

Approval of the Application by British Accreditation Council (BAC) for Renewal of Inclusion on the Register

Register Committee

2 November 2020

Ref. RC28/A82

Ver. 1.0

Date 06/11/2020

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Application of:	19/12/2018
Agency registered since:	05/06/2015
External review report of:	20/02/2020
Review coordinated by:	European Association for Quality Assurance of Higher Education (ENQA)
Review panel members:	Aurelija Valeikiene (chair), Ellen Hazekorn (academic), Dan Dericott, Samin Sedghi Zadeh (student)
Decision of:	02/11/2020
Registration until:	28/02/2025
Absented themselves from decision-making:	Not applicable
Attachments:	<ol style="list-style-type: none"> 1. Confirmation of eligibility, 13/01/2019 2. External Review Report, 20/02/2020 3. Request to the Review Panel, 27/04/2020 4. Clarification by the Review Panel, 14/05/2020 5. Additional representation by BAC, 02/10/2020

1. The application of 19/12/2018 adhered to the requirements of the EQAR Procedures for Applications.
2. The Register Committee confirmed eligibility of the application on 13/01/2019.
3. The Register Committee considered the external review report of 20/02/2020 on the compliance of BAC with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG, 2015 version).
4. The Register Committee sought and received clarification from the chair of the review panel (letter of 14/05/2020).
5. The Register Committee invited BAC to make additional representation on the grounds for possible rejection on 01/07/2020. The Register Committee considered BAC's additional representation on 02/11/2020.

1. Analysis:

6. In considering BAC's compliance with the ESG, the Register Committee took into account *higher educational institutional accreditation* activities.

7. Other activities, such as *consultancy services*, are activities outside the scope of the ESG. The clear separation between such activities and the agency's accreditation activities is nevertheless addressed under ESG 3.1 below.

8. The Register Committee noted that BAC has signed a Memorandum of Understanding with the Malaysian Financial Accreditation Agency in order to offer a joint accreditation exercise where a provider wishes to seek accreditation from both organisations. As this has not become operational at the time of the external review, and thus was not covered by the review panel, the Committee did not analyse this activity further; **BAC is expected to provide a Substantive Change Report should this activity be launched.**

9. The Register Committee found that the report provides sufficient evidence and analysis on BAC's level of compliance with the ESG.

10. With regard to the specific European Standards and Guidelines, the Register Committee considered the following:

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ESG 2.2 – Designing methodologies fit for purpose

11. The review panel noted the progress made by BAC in recent years to involve stakeholders in the design and maintenance of its accreditation process.

12. The Register Committee thus concluded that the flag related to the involvement of key stakeholders in the development of BAC's quality assurance processes has been addressed.

ESG 2.3 – Implementing processes

13. The Register Committee noted that interim inspections are carried out by one lead inspector only. The Committee sought further clarification from the review panel about the involvement or consultation of other members of the inspection team.

14. The panel explained (see letter of 14/05/2020) that interim inspections are not 'free standing' procedures, but rather an integral part of the institutional accreditation activities, i.e. they should be considered a follow-up procedure.

15. Having considered the clarification provided, the Register Committee could follow the reasoning of the panel that interim inspections do not require to be carried out by a full group of experts. The Committee therefore concurred with the conclusion that BAC complies with the standard.

ESG 2.4 – Peer-review experts

16. In its decision of inclusion the Register Committee flagged the composition of the expert groups, in particular the involvement of students.

17. Regarding the inspections carried out by BAC in recent years, the review panel confirmed that the agency has typically deployed a team of three people for full inspections, including a student inspector with a few exceptions. In its Self-Evaluation Report, the agency explained that students could not be involved in two occasions due to conflicting visitation scheduling, that were set during an examination period or other study commitments. The agency stated that this is an exception and not a recurring issue, and that has taken steps in addressing this issue by recruiting additional students for BAC's reviews.

18. The Register Committee initially found that the flag was only partially addressed since it was not clear whether BAC has fully ensured the consistent involvement of students in all its review panels.

19. Following the agency's additional representation, the Register Committee noted that BAC has introduced an improved mechanism for securing student participation in inspectors' review teams and a system for monitoring the availability of students. The Committee also welcomed BAC's commitment to conduct evaluations only when a student member participates in inspectors' team.

20. Considering the recently introduced improvements ensuring the systematic involvement of students in review panels, the Register Committee was now able to concur with the panel's conclusion, that BAC complies with standard 2.4.

ESG 2.6 – Reporting

21. In its decision of inclusion the Register Committee flagged the publication of inspection reports for unsuccessful applications.

22. The Register Committee noted that BAC has decided to publish reports of refused, withdrawn and suspended accreditations shortly before its external review (May 2019). The Register Committee noted that no negative reports have been produced since this change in policy, but welcomed BAC's clear commitment for transparency in the publication of its negative reports.

23. Considering the quality of reports, the Committee noted the panel's assessments that BAC *"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"* (Review report p. 40).

24. The panel further pointed out that the reports provide limited qualitative insight and there was no evidence of how the Accreditation Committee was able to consider the effectiveness of a higher education institution's internal quality assurance process on the basis of the reports.

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25. In its additional representation BAC stated that it was in the process of addressing the shortcomings of its reporting format.

26. While the Register Committee acknowledged agency's plans towards more qualitative reporting, the Committee underlined that a full redraft of BAC's reporting template is only expected to be completed in the following years. The Committee was therefore unable to concur with the panel's conclusion of substantial compliance, but considered that BAC complies only partially with the standard.

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ESG 3.1 – Activities, policy and processes for quality assurance

27. Regarding the involvement of stakeholders in the governance and work of the agency, the Register Committee noted that BAC's Accreditation Committee includes a student member. The rotating attendance system, however, substantially limits the role of the student member to participate and gain experience on par with other Committee members.

28. Considering the agency's goals and their translation into the daily work of the agency, the review panel noted that while it was provided with a strategic plan for 2015-2018, that no further documentation of implementation was prepared during the lifespan of the strategy. The review panel added that it did not see evidence of staff and stakeholder involvement in the development of BAC's Interim Strategic Plan, or how it was explicitly driving the work of the organisation.

29. In addressing BAC's consultancy activities, the panel noted that higher education providers that have previously used BAC's consultancy services were not excluded from subsequently seeking accreditation with the agency (Review Report p. 14).

30. The Register Committee asked the panel to elaborate on the separation between BAC's consultancy services and external quality assurance activities. The panel responded that it was reassured from its discussion with BAC's senior staff that the agency understood the importance of the separation of consultancy and accreditation activities and had, in practice, implemented such a separation when both consulting and accrediting had taken place at the same institution. The panel concluded that the available evidence gave no cause for major concern, but noted that – as BAC develops its international strategy – it would be sensible to ensure a stronger separation of external quality assurance from consultancy activities.

31. The Register Committee was not fully reassured by the panel's assessment, and underlined that agencies are expected to take appropriate precautions to prevent any conflicts of interest arising from the consultancy activities they carry out, as indicated in Annex 2 to the EQAR Policy on the Use and Interpretation of the ESG.

32. In its additional representation BAC stressed the recent inclusion of stakeholders in the drafting of the agency's new strategic directions, i.e. action plan and risk analysis and provided supporting evidence to this effect. Concerning the participation of the student member in the Accreditation

Committee, the agency explained that it had changed the rotating attendance system to a more permanent position and that a student will be in post by January 2021.

33. Considering its consultancy services, the Register Committee noted from the agency's additional representation that BAC had only facilitated consultancy arrangements for one provider and that the agency is currently reviewing its position in respect to such facilitations. In case the agency continues its consultancy activities, BAC stated that it will publish the measures used to prevent conflicts of interest.

34. **Having considered the clarifications and changes enacted by the agency, the Committee was able to concur with the panel's conclusion that BAC (substantially) complies with standard 3.1.**

ESG 3.4 – Thematic analysis

35. The Register Committee flagged in its decision of inclusion BAC's development of a system-wide analyses.

36. The Register Committee noted that BAC took steps to address the flag and undertook its first thematic analysis in 2019, drawing from 63 inspection reports.

37. The review panel, however, found that BAC's thematic review report provided a limited analysis and was rather descriptive by simply summarising the content of inspection reports. Overall, the review panel felt there were still significant weaknesses in BAC's approach to thematic analysis.

38. According to the strategic documents provided with the additional representation by BAC, one thematic analysis is planned to be produced in the period 2020/21. The agency stated that the upcoming thematic analysis, planned to be published in January 2021, will serve to improve key areas of agency's work.

