening robustly and consistently. A greater focus on drawing out, testing and reporting the analysis of inspectors throughout the process, culminating in a more analytical report, will not only bring greater transparency to the process but will also allow BAC to ensure its accreditation decisions are more secure. It is for BAC to

determine whether this should be the case for all inspection areas, but it should, at a minimum, apply to the inspection areas relating to Part 1 of the ESG.

### **Panel recommendations**

Strengthen the coverage of ESG 1.4 in the inspection process so that the provider's policy on the recognition of qualifications is specifically considered, taking note of most recently available international guidance on the matter.

Evolve the inspection process and the Accreditation Committee's decision making to more explicitly address the effectiveness of the internal quality assurance processes described in Part 1 of the ESG.

### **Panel conclusion: Substantially compliant**

## **ESG 2.2 DESIGNING METHODOLOGIES FIT FOR PURPOSE**

Standard:

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.

### **2015 review recommendations**

That BAC changes its way of updating its procedures and standards so that it includes a wider variety of key stakeholders (students of BAC's accredited institutions, accredited institutions, representatives of the sector, government and so on).

That BAC considers how to include students and international experts in a meaningful and impactful way to provide benefits for its strategy, procedures, and standards with particular reference to the HE component of its work. In this respect, the panel recommends that BAC uses and consults stakeholders. In addition, the panel recommends that inspection visits for full accreditation are not done with just one inspector.

### **Evidence**

BAC's Accreditation Handbook sets out four main aims of accreditation:

- To provide assurance of the good standing of an institution.
- To provide guidance for anyone seeking to undertake training, vocational programmes, and further or higher education in an organisation.
- To support and advise organisations offering training, vocational programmes, and further or higher education in the maintenance and enhancement of the quality of their provision.
- To increase market differentiation. BAC accreditation enables an organisation to show that it has voluntarily undergone independent inspection and has met BAC's globally recognised standards.

The IHE Scheme Document, Accreditation Handbook and Inspectors' Handbook collectively articulate how accreditation for higher education providers is operationalised in support of these aims. They set out the minimum standards that higher education providers are assessed against and the practical details of how the BAC inspections are conducted to undertake this assessment.

The review panel had access to these documents, BAC's self-assessment of how they were developed and various documents relating to the most recent review of the IHE Scheme. The aims and operationalisation of the accreditation process were discussed in meetings with staff, inspectors, Accreditation Committee members and providers.

The review panel found that in practice, the most important aim of the scheme differed for providers in the UK and other countries. For UK providers that the review panel met, they sought the ability to sponsor short-term study visas on the basis of having BAC accreditation which related to the aim of providing assurance of their good standing to government. For international providers that the review panel met, they principally sought the market differentiation and distinction that having the 'quality kite mark' of BAC accreditation (as an international accreditation with clear links to British and European standards) brought to their recruitment of students. This was confirmed in discussions with senior staff and members of the Council, who were developing their strategy for business development on this basis.

#### *Stakeholder involvement in the design and continuous improvement*

The IHE Scheme was established as a dedicated scheme for higher education providers following the last ENQA review and providers were first accredited under this scheme in 2016. After one year of operation, the scheme was reviewed in 2017 and then relaunched in 2018. The review panel found that BAC had taken the opportunity to introduce a more structured approach to the review of schemes. This brought about a schedule of cyclical reviews for each of BAC schemes and also piloted to the use of an advisory group (the 'Higher Education Focus Group' (HEFG)), which met in person twice to guide the review as it was taken forward by BAC staff. The HEFG's terms of reference set out its primary responsibilities as being to provide feedback on the scheme's relevance and fitness for purpose, and on its applicability in a range of higher education settings. The Group's membership included 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 HEFG was used by BAC as a means for facilitating stakeholder involvement in the review and development of its accreditation scheme. This was a new innovation for BAC and somewhat of a pilot for a model that could be replicated. In its Self-Assessment Report, BAC reflected on this approach as a success, and the review panel heard from BAC staff that they would likely retain this approach going forward.

#### *Supporting providers to improve quality*

The review panel considered in detail the extent to which BAC's methodologies went beyond confirming that a threshold expectation had been met and supported providers to improve quality. From discussions with staff, inspectors, members of the Accreditation Committee and providers, the review panel found that the aim of accreditation to 'support and advise organisations offering ... higher education in the maintenance and enhancement of the quality of their provision' was felt to be important by BAC and translated into the methodology used. In particular, the use of action points with graded priorities (high, medium or low) and advisory recommendations for improvement in the inspection reports were central to this approach. Inspectors have the flexibility to range from suggestions that are simply intended to help and advise the provider through to high priority action points that require urgent remedial action in response to an important minimum standard not being met. While the latter may delay the decision to award or renew accreditation, the suggestions are for the provider's benefit in between inspections.

The review panel heard from members of the Accreditation Committee that they retain the ability to adjust the priority attached to action points, which enables the Committee to moderate any significant differences in approach between inspection teams. The review panel also heard from different groups that when returning for reaccreditation or an interim inspection, inspectors may carry forward and increase the priority of action points where the provider is unable to provide a sound rationale for not previously addressing it. This means that it is possible for a suggestion to evolve into a more serious requirement if it is not addressed. This may not preclude a provider from maintaining the quality of its provision at a particular level if it has a sound rationale for doing so, and therefore it may be possible for a provider to essentially exempt itself from the improvement and enhancement aspects of BAC accreditation.



### *Follow-up*

Following an inspection and the production of an inspection report, the Accreditation Committee makes a holistic judgement on the accreditation of a provider. The Committee is able to award full accreditation for four years or to award accreditation on 'probation' for six or twelve months where it requires a provider to demonstrate that it can maintain compliance with the minimum standards. Additionally, the Committee is able to defer its decision on awarding or renewing accreditation for up to six months where not all minimum standards have been met, but this can easily be rectified.

Whilst the Committee has the ability to refuse accreditation for providers when they first apply for it, this is not typical as BAC staff undertake considerable due diligence – including a Skype interview – before an inspection is commenced. In practice, only providers capable of at least achieving accreditation on probation are likely to reach the Accreditation Committee. It is, however, more feasible for the Accreditation Committee to put a provider seeking renewal of accreditation on probation and to ultimately withdraw accreditation when the necessary improvements are not demonstrated. Furthermore, the Committee can put a provider into abeyance (i.e. suspend accreditation) where concerns are raised about its ongoing compliance with the minimum standards ahead of carrying out a formal investigation.

The review panel discussed these various scenarios with staff, inspectors and members of the Accreditation Committee, and found the Accreditation Committee to be comfortable and confident in making full use of the range of options available to it. The review panel considered in detail the case of a provider having its accreditation withdrawn, which demonstrated the effectiveness of these interventions and also highlighted a necessary improvement to BAC's due diligence processes. The review panel was reassured that this improvement had been made and BAC's overall approach had been strengthened as a result.

### **Analysis**

The changing landscape in the UK's independent higher education sector has required BAC to diversify and seek new opportunities in other markets, as outlined in the introductory chapters of this report. This has resulted in higher education providers having quite different reasons for seeking accreditation from BAC and in particular, quite different audiences that take assurances from BAC confirming that a provider is of good standing. In practice, BAC has developed a methodology that responds to this well and is flexible enough to satisfy different needs. In particular, there is a strong core to the accreditation that requires providers to meet a common threshold (the minimum standards), which ensures the integrity of BAC's accreditation and reputation. There is a range of options available to the Accreditation Committee where the standards are not yet fully met or where compliance is not maintained over time, which balance a robust approach to upholding the integrity of the accreditation scheme with providing support to a provider to make the necessary improvements.

