

**Approval of the Application
by the British Accreditation Council for Independent
Further and Higher Education (BAC)
for Inclusion on the Register**

Register Committee

Ref. RC15/A24

Ver. 1.0

Date 2015-06-05

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Application of:	11/03/2015
External review report of:	January 2015
Review coordinated by:	ENQA
Review panel members:	Marion Coy (chair), Janja Komljenovic (secretary), Henrik Toft Jensen, Mateusz Celmer, Nora Skaburskiené
Decision of:	29 November 2014
Registration until:	31 January 2020
Absented themselves from decision-making:	none

1. The application of 11/03/2015 adhered to the requirements of the EQAR Procedures for Applications.
2. The Register Committee considered the external review report of January 2015 on the compliance of BAC with the European Standards and Guidelines (ESG¹). The Register Committee found that the report provides clear evidence and analysis of how BAC complies with ESG.
3. The Register Committee considered the commentary on the external review report provided by BAC.
4. The Register Committee sought and received further clarification from BAC.

Analysis:

5. **In considering BAC's compliance with the ESG, the Register Committee only took into account accreditation of higher education institutions in the UK and abroad. The accreditation of other education providers is not within the scope of the ESG and, thus, not pertinent to the application inclusion on the Register.**
6. With regard to the specific European Standards and Guidelines, the Register Committee considered the following:

¹ The application was made before adoption of the 2015 version of the ESG. It has therefore been considered on the basis of the 2005 version of the ESG, and all references refer to that version.

ESG 2.2 – Development of external quality assurance processes

7. The Register Committee noted the review panel’s observations that the agency did not sufficiently consult the key stakeholders in developing its procedures, standards and criteria. The Register Committee concurred with the panel’s view that the nature of BAC’s sector does not as such prevent increased consultation.

8. The Register Committee was unable to concur with the review panel’s conclusion of “substantially compliant” and considered that BAC currently only partially complies with the standard. The issue has therefore been flagged.

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ESG 2.4 – Processes fit for purpose

9. The Register Committee considered that the review panel’s analysis demonstrates that BAC’s processes in accreditation of higher education providers are in general fit for their purposes.

10. The Register Committee considered that the review panel’s concerns regarding the lack of students on inspection teams and the number of inspectors deployed in each accreditation actually relates to standard 3.7; these issues are therefore addressed below.

11. The Register Committee concurred with the panel’s view that it would be desirable if BAC involved international experts, as suggested by the guideline to standard 2.4. The Committee, however, noted that this is one element of the guidelines, but not prescribed by the standard.

12. The Register Committee noted the observations regarding the use of BAC’s logo by institutions. While the Committee assumed that BAC will take into account the points raised by the panel, it did not consider the matter relevant in determining compliance with the present standard.

13. In view of the above and considering that certain issues are addressed under standard 3.7, the Register Committee did not concur with the panel’s conclusion of non-compliance but considered that BAC does comply with the standard.

ESG 2.5 – Reporting

14. The Register Committee noted the review panel’s analysis and BAC’s comments thereon.

15. The Register Committee noted that BAC’s website was updated since the external review took place. At least based on the current website, the Committee was unable to follow the review panel’s concerns regarding the accessibility of reports, since they were easy to find.

16. The Register Committee concurred with the panel’s concern that reports with a negative accreditation outcome are not published. The Register Committee did not follow BAC’s argument that there would be

“no overriding interest in public notification of unsuccessful applications” due to the voluntary nature of BAC accreditation and the competitive environment in which it operates. On the contrary, the Committee considered that especially in an unregulated environment, where institutions may continue to operate and offer their programmes despite an unsuccessful application for accreditation, it is vital to ensure full transparency for potential students.

17. The Register Committee underlined that the ESG require the publication of reports without making any specific exceptions or qualifications. The issue has therefore been flagged.

ESG 2.8 – System-wide analyses

18. The Register Committee concurred with the panel’s conclusion that BAC is only partially compliant with the standard. The issue has therefore been flagged.

ESG 3.4 – Resources

19. The review panel found that the central administration of BAC was in need of additional appropriately qualified professional staff. Given the volatility of BAC’s workload and the currently small number of reviews in higher education, the Register Committee considered that it will depend on the future development of BAC’s workload whether and how much additional staff the agency would need.

20. The adequacy of BAC’s human resources should be carefully analysed again in the next review of BAC. The issue has therefore been flagged.

ESG 3.7 – External quality assurance criteria and processes

21. The review report pointed out (in relation to standard 2.4) that BAC only included students in two pilot inspections, while its current inspection model does not provide for the involvement of students.

22. The Register Committee “understands the standard to require that students are part of an agency’s groups of experts” (see Practices and Interpretations, par. 34), while it the agency may “determine the profiles and roles of student experts appropriate for its different external QA processes” (idem).

23. The Register Committee sought and received clarification from BAC on that matter. BAC explained that it was currently finalising a new inspection scheme for higher education, which unites BAC’s previously different schemes for UK-based and overseas higher education provision. BAC announced that the new scheme takes effect from September 2015 and that students will be included in all inspection teams under the provisions of the new scheme. BAC also committed to include a student in all inspection teams that would be deployed meanwhile.

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24. The Register Committee noted that under the current inspection model inspections were carried out by “usually two” inspectors (self-evaluation report, p. 52), while the possibility of a single inspector carrying out a review was not ruled out.

25. The Register Committee considered that the requirement of an “external assessment by a group of experts”, as set out in the standard, implies that an assessment (including the site visit) performed by a single inspector would not be in compliance with the ESG.

26. The Register Committee noted from BAC's clarification that under the new accreditation scheme at least three inspectors will perform assessments of higher education institutions.

27. The Register Committee concluded that under its current inspection scheme BAC only partially complies with the standard, while under the new Independent HE scheme BAC complies with the standard. Since the new scheme has not yet come into effect and has therefore not been analysed by the external review panel, the matter has been flagged.

ESG 3.8 – Accountability procedures

28. The Register Committee concurred with the review panel in that it might be desirable to bring together BAC's internal QA procedures in a coherent policy in order to ensure a more systematic implementation.

29. The Committee, however, considered that the panel's analysis demonstrated that BAC implements a range of accountability procedures as required by the standard.

30. Notwithstanding the fact that there might be room for improvement, the Register Committee considered that BAC is, in fact, (substantially) compliant and not only partially compliant with the standard.

Conclusion:

31. **Based on the external review report and the considerations above, the Register Committee concluded that BAC complies substantially with the ESG and, therefore, approved the application for inclusion on the Register.**

BAC's inclusion shall be valid until 31/01/2020².

32. The following issues have been flagged for particular attention when considering a potential application for renewal of inclusion. BAC is expected to address these issues specifically in its next self-evaluation report, setting out whether the issue has been resolved or indicating what progress has been made. BAC is further responsible for informing

² Inclusion is valid for five years from the date of the external review report, see §4.1 of the EQAR Procedures for Applications.

the coordinator of the next external review and the review panel of the need to address these issues in the external review report.

ESG 2.2: Involvement of stakeholders

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

ESG 2.5: Reporting

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

ESG 2.8: System-wide analyses

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

ESG 3.4: Resources

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

ESG 3.7: External quality assurance criteria and processes

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.

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