39. While the Register Committee acknowledged the agency's commitment towards improving its thematic analysis in the future, the Register Committee concurred with the panel's conclusion that BAC complies only partially with ESG 3.4, based on the situation as of now.

ESG 3.5 – Resources

40. In its decision of inclusion, the Register Committee flagged for attention whether BAC had a sufficient and sustainable basis of professional staff in its central administration.

41. The review panel found that BAC's Chief Executive, Chief Inspector and the wider team of professional staff were effective and well-supported by managers responsible for delivering the accreditation and higher education operations; the organisation had a clear division of responsibilities. The panel concluded that if the organisation was aiming to maintain the status quo, this could be achieved with its current staff.

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42. Considering the stability in the operational delivery of its core business, the Register Committee was able to conclude that the flag was sufficiently addressed and thus **concurred with the panel's conclusion that BAC (substantially) complies with ESG 3.5.**

43. For the remaining standards, the Register Committee was able to concur with the review panel's analysis and conclusion without further comments.

2. Conclusion:

44. Based on the external review report and the considerations above, the Register Committee concluded that BAC demonstrated compliance with the ESG (Parts 2 and 3) as follows:

Standard	Review panel conclusion	Register Committee conclusion
2.1	Substantial compliance	Compliance
2.2	Full compliance	Compliance
2.3	Full compliance	Compliance
2.4	Substantial compliance	Compliance
2.5	Full compliance	Compliance
2.6	Substantial compliance	Partial compliance
2.7	Full compliance	Compliance
3.1	Substantial compliance	Compliance
3.2	Full compliance	Compliance
3.3	Full compliance	Compliance
3.4	Partial compliance	Partial compliance
3.5	Substantial compliance	Compliance
3.6	Full compliance	Compliance
3.7	(not expected)	Compliance (by virtue of applying)

45. The Register Committee considered that BAC only achieved partial compliance with two standards. In its holistic judgement, the Register Committee concluded that these are specific and limited issues, and that BAC has already been working to address these matters. BAC therefore continues to comply substantially with the ESG as a whole.

46. The Register Committee renewed BAC's inclusion on the Register. BAC's renewed inclusion shall be valid until 28/02/2025¹.

¹ Inclusion is valid for five years from the date of the external review report, see §4.1 of the EQAR Procedures for Applications.

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47. The Register Committee further underlined that BAC is expected to continue addressing the issues mentioned appropriately and to resolve them at the earliest opportunity.

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EQAR | Aarlenstraat 22 Rue d'Arlon 22 | BE-1050 Brussels

British Accreditation Council (BAC)

Paul Fear, Chief Executive

Ground Floor

14 Devonshire Square

EC2M 4YT London

United Kingdom

Brussels, 14 January 2019

Confirmation of Eligibility: Application for Renewal of Inclusion on the Register

Application no. A82 of 19/12/2018

Dear Mr Fear,

We hereby confirm that the application by BAC for renewal of registration is eligible.

Based on the information and draft terms of reference provided, the external review coordinated by ENQA - European Association for Quality Assurance of Higher Education fulfils the requirements of the EQAR Procedures for Applications.

We confirm that the following activity of BAC is within the scope of the ESG:

- higher educational institutional accreditation.

Please ensure that BAC's self-evaluation report covers the aforementioned activity, irrespective whether the activity is carried out within and outside the European Higher Education Area (EHEA).

We further remind you that the following issues were flagged when BAC's registration was last renewed and should be addressed in your self-evaluation report and external review report:

ESG 2.2: Designing methodologies fit for purpose [ESG 2005: standard 2.2]

It should receive attention how BAC has involved the key stakeholders in the development of its quality assurance processes.

ESG 2.4: Peer-review experts [ESG 2005: standard 3.7]

European Quality Assurance
Register for Higher Education
(EQAR) aisbl

Aarlenstraat 22 Rue d'Arlon
1050 Brussels – Belgium

Phone: +32 2 234 39 12
Fax: +32 2 230 33 47

info@eqar.eu
www.eqar.eu

VAT BE 0897.690.557

EQAR Founding Members:



It should receive attention whether students were consistently involved in the HE inspections carried out by BAC and whether these were carried out by at least three inspectors.

ESG 2.6: Reporting [ESG 2005: standard 2.5]

It should be addressed whether BAC has considered the publication of inspection reports for unsuccessful applications.

ESG 3.4: Thematic analyses [ESG 2005: standard 2.8]

It should receive attention whether BAC has carried out system-wide analyses as required by the standard.

ESG 3.5: Resources [ESG 2005: standard 3.4]

It should be addressed whether BAC's central administration has a sufficient and sustainable basis of professional staff.

We confirm that the following activity is not within the scope of the ESG:

- *Non Higher Education Accreditation.*

We further confirm that *consultancy services* are activities outside the scope of the ESG. However, where consultancy services relate to issues covered by the ESG (e.g. consultancy as support for higher education in the preparation of a review) BAC is expected to demonstrate that adequate policies and processes are in place to prevent conflict of interest in performing their QA function and a clear separation exists between such activities and the agency's assessment procedures (see Annex 5 of the Use and Interpretation of the ESG for the European Register of Quality Assurance Agencies¹).

We will forward this letter to ENQA - European Association for Quality Assurance of Higher Education in its capacity of the coordinator of the external review. At the same time we underline that it is BAC's responsibility to ensure that the coordinator and review panel take account of the present confirmation, so as to ensure that all activities mentioned are analysed by the panel.

This confirmation is made according to the relevant provisions of the EQAR Procedures for Applications. BAC has the right to appeal this decision in accordance with the Appeals Procedure; any appeal must reach EQAR within 90 days from receipt of this decision.

¹ Version 2.0 of November 2017

https://www.eqar.eu/fileadmin/documents/eqar/official/RC_12_1_UseAndInterpretationOfTheESG_v2_0.pdf

Yours sincerely,



Colin Tück
(Director)

Cc: ENQA (coordinator)

Brussels, 27 April 2020

Application by BAC for renewal of registration on EQAR

Dear Aurelija,

The British Accreditation Council (BAC) has made an application for renewal of registration on the European Quality Assurance Register for Higher Education (EQAR).

We are contacting you in your capacity as chair of the panel that prepared the external review report of 19/09/2019 on which BAC's application is based.

The EQAR Register Committee's rapporteurs have been considering the application and the external review report. We would be obliged if you could clarify, in consultation with the panel members as necessary, some matters in order to contribute to the consideration of BAC's application.

1. ESG 2.4 Peer review experts

We noted that all accredited institutions by BAC go through an interim inspection, which is carried out by a lead inspector.

Could you clarify whether the panel has also inquired upon the involvement and/or consultation of other members of the initial inspection group, including the student expert (inspector)? If so, could you elaborate on their involvement?

2. ESG 3.1 Activities, policy and process for quality assurance

We noted from the review panel's report, that BAC does not exclude providers that have engaged in consultancy activity from subsequently seeking accreditation. (p. 14)

Could you please clarify what is the understanding of the panel with regards to BAC's "engagement" in consultancy activities? Could you also please elaborate on why the panel felt this was not an issue i.e. having

European Quality Assurance
Register for Higher Education
(EQAR) aisbl

Aarlenstraat 22 rue d'Arlon
1050 Brussels
Belgium

Phone: +32 2 234 39 12

Fax: +32 2 230 33 47

info@eqar.eu

www.eqar.eu

VAT BE 0897.690.557

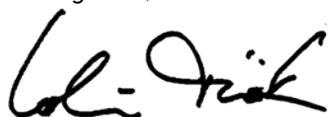
consultancy engagements at the same institution BAC may later accredit?¹

We would be grateful if it was possible for you to respond by 15 May 2020, and we would appreciate if you get in contact with us should that not be feasible.

Please note that EQAR will publish this request and your response together with the final decision on BAC's application. We, however, kindly ask you to keep information related to the application confidential until the final decision has been published.

We acknowledge that it might not be possible to clarify all of the above. However, we appreciate your assistance and I shall be at your disposal if you have any questions in relation to this request.