Above and beyond this, there is an element of responsiveness and flexibility in the inspection process that will support a provider to continue to improve the quality of its provision. Whereas the strong core (the minimum standards) are non-negotiable, the provider has some control over the pace at which it seeks to improve its provision between inspections. This accommodates diverse providers and provisions in diverse markets, and is sensitive to the purpose of BAC accreditation to 'support and advise in ... the enhancement of quality' rather requiring that they demonstrate enhancement has taken place in the same way that a national system that may require this.

BAC's approach is distinctive in this sense. The review panel has taken care to evaluate the fitness for purpose of BAC's methodologies in this context and has concluded that they are indeed fit for the purpose intended. Furthermore, the review panel recognises the progress made in recent years to involve stakeholders in the design and maintenance of the processes and confirms that this marks a significant step forward from the state of play at the last ENQA review, which resulted in the recommendation above. Ultimately, this improvement justifies an improvement from substantially compliant (ESG 2.2 in the 2005-2015 ESG) to fully compliant.

## Panel suggestions for further improvement

Take forward the lessons learnt from piloting the Higher Education Focus Group into the next iteration and build on these by achieving even wider and deeper engagement, including from the network of accredited higher education providers.

## Panel conclusion: Fully compliant

### ESG 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
- a consistent follow-up

## Evidence

The accreditation process used by BAC is well-established and has evolved over a number of decades. In its present form, as set out in the Accreditation Handbook, it is centred on an inspection of the provider and the consideration of the inspection outcomes by the Accreditation Committee. A full inspection comprises the following principal stages: production of a self-evaluation report, desk-based scrutiny of this report and its supporting evidence, an on-site inspection visit, production of an inspection report by the inspection team. Full inspections are used when a provider first applies for accreditation and then every four years when the renewal of accreditation is sought.

The review panel had access to a wide range of documentation used to operationalise the accreditation process, including the Accreditation Handbook, the Inspectors' Handbook, the IHE Scheme Document, standard operating procedures, self-evaluation guidance and template, and inspection report writing guidance and templates. The review panel also had access to materials from inspections carried out since the last ENQA review, including Chief Inspector's inspection sign off form, correspondence between Lead Inspectors and providers, inspection records of evidence, self-evaluation reports, inspection reports, and feedback forms.

From considering these documents and discussing the experience of inspections in detail with staff, inspectors, members of the Accreditation Committee and providers, the review panel found the end-to-end process of inspection to be well articulated and clear. In particular, through discussing a number of cases with inspectors, it was evident that the processes were mature, well understood and consistently applied. Providers with whom the panel spoke confirmed the usefulness of undergoing BAC's procedures and appreciated supported given by BAC.

BAC requires the annual submission of data and undertakes interim inspections as standard for all accredited providers. Interim inspections ensure that minimum standards are being maintained and assess the provider's progress towards any action points. They are carried out by the twelfth month in an organisation's first cycle and then, for all subsequent accreditation cycles, between the 18th and 36th month. Inspection reports from interim inspections are considered by the Accreditation Committee, which is able to amend, suspend or withdraw accreditation where it has concerns. In discussing the process and specific cases with inspectors and members of the Accreditation Committee, the review panel found that this approach to follow-up with providers was similarly well-established and consistently implemented.

## Analysis

The accreditation process used by BAC articulated in considerable detail through various handbooks, process notes and templates. The inspection-based nature of BAC's approach tests that providers meet a common set of minimum standards, and as such, it lends itself to a heavily prescribed approach that can be implemented consistently. The review panel concluded that this was indeed the case and that providers' experiences of a BAC inspection were broadly similar. However, this was balanced appropriately with the need to focus the attention of inspectors on the areas they felt needed most attention through the inspection process.

The review panel believes that some adjustments are needed to the design and focus of the accreditation process as detailed in other chapters relating to Part 2 of the ESG, which will require some changes to the way in which BAC implements its processes. However, it was clear that the current process included the core components (self-evaluation, a site visit, a report, and follow-up) required by this standard, and that it was consistently and effectively implemented in line with its published specification.

## Panel commendations

The rigorous approach taken to follow-up after accreditation is awarded.

## Panel conclusion: Fully compliant

### ESG 2.4 PEER-REVIEW EXPERTS

Standard:

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

## 2015 review recommendation

That BAC considers how to include students and international experts in a meaningful and impactful way to provide benefit for its strategy, procedures, and standards with particular reference to the HE component of its work. In this respect, the panel recommends that BAC uses and consults stakeholders. In addition, the panel recommends that inspection visits for full accreditation are not done with just one inspector.

## Evidence

BAC has deliberately adopted an inspection-based model, which is considered to be distinctive to a review-based model. As such, it recruits Inspectors (collectively known as the Inspectorate) to undertake inspections. Inspectors are not employed as BAC staff but rather work on a self-employed basis as and when they are assigned to inspect providers as is common in other agencies. They typically hold other substantive roles in higher education, have a portfolio of consultancy engagements or are retired. At the time of submitting the SAR, BAC had 48 active inspectors, of whom 31 worked on HE inspections (including 10 student inspectors).

### *Panel Composition*

In reviewing the details of inspections in recent years, the team found that BAC typically deploys a team of three people for full inspections, comprising a Lead Inspector, Team Inspector and Student Inspector. All but two full inspections since 2016 have included a student inspector. BAC staff confirmed that a small number of full inspections had involved fewer than three inspectors since the last ENQA review, but that it was now only by exception. Interim inspections, including those of providers on probation and where a concern is raised, are carried out by one inspector. For all inspections, BAC confirms with both inspectors and providers that there are no conflicts of interest amongst the proposed inspection team. This is in

addition to inspectors submitting an annual declaration of interests, which allows BAC to avoid potential conflicts proactively.

In discussions with staff and inspectors – including student inspectors, the review panel found that BAC considered the introduction and development of student inspectors to be one of the biggest changes since the last ENQA review. It was evident from these discussions that significant progress had indeed been made and that student engagement in inspections was now much stronger. BAC is well placed to build on this further and ensure there are appropriate diversity and breadth of higher education experience in the pool of student inspectors.

BAC has strengthened the inclusion of international perspectives in its governance structures in response to the recommendation of the last ENQA review, namely through a new member of the Council. However, this has not carried through into the inclusion of international inspectors (i.e. those from outside of the UK higher education system). The review panel heard mixed messages from the staff and members of Council whom it met, with some justifying the current position based on the international outlook and expertise of UK-based expertise and others citing the cost as a barrier. The review panel took the message that BAC does not intend to change this position in the near future as other changes are prioritised, but would nonetheless encourage BAC to keep this under review and give serious consideration to the benefits that could be derived for providers.

### *Recruitment and training*

Inspectors are recruited through word-of-mouth and, increasingly, through advertising campaigns. Once they have submitted a CV and application, they are now invited to an interview with the Chief Inspector before a decision is made on their appointment. In discussing their recruitment with inspectors, the review panel found that the process had become more structured and formalised in recent years. Furthermore, the review panel found that BAC was increasingly developing a subset of the inspectorate with expertise in higher education, which is provided with tailored support to undertake IHE Scheme inspections.

Successful applicants are invited to an induction session upon their appointment and are then paired with an experienced Lead Inspector, either as a team inspector themselves or as an observer. On their second inspection, they fully participate as a member of the team and are monitored by an experienced inspector. Thereafter, inspectors participate in inspections routinely and benefit from the same ongoing support as other inspectors. The review panel had access to the training materials used during the induction session for inspectors and the Inspectors' Handbook and confirmed in discussions with inspectors that the support offered helped to ease them into confidently undertaking inspections.

### *Ongoing support*

Once established in the role, inspectors are asked to attend an annual training conference in-person and a range of other online and in-person training focused on particular themes. Together with the Inspectors' Handbook, these are aimed at proactively enabling greater consistency between inspectors. Furthermore, the Chief Inspector or other experienced senior inspectors undertake monitoring visits whereby they accompany an inspector during an inspection in order to provide feedback and support. Written reports are produced as a result of this in order to summarise the feedback to the inspector and capture a record of the visit for BAC's records. The review panel had access to training materials, the Inspectors' Handbook and several completed monitoring reports. In discussing this support with inspectors, staff and providers, there was a consensus that it had proven effective in standardising practice and in being responsive to the individual needs of inspectors.

Through discussions with inspectors, staff and the Accreditation Committee, the review panel found the role of the Chief Inspector to be of great importance to the quality assurance of the inspection process. From recruiting and assigning inspectors through to considering complaints made against them, the Chief Inspector fulfils many management and oversight functions. The review panel also found that the Chief Inspector occasionally joins review panels as an inspector, sometimes combining this with a monitoring

visit whereby they observe and provide feedback to other inspectors on the team. This practice was considered by BAC to enable the Chief Inspector to use their time efficiently.

### **Analysis**

BAC has a long history of recruiting, supporting and managing its inspectorate. This is demonstrated by the well-established processes and training in place, and by the shared understanding between staff and inspectors of their respective responsibilities. This includes an expectation that inspectors must continue to work in line with the requirements of the Inspectors' Handbook and the IHE Scheme Document, and that any deviation from this would be identified and remedied through BAC's monitoring processes.

The approach to recruitment has been professionalised in recent years and now relies less on inviting in known associates or colleagues of existing inspectors. This is a positive step forward and should help to diversify the inspectorate to the benefit of BAC and the providers it accredits. Furthermore, the introduction of Student Inspectors has been a force for good in the BAC accreditation process and has now become an established feature of inspections of higher education providers. This change sufficiently addresses the gap identified during the last ENQA review and removes the barrier previously in place to achieve full compliance with this standard.

The review panel recognises that the inclusion of international inspectors is a desirable feature of the guidance rather than an explicit requirement of the standard. As such, the decision of BAC to not pursue this is accepted but should remain under review, and the review panel continues to view this as an important suggestion for improvement.

Overall, BAC has a robust approach to selecting, supporting and managing its inspectorate, and to ensure that conflicts of interest are managed. However, the review panel considers that there is a significant exception to this because of the potential for the inclusion of the Chief Inspector as a member of an inspection team. Despite the title, the role of Chief Inspector is in practice one focused on management, quality assurance and oversight, which requires separation from the inspection activity itself. Whilst this potential conflict continues, the review panel is unable to conclude that BAC has reached full compliance in this standard.

### **Panel recommendations**

Clearly separate the functions of staff and inspectors, including the role of the Chief Inspector.

### **Panel suggestions for further improvement**

Continue to professionalise the recruitment of inspectors and diversifying the experiences they bring to BAC inspections, including Student Inspectors.

Review the decision to not introduce international inspectors (those based outside of the UK) as part of the IHE Scheme.

### **Panel conclusion: Substantially compliant**

## **ESG 2.5 CRITERIA FOR OUTCOMES**

Standard:

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.

### **Evidence**

The IHE Scheme Document clearly details the minimum standards that providers are required to meet before accreditation is awarded. Under each minimum standard, several indicators are individually

assessed by inspectors to inform the overall judgement for the minimum standard. The approach to determining whether the indicators and minimum standards are met is set out in the Accreditation Handbook and the Inspectors' Handbook. Inspectors are expected to use the Record of Evidence template supplied by BAC in order to record their findings and supporting evidence throughout the inspection visit. The final outcomes are then recorded in the published inspection report together with a short commentary on how the provider meets each minimum standard overall, and any action points to be addressed by the provider.

Draft reports are reviewed by the Chief Inspector, which acts as a process of moderation and ensures that the report meets BAC's expectations before it is considered by the Accreditation Committee. The Accreditation Committee does not amend the findings of inspectors but does retain the right to revise the priority attached to action points (e.g. changing medium to high) in order to moderate the approach taken to follow up across inspections.

The review panel had access to all inspection reports, a range of Records of Inspection, and the minutes of the Accreditation Committee. In discussing the accreditation process and these documents with staff, inspectors, members of the Accreditation Committee and providers, the review panel found that they were consistently used across inspections. Each group agreed that the process did produce outcomes that were based on the published criteria.

In addition to the standard assurance mechanisms in place for all inspections, the Chief Inspector undertakes monitoring visits, whereby they attend and observe inspections. This results in verbal feedback on the spot and in a written feedback report to the inspector. From a sample of monitoring visit reports reviewed by the review panel, it was evident that the inspector's approach to assessing a provider's compliance with the minimum standards featured clearly in the Chief Inspector's assessment of their work.

In reviewing the minimum criteria and indicators, the review panel found that they varied in the degree of specificity with some being very focused and tangible, whilst others could be interpreted in different ways. Noting that the IHE Scheme is successful in its applicability to a diverse range of institutions and therefore needs some flexibility, the review panel discussed how straightforward it was for providers to understand what was required by some of the less tangible minimum standards, and for inspectors to be consistent in assessing providers against them. The review panel found that there had been no major issues and that a degree of flexibility was important in recognising that providers would take different approaches to achieve the same outcome. However, it was noted that providers would welcome supporting guidance alongside the minimum standards to illustrate what good practice might look like.

### **Analysis**

Notwithstanding the concerns about BAC's focus on addressing the effectiveness of internal quality processes (see ESG 3.1), the review panel was able to confirm that a consistent approach was being taken to the inspection and accreditation of providers applying to the IHE Scheme. BAC's long history of undertaking inspections has allowed it to establish and refine its approach over many years, which was demonstrated to the review panel by the shared, detailed understanding of that approach amongst the various groups of staff and inspectors met during the site visit. The coherence between the IHE Scheme, the Inspectors' Handbook, the various supporting template and the report template effectively provide assurance that the final outcomes of the inspection process will be in line with the criteria for accreditation. The moderation of reports by the Chief Inspector and the use of monitoring visits strengthens this assurance and builds the capabilities of inspectors over time.

### **Panel suggestions for further improvement**

Further develop supporting guidance available alongside the minimum standards in the IHE Scheme so that providers can see what good practice would look like when meeting the standard.

### **Panel conclusion: Fully compliant**

## ESG 2.6 REPORTING

Standard:

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.

### 2015 review recommendation

BAC to consider if the structure, style, and content of inspection reports are useful for judgment of potential students, their parents and the general public. In addition, navigation to reports should be made clearer and simpler. Furthermore, the panel asks BAC to consider how reports with negative decisions could be presented to the public.

### Evidence

Following each full inspection, inspectors produce a report of their findings for consideration by the Accreditation Committee. The Committee's decision is added and the report is subsequently published on BAC's website. The reports all use a standard template which comprise: basic details about the provider; a description of the provider's background and current provision; a brief summary of the inspection process; judgements on whether each of the minimum standards and indicators is met; a commentary on how the minimum standard is met; a summary of the provider's strengths; the required action points; and recommendations for improvement. The reports do not list the inspectors involved with the inspection.

In reviewing a range of reports, the review panel found the main focus of the reports to be on whether the minimum standards and indicators are met or not. The report, therefore, appears to be largely a series of binary 'yes' or 'no' answers and suggests that a checklist approach to the inspection is still the main focus of the report, as noted in the last ENQA review.

Following the last ENQA review, BAC developed Report Writing Guidelines for inspectors and an editor's checklist for staff. These have been complemented with revised training as part of the induction for inspectors and the annual inspectors' event. The review panel found that this had improved the consistency and depth of the commentary about how providers had met the minimum standards to some extent, with reports produced in the last few years demonstrably more useful. However, the review panel still found the inclusion of evidence and analysis to be limited, which made it difficult to ascertain the effectiveness of the provider's internal quality assurance processes.