Kind regards,



Colin Tück
(Director)

Cc: Dan Derricott (secretary of the review panel)
ENQA (coordinator)
BAC

¹ Please also see Annex 5 of our Use and Interpretation of the ESG.
https://www.eqar.eu/assets/uploads/2018/04/UseAndInterpretationOfTheESGv2_0.pdf

To: Colin Tuck, Director
EQAR

Cc: ENQA (coordinator), BAC

May 14, 2020
Vilnius

Re: Application by BAC for renewal of registration on EQAR

Thank you for an opportunity to provide additional information regarding how the British Accreditation Council (BAC) complies with the expectations of the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG). Please find below the Panel's response to your letter dated 27 April 2020, issued in Brussels.

The panel took time to discuss among ourselves evidence that was available at the time of the visit and when producing the external review report, and refreshed memories of the discussions between ourselves and with the BAC.

1. Question: *ESG 2.4 Peer review experts*

We noted that all accredited institutions by BAC go through an interim inspection, which is carried out by a lead inspector.

Could you clarify whether the panel has also inquired upon the involvement and/or consultation of other members of the initial inspection group, including the student expert (inspector)? If so, could you elaborate on their involvement?

Answer:

When preparing for a site visit, the Panel carefully read the Self-Assessment Report (SAR) by BAC and all provided documentation (including that submitted by additional panel's requests), also double-checked information during the meetings at the agency. They all matched, it was confirmed that an interim inspection is carried out by one inspector, as is stated in the ENQA External Review Report (ERR), page 35: "Interim inspections, including those of providers on probation and where a concern is raised, are carried out by one inspector."

BAC's "Accreditation Handbook" has several categories of inspections, such as "candidacy inspection", "full inspection", "the accreditation inspection (full inspection)", "interim inspection", "spot-check inspection". Noteworthy, "Interim inspections" are not labelled as "full inspections", as they clearly are not, this is by design and purpose of the procedure. In addition, on SAR page 37, among 11 steps of the accreditation process, there is step nine which has a title "Follow-up and monitoring including an interim inspection".

As to the design and purpose, BAC wrote in their SAR, page 11: "Once accredited, institutions will have an interim inspection to check the progress of the institution in meeting any action points or recommendations set at the previous inspection and undertaking a spot check across the standards to ensure they are being maintained." As stated on page 35 of ERR "the 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."

These passages clearly indicate the status of the interim inspection - it is not a free-standing procedure in itself in addition to the full inspection, but rather it is a part of the overall inspection procedure, and, more precisely, falls under the follow-up process, after the accreditation decision was taken, thus, the "core process", if it could be named so, is fully finished.

Therefore, in the panel's opinion, one inspector being involved in the interim inspection should be discussed not under ESG 2.4 *Peer-review experts* in the context of composition of the panel and student inclusion, but rather in the context of follow-up procedures, which leads us to ESG 2.3 *Implementing processes* and to the overall description of processes.

The panel has analysed the question of follow-up having in mind the entire design of the external quality assurance procedures. According to the ESG, follow-up in itself does not have a pre-defined format and can be carried in a variety of ways.

Under ESG 2.3 the guidelines include: "External quality assurance does not end with the report by the experts. The report provides clear guidance for institutional action. Agencies have a consistent follow-up process for considering the action taken by the institution. The nature of the follow-up will depend on the design of the external quality assurance."

From the above, the panel inferred that BAC as the agency has full freedom to design the follow-up. Consequently, we do not see why it cannot be carried in the form of a visit by one inspector. The only requirement in the ESG regarding this is consistency of follow-up, which, to the best of the panel's judgement, is met, BAC assures it.

2. Question: *ESG 3.1 Activities, policy and process for quality assurance*

We noted from the review panel's report, that BAC does not exclude providers that have engaged in consultancy activity from subsequently seeking accreditation. (p. 14)

Could you please clarify what is the understanding of the panel with regards to BAC's "engagement" in consultancy activities? Could you also please elaborate on why the panel felt this was not an issue i.e. having consultancy engagements at the same institution BAC may later accredit?

Answer:

BAC included a detailed description of the general consultancy protocol on page 21 of SAR. The agency also provided all relevant contracts of consultancy activities with foreign state authorities or independent agencies and individual HEIs. The Panel took care to explore how consultancy principles were applied in practice during the site visit through discussions with senior staff, inspectors and members of the Council, and by reviewing the contracts between BAC and its consultancy clients. In the majority of cases, BAC had not engaged in both consultancy and accreditation activities with the same institutions. This had, to date, occurred with only one institution. The panel felt obliged to mention this case in the report. On page 14 of the ERR, it is stated: "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 informed that it has worked with governments in Bahrain, Kazakhstan, Kosovo and Singapore in capacity building projects designed to improve the governance and outcomes in further and higher education. The agency has delivered a training programme for all Bahraini HE institutions and staff of the Higher Education Council, and undertook three pilot accreditation inspections. It was explained to the panel, that following the successful conclusion of these inspections, BAC has been contracted to conduct inspections of all the Kingdom's higher education institutions on behalf the Bahrain Higher Education Council. In no case final and/or the legally binding decisions were made by BAC. The panel found no concern in actual implementation of these activities.

As to external quality assurance activities carried directly with higher education institutions, there were two contracts with two institutions, one in Georgia, the other in Hungary. As to the institution in Tbilisi, the task of BAC was centered around capacity building of the staff and advising the institution in order for the HEI in question to comply with the expectations of the National Centre for Education Quality Enhancement (Georgian external quality assurance agency). The panel took particular note that in case of the institution in Budapest, the following declaration was included in the contract: "BAC and the Lead Consultant have no involvement or interest which conflicts or competes, directly or indirectly, with any interest of the government and/or with any duties of BAC or the Lead Consultant".

The Panel took reassurance from its discussions with BAC senior staff that they understood the importance of this separation and had, in practice, implemented such an approach when managing the one instance of both consulting and accrediting. Furthermore, it is helpful to note that in BAC's structure, the Accreditation Committee has responsibility and autonomy for making accreditation decisions, but is not involved in or would necessarily have detailed knowledge of consultancy work undertaken.

The Panel ultimately concluded that the evidence available gave no cause for major concern about BAC's compliance with the part of the guideline in ESG 3.1 about "a clear distinction" between external quality assurance and other activity. However, this did require a significant amount of reflection on the part of the Panel. As BAC develops its international strategy and the potential for further overlap increases, it would be sensible for the management of this activity and for more robustly evidencing compliance with ESG 3.1 if BAC were to additionally codify and document its approach to ensuring appropriate separation of external quality assurance and consultancy activity.

Hopefully, this information supports EQAR's decision making process. The panel also suggests that it may be useful to provide an opportunity to BAC itself to comment on implementation of ESG 2.4 and ESG 3.1.

Should the EQAR's Register Committee have any other questions, the panel is open to respond to them too. Thank you for your attention and consideration.

Sincerely,



*Aurelija Valeikiene, Chair
on behalf of BAC review panel coordinated by ENQA*

REPRESENTATION

to the Deferral of the Application by the British Accreditation Council (BAC) for Renewal of Inclusion on the European Quality Assurance Register (EQAR)

This document contains:

- **Letter** from the Chair and Chief Executive of the British Accreditation Council
- **Representation** to the Deferral of the Application by BAC for Renewal of Inclusion on the European Quality Assurance Register, including detailed response, per Standard, to the points raised by the Register Committee
- **Appendix:** BAC Strategic Documents, including the Action Plan and Risk Register

BAC is fully committed to its application for renewal of inclusion on EQAR and will make available, upon request, any additional evidence required by the Register Committee which can act in support of the claims included herein.

Additionally, as we acknowledge that, due to high-level organisational transformations in BAC, it may be suitable to present the Register Committee with a progress report at the end of 2021 to further consolidate our demonstration of commitment to the Standards and Guidelines for Quality Assurance in the European Higher Education Area (2015) and our affiliations in the European Higher Education Area.

October 2020

For the attention of the EQAR Register Committee

October 2020

Dear President and Committee Members,

Thank you for your letter detailing the Deferral Decision of the Register Committee dated 22 June 2020. We are grateful for the opportunity to express our position and request that you consider the following in support of our renewal application for the European Quality Assurance Register.

In the detailed response below we put forward formal representation to demonstrate that the British Accreditation Council (BAC) is highly committed to building on the review findings from the European Association for Quality Assurance in Higher Education (ENQA) review, that it prioritises its alignment with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG, 2015 version), and that robust actions have already been taken to accelerate the progress needed to ensure key requirements are fully met and allow the British Accreditation Council to continue to be included on the European Quality Assurance Register (EQAR).