The review panel discussed the usefulness of reports and the extent to which they address the effectiveness of processes with staff, inspectors, members of the Accreditation Committee and providers.

In discussions with members of the Accreditation Committee, the review panel heard that they sought to make a holistic decision about accreditation, rather than continuing the strict binary approach of inspections. This holistic decision is informed by the inspection report, the provider's history with BAC and the advice of the Chief Inspector; the inspection team are not present at meetings of the Accreditation Committee to elaborate on their findings. The review panel could not, therefore, see evidence of how the Accreditation Committee was able to consider the effectiveness of a provider's internal quality assurance processes based on the limited qualitative insight provided by the inspection reports.

### *Accessibility*

The review panel found that BAC prides itself on the accessibility of its reports and that providers confirmed this. However, providers were keen to make more of the findings of BAC inspections when

promoting themselves through the use of a short summary of the inspection findings, which they felt should be produced by BAC to ensure its integrity.

### *Publishing Negative Decisions*

Following the recommendation of the last ENQA review to consider how negative decisions are presented to the public, BAC has defined negative decisions as:

- 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).

In April 2019, BAC took the decision to publish inspection reports that led to one of the outcomes above. Two web pages have been created on BAC's website for these reports: one for unsuccessful applications and one for providers no longer accredited after voluntarily exiting the scheme or having their accreditation withdrawn by the Accreditation Committee. The policy took effect from 1<sup>st</sup> May 2019, immediately before the submission of BAC's Self-Assessment Report for this ENQA review, and as such there were no examples available for the review panel to consider. Reports relating to a provider that had its accreditation removed since the last ENQA review were available to the review panel privately but were not published as the policy had not taken effect at the time.

### **Analysis**

The review panel dedicated significant time during the review to considering whether BAC's inspection reports met this standard. The review panel took care to appreciate the distinctive inspection-based model adopted by BAC and that this would necessarily result in a report that differed to the styles used in other ENQA member agencies. Given the recommendation made during the last ENQA review, the review panel also paid attention to the recent progress made.

In conclusion, it is clear that some progress has been made and that the quality of reports has subsequently improved. BAC staff invest more time in ensuring that reports are consistent and meet BAC's expectations, as set out through the Inspectors' Handbook, the Report Writing Guidelines and the inspection report template itself. BAC is now gaining as much value from the current approach to reporting as is possible.

However, the reports still fail to completely meet the expectations of this standard as they are not yet 'full' reports. In order to be full reports, they must clearly and consistently include evidence, analysis and findings in order to demonstrate how the conclusions were reached. They must also list the inspectors involved in the inspection. BAC's reports do not currently achieve this. This is part of the wider need to more explicitly address the effectiveness of internal quality assurance processes in BAC's methodology, as outlined in ESG 2.1. As discussed in that section, the review panel does not suggest that this consideration of effectiveness is not happening, but rather that it is not transparent and explicit throughout, including in the reports.

The review panel, therefore, concludes that the issue is not with the quality of the drafting by inspectors or the subsequent editing and moderation of the reports, but with what BAC requires from the reports in the first place. In order to fully meet this expectation, and to ensure the decisions of the Accreditation Committee become more secure, the overall approach to reporting must evolve further.

### *Accessibility*

The review panel recognises the value of BAC accreditation for providers seeking to differentiate themselves to potential students. As such, the review panel would endorse the suggestion by providers that a short summary of findings, which could be disseminated by the provider separately from the full



report, would be a helpful addition. This will become more pertinent as BAC evolves the content of the full report to include more analytical content.

#### *Publishing Negative Decisions*

Given the relative simplicity of the recommendation to publish negative decisions compared to other recommendations arising from the last ENQA review, and that BAC has known about this clear requirement of the ESG (both the 2005 and 2015 versions) since first applying for ENQA membership in 2014, the review panel was disappointed by the significant delay in action being taken by BAC. By the time of this review, BAC was able to demonstrate that some steps had been taken to fulfil the requirement of the ESG, but it was far too early to see the implementation or impact of this in practice. In line with the suggestion for improvement in ESG 3.7, BAC should give serious consideration to how it demonstrates its commitment to fully meeting all of the ESG.

#### **Panel recommendations**

Further strengthen the transparency of how inspections consider the effectiveness of providers' internal quality assurance processes in the published reports by increasing their analytical content and listing the inspectors involved.

#### **Panel suggestions for further improvement**

Evolve the templates for inspection reports to include a short summary that could be published by itself for public consumption, drawing on the recommendations of ENQA's EQArep project.

#### **Panel conclusion: Substantially compliant**

### **ESG 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 the institutions.

#### **Evidence**

The processes for appealing a decision of the Accreditation Committee and for complaining about BAC's service or conduct are set out in the Accreditation Handbook.

There is just one specific basis for appeal – "The decision was not made in accordance with the procedures or criteria set out in the Accreditation Handbook" – and a second 'other' option allowing the appellant to specify their own grounds. There are clear timelines for appeals being submitted and heard by the Standing Committee. BAC has received no appeals from providers applying for accreditation under the IHE Scheme. The considerable effort invested in due diligence before an inspection is undertaken and the range of 'probation' and deferral options available to the Accreditation Committee reduce the likelihood of a decision to completely refuse accreditation for a new applicant. Based on one recent case, the review panel found that accreditation is only likely to be withdrawn after the use of suspension, probation or some other means of follow-up and would therefore not come as a surprise to the provider. This does not prevent a provider from appealing the decision, although it may reduce the likelihood in practice.

Complaints can be submitted via the feedback form that providers complete following an inspection or in writing to the Chief Executive. There is an established process, including clear timescales, for investigating complaints and informing the complainant of the outcome. No complaints have been received in relation to BAC's higher education activities since the last ENQA review.

**Analysis**

There are clearly defined processes in place for both appeals and complaints. These are available to be followed should an appeal or complaint be submitted. In practice, the voluntary nature of BAC's accreditation together with the due diligence undertaken before providers commit to an inspection reduce the likelihood of providers being disappointed by the delivery or outcome of the process.

**Panel conclusion: Fully compliant**

## ADDITIONAL OBSERVATIONS

In addition to the conclusions reached about BAC's compliance with the ESG, as outlined above, the review panel wishes to share two additional observations about BAC.

### BAC's mission

Since its establishment in 1984, BAC has fulfilled an important role in engaging and supporting providers that otherwise would not benefit from this level of scrutiny and rigour in their quality assurance activities. Today, BAC is undertaking this work around the world and helping to embed proven quality assurance practices to the benefit of many students.

BAC does not fulfil a traditional role as part of a national system or with public higher education providers. However, it should be considered an important player in promoting and upholding the European Standards and Guidelines across the European Higher Education Area and beyond.

The flexibility of BAC's processes to bring providers into the fold, such as through probation periods and deferrals, is positive and should be continued. BAC may want to consider how accreditation on probation is framed publically in order to protect the integrity of its full accreditation and to further promote this as a positive route to achieving full accreditation.

### Being outward facing

The last ENQA review concluded that stakeholder involvement in the development and maintenance of BAC's methodologies should be strengthened. Whilst this has clearly improved since, as detailed in this report, there is still room for improvement in how BAC looks outward and learns from others. BAC could still be characterised as insular at times and would benefit from taking advantage of the excellent access it has to international networks. This should certainly include benchmarking itself against the practices of similar organisations and could also include more actively contributing to the work of ENQA as a member agency.