Throughout this year, BAC has undergone strategic changes which, we believe, are highly beneficial in our work moving forward, and which strongly resonate with the ambitions of the European Higher Education Area. We are confident we will succeed in embedding a new direction for BAC that demonstrates how its mission to enhance the standards and quality of independent and higher education and training institutions further aligns to the principles of the ESG, and that BAC will continue to benefit from inclusion on the Register.

BAC's new leadership was appointed to facilitate organisational transformation at strategic level, to further explore the potential of BAC's positioning in Europe and internationally, and to streamline development directions to enable more unified and better coordinated operational activities. In the vision displayed by our new Chief Executive, there is increased awareness of the need to prioritise and invest in solutions which have the capacity to relevantly address weaknesses highlighted by ENQA and EQAR, but also build on the good practice identified.


Similar to other organisations across the world, BAC too was affected by the impact of the global pandemic; however, this has not deterred us from continued and sustained action in line with strategic directions approved at the start of the year. Following the initial emergency response, BAC colleagues are now concentrated on embedding new ways of working into our strategic planning as we look to the future. We acknowledge that some of the responses we had planned to make following the publication of our ENQA Review report received in February 2020 have been affected by the governmental lockdown impositions. However, the progress so far confidently demonstrates our commitment to addressing the issues highlighted and we strongly hope can safeguard our position on the Register.

We look forward to hearing from you in due course.

Yours sincerely,

Dominic Scott OBE

Chair
British Accreditation Council



Dr Janet Bohrer

Chief Executive
British Accreditation Council



Representation to the Deferral of the Application by the British Accreditation Council (BAC) for Renewal of Inclusion on the European Quality Assurance Register (EQAR)

The context for BAC has changed fundamentally since the beginning of 2020. A new leadership, new strategic directions and concrete operational priorities are now paving the way for a more robust approach and one that has the capacity to more fully align with ENQA and EQAR requirements.

In what follows we will detail the new context for BAC, the transformational achievements so far, and the impact these have had on ENQA/EQAR requirements. Updates on each of the points raised in the EQAR deferral letter will be systematically provided.

Preamble

During the academic year 2019/2020, BAC appointed a new Chief Executive with a view to facilitating transformational change, both in terms of the vision and strategic priorities, as well as operational activities. With a strong higher education background, the commitment to the European and international affiliations was evident from the very beginning as our newly-appointed Chief Executive conducted a needs analysis and determined the strategic directions for the future. Additionally, to strengthen capacity for the involvement with ENQA and EQAR and to ensure alignment with requirements within the European Higher Education Area, BAC engaged the contribution of an external senior advisor with specific expertise in quality assurance of higher education at European and international levels. It was acknowledged that it would be beneficial for all BAC accredited providers to relate to ESG-driven requirements and that a project to unify BAC activity strands across a variety of providers would be rolled out across the organisation. The dispersed engagement with different providers needed to be addressed and brought together under a philosophy of the BAC community, a network for sharing practices and raising standards for the educational experiences of all students.

The initial needs analysis identified three strategic directions requiring immediate attention:

1. Ways of working within the organisation needed to be streamlined to ensure more efficiency in resource allocation and better business continuity, whereas ways of working with BAC providers needed to ensure increased consistency and more developmental engagements.
2. Digitalisation needed to be accelerated to further facilitate engagement with all relevant stakeholders.
3. Collaboration within Europe and internationally needed to be more robustly placed in focus and opportunities for strengthening BAC's position strategically explored.

Following the receipt of the ENQA report, a thorough analysis was conducted and the directions above were corroborated with priorities highlighted by the ENQA panel. As such actions relating to organisational fitness-for-purpose, more explicit ESG alignment of the HE inspection model, and increased collaborations with international bodies were embedded in strategic planning documentation. A detailed action plan was drafted coupled with a risk register and various events were scheduled to allow for actions to be implemented swiftly and meaningfully with the relevant contribution of stakeholders.

Working on these three priorities in the ways detailed allows BAC to get back on track in developing the strategic plan for the next five years. The Action Plan for 20-21 in Appendix gives detail to the importance BAC attributes to strategic planning and the embedding of our response to the ENQA Review findings.

Needless to say, the pandemic accelerated our digitalisation processes and after the initial emergency response which prioritised the support of our community with pragmatic solution (e.g. FAQs on our website, offering individual discussions for Providers with BAC staff and offering discounts/payment plans for inspections and accreditation fees where Provider business had been seriously curtailed), we are now developing our approach to stakeholder engagement in a hybrid online/face to face mode. We have reviewed our policy on dormancy and are piloting how we move all our processes and inspections online while maintaining a robust approach to quality and standards for the foreseeable future. We are supporting our inspectors with this move to online processes through an online training event in October 2020 and we have offered our Accredited Providers a free facilitated workshop *Building on lessons Learned: From Emergency Response to Planned Action* also in October 2020. We are also currently developing a programme for further webinars and workshops that we will make available to Providers during the rest of 2020-2021.

Response to the Analysis from the Register Committee

Paragraph 6	<i>Other activities, such as consultancy services, are activities outside the scope of the ESG. BAC is however expected to demonstrate that adequate policies and processes are in place to prevent conflict of interest in performing its QA function and that a clear separation exists between such activities and the agency's accreditation activities (see also under ESG 3.1).</i>
Please see response below under 3.1	
Paragraph 7	<i>The Register Committee noted that BAC has signed a Memorandum of Understanding with the Malaysian Financial Accreditation Agency in order to offer a joint accreditation exercise where a provider wishes to seek accreditation from both organisations. As this has not been operationalised at the time of the external review, and thus covered by the review panel, BAC is expected to provide a Substantive Change Report once this activity is operational and ready to be launched.</i>
In 2016, BAC signed a Memorandum of Understanding with the Malaysian Financial Accreditation Agency to offer a joint accreditation exercise. However, no subsequent action was taken. Soon after her appointment in December 2019, the new Chief Executive met with the Financial Accreditation Agency and while acknowledgement was made that we could at some point in the future offer the potential for joint working there appeared to be no actual market interest and therefore this has not been operationalised and is not planned for operationalisation in the foreseeable future. Should the situation change BAC would complete a Substantive Change Report, but currently this activity is on hold.	
Paragraph 11	ESG 2.2 - Designing methodologies fit for purpose <i>The Register Committee thus concluded that the flag related to the involvement of key stakeholders in the development of BAC's quality assurance processes has been addressed.</i>
We appreciate the evaluation by the Register Committee acknowledging that stakeholder involvement has increased and that key stakeholders are present in development activities for BAC's quality assurance processes. To emphasise, this work will continue as we further embed such participation in our various committees (please see response to paragraph 35 below Standard 3.5 Resources) and, more broadly, as we encourage participation in various consultative events, e.g. on the new Standards Framework which aims to become the reference point for multiple BAC methods (please see response to paragraph 24 below).	

Paragraph 14	ESG 2.3 – Implementing processes <i>Having considered the clarification provided, the Register Committee could follow the view of the panel that interim inspections do not require to be carried out in the same way as individual review procedures, i.e. by a group of experts.</i>
Interim inspections are, indeed, part of the follow-up procedure and are organised flexibly depending on the aspects raised by the inspection panel.	
Paragraph 17	ESG 2.4 – Peer-review experts <i>The Register Committee found that the flag was only partially addressed since BAC has not ensured the consistent involvement of students in all its review panels and therefore concluded that BAC complies only partially with ESG 2.4.</i>
<p>The IHE Scheme Handbook (page 4) reiterates the permanent role of the student on the inspection team. Operationally, BAC will now only conduct inspections if a student is available to participate. Explicit responsibility for the oversight of securing student participation is attributed to the Chief Inspector.</p> <p>In the previous academic year 2019-20 and, specifically, since the appointment of the new Chief Executive, consistent involvement of students has been recorded. There have been 12 International Higher Education Inspections which were a mixture of new accreditation and re- accreditation and all were undertaken with a team of at least two inspectors one of which was consistently a student.</p> <p>Additionally, since November 2019, 12 students were recruited and trained allowing us to draw from a broader pool when forming teams, thus stabilising availability of students for panels. We have now also instituted a system of monitoring availability requests and responses by students to ensure we are fully aware when additional recruitment and training may become necessary.</p> <p>We recognise that the contribution of students to inspections is well appreciated and allows for a more balanced approach across the inspection team. Feedback on student participation to panels is recorded and analysed for training purposes.</p> <p>Students also regularly participate in Stakeholder and Inspector events consolidating their knowledge and experience of the inspection processes.</p>	
Paragraph 22	ESG 2.6-Reporting <i>Considering the above mentioned shortcomings, the Register Committee could not follow the panels' conclusion of (substantial) compliance but found that BAC complies only partially with standard 2.6.</i>
<p>BAC has committed to more transparency and more public accountability and the new strategic priorities set are a guarantee of this commitment. BAC publishes negative reports on its website, as a matter of course, however no such outcomes have been recorded since April 2019.</p> <p>In regards to the shortcomings of the reporting format, in the short-term the following updates are proposed and have been considered for the revision of the Report Template: (1) identifying inspectors by name and title, (2) introducing an executive summary, (3) introducing non-binary assessment markers, and (4) evidence referencing throughout the text as numbers in brackets in the relevant paragraphs, coupled with a full list of evidence compiled and included as an Annex to the Report. The changes to how evidence is referenced and recorded will explicitly allow for a stronger link and more transparency between the findings and the evidence which underpins these findings, making Reports more accessible to our varied audiences. The Report template is currently being updated</p>	

and the changes are being recorded in the Report Writing Guidelines. Additionally, the associated training webinar that all inspectors have to complete is also being amended to reflect these changes. It has also been agreed that BAC will now require Inspectors to include more evaluative (rather than descriptive) text in the Comments sections and the Inspectors Handbook is being updated to provide guidance in this respect. The Chief Inspector has responsibility for the oversight of the Report update process.

A full redraft of the Report template will be considered as part of the methodological unification project (please see Strategic Objectives 2 and 3 in Action Plan) which is currently ongoing, and has started with the Standards Framework revision. Once the Framework is complete and applicable for the various methods (target date Sept 2021), the operational documentation for the implementation of the methods will be revised (following a consultation process), including the reporting format. This is likely to be completed in autumn 2022 (please see Action Plan). At this point, we anticipate that more emphasis will be placed on the internal quality assurance (IQA) processes of institutions, with relevant indicators directly contributing to the detailed scrutiny of IQA and the Comments textbox including evaluative text specifically targeting IQA arrangements.

Paragraph 28

ESG 3.1 – Activities, policy and processes for quality assurance

In light of the lack of a long term strategic planning, the limited involvement of stakeholders within the organisations work and the need to improve measures against conflicts of interests from the agency's consultancy work, the Committee was unable to concur with the panel's conclusion of (substantial) compliance, but considered that BAC only achieved partial compliance with the standard.

23. Regarding the involvement of stakeholders in the governance and work, the Register Committee noted that BAC's Accreditation Committee includes a student member. The rotating attendance system, however, substantially limits the role of this member to participate and gain experience on par with other Committee members.

The Standing Committee agreed the process of regularising the use of students on the Accreditation Committee from the current system of rotating attendance between different students to one of a permanent student member. We are in the process of recruiting for this role and expect to have a student in post by January 2021. This timeline was also determined by the start of the new academic year.

24. Considering the agency's goals and their translation into the daily work of the agency, the review panel noted that while it was provided with a strategic plan for 2015-2018, that no further documentation of implementation was prepared during the lifespan of the strategy. The review panel added that it did not see evidence of staff and stakeholder involvement in the development of BAC's Interim Strategic Plan, or how it was explicitly driving the work of the organisation.

BAC appointed a new Chief Executive with a view to facilitating transformational change, both in terms of the vision and strategic priorities, as well as operational activities. At the beginning of 2020, the new Chief Executive conducted an initial needs analysis, identified three major strategic priorities which were endorsed by the Standing Committee and developed a detailed action plan and completed a risk register. Various events were planned and stakeholder engagements were organised to support the implementation of concrete action lines.

The implementation of the new strategic directions (as per the Action Plan) started with the first BAC stakeholder event held 23rd January 2020. The attendance of over fifty delegates at this event included BAC Accredited Providers from the UK and overseas, BAC inspectors, BAC staff and BAC Council members all of whom bring a wide range of external experience and perspectives to BAC's work. Related agencies including the Department for Education,

UK NARIC and the British Council were also involved. The event also confirmed the conclusion of the needs analysis and steered the way for a paper presented at Council soon after promoting the philosophy of the BAC Community and detailing the three key future priorities for BAC, as listed above.

The paper to Council on 6th February 2020 outlined the necessity of completing a fundamental review of the BAC Standards which influence the detail of the methods of all different BAC inspection schemes. Discussion with Council at the February meeting endorsed the conclusion of the advisability of bringing the common aspects from all the standards from across the BAC schemes into one Standards Framework but Council cautioned that this needed to be completed without undermining the excellent reputation and confidence in our current processes that Providers already had and they had seen first-hand expressed at the Stakeholder event. The advantage of having a unified Framework they agreed was of being more transparent as to how an Accreditation from BAC was assured even when derived from the outcomes using one of a number of different inspection schemes. The flexibility of having different inspection methods for different types of Provider was considered by Stakeholders a strong asset of BAC.

Following the Council meeting the Chief Executive commissioned a facilitated workshop about Standards developed by an external expert in professional and vocational education for BAC staff. An outline for a framework based on Principles common to BAC and derived from all BAC inspection schemes was identified as a pragmatic way forward. An analysis of all the common standards across all schemes was completed by the Acting Accreditation Manager in May/June 2020 and paved the way for the BAC inspection processes to move online during the pandemic crisis and is further providing the evidence from which a consultation paper is being developed for creating a set of common Principles (aligned to ESG) which will form the core of the BAC Standards Framework going forward. The paper is due to be ready for consultation with BAC Stakeholders during the Autumn of 2020. The response to how BAC further develops the Framework will influence how the various Schemes may have to be revised in the future, what support needs to be offered to providers to allow them to successfully migrate to the new arrangements and how outcomes will be communicated to the public. We anticipate that this project will reach relevant milestones over the course of 2021.

27. The Register Committee was not fully reassured by the panel's assessment, and underlined that agencies are expected to take appropriate precautions to prevent any conflicts of interest arising from the consultancy or other forms of activities they carry out that relate to issues covered by the ESG, and publish the respective measures or principles on their website.

Precautions for conflicts of interest are well managed and clearly regulated by BAC. As such, BAC Inspectors and all our Committee and Council members complete an annual conflict of interest declaration. BAC also identifies further conflicts of interest before each inspection as the inspection team must complete an individual declaration before they undertake an inspection.

Any BAC Consultancy work that took place was well documented in the ENQA Review Report such as the work for the Bahrain Higher Education Ministry and the appropriate checks and balances between any Consultancy work and Inspection work rigorously maintained.

In the past, BAC could facilitate consultancy arrangements for providers (in practice this only happened once, as recorded in the ENQA report), but BAC took no active part in the consultancy. We are currently reviewing our position in respect such facilitation and, should we decide this work may continue, we will publish measures used to prevent conflicts of interest.

Paragraph 32	ESG 3.4 – Thematic analysis <i>The Register Committee thus concurred with the panel that BAC complies only partially with ESG 3.4.</i>
	<p>The thematic analysis conducted in 2019 was the first of its kind and attempted to summarise the findings from various reports so as to highlight trends across the different provider profiles. We accept that, as an initial exercise, the detail of the structure, the accessibility of the format and the depth of the content can be improved to better serve priorities of BAC and its providers. With the lessons learned, BAC has now contracted a more detailed, better focussed and more meaningful thematic analysis which will be produced for January 2021. As part of the major transformational work rolled out, BAC intends to use the thematic analysis and the emerging patterns of practice across BAC-accredited providers towards multiple aims: (1) to confirm the Standards Framework and the indicators which providers should meet through their quality processes, (2) to determine the content of supplementary guidance which needs to be elaborated for the successful implementation of the Framework, and (3) to design additional mechanisms in which it may support its providers (including dedicated workshops and/or capacity building event on specific themes), as well as the seed-funding initiative meant as a platform for provider projects and practice sharing.</p> <p>The results of the analysis will be presented to the 2nd BAC stakeholder event planned for 25 January 2021 where the implications of the findings will be discussed with participants.</p>
Paragraph 35	ESG 3.5 – Resources <i>Considering the stability in the operational delivery of its core business, the Register Committee was able to conclude that the flag was sufficiently addressed and thus concurred with the panel's conclusion that BAC (substantially) complies with ESG 3.5.</i>
	<p>In December 2019, BAC appointed the new Chief Executive who is now leading on transformational change and revaluation of job roles to further increase the stability of the operational delivery and to propose realistic areas of growth.</p> <p>BAC has also appointed a new International Member to Council, Esther Heurtas Hidalgo, from the Catalanian Quality Assurance Agency and an International Member to the Accreditation Committee Dr Olgun Cicek currently working on sabbatical from Cyprus at the University of South Florida. Along with two other new Council members they all attended online induction events which were held in May 2020 and the new members have been attending Council and Accreditation Committee since then.</p> <p>BAC is also now in the process of advertising and interviewing for two new members to join the Accreditation Committee to act as Deputy Chair and as a permanent student member of the Committee to replace the rotating students that currently attend Accreditation Committee. These new members will be in post by the January 2021 meeting.</p> <p>Additionally, BAC has engaged the collaboration of an international quality assurance expert, Professor Anca Greere, to act as an external senior advisor to contribute to the strategic organisational developments and to support BAC's affiliations to European and international structures, including ENQA and EQAR.</p> <p>BAC continuous professional development actions are now determined by strategic priorities and staff and Council members are taking advantage of the online events such as EQAF and INQAAHE conferences. A register of BAC staff and Council members CPD is maintained by the BAC Administrator.</p>

Conclusion

We aim to continue with our developments as described in the Action Plan inserted below and are fully committed to the EHEA agenda.