# CONCLUSION

## SUMMARY OF COMMENDATIONS

The impact of BAC's work to engage higher education providers that would not otherwise benefit from external quality assurance. (ESG 3.1)

The stability brought to the operational delivery of core business in recent years. (ESG 3.5)

The successful streamlining of internal processes and the implementation of a robust approach to internally managing the quality of its operations. (ESG 3.6)

The rigorous approach taken to follow-up after accreditation is awarded. (ESG 2.3)

## OVERVIEW OF JUDGEMENTS AND RECOMMENDATIONS

3.1 Activities, policy and processes for quality assurance **Substantially compliant** with two recommendations:

Strengthen BAC's approach to strategic planning, ensuring that plans are robust, that they explicitly translate into the daily work of the organisation, and that the success of their implementation is routinely considered by the Council.

Introduce student and international members of the Accreditation Committee who attend every meeting during their term, rather than rotating attendance between a pool of members.

3.2 Official status **Fully compliant** with no recommendations.

3.3 Independence **Fully compliant** with no recommendations.

3.4 Thematic analysis **Partially compliant** with one recommendation:

Develop an approach to thematic reviews which is more analytical in nature with appropriate commentary on the issues identified, more clearly driven by predetermined outcomes, and has an impact on the approach to quality assurance taken by BAC and accredited higher education providers.

3.5 Resources **Substantially compliant** with one recommendation:

Build capability in the core staff team that better enables it to enhance their understanding of international higher education trends and developments and hence to better reflect on current practice and to inform member institutions and the public about its activities in line with its strategic plan.

3.6 Internal quality assurance and professional conduct **Fully compliant** with no recommendations.

3.7 Cyclical external review of agencies	<b>Fully compliant</b> with no recommendations.
2.1 Consideration of internal quality assurance	<p><b>Substantially compliant</b> with two recommendations:</p> <p>Strengthen the coverage of ESG 1.4 in the inspection process so that the provider’s policy on the recognition of qualifications is specifically considered, taking note of most recently available international guidance on the matter.</p> <p>Evolve the inspection process and the Accreditation Committee’s decision making to more explicitly address the effectiveness of the internal quality assurance processes described in Part 1 of the ESG.</p>
2.2 Designing methodologies fit for purpose	<b>Fully compliant</b> with no recommendations.
2.3 Implementing processes	<b>Fully compliant</b> with no recommendations.
2.4 Peer-review experts	<p><b>Substantially compliant</b> with one recommendation:</p> <p>Clearly separate the functions of staff and inspectors, including the role of the Chief Inspector.</p>
2.5 Criteria for outcomes	<b>Fully compliant</b> with no recommendations.
2.6 Reporting	<p><b>Substantially compliant</b> with one recommendation:</p> <p>Further strengthen the transparency of how inspections consider the effectiveness of providers’ internal quality assurance processes in the published reports by increasing their analytical content and listing the inspectors involved.</p>
2.7 Complaints and appeals	<b>Fully compliant</b> with no recommendations.

In light of the documentary and oral evidence considered by it, the review panel is satisfied that, in the performance of its functions, BAC is in compliance with the ESG.

## SUGGESTIONS FOR FURTHER DEVELOPMENT

1. Formalise and accelerate the implementation of BAC’s plans for enhancing the engagement of stakeholders in its work. (ESG 3.1)
2. Given the centrality of the Accreditation Committee to the way BAC exercises its independence and fairness in making decisions about accreditation, there should be greater transparency and clarity about the function, membership and operation of the Committee on BAC’s website. (ESG 3.3)
3. If BAC is to demonstrate its commitment to complying with all of the European Standards and Guidelines – a trait that it promotes its IHE scheme on – then the review panel would expect to see a robust and accelerated response over the next three years. It is for BAC to decide on how it responds, but the review panel suggests that this includes maximising the impact of the recently published thematic review report, taking the lessons learnt into a second more comprehensive review by 2022, and considering how inspection reports might evolve to enable a better quality analysis of their findings. (ESG 3.4).

4. BAC has been developing a more robust approach to Internal Quality Assurance. It should, therefore, consider publishing this approach more comprehensively on its website so that stakeholders can be more fully assured and the public more fully informed. (ESG 3.6)
5. BAC staff recognise the importance of further work to improve the quality of feedback collected from inspectors and providers, and the way in which that feedback is systematically used to improve BAC's operations. The review panel would encourage BAC to ensure this is given sufficient attention in the coming years. (ESG 3.6)
6. The review panel heard throughout the site visit that membership of ENQA, inclusion on EQAR's register and alignment to the ESG were important to BAC. To demonstrate this importance more robustly, it is strongly advised that BAC develop an action plan in response to the recommendations and suggestions for further improvement arising from this review with actions that are SMART (specific, measurable, achievable, realistic and time-bound). As a minimum, annual reports on progress towards these actions should be scrutinised by the Council, used to inform the mid-point progress report to ENQA, and available to the review panel undertaking the next ENQA review. BAC may wish to go a step further and publish these updates alongside this report on its website. (ESG 3.7)
7. Take forward the lessons learnt from piloting the Higher Education Focus Group into the next iteration and build on these by achieving even wider and deeper engagement, including from the network of accredited higher education providers. (ESG 2.2)
8. Continue to professionalise the recruitment of inspectors and diversifying the experiences they bring to BAC inspections, including Student Inspectors. (ESG 2.4)
9. Review the decision to not introduce international inspectors (those based outside of the UK) as part of the IHE Scheme. (ESG 2.4)
10. Further develop supporting guidance available alongside the minimum standards in the IHE Scheme so that providers can see what good practice would look like when meeting the standard. (ESG 2.5)
11. Evolve the templates for inspection reports to include a short summary that could be published by itself for public consumption, drawing on the recommendations of ENQA's EQArep project. (ESG 2.6)

# ANNEXES

## ANNEX 1: PROGRAMME OF THE SITE VISIT

<b>Day One – Monday 9<sup>th</sup> September 2019</b>			
<b>Meeting #</b>	<b>TIMING</b>	<b>TOPIC</b>	<b>PERSONS FOR INTERVIEW</b>
	09.00 30 minutes	Review panel's private meeting	
<b>1</b>	09.30 75 minutes	Meeting with the CEO	<b>Paul Fear</b> , Chief Executive
	10.45 15 minutes	Review panel's private discussion	
<b>2</b>	11.00 75 minutes	Meeting with other members of the Senior Management Team, discussion to include the preparation of the self-assessment report	<b>Diana Morriss</b> , Chief Inspector (Video Call) <b>Hayley Boyes</b> , Higher Education Manager <b>Lucy Fox</b> , Accreditation Manager
	12.15 15 minutes	Review panel's private discussion	
<b>3</b>	12.30 60 minutes	Meeting with representatives from the Council	<b>David Law</b> , Deputy Chair <b>Stephen Jackson</b> , Honorary Treasurer <b>Colette Fletcher</b> , Member of Council <b>Karena Maguire</b> , Member of Council <b>Kevin Everett</b> , Member of Council
	13.30 75 minutes	Review panel's private discussion and lunch	
<b>4</b>	14.45 45 minutes	Meeting with BAC staff who are not members of the Senior Management Team	<b>Lisa Atkins</b> , Office PA <b>Clare Baker</b> , Inspection Coordinator <b>Dinesh Thakur</b> , Finance Officer
	15.30 15 minutes	Review panel's private discussion	
<b>5</b>	15.45 60 minutes	Meeting focused on student engagement with student inspectors	<b>Kirill Tchevytchalov</b> , Student Inspector <b>Afshan Khan</b> , Student Inspector (Video Call) <b>Fabienne Tannah</b> , Student Inspector
	16.45 45 minutes	Review panel's private discussion	
	17.30 30 minutes	Clarification meeting with HE Manager	<b>Hayley Boyes</b> , Higher Education Manager
<b>Day Two – Tuesday 10<sup>th</sup> September 2019</b>			
<b>Meeting #</b>	<b>TIMING</b>	<b>TOPIC</b>	<b>PERSONS FOR INTERVIEW</b>
	08.45 30 minutes	Review panel's private discussion	
<b>6</b>	09.15 90 minutes	Meeting with staff of the agency involved in the management of accreditation	<b>Diana Morriss</b> , Chief Inspector <b>Hayley Boyes</b> , Higher Education Manager <b>Lucy Fox</b> , Accreditation Manager <b>Clare Baker</b> , Inspection Coordinator
	10.45 15 minutes	Review panel's private discussion	
<b>7</b>	11.00 60 minutes	Meeting with Accreditation Committee representatives	<b>Ann Read</b> , Chair of the Accreditation Committee <b>Steven Quigley</b> , Deputy Chair of the Accreditation Committee <b>Nicola Mellor</b> , member of the Accreditation Committee