We hereby kindly request that the Register Committee consider the details provided above in finalising its decision in regards the renewal for BAC's inclusion on the EQAR Register. We hope that the above will serve to sufficiently clarify BAC's activities at the present moment and its plans for the future. We strongly believe these are compatible with broader directions taken by ENQA and EQAR and we are committed to further aligning to all requirements through the actions we take.

The claims made above can be supported by additional, specific pieces of evidence and BAC will provide these for the attention of the Register Committee should this be requested.

STRATEGIC PLANNING

BRITISH ACCREDITATION COUNCIL

Context

The change in BAC leadership from Oct 2019 and the global pandemic from March 2020 meant both the direction for BAC and the anticipated timeline for actions changed.

The new BAC Chief Executive took up her new role in Oct 2019 just after the completion of the ENQA review and before the report was finalised. Her immediate analysis of the organisation's strengths: its professional approach to working with providers; the flexibility of its schemes and the well documented procedures which allowed for the assessment of a wide range of types and size of BAC Accredited providers. The analysis also demonstrated the weaknesses. BAC's detailed processes had become complex and the resultant matrix of standards made it difficult to clearly articulate BAC's purpose. It also limited the ability to promote an overall BAC Stakeholder Community that could share practice effectively and support the systematic raising of standards. A lack of the coherence to the BAC Community potentially restrained meaningful growth both in terms of the numbers of Providers accredited and the extent of BAC's activities in other countries. Influenced by the constructive findings from the external ENQA review this all helped to shape the new direction of travel for BAC.

BAC Strategic Priorities

It was made clear from Providers at the first BAC stakeholder event in January 2020 that BAC needed to concentrate on developing community facilitating the ability to share practise between BAC stakeholders and influencing the quality assurance debate for independent and further and higher education both in the UK and beyond. Not only was this important to Stakeholders it would ultimately support the raising of standards by BAC Providers. It was agreed at the Stakeholder event that the event should become an annual affair. BAC is committed to investing in future annual events.

Feedback from the event and other discussions culminated in three strategic priorities presented to BAC Council at the Feb 2019 meeting.

BUSINESS STRAND	DIGITAL AND ENGAGEMENT STRAND	GLOBAL STRAND
Priority 1: To develop our ways of working	Priority 2: To develop how we engage, particularly digitally	Priority 3: To develop our work in Europe and Internationally
<ul style="list-style-type: none"> requires a <i>review</i> of the fundamental basis of our business <i>our Standards</i> which in turn will influence the detail of our methods of inspection and reporting. 	<ul style="list-style-type: none"> requires an update of our systems making information more transparent and supporting/developing online activities for our Providers and our Inspectors. requires a platform by which we can <i>promote community</i>. 	<ul style="list-style-type: none"> requires a proactive (not reactive) approach to opportunities in different sectors and regions

Update on Progress

Central to delivering these priorities was the re-evaluation for the future fitness of the BAC Standards. To support strategic growth a better positioning of those Standards is needed to be able to align more closely with other European and International contexts. A series of planned work activities to consider the approach was started and halted because of the pandemic in March 2020. After the initial emergency responses to support BAC providers a review of the BAC standards used across BAC schemes and that were common to all was undertaken in Spring 2020. This paved the way to the immediate pandemic response of moving all BAC processes online. This complete move to online was considered a short-term solution with a more hybrid approach to site visits envisaged into the future. This is impossible to develop at present because of the current UK government guideline for Covid-19 secure working and for international travel. The analysis of the standards across all BAC schemes allowed for the re-evaluation to be picked up again from Autumn 2020 with a planned outcome from that review expected for discussion at the next Stakeholder forum in 2021. The re-evaluation is expected to endorse 10-15 core BAC Principles to be embedded in every BAC scheme and disseminated to individual scheme processes through the standards of that scheme. The Principles will closely align to the ESG and, once agreed, will influence the Scheme reviews and subsequent reports. It is planned that these will be launched and processes discussed with inspectors at their next inspectors event in April 2021 and embedded during summer 2021 for use from 2021-22. The impact of this re-evaluation is to give clarity to BAC accreditation across all BAC Providers producing a coherence to the BAC offer while retaining the flexibility that different schemes allow for different types of independent higher and further education institutions.

Further support to the development of the BAC Community is the embedding of the Thematic Review Work commenced with initial discussion in March 2020. They are now to be led by Prof Anca Greere during the Autumn of 2020 with the findings being distributed at the January 2021 stakeholder event. Those findings will influence the development of the new Seed funding activity for BAC providers the details of which will be finalised during 2021 and launched at the January 2022 Stakeholder event. The seed funding suggestion was highlighted in the Council paper of Feb 2020. It is expected that BAC will invest from its reserves approx. 50,000 GBP over the strategic plan period to support small projects by providers and shared with the BAC community to enhance teaching and learning practice.

As with any quality assurance agency the most important resource is its staff. BAC is committed to supporting staff with their development encouraged participation in sector wide events and training opportunities. In order to support the ambitious programme of meeting the BAC strategic priorities as detailed in the action plan attached a job evaluation is expected to take place in late Autumn 2020. This will make sure that the new skills and task allocations developed in response to the crisis management of the pandemic are properly reflected in individual staff job descriptions. The regularising of staff contracts with any new responsibilities may mean a slightly different organisational structure will follow. This is expected to strengthen the capacity of the BAC staff group as a whole while continuing to support individuals to perform at the high levels BAC expects.

The detail of this work is outlined in the attached action plan and by following this plan BAC has produced the space for the development of the next strategic plan to be consulted on during the summer of 2021 and published by September 2021.

ACTION PLAN 2020-2021

BRITISH ACCREDITATION COUNCIL

Area	Objectives	Action steps	Deliverables	Target dates	Assigned to	Success measures	Status/ Progress
STRATEGY	1. Developing and reinforcing BAC strategic directions	<ul style="list-style-type: none"> Conducting a needs analysis Identifying key priorities Consultation with stakeholders Developing an action plan Revising the risk register MILESTONE: Action Plan sign-off	Stakeholder event (01/20) Paper to Council (02/20) Staff workshops (02/20; 03/20 - delayed) Action Plan to SC and Council (10/20) Risk Register to AC (10/20)	Oct 2020	Chief Executive AP supported by Senior Advisor (External) RR supported by Finance Officer and Finance Advisor	<ul style="list-style-type: none"> Endorsed by Standing Committee and Council Used to inform all operational developments, including resources and partnerships 	COMPLETED All deliverables –completed AP to be presented to SC and Council RR to be presented to Audit Committee
	2. Revising the Standards Framework to apply for all BAC schemes	<ul style="list-style-type: none"> Analysis and mapping of current schemes Thematic analysis of accreditation reports Consultation with stakeholders Dissemination Evaluation MILESTONE: Standards Framework sign-off	Mapping Document (06/20) Survey/Focus groups (12/20) Thematic report (01/21) Launch (summer 21) Inspectors briefing (04/21)	Sept 2021	Acting Accreditation Manager supported by Chief Executive	<ul style="list-style-type: none"> Website publication by summer 2021 Demonstrably embedded into methodologies by summer 2022 	ONGOING Mapping-completed Thematic report -contracted Consultation event - booked
	3. Unifying Schemes under the revised Standards Framework	<ul style="list-style-type: none"> Revising Method Handbooks and Guidance Organising Dissemination events MILESTONE: Updated Handbooks sign-off	Revised Handbooks and Guidance(09/21) Briefing events (10/21)	Oct 2022	Chief Inspector supported by Chief Executive	<ul style="list-style-type: none"> Endorsed by BAC Council Published on the web site Maintaining BAC Accredited Providers (possible growth depending on international situation) 	NOT STARTED Interdependency with Strategic Objective 2. To start late spring 2021