	12.00 15 minutes	Review panel's private discussion	
<b>8</b>	12.15 75 minutes	Meeting with representatives from the reviewers' pool (excluding student inspectors)	<b>Richard Smith</b> , Senior Inspector <b>Amanda Greason</b> , Senior Inspector <b>Miranda Hobart</b> , Inspector <b>Pauline Bateman</b> , Inspector <b>Simon Bellamy</b> , Inspector
	13.30 60 minutes	Review panel's private discussion and lunch	
<b>9</b>	14.30 60 minutes	Meeting with Heads/ Heads of QA of some reviewed International HEIs  Meeting took place using video call software	<u>The Independent Institute of Education, South Africa</u> <b>Dr Felicity Coughlan</b> , Director and Group Academic Director of ADVTECH <b>Dr Gill Mooney</b> , Dean of Academic Development and Support (QA Lead)  <u>CITY College, Greece</u> <b>Prof. Petros Kefalas</b> , Vice-Principal for Teaching & Learning, The University of Sheffield International Faculty,  <u>AKTO (Art &amp; Design), Greece</u> <b>Dionysia Marinou</b> , Academic Head <b>Litsa Bekiaris</b> , Head of Quality Assurance
	15.30 15 minutes	Review panel's private discussion	
<b>10</b>	15.45 60 minutes	Meeting with Heads/ Heads of QA of some reviewed UK HEIs	<u>QA Higher Education</u> <b>Janis Gladwin</b> , Head of Quality Assurance  <u>London College of Contemporary Arts</u> <b>Sharjeel Nawaz</b> , Principal  <u>New School of Psychotherapy and Counselling</u> <b>Sasha Smith</b> , Registrar
	16.45 75 minutes	Review panel's private discussion	
<b>Day Three – Wednesday 11<sup>th</sup> September 2019</b>			
<b>Meetin g #</b>	<b>TIMING</b>	<b>TOPIC</b>	<b>PERSONS FOR INTERVIEW</b>
	09.00 60 mins	Review panel's private discussion	
<b>11</b>	10.00 45 minutes	Meeting with external stakeholders  <b>Meeting taking place using online meeting software</b>	Office of the Independent Adjudicator for Higher Education <b>Charlotte Corrish</b> , Head of Stakeholder Engagement and Membership  Malaysian Financial Accreditation Agency (via online meeting software) <b>Dr Eddy Chong Siong Choy</b> , Chief Technical Officer and/or <b>Prem Anand M Arjunan</b> , Head, Accreditation Assessment
	10.45 15 minutes	Review panel's private discussion	
<b>12</b>	11.00 60 minutes	Meeting with the CEO to clarify any pending issues	<b>Paul Fear</b> , Chief Executive
	12.00 120 minutes	Review panel's private discussion to agree on the main findings	
	14.15 45 minutes	Final de-briefing meeting with staff and Council/Board members of the agency to inform about preliminary findings	



## ANNEX 2: TERMS OF REFERENCE OF THE REVIEW

External review of the British Accreditation Council (BAC) by the European Association for Quality Assurance in Higher Education (ENQA)

### Annex I: TERMS OF REFERENCE

January 2019

#### **1. Background and context**

British Accreditation Council (BAC) is an independent organisation, established to be the national accrediting body for independent post-16 education in the UK. BAC is a not-for-profit charitable organisation and is self-financing through accreditation fees. It receives no public funding. BAC is a non-regulatory body and higher education institutions applying for accreditation approach BAC voluntarily. BAC accreditation is recognised by the UK government in connection with the granting of Student Visitor visas.

BAC accredits institutions. Institutions applying for accreditation vary greatly in size and in the character of provision. Many are specialist institutions offering only a small number of study programmes. To reflect the diversity of the sector, BAC operates different accreditation schemes to cover all types of providers. There are two schemes for international providers – Independent Higher Education and International Centre. Accreditation is available to public and private providers.

BAC's mission is to provide respected and rigorous inspection-based accreditation to enhance the standards and quality of independent further and higher education and training providers. It also offers a bespoke consultancy service.

There are now hundreds of BAC-accredited colleges in the UK, providing a wealth of academic programmes, including vocational and professional qualifications, foundation courses for university entry, and externally validated degree courses.

As well as providing clear guidance to prospective students, we want to encourage continuing improvement in the general standard and quality of independent education in the UK.

While the BAC is not a membership organisation, and indeed must maintain an objective distance from institutions to preserve the value of our accreditation, we are nevertheless dedicated to helping colleges in their efforts for continual improvement.

Our vision is to be an established, diverse and leading education charity for the independent further and higher education and training sectors. It is focused on expanding its accreditation and consultancy activities in the UK and international markets. Linked to this, BAC aims to be recognised by UK and overseas governments as an influential voice on standards and quality for the independent education sector.

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.

(Note: further education is defined by BAC as any educational or training activity, which is not part of a national compulsory school education system.)

BAC has been an ENQA member since March 2015 and is applying for renewal of ENQA membership.

BAC has been registered on EQAR since June 2015 and is applying for renewal of EQAR registration.

## **2. Purpose and scope of the evaluation**

This review will evaluate the way in which and to what extent BAC fulfils the *Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG)*. Consequently, the review will provide information to the ENQA Board to aid its consideration of whether membership of BAC should be reconfirmed and to EQAR to support BAC application to the register.

The review panel is not expected, however, to make any judgements as regards granting membership.

### **2.1 Activities of BAC within the scope of the ESG**

In order for BAC to re-apply for ENQA membership and for renewal of registration in EQAR, this review will analyse all BAC activities that are within the scope of the ESG, i.e. reviews, audits, evaluations or accreditation of higher education 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 following activities of BAC have to be addressed in the external review:

- **Accreditation of higher education institutions**

Note:

BAC is an institutional accrediting body and not a programme accrediting body.

BAC offers five other accreditation schemes, which are not relevant to higher education and do not fall under the ESG's 2015.

## **3. The review process**

The process is designed in the light of the *Guidelines for ENQA Agency Reviews* and in line with the requirements of the *EQAR Procedures for Applications*.

The evaluation procedure consists of the following steps:

- Formulation of the Terms of Reference and protocol for the review;
- Nomination and appointment of the review panel;
- Self-assessment by BAC including the preparation of a self-assessment report;
- A site visit by the review panel to BAC;
- Preparation and completion of the final evaluation report by the review panel;
- Scrutiny of the final evaluation report by the ENQA Review Committee;
- Analysis of the scrutiny by the ENQA Board and their decision regarding ENQA membership;
- Follow-up of the panel's and/or ENQA Board's recommendations by the agency, including a voluntary progress visit.

### **3.1 Nomination and appointment of the review panel members**

The review panel consists of four members: one or two quality assurance experts, an academic employed by a higher education institution, student member, and eventually a labour market representative (if requested). One of the members will serve as the chair of the review panel, and another member as a review secretary. For ENQA Agency Reviews at least one of the reviewers is an ENQA nominee (most often the QA professional[s]). At least one of the reviewers is appointed from the nominees of either the European University Association (EUA) or the European Association of Institutions in Higher Education

(EURASHE), and the student member is always selected from among the ESU-nominated reviewers. If requested, the labour market representative may come from the Business Europe nominees or from ENQA. An additional panel member may be included in the panel at the request of the agency under review. In this case an additional fee to cover the reviewer's fee and travel expenses is applied.

In addition to the four members, the panel will be supported by the ENQA Secretariat review coordinator who will monitor the integrity of the process and ensure that ENQA expectations are met throughout the process. The ENQA staff member will not be the Secretary of the review and will not participate in the discussions during the site visit interviews.

Current members of the ENQA Board are not eligible to serve as reviewers.

ENQA will provide BAC with the list of suggested experts with their respective curriculum vitae to establish that there are no known conflicts of interest. The experts will have to sign a non-conflict of interest statement as regards BAC review.

### **3.2 Self-assessment by BAC, including the preparation of a self-assessment report**

BAC is responsible for the execution and organisation of its own self-assessment process and shall take into account the following guidance:

- Self-assessment is organised as a project with a clearly defined schedule and includes all relevant internal and external stakeholders;
- The self-assessment report is broken down by the topics of the evaluation and is expected to contain, among others: a brief description of the national HE and QA system; background description of the current situation of the Agency; an analysis and appraisal of the current situation; proposals for improvement and measures already planned; a SWOT analysis; each criterion (ESG part II and III) addressed individually. All agency's QA activities (whether within their national jurisdiction or outside of it, and whether obligatory or voluntary) will be described and their compliance with the ESG analysed.
- The report is well-structured, concise and comprehensively prepared. It clearly demonstrates the extent to which BAC fulfils its tasks of external quality assurance and meets the ESG and thus the requirements of ENQA membership.
- The self-assessment report is submitted to the ENQA Secretariat who has 4 weeks to pre-scrutinise it before forwarding the report to the panel of experts. The purpose of the pre-scrutiny is to ensure that the self-assessment report is satisfactory for the consideration of the panel. The Secretariat will not judge the content of information itself but whether the necessary information, as stated in the Guidelines for ENQA Agency Reviews, is present. For the second and subsequent reviews, the agency is expected to enlist the recommendations provided in the previous review and to outline actions taken to meet these recommendations. In case the self-assessment report does not contain the necessary information and fails to respect the requested form and content, the ENQA Secretariat reserves the right to reject the report and ask for a revised version within 4 weeks. In such cases, an additional fee of 1000 EUR will be charged to the agency.
- The report is submitted to the review panel a minimum of six weeks prior to the site visit.

### **3.3 A site visit by the review panel**

BAC will draw up a draft proposal of the schedule for the site visit to be submitted to the review panel at least two months before the planned dates of the visit. The schedule includes an indicative timetable of the meetings and other exercises to be undertaken by the review panel during the site visit, the duration of which is 2.5 days. The approved schedule shall be given to BAC at least one month before the site visit, in order to properly organise the requested interviews.

The review panel will be assisted by BAC in arriving in London, UK.

The site visit will close with a final de-briefing meeting outlining the panel's overall impressions but not its judgement on compliance or granting of ENQA membership.

### **3.4 Preparation and completion of the final evaluation report**

On the basis of the review panel's findings, the review secretary will draft the report in consultation with the review panel. The report will take into account the purpose and scope of the evaluation as defined under articles 2 and 2.1. It will also provide a clear rationale for its findings with regards to each ESG. A draft will be first submitted to the ENQA review coordinator who will check the report for consistency, clarity and language and it will be then submitted to BAC within 11 weeks of the site visit for comment on factual accuracy. If BAC chooses to provide a statement in reference to the draft report it will be submitted to the chair of the review panel within two weeks after the receipt of the draft report. Thereafter the review panel will take into account the statement by BAC, finalise the document and submit it to ENQA.

The report is to be finalised within three months of the site visit and will not exceed 40 pages in length.

When preparing the report, the review panel should also bear in mind the *EQAR Policy on the Use and Interpretation of the ESG*, so as to ensure that the report will contain sufficient information for the Register Committee for application to EQAR.

BAC is also requested to provide a letter addressed to the ENQA Board outlining its motivation applying for membership and the ways in which BAC expects to contribute to the work and objectives of ENQA during its membership. This letter will be discussed along with the final evaluation report.

### **4. Follow-up process and publication of the report**

BAC will consider the expert panel's report and will publish it on its website once the ENQA Board has made its decision. The report will also be published on the ENQA website, regardless of the review outcome and decision by the ENQA Board. BAC commits to preparing a follow-up plan in which it addresses the recommendations of the review panel and to submitting a follow-up report to the ENQA Board. The follow-up report will be published on the ENQA website, in addition to the full review report and the Board's decision.

The follow-up report will be complemented by a small-scale visit to the agency performed by two members of the original panel (whenever possible). This visit will be used to discuss issues, based on the ESG, considered as of particular importance or challenge by BAC. Its purpose is entirely developmental and has no impact on the judgement of membership and/or compliance of the agency with the ESG. Should the agency not wish to take advantage of this opportunity, it may opt out by informing the ENQA Review Coordinator about this.

### **5. Use of the report**

ENQA shall retain ownership of the report. The intellectual property of all works created by the expert panel in connection with the review contract, including specifically any written reports, shall be vested in ENQA.

The review report is used by the Board of ENQA for the purpose of reaching a conclusion on whether BAC has met the ESG and can be thus admitted/reconfirmed as a member of ENQA. The report will also be used for registration on EQAR, and is designed so as to serve these two purposes. However, the review report is to be considered final only after being approved by the ENQA Board. Once submitted to BAC and ENQA and until it is approved by the Board the report may not be used or relied upon by BAC, the panel and any third party and may not be disclosed without the prior written consent of ENQA. BAC may use

the report at its discretion only after the Board has approved of the report. The approval of the report is independent of the decision on membership.

The Chair of the panel shall remain available to respond to questions of clarification or further information from the EQAR Register Committee provided that the ENQA Secretariat is copied in all such requests.

## 6. Budget

BAC shall pay the following review related fees:

Fee of the Chair	4,500 EUR
Fee of the Secretary	4,500 EUR
Fee of the 2 other panel members	4,000 EUR (2,000 EUR each)
Fee of 2 panel members for progress visit	1,000 EUR (500 EUR each)
Administrative overhead for ENQA Secretariat	7,000 EUR
Experts Training fund	1,400 EUR
Approximate travel and subsistence expenses	6,000 EUR
Travel and subsistence expenses progress visit	1,600 EUR

This gives a total indicative cost of 30,000.00 EUR VAT excl. for a review panel of 4 members. In the case that the allowance for travel and subsistence expenses is exceeded, BAC will cover any additional costs after the completion of the review. However, the ENQA Secretariat will endeavour to keep the travel and subsistence expenses in the limits of the planned budget, and will refund the difference to BAC if the travel and subsistence expenses go under budget.

The fee of the progress visit is included in the overall cost of the review and will not be reimbursed in case the agency does not wish to benefit from it.

In the event of a second site visit required by the Board and aiming at completing the assessment of compliance, and should the agency accept a second visit, an additional fee of 500 EUR per expert, as well as travel and subsistence costs are recoverable from the agency.