Area	Objectives	Action steps	Deliverables	Target dates	Assigned to	Success measures	Status/ Progress
STRATEGY (cont.)	4. Strengthening the BAC community through national, European and international initiatives.	<ul style="list-style-type: none"> Engaging more in global QA debate Organising platforms for sharing of practices Further aligning with ENQA/EQAR Reinforcing strategic collaborations (British Council, UKNARIC, UKCISA, INQAAHE) MILESTONES: ENQA & EQAR renewals MoUs	Provider capacity building/training programme Seed funding projects for providers ENQA membership EQAR membership Consolidated Partnerships	Dec 2021	Chief Executive supported by Senior Advisor (External)	<ul style="list-style-type: none"> Retaining ENQA/EQAR status MoUs signed growth and variety of work in the EHEA and internationally 	ONGOING ENQA membership – confirmed 1 st provider workshop - delivered
GOVERNANCE	5. Reviewing and maintaining of Committees <ul style="list-style-type: none"> <i>Council</i> <i>Standing Committee</i> <i>Audit Committee</i> <i>Accreditation Committee</i> 	<ul style="list-style-type: none"> Recruiting new members, as necessary Inducting new members MILESTONE: New members in post	Committee composition complete and functional	Ongoing As per BAC Articles of Association, Committee membership is limited and must be reviewed regularly.	Chief Executive	<ul style="list-style-type: none"> Membership to meet BAC requirements for 'not for profit' status and registration with the Charities Commission. Membership to meet ESG requirements 	ONGOING Two international members – recruited to Council & AC National members renewed or replaced - completed Permanent student member- currently being recruited to Deputy Chair AC – currently being recruited to
INSPECTIONS	6. Maintaining and digitalising inspectorate	<ul style="list-style-type: none"> Consulting with inspectors and providers Piloting online mode Briefing and training inspectors for online Updating documentation Using online platforms more effectively 	Papers to Council (06/20; 10/20) Handbooks/Guidance updated (10/20) Inspector training + webinars (10/20) Annual inspector contracts + Conflict of Interest (11/20) Online inspections	Oct 2020	Chief Inspector	<ul style="list-style-type: none"> Inspections moved online Full programme of workshops/training for BAC accredited providers 	ONGOING Online inspection pilot – completed Inspection briefing - scheduled
	7. Scheme Reviews See Strategic Objective 3.	<ul style="list-style-type: none"> Launching ODBL revised scheme MILESTONE: ODBL operational	Scheme Document	Sept 2020	Acting Accreditation Manager	<ul style="list-style-type: none"> Providers reviewed against ODBL 	COMPLETED For other schemes to be conducted on completion of Strategic Objective 2.
	Thematic analysis	To inform Strategic Objective 2					

Area	Objectives	Action steps	Deliverables	Target dates	Assigned to	Success measures	Status/ Progress
OPERATIONS	8.Re-evaluating job posts and responsibilities	<ul style="list-style-type: none"> Ensuring continuity (as a result of maternity/sickness and the pandemic) Reviewing staff job descriptions <p>MILESTONE: New job roles are operational</p>	Job roles mapped to current activities New contracts signed	Jan 2021	Chief Executive supported by the Acting Accreditation Manager	<ul style="list-style-type: none"> Staff evaluations completed and change to contract notifications issued More effective work allocations and increased job security 	<p>ONGOING</p> <p>Evaluation of roles – completed</p> <p>Contract negotiations - ongoing</p>
	9.Annual Audit of financial accounting	<ul style="list-style-type: none"> Conducting online annual audit <p>MILESTONE: Accounts lodged</p>	Accounts complete External Financial Audit (11/20)	Feb 2021	Finance Officer supported by the Financial Advisor and Chief Executive	<ul style="list-style-type: none"> Legal requirement to lodge accounts with companies house met 	<p>ONGOING</p> <p>Annual Financial Accounts - in preparation</p>
	10.Securing premises including H&S	<ul style="list-style-type: none"> Sourcing new optimal premises (due to non-renewal by current Landlord) Sending Heads of Terms arrangements to lawyers Risk assessing against Health and Safety frameworks and against the new covid-19 secure guidelines for offices issued by the UK government August 2020 Taking occupation of new office <p>MILESTONE: Office move in</p>	Legal formalities complete Office operational and safe	Dec 2020	Chief Executive	<ul style="list-style-type: none"> Office safe from Covid-19 Office appreciated by staff and external collaborators 	<p>ONGOING</p> <p>Premises - sourced</p>

The British Accreditation Council Risk Register

The BAC Risk Register is owned by the Audit Committee and reported to Council as a Standing Agenda item. This Risk Register was last reviewed April 2020 in light of the Pandemic CONVID-19 and actions taken to mitigate the risk

“BAC trustees, committee members and staff will consider risks with the aim of ensuring, as much as is practically possible, that the Objectives, Values and Mission are strengthened and enhanced but also ensure that BAC fulfils its Objects and Mission. BAC trustees, committee members and employees recognise that accepting risk is inherent in its work, but it is incumbent on all decision makers to consider when discussing or taking strategic or material decisions, i.e. a decision which may have an impact on the performance or reputation of the organisation, the potential risks in light of BAC Objects, Values and Mission”

Updated: 10 September 2019

The Risk Register is colour coded to easily identify potential risks. Green indicates the likelihood combined with the impact of an event occurring is considered to be relatively low given **current** controls. A green coded risk may become an Amber or Red risk if circumstances change and the likelihood or impact changes.

Amber coding suggest that the risk is considered possible and its impact will materially affect BAC activity.

Red coding would suggest that it is likely the risk will materialise, and it will have a severe impact. Red coded risks would suggest immediate mitigation strategies are prepared or implemented (if possible).

Risk dashboard

The Risk Dashboard sets out the mechanism BAC uses to assess risk and helps to immediately identify high level risks,

We do this by assigning values to the likelihood of a risk occurring and the perceived impact it will have on the organisation.

Likelihood	Frequency	Value
Unlikely	Can reasonably be expected to occur in the organisation or in similar organisations once or twice every 10 years	1
Possible	Has occurred in this organisation in the past ten years or occurs regularly in similar organisations, or is considered, to have a reasonable likelihood of occurring in the next few years	2
Likely	Occurs relatively frequently in this organisation, or similar organisations, or circumstances are such that it is likely to happen in the next few years	3
Almost Certain	Occurs frequently and circumstances are such that it is almost certain to happen.	4
Impact	Descriptor	Value
Small	There is little financial, reputational or operational impact	1
Medium	There will be a minor impact on finances, some reputational damage may occur, and operations will be affected. However, damage can be recovered in the short term	2
Severe	There will be a serious impact on finance, reputational damage and operations which will not be recoverable in the short term	3
Catastrophic	There will be a severe impact on the finances, reputational damage and the organisation will face difficulties in operating. The organisation is unlikely to recover in the medium term	4

Calculating Risk

In order to calculate risk, the Likelihood is multiplied by the Impact to develop our Risk Matrix.

Impact ↑	4	8	12	16
	3	6	9	12
	2	4	6	8
	1	2	3	4
	Likelihood →			

A risk with a value which is within the green area of the Risk Matrix is acceptable although this does not mean that no action should be taken.

Green would suggest the organisation is comfortable with the risk Amber means a risk is of concern and needs to be monitored closely and Red implies a potential existential risk.

With all risks there are ways of reducing exposure even if the solution might be very long term.

There are effectively four ways of dealing and controlling risks:

- 1) Preventative (or Terminate)** - we try to limit the possibility of the risk occurring either through very strict oversight or by reducing the impact of the risk. In some cases, this might take a considerable amount of time to achieve.

Risks that are tagged as RED would fall into this category. An example would be a change in immigration rules that removed Short Term Visa status for accredited BAC providers. A long-term solution would be to diversify BAC activities to lessen the risk but in the short term everything should be done to make sure that BAC is seen as a reliable partner by the government. In this instance there is no way to eliminate the risk, although in the long term its impact can be reduced, but it should be reported on regularly.

These risks need to be closely monitored and if they cannot be mitigated against immediately a plan should be implemented to reduce risk in the medium to long term.

- 2) Corrective (Treat)** - We put in place controls to limit the scope of loss. Typically, this would be insurance cover, ensuring we have online backups of our data etc.

Risk that fall into this category will either be amber or green.


Amber risks should be reported on regularly to ensure they are being dealt with and they do not become high risk.


An independent and regular Health and Safety audit would be a good example of treating or correcting the risk of serious employee injury. We also have extensive insurance cover in case one of these risks materialises


- 3) Directive (Transfer)** – this is where we either get someone else to take the risk or and more realistically, we impose working procedures and systems which limit the likelihood of the risk occurring. An example of this is the BAC phone subsystem which is managed by an external company. If there is a problem with our phones, they are responsible for fixing it. Other examples will include financial procedures, accreditation procedures, inspection guidance and so on. BAC makes extensive use of this risk management strategy. These risks are likely to be classified as Green or Amber.
- 4) Detective (Tolerate)** – these controls are designed to pick up a problem after the event. Such risks tend to be relatively minor although their cumulative effect could be very significant. A good example of this type of control is the use of BAC feedback statistics where we gather information from institutions and inspectors on the efficiency of our inspection activities. BAC has a number of such controls built into its governance systems including the work of the Accreditation Committee, Audit Committee, external Auditors, etc.


Many of the risks associated with this type of control would typically be classified as Green risks



The Risk Register – Updated September 2019



Identified Risk	Likelihood	Impact	Risk Rating	Is the likelihood and impact of this risk increasing or decreasing?	Why?	Color Code	What are we doing to manage the risk?	Person(s) Responsible for overseeing risk mitigation
CHANGE IN GOVERNMENT SHORT TERM STUDY STUDENT VISA REGIME (STSV)	Unlikely	Catastrophic	4	 Decreasing	Government policy appears to be shifting in favour of a more liberal student immigration policy		<p>BAC has developed a range of value-added products including webinars and the Marketing Pack to attract and retain providers and reducing susceptibility to withdraw in the extreme event of BAC losing its STSV status;</p> <p>BAC has significantly increased due diligence in accepting new and reaccreditation applications and developed and implemented a more rigorous inspection process in order to build and maintain confidence in the inspection and accreditation process.;</p> <p>We are diversifying income streams to reduce reliance on the UK market and limit the impact of an unexpected change in government policy</p>	Chief Executive



LOSS OF KEY STAFF	Certain	Medium	8	 Increasing	BAC staff are increasingly approached by other employers.		<p>We have developed Standard Operating Procedures (SOPs) for common processes so that other members of staff can take over when a staff member leaves BAC;</p> <p>We have improved the quality of training to disseminate skills and good practice within the organisation;</p> <p>We have improved internal communication within the organisation to help engage staff;</p> <p>We are working to offer staff the opportunity to work on across the organisation, so they develop their knowledge and skills across all BAC processes and increase BAC's resilience;</p> <p>We are adopting a more entrepreneurial operating environment offering increased responsibility for all staff;</p> <p>Pay and other fiscal rewards are competitive with competing organisations and where possible we have adopted a flexible working policy.</p>	Chief Executive
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FINANCIAL LOSS ARISING OUT OF FINANCIAL IMPROPRIETY	Unlikely	Catastrophic	4	 No Change			<p>BAC maintains a large financial reserve equivalent to 18 months of operating costs;</p> <p>BAC has extensive and transparent financial controls and has chosen to adopt an external auditing policy which exceeds legal requirements</p> <p>BAC has independent auditors who have a reputation for independence and rigour</p> <p>There is a division of responsibility with the Finance Section and we have a BAC external auditor scrutinizing BAC finances and budgets</p>	Chief Executive Audit Committee
COMPETITION INCREASES IN THE QUALITY ASSURANCE ARENA	Almost Certain	Severe	12	 No Change			<p>BAC conducts regular reviews of BAC processes to ensure they meet the needs of external stakeholders;</p> <p>BAC continues to develop products and processes to ensure they remain world leading in terms of quality assurance;</p> <p>We are working to improve the BAC profile in all markets in which we operate;</p> <p>We have built and continue to build and develop links with stakeholders through webinars,</p>	Chief Executive Accreditation Manager and Higher Education Manager

							<p>the Newsletter and the Provider Journey;</p> <p>We maintain strict cost controls to allow competitive prices to be offered to existing and new providers.</p> <p>We are Increasing investment in developing and promoting BAC across all markets</p>	
REPUTATIONAL DAMAGE ARISING OUT OF INAPPROPRIATE ACTIVITY OR BEHAVIOUR	Possible	Severe	6	 <p>No Change</p>			<p>BAC has embedded integrity and transparency across all activities;</p> <p>All BAC representatives are DBS checked when working with under 18s;</p> <p>BAC has produced clear inspection guidelines and conducts monitoring inspections to ensure they are adhered to;</p> <p>The Bribery and Anti-Corruption policy is strictly enforced and monitored;</p> <p>BAC adheres to all aspects of competition law and all staff, trustees and committee members fully understand CMA requirements;</p> <p>There is ongoing training of all BAC staff and associates to embed and instill the values and expectations of the</p>	<p>Chief Executive</p> <p>Chief Inspector</p> <p>Accreditation Manager</p> <p>Higher Education Manager</p>

							<p>organisation;</p> <p>BAC has the necessary legal insurance requirements and professional indemnity cover to provide financial support in the event BAC is accused of acting inappropriately.</p>	
CATASTROPHIC INFRASTRUCTURE FAILURE	Possible	Medium	4	 No Change			<p>Almost all data is now backed up offsite with very limited held only in the BAC offices;</p> <p>Key IT infrastructure is now in the Cloud with greater security and multiple backup processes</p> <p>In the event of damage to premises BAC telephone services can be rerouted to temporary accommodation</p> <p>Financial information is now held in the Cloud via Sage and is considered to be as secure as is feasibly possible for an organisation of BAC's size.</p>	<p>Chief Executive</p> <p>Finance Officer</p>
LEAVING THE EU WITHOUT A DEAL	Likely	Medium	6	 No Change			<p>We maintain awareness of the political debate</p> <p>We have identified possible outcomes of different scenarios</p> <p>We are working to forge links with the Home Office to influence the debate on student visas – particularly Short-Term Study Visas</p>	Chief Executive

							We review the impact of possible scenarios on a regular basis to monitor the impact on BAC accredited institutions	
INTERNATIONAL RECESSION	Likely	Medium	6	 Increasing	Leading economic indicators suggest a recession is increasingly likely in the UK, Europe, USA and China.		We maintain awareness of leading economic indicators. We maintain close links with the sector to monitor sector feedback We continue to provide added value activities thereby increasing the value of BAC accreditation We continue to communicate the value of accreditation to BAC providers, educators, students and governments	Chief Executive Accreditation Manager Higher Education Manager
REGULATORY FRAMEWORK CHANGES	Likely	Medium	6	 No Change			We maintain awareness of the political debate We identify possible outcomes of different scenarios We review the impact of possible scenarios on a regular basis to monitor the impact on BAC accredited institutions or on the impact on BAC's right to conduct accreditation activities.	Chief Executive

SIGNIFICANT AND PROLONGED DOWNTURN IN STOCK MARKETS NEGATIVELY IMPACTING BAC INVESTMENTS AND REDUCING CAPITAL TO INVEST	Likely	Medium	6	 Increasing	<p>BAC investments have lost value over the past year. The UK stock market indices are lower than last year.</p> <p>The increased likelihood of recession will mean lower stock market prices <i>ceteris parabus</i></p>		We take expert advice on management of BAC investments	Chief Executive Audit Committee
LOSS OF ENQA MEMBERSHIP/ EQAR LISTING	Possible	Catastrophic	8	 No Change			<p>We have given responsibility for ENQA/EQAR oversight to a designated member of staff who reports directly to the Standing Committee on ENQA/EQAR compliance.</p> <p>We give the member of staff the necessary time and resources to attend ENQA events and to keep up to date with ENQA/ EQAR membership/ listing requirements</p> <p>We review BAC procedures to make sure they are ENQA and EQAR compliant on a regular basis and we follow these requirements through strategic planning initiatives.</p>	Chief Executive Higher Education Manager