## 7. Indicative schedule of the review

Agreement on terms of reference	December 2018
Appointment of review panel members	March 2019
Self-assessment completed	15 May 2019
Pre-screening of SAR by ENQA coordinator	June 2019
Preparation of site visit schedule and indicative timetable	July 2019
Briefing of review panel members	August 2019
Review panel site visit	Early-September 2019
Draft of evaluation report and submitting it to ENQA coordinator for pre-screening	End-October 2019
Draft of evaluation report to BAC	Early-November 2019
Statement of BAC to review panel if necessary	Late-November 2019
Submission of final report to ENQA	December 2019
Consideration of the report by ENQA Board	January 2020
Publication of the report	January 2020

## ANNEX 3: GLOSSARY

AC	Accreditation Committee
BAC	British Accreditation Council
DfE	Department for Education
ENQA	European Association for Quality Assurance in Higher Education
ESG	European Standards and Guidelines (formally the <i>Standards and Guidelines for Quality Assurance in the European Higher Education Area</i> , 2015)
HE	higher education
HEFG	Higher Education Focus Group
IHE	BAC's Independent Higher Education scheme
Ofsted	The Office for Standards in Education, Children's Services and Skills in England
Provider	Higher education provider
QA	quality assurance
QAA	Quality Assurance Agency for Higher Education, UK
SAR	self-assessment report
Tier 4	Tier 4 (General) student visa to study in the UK
UK	United Kingdom

## ANNEX 4. DOCUMENTS TO SUPPORT THE REVIEW

### DOCUMENTS PROVIDED BY BAC

<u>Reference #</u>	<u>Description</u>
SAR	Self-Assessment Report
SAR Annex 1	Articles of Association
SAR Annex 2	Independent Higher Education Scheme
SAR Annex 3	Internal Quality Assurance Processes
SAR Annex 4	Inspectors' Handbook
SAR Annex 5	IHE Full Inspection Report Template
SAR Annex 6	Accreditation Handbook
SAR Annex 7	Survey of accredited institutions
SAR Annex 8	Mapping of IHE Standards against ESG
001	Accreditation Committee attendance tracker
002	Accreditation Committee meeting agenda
003	Accreditation Committee Minutes
004	Accreditation Committee terms of reference
005	Accreditation Cycle poster 2018
006	Annual Budgets
007	Annual Report and Audits
008	Anti-Bribery & Corruption Policy
009	Application documents
010	Attendance of Webinars and feedback
011	Audit Committee Meeting Minutes
012	BAC Accreditation Handbook [SAR Annex 6]
013	BAC Accreditation Process
014	BAC Articles of Association [SAR Annex 1]
015	BAC Governing articles
016	BAC institute survey [SAR Annex 7]
017	BAC Operational Plans
018	BAC organogram
019	BAC Staff Job Descriptions
020	BAC Staff Training Policy
021	BAC Strategic Plans
022	BAC Terms and Conditions
023	Chief Inspector (CI) Inspector monitoring report
024	Council Meeting Minutes
025	Criteria for establishing the size of an inspection team
026	Details of inspections of less than 3 inspectors
027	Emails asking about conflicts of interest
028	Emails to inspectorate from the Chief Inspector
029	ENQA follow-up report and action plan
030	ENQA Report
031	EQAR Letter
032	ESG mapping BAC standards and key indicators [SAR Annex 8]
033	Executive Committee Minutes and Agendas
034	Exemplar Inspection reports
035	Exemplar Inspector CV's (Available onsite)

036	Feedback on inspectors' annual event
037	Feedback re the students' contribution to inspections
038	BAC Financial Regulations
039	HE Questionnaire 2019
040	HEFG member invitation
041	HEFG outline and members
042	HEFG Standard Operational Procedure (SOP)
043	HEFG terms of reference
044	IHE Scheme document 2018 [SAR Annex 2]
045	Induction timetable and sample slides
046	Inspection monitoring form
047	Inspection planning emails
048	Inspection Questionnaires
049	Inspection record of evidence
050	Inspector and institution feedback forms
051	Inspector and student inspector application forms
052	Inspector Conference Agenda
053	Inspector Contract
054	Inspector Handbook [SAR Annex 4]
055	Inspector job specification
056	Inspector Working Group documents
057	Inspectors' master spreadsheet
058	International expert bio
059	List of countries inspectors have inspected HEI since the last ENQA
060	Mid-year training events
061	Official Visa Status
062	PCG Agenda
063	PCG Minutes
064	PCG Remit
065	Proposal to appoint Student Trustee
066	Report editors checklist
067	Report Processing
068	Report Writing Guidelines
069	Screenshots of BAC website
070	Self-evaluation reports
071	Signed conflict of interest forms
072	Staff Handbook
073	Standard Operating Procedures (SOPs)
074	Standing Committee Meeting Minutes
075	Student annual declaration
076	Student code of conduct
077	Student confidentiality agreement
078	Student contract for services
079	Student induction agenda
080	Student induction key skills test
081	Student induction presentation
082	Student inspector job description
083	Student Inspectors' CV's (Available onsite)
084	Student interviews
085	Student recruitment procedures guidelines



086	Student reference request form
087	BAC Internal Quality Assurance Processes [SAR Annex 3]
088	Independent Higher Education Report Template [SAR Annex 5]
089	BAC Consultancy Activity 2015 - 2019
089a	Bahrain Inspection Contract
089b	Bahrain Accreditation Framework
089c	Kazakhstan Agreement
089d	Cacusus International University
089e	Deqar Project
089f	International Business School
090	Inspectors CVs
091	List of inspected HEIs, inspectors and student numbers
092	List of Council and Accreditation Committee members
093	Updated BAC Organogram
094	Minutes of each Council meeting in the last two years
095	Minutes of each Accreditation Committee meeting in the last two years
096	Minutes of each Standing Group meeting in the last two years
097	Minutes of each Planning and Coordination Group meeting in the last two years
098	Annual Accounts 2017-18
099	Management Accounts - September 2019
100	End of 2015- 2018 Strategic Plan Review
101	Number of accredited providers by scheme - year by year for the last five years
102	BAC Strategic Plan 2015-18
103	Inspector Feedback Forms
104	Institution Feedback Forms
105	Summary Report Briefings from recent AC meetings
106	Exemplar completed Record of Evidence forms from a few recent inspections
107	Accreditation Committee Member Handbook

## ANNEX 5. BAC'S MAPPING OF THE IHE SCHEME'S STANDARDS AGAINST PART 1 OF THE ESG

Reproduced from Annex 8 of BAC's Self-Assessment Report

ESG Part 1	BAC Standards & Key Indicators						
	Governance, Strategy and Financial Management (KI 1-3)	General and Academic Management and Administration (KI 4-10)	Teaching, Learning and Assessment (KI 11 - 13)	Student Support, Guidance and Progression (KI 14-19)	Premises, Facilities and Learning Resources (KI 20-25)	Quality Management, Assurance and Enhancement (KI 26-28)	Online, Distance, and Blended Learning (if applicable) (KI 29)
1.1 Policy for quality assurance	1.1 - 1.8					26.1 - 26.3 27.1 - 27.12 28.1 - 28.3	
1.2 Design and approval of programmes		7.1 - 7.6 10.1 - 10.5				27.1 - 27.12	29.1
1.3 Student-centred learning, teaching and assessment			11.1 - 11.8 12.1 - 12.6				
1.4 Student admission, progression, recognition and certification	2.1	5.3 8.1 - 8.9 10.1 - 10.5					
1.5 Teaching staff		6.1 - 6.8	11.1 - 11.8 13.1 - 13.5				29.2
1.6 Learning resources and student support	2.1 - 2.4	7.1 - 7.6	11.8	14.1 - 14.8 15.1 - 15.9 16.1 - 16.5	22.1 - 22.3 24.1 - 24.6 25.1 - 25.6		
1.7 Information management						26.1 - 26.3 27.1 - 27.12	
1.8 Public information	2.4	7.2 8.1 - 8.9 10.1 - 10.5	12.1 - 12.6				
1.9 On-going monitoring and periodic review of programmes	2.2	7.1		15.1 - 15.9		26.1 - 26.3 27.1 - 27.12 28.1 - 28.3	
1.10 Cyclical external quality assurance	2.2	7.1				27.1 - 27.